



Submission on the Draft Dublin City Development Plan 2022-2028

Regarding a site at Merrion Road, Dublin 4

February 2022

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Appendices

Appendix I Building Appraisal Report prepared by O’Connell Mahon Architects

Prepared By: Brian Maher, Heather McMeel and Rachel Lawler

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For and on behalf of Avison Young Planning and Regeneration Limited

1. Introduction

This submission has been prepared by Avison Young on behalf of the Religious Sisters of Charity in relation to a 6.55-hectare campus at Merrion Road, Dublin 4 in response to the publication of the Draft Dublin City Development Plan 2022-2028 (hereafter 'Draft Development Plan').

The Religious Sisters of Charity (RSC) welcome the opportunity to make a submission on the preparation of a new Development Plan for the City that will provide a basis for the sustainable development of the City over the plan period, in line with the objectives of the National Planning Framework (hereafter, NPF) and the Regional Spatial and Economic Strategy for the Eastern Region (hereafter 'RSES').

2. Executive Summary

The Merrion Road campus totalling 6.55ha comprises the former St. Mary's Home for the Blind dating from 1866 and an adjoining late 18th Century period house, together with various extensions to St. Mary's including St. Oliver's and Loyola and the adjoining sheltered housing accommodation fronting Merrion Road. The Caritas Convalescent Centre, RSC community accommodation in Marmion, Providence and Shalom together with a now disused swimming pool, maintenance office and vacant site are located to the rear of the original buildings.

The grounds of this submission on the Draft Development Plan can be summarised as follows:

- The institutional buildings on the subject site are physically and functionally obsolete. (See attached Building Appraisal Report as prepared by O'Connell Mahon Architects in Appendix I)
- The institutional uses have ceased and buildings of approx. 6,465 sqm (87 % of the accommodation) on 4.5 hectares is vacant.
- St Mary's Nursing Home closed in 2020 following the liquidation of the operating company with the liquidators citing insolvency due to regulatory compliance difficulties, concerns over future HSE funding and the cost of compliance with HIQA recommendations and modernisation.
- The site is underutilised with the current single and 2-storey buildings giving a very low plot ratio of 0.195:1, vis a vis the adjacent 6-8 storey St Vincent's Private Hospital and Elm Park Green. Underutilised 'Z15' lands provide an opportunity to deliver high quality residential development and address housing need.
- Due to their age, construction and footprint many of the buildings are not energy efficient and would require extensive and prohibitively expensive retrofitting to bring them up to current building control standards and in many cases will not be a sustainable option.
- It is submitted that the zoning of this large site, at a prime location in Dublin City Council's administrative area, for appropriate future redevelopment would align with both NPF and RSES policies, by way of providing a more efficient and intensive use of this key site.
- The site is in a strategic location to high-quality public transport linkages including BusConnects, Dublin Bus, Dart, as well as cycling routes and is in close proximity to Ireland's largest third level campus at University College Dublin and various other centres of

employment. As such, in alignment with both the NPF and RSES, the subject site, and any redevelopment of same, has the potential to support sustainable compact growth and accelerated housing delivery, and the integration of transport and land use. It is considered that the subject site has the capacity to support future redevelopment opportunities and the current land use zoning objective of 'Z15' creates a barrier to other future essential and appropriate uses, including housing.

- The 'Z6' zoning on part of the site is remnant of the zoning on the adjacent Elm Park Green site and is inappropriate for the subject lands.
- Recognising the cessation of the previous institutional uses due to physical and functional obsolescence etc., the most appropriate zoning for the bulk of the site is considered 'Z12- Institutional Land (Future Development Potential)'.
- It is requested that Dublin City Council amend the land use zoning on c. 4 hectares of the site, outlined on Figure 1 overleaf, from 'Z15' (Community and Social Infrastructure) and 'Z6' (Enterprise and Employment) to 'Z12', (Institutional Land - Future Development Potential), leaving c. 40% of the site to remain as 'Z15' in order to support an appropriate level of institutional and community uses.
- It is further requested that the proposed restrictive 'Z15' land use zoning policy provisions are amended to the existing 'Z15' provisions as per the current Dublin City Development Plan in order to facilitate potential future development.
- In the absence of rezoning the proposed 4.0 ha to 'Z12' and the amendment to the proposed 'Z15' provisions, the opportunity to redevelop this site for alternative uses including housing will be sterilized which is contrary to the objectives of the NPF, RSES and Dublin City Development Plan.



Figure 1: Proposed Rezoning of Merrion Road Site. Source: O'Connell Mahon Architects.

3. Site Context

3.1 Site Location

The subject site is located directly adjacent St. Vincent's University Hospital Campus in a prime suburban location along Merrion Road (R118) just south of the Strand Road and Merrion Gates junction. The site is located within close proximity to Ballsbridge (c. 2.2km), Donnybrook (c. 1.5km) and Blackrock (c. 2.6km) and approximately 7 km from the City Centre, in the south-east Administrative Area on the outer edge of Dublin City.

The site is bounded to the north and west by St. Vincent's University Hospital Campus which includes the public and private hospitals and the site of the new National Maternity Hospital which is currently under construction. To the south, the site is bounded by the ElmPark Green Business Park which comprises of commercial offices and apartments; to the east by Merrion Road and Dublin Bay beyond and to the west by the Elm Park Golf and Sports Club.

The surrounding area to the south is predominately residential housing with further commercial/retail development to the north along Merrion Road. University College Dublin ('UCD') is situated further west of the site (less than 3km) and the South City and Docklands enterprise zones are located 5km to the west.

The area is well served by public transport with nearby Dart stations at Booterstown and Sydney Parade Avenue, approximately a 15-minute walk, providing direct links to Dublin City Centre to the north, continuing to Howth/Malahide, and to Bray/Greystones in the south. Additionally, various peak hour high-frequent bus services on Merrion Road are within a 5-minute radius of the site. Schools in the locality include Blackrock College, St. Michael's College, Coláiste Eoin, St Andrew's College and Coláiste Íosagáin and the above mentioned UCD. Also located nearby at Ballsbridge is the Royal Dublin Society (RDS) venue and the Aviva Stadium.

Merrion Road is a major arterial route carrying vehicular traffic between Dublin City Centre and the south suburbs and M50 ring road and also connecting via Strand Road, Sandymount to the East Link Toll Bridge and port tunnel to the northern suburbs and airport.

Figure 2 below identifies the subject site in its surrounding context.



Figure 2: Subject site and surrounding uses. Subject site is identified in red. (Source: Google Earth).

3.2 Site Description

The subject site comprises a 6.55 ha (16.17 ac) campus of low-density development and contains a variety of uses consisting of institutional and community in buildings dating from 1866 to 1990's. (see detailed Building Appraisal prepared by O'Connell Mahon Architects in Appendix I and Figure 3 below).

To the west of the site, fronting onto Merrion Road, is the two-storey former St. Mary's Home for the Blind dating from 1866. Located to the north of the St. Mary's building is the 11-bedroom St. Oliver's, a single storey cruciform residential unit built in 1974 and the 30 bedroom Loyola building connects to St. Mary's to the south via a long corridor.

The original 18th Century house and the adjoining chapel built by RSC in 1875 adjoin and interconnect with St. Mary's.

The St Mary's, Loyola and St Oliver's complex was developed in phases over 150 years and is now physically and functionally obsolete, entirely vacant and unsuited to the provision of modern healthcare.

To the north east of the site are 4 semi-detached houses, a block of 10 apartments and a detached office building which (with the exception of one house occupied by RSC) were developed as a "Disability Centre" to provide supported accommodation in conjunction with St. Mary's Home. The Centre is currently licensed to HSE to facilitate the relocation of residents, of which 2 remain. The HSE licence expires in May 2022 following which HSE will vacate the site upon relocation of the remaining residents.

St Mary's nursing home closed in 2020 following the liquidation of the operating company with the liquidators citing insolvency due to regulatory compliance difficulties, concerns over future HSE funding and the cost of compliance with HIQA recommendations and modernisation.

Located to the west of the subject site is a 2-storey active convent called Marmion and 2 detached houses known as Providence and Shalom, all of which are currently occupied by RSC.

Along the north-western boundary of the site adjacent to the St. Vincent's University Hospital campus is the former Caritas Convalescence Centre which closed following liquidation in 2020 but is currently occupied by St. Vincent's Hospital Group under a licence expiring in March 2022.

Centrally located on the Merrion campus is a disused swimming pool which closed c. 2007 and an adjoining maintenance workshop.



Figure 3: Site Context – Buildings on the site which are occupied and vacant. Source: O’Connell Mahon Architects.

Underutilisation

The site is characterised by low density largely 2 storey buildings which suggest a very low Plot Ratio of 0.195:1. It is considered that the existing site is significantly underutilised and there is a clear contrast between the low-density and low-rise buildings within the subject site and the adjacent high-density Elm Park Green development and St. Vincent’s Hospital campus. Figure 4 below highlights the relationship of the subject site with the surrounding higher-density developments.



Figure 4: Subject site and the immediate adjacent buildings of Elm Park Green and St. Vincent's Hospital (Source: Google Earth).

4. Policy Context

The following national and local planning policy context is considered relevant for this submission.

4.1 National Planning Framework

The Government published the National Planning Framework (hereafter “the NPF”) in February 2018 which projects the need for a minimum of 550,000 new homes in the country by 2040, at least half of which are targeted for provision within the built-up area of Ireland’s five cities. The NPF signals a shift in Government policy towards securing more compact and sustainable urban development, to enable people to live nearer to where jobs and services are located and by prioritising sustainable modes of transport. The objectives in the NPF that are considered of particular relevance to lands at Merrion Road are outlined below:

- **National Policy Objective 3a: Securing Compact and Sustainable Growth:** *Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.*¹
- **National Policy Objective 3b: Securing Compact and Sustainable Growth:** *Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.*²
- **National Policy Objective 11: Achieving Urban Infill:** *In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.*³
- **National Policy Objective 33: Housing:** *Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.*⁴
- **National Policy Objective 35: Housing:** *Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.*⁵

¹ Project Ireland 2040, National Planning Framework, pg. 29

² Project Ireland 2040, National Planning Framework, pg. 29

³ Project Ireland 2040, National Planning Framework, pg. 65

⁴ Project Ireland 2040, National Planning Framework, pg. 163

⁵ Project Ireland 2040, National Planning Framework, pg. 164

4.2 Regional Spatial and Economic Strategy

The subject site is located in the Eastern and Midland Regional Assembly area for which a Regional Spatial and Economic Strategy (RSES) was published for the period 2019-2031. The following Regional Strategic Outcomes (RSO) are considered of particular relevance to the subject site:

- **RSO 1: Sustainable Settlement Patterns:** *Better manage the sustainable and compact growth of Dublin as a city of international scale.*
- **RSO 2: Compact Growth and Urban Regeneration:** *Promote the regeneration of our cities, towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint and to drive the delivery of quality housing and employment choice for the Region's citizens.*
- **RSO 6: Integrated Transport and Land Use:** *Promote best use of Transport Infrastructure, existing and planned, and promote sustainable and active modes of travel to ensure the proper integration of transportation and land use planning.*

Furthermore, the RSES Settlement Strategy is informed by the NPF which predicts that the population of Dublin will increase from 1,347,500 in 2016, to between 1,489,000-1,517,500 in 2026 and to between 1,549,500-1,590,000 by 2031.⁶ The Settlement Strategy for Dublin City and Suburbs builds on the objectives of the NPF and recognises the need for compact growth with the following objective provided:

"Promote compact, sequential and sustainable development of urban areas from large to small to realise targets of at least 50% of all new homes to be built, to be within or contiguous to the existing built up area of Dublin city and suburbs".⁷

Consolidation and re-intensification are also specific objectives of the Settlement Strategy for Dublin City and Suburbs as outlined in Regional Policy Objective (RPO) 4.3:

- **RPO 4.3:** *Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin City and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport project.⁸*

⁶ Eastern and Midlands Regional Assembly; Regional Spatial & Economic Strategy, pg. 44

⁷ Eastern and Midlands Regional Assembly; Regional Spatial & Economic Strategy, pg. 48

⁸ Eastern and Midlands Regional Assembly; Regional Spatial & Economic Strategy, pg. 52

The potential for the redevelopment of the Merrion Road site to provide for future uses, including residential, on a site situated along a public transport corridor located within the existing built-up footprint of Dublin City & Suburbs and proximate to extensive local amenities would be consistent with RSES objectives which seek compact growth, intensification and consolidation of the City and the integration of transportation and land use planning.

4.3 Dublin City Development Plan 2016-2022

Under the current Dublin City Development (hereafter ‘the Development Plan’), the majority of the subject site is zoned ‘Z15 - Institutional and Community’, with a portion to the east of the site adjacent to Merrion Road (c. 0.53 ha/1.3 ac) being zoned as ‘Z6 – Enterprise and Employment’.

Under ‘Z15’, the objective is to “protect and provide for institutional and community uses” and the ‘Z6’ zoning seeks to “provide for the creation and protection of enterprise and facilitate opportunities for employment creation”. The site in the vicinity of St. Mary’s is also designated as a ‘Site of Archaeological Interest’.

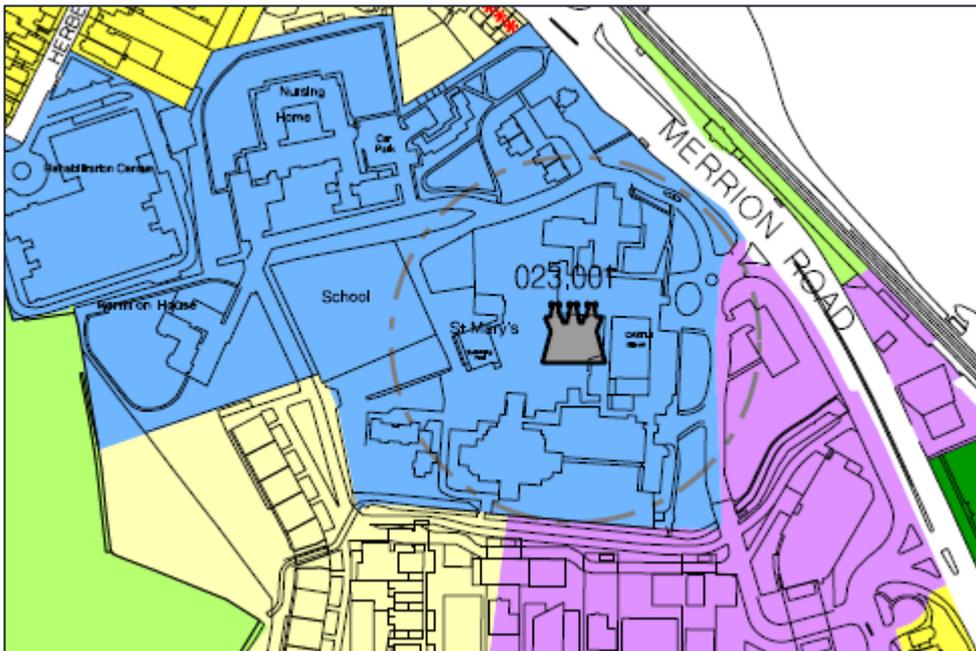


Figure 5: Dublin City Development Plan 2016-2022 Map H extract.

Z15 - Institutional and Community

Under the Institutional and Community zoning objective, uses such as “community facility, cultural/recreational building and uses, medical and related consultants, place of public worship, and residential institution” are listed as permissible uses, while uses such as “conference centre, hotel, residential, and student accommodation” are all open for consideration.

In relation to 'Z15' lands, the Development Plan states that *"these lands play an important role in the achievement of a more compact city in that they contribute to the creation of vibrant neighbourhoods and a sustainable well-connected city"*. In terms of new proposals on 'Z15' lands, the Development Plan states that with any development proposal on these lands, consideration should be given to their potential to contribute to the development of a strategic green network and to the delivery of housing in the city.

In this regard the following policies and objectives of the Urban Framework Plan are considered relevant:

- **GI11:** *To seek the provision of additional spaces in areas deficient in public open spaces – by way of pocket parks or the development of institutional lands.*
- **SC13:** *To promote sustainable densities, particularly in public transport corridors, which will enhance the urban form and spatial structure of the city, which are appropriate to their context, and which are supported by a full range of community infrastructure such as schools, shops and recreational areas, having regard to the safeguarding criteria set out in Chapter 16 (development standards), including the criteria and standards for good neighbourhoods, quality urban design and excellence in architecture. These sustainable densities will include due consideration for the protection of surrounding residents, households and communities.*
- **SC14:** *To promote a variety of housing and apartment types which will create a distinctive sense of place in particular areas and neighbourhoods, including coherent streets and open spaces.*
- **SC19:** *To promote the development of a network of active, attractive and safe streets and public spaces which are memorable, and include, where appropriate, seating, and which encourage walking as the preferred means of movement between buildings and activities in the city. In the case of pedestrian movement within major developments, the creation of a public street is preferable to an enclosed arcade or other passageway.*

4.4 Draft Dublin City Development Plan 2022-2028

The Draft Development Plan sets out the Core Strategy for the development of Dublin City in the period 2022-2028 in relation to population growth and housing delivery. The population projection for the Dublin City Council Area for 2028 is 625,750 (Low) to 640,000 (High) persons (between 21,350 - 31,450 additional people)⁹. The Draft Plan estimates that the demand for the years 2022 to 2028 is approximately 40,000 residential units for the 6-year period¹⁰, highlighting the acute need for the

⁹ Draft Dublin City Development Plan, 2022-2028, pg. 60.

¹⁰ Draft Dublin City Development Plan, 2022-2028, pg. 61.

delivery of an appropriate quantum of residential-supporting zonings which can deliver housing within the Plan period and beyond.

Land Use Zoning

Under the Draft Development Plan, the subject site is zoned in a similar format to that which is existing. The 'Z15' zone is now called 'Community and Social Infrastructure' with an objective to "protect and provide for community uses and social infrastructure". The 'Z6' zoning objective seeks to "provide for the creation and protection of enterprise and facilitate opportunities for employment creation". The site in the vicinity of St. Mary's also remains designated as a 'Site of Archaeological Interest'.

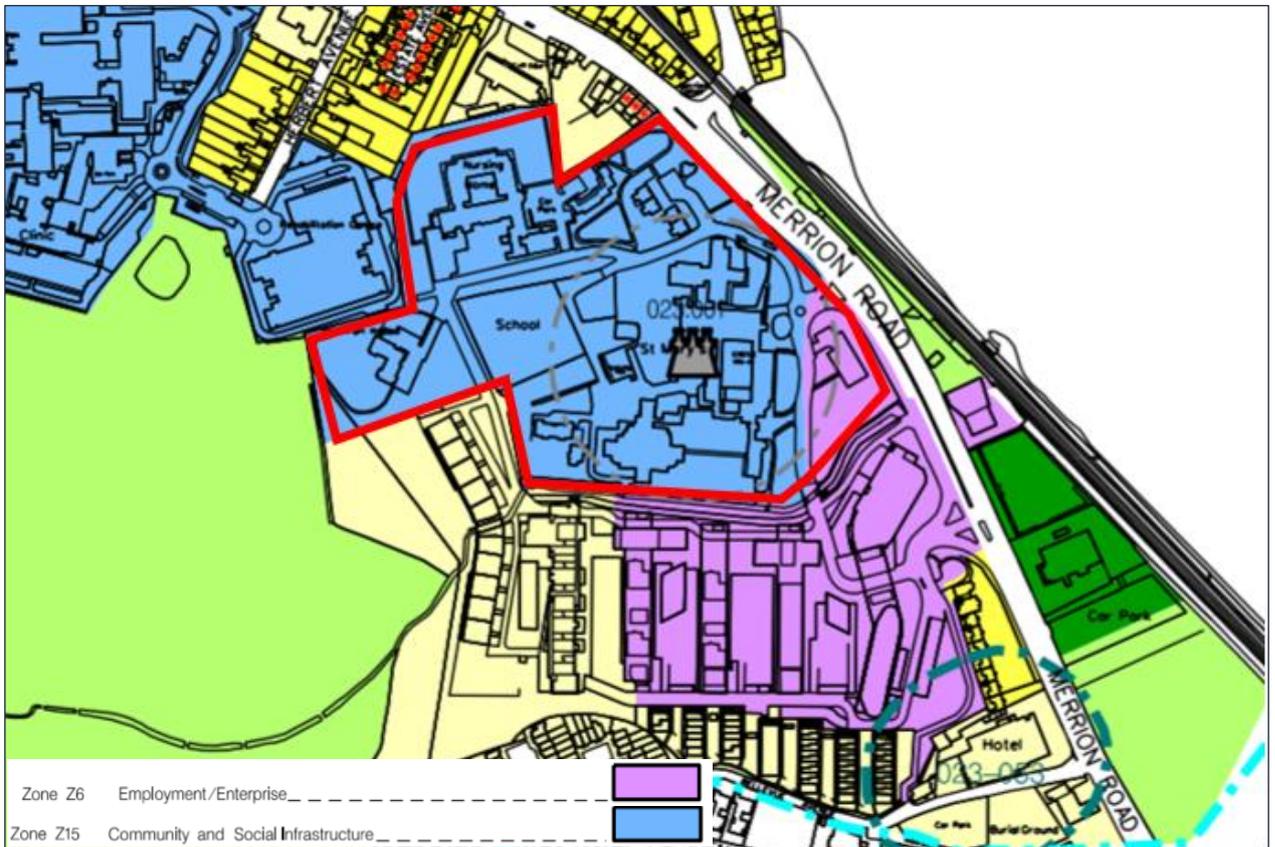


Figure 6: Draft Development Plan Zoning Map H Extract (indicative site boundary outlined in red)

There is a significant difference under the Z15 zoning objective between the Draft Development Plan and the current Development Plan; a number of land uses, such as 'residential', are no longer open for consideration. The Draft Development Plan notes:

"In recent years, Z15 lands have come under increased pressure for residential development. However, protecting and facilitating the ongoing use of these lands for community and social infrastructure is a key objective of the Council. The Council are committed to strengthening the role of Z15 lands and will actively discourage the piecemeal erosion and fragmentation of such lands".

The Local Authority has stated that there will be a presumption against uses not listed under the permissible or open for consideration categories in zones including Z15. The Draft Development Plan has stated that limited residential/office development on Z15 lands will only be allowed in highly exceptional circumstances where it can be demonstrated by the institutional landowner that the proposed development is required in order to maintain or enhance the function/operational viability of the primary institution on the lands. In this regard, the Draft Development Plan outlines that the following criteria is to be adhered to for development on Z15 land:

- *Any such residential/office development must demonstrate that it is ancillary in scale to the primary social/community use.*
- *The development must not compromise the open character of the site and should have due regard to features of note including mature trees, boundary walls and any other feature/s as considered necessary by the council.*
- *Only a once-off development in respect of the site / lands in the ownership of and /or use by the institution will be considered.*
- *In all cases, the applicant shall submit a statement, as part of a legal agreement under the Planning Acts, demonstrating how the existing institutional facility will be retained long term on site.*
- *In all cases the applicant shall be the institutional owner/occupier.*
- *In cases of rationalisation of an existing use in order to facilitate such a residential/office development, the applicant must demonstrate that the future anticipated needs of the existing use, including extensions or additional facilities would not be compromised¹¹.*

'Z12' Institutional Land (Future Development Potential)

The proposed 'Z12' land use zoning objective provides for other uses in the future. As well as colleges and residential health care institutions, it is substantially similar to the extant 2016-2022 Development Plan policy provisions. A notable change is an increase in public open space from 20% to 25% in order to preserve the open character of the site and should not be split up. Where such lands are developed the predominant land use is for residential. There is also, as previously, a requirement to prepare a masterplan where uses other than community and institutional uses are proposed.

¹¹ Draft Dublin City Development Plan 2022-2028, Chapter 14: Land Use Zoning, pg. 629-630

5. Grounds of Submission

5.1 Draft Development Plan Proposed Changes

Having reviewed the Draft Development Plan and associated proposed changes, as well as having considered local and regional planning policy context, the pattern of development in Dublin City, the existing character and setting of the subject site, the Religious Sisters of Charity wish to make a submission on the Draft Development Plan based on the following points:

- The proposed 'Z15' policy changes which will have significant implications for any future proposals to develop residential or commercial developments on underutilised portions of such lands. As such, the proposed 'Z15' zoning should be amended to the existing 'Z15' policy objectives.
- On the basis that the former institutional uses have ceased due to the physical and functional obsolescence of the buildings, that c. 4ha of currently zoned 'Z15'/'Z6' be rezoned to 'Z12 Institutional Land (Future Development Potential)'.

Community and Social Infrastructure Policy Changes

A concern for our client is the proposed changes in regard to the 'Z15' zoning. As noted previously, Dublin City Council have stated that many large former institutional sites have been subject to Strategic Housing Developments and as a result, the Draft Development Plan states that the number of 'Z15' sites have become steadily eroded by the approval of these large residential schemes. Accordingly, the Draft Development Plan is seeking that the 'Z15' land use zoning is intended in strengthening the role of these lands and also seeks to "*actively discourage*" the piecemeal erosion and fragmentation of these lands.

While this matter is acknowledged, it is considered that the resultant policy alterations has created a barrier to future essential and appropriate development opportunities for strategic 'Z15' sites such as at Merrion Road. In the absence of rezoning at least 4ha of the site to 'Z12' and making amendments to the proposed 'Z15' policy changes, the subject site will be restricted in its future development potential even though the extent of the institutional and community uses required at this location has diminished very significantly and will continue to diminish due to obsolescence and the reduced demand for their original purposes.

The Draft Development Plan states that residential use is no longer open for consideration under the 'Z15' zoning and "*limited*" development will only be considered in "*highly exceptional circumstances*" and

this is similar for any office development. However, the Draft Development Plan fails to outline exactly what a *“highly exceptional circumstance”* may consist of or as to the extent of what *“limited”* development may refer. Considering the ongoing housing crisis, it seems that the opportunity to provide badly needed homes both to purchase and to rent should be retained as previously provided for in the Dublin City Development Plan 2016-2022 policy provisions.

Furthermore, the Draft Development Plan requires that the institutional landowner must demonstrate that any future proposed development will maintain or enhance the function/operational viability of the primary institution on the lands. In the case of the Merrion lands, the continued use of the entire lands within the Institutional and Community uses is not sustainable due to diminishing requirements and building obsolescence.

A series of criteria to be satisfied if bringing forward residential or office development on ‘Z15’ lands has been included in the Draft Development Plan including the following: illustrating the residential development is ancillary in scale to the primary institutional use; 25% public open space; only considering a once-off development on the overall landholding; requirement for a legal agreement in relation to the long term use of the overall landholding; requirement for the institution to be the applicant; and demonstrating that the existing use will not be compromised.

The requirement that the criteria to be met may give rise to future conflicts and in the case that a private individual/developer in ownership of any ‘Z15’ lands would be precluded from making a planning application on same.

The Draft Development Plan also includes the following restrictive requirements:

- Greater commitments required on the longer-term use of the overall landholding e.g., Section 47 legal agreements to maintain the existing institutional use on the lands for a period of time and the institutional owner must show that there is sufficient space for further extension of the primary use.
- The institutional owner must demonstrate that the development is needed to maintain the viability of the primary institutional function.
- Requirement for replacement sporting / recreational facilities to be provided as part of the residential development of sites which have an existing sporting / recreational function, for the benefit of the wider community

There is further clarification required on items such as:

- Whether any residential proposed on the ‘Z15’ lands can be applied for as Build to Rent (BTR).

- The Requirement for a variation of the City Development Plan if part of the 'Z15' zoned land is transferred and being proposed for development by a new landowner for residential / office use (any Variation would need to be approved by the full Council).

It is considered wholly inappropriate to restrict existing 'Z15' lands in this way. It is, therefore, requested that Dublin City Council consider the amendment of the 'Z15' requirements prior to the finalisation of the Draft Development Plan to align with the existing 'Z15' zoning in the current Dublin City Development Plan 2016-2022. It is submitted that underutilised 'Z15' lands provide an opportunity to deliver high-quality residential developments in the City and contribute to addressing housing need.

Requested Land Use Zoning Change

In light of the above amendments to the 'Z15' development potential, an amendment of the proposed land use zoning to provide for a more sustainable residential neighbourhood and which takes account of the relative inefficiencies of the buildings within the current context is being sought. It is requested that 4ha of the subject site be rezoned from 'Z15 - Community and Social Infrastructure' and 'Z6 - Employment/Enterprise' to 'Z12 Institutional Land (Future Development Potential)'. A portion of the site is sought to remain zoned for 'Z15' uses subject to amendment in line with the existing 'Z15' zoning to allow for the retaining institutional and community uses which are historic to the site, while allowing for a significant and well-defined area to be set aside for residential development.

Z12 Institutional Land (Future Development Potential)

The 'Z12' land use zoning objective is proposed as being a more appropriate land use zoning for 4 ha of the Merrion Road site as identified on Figure 7. The policy provisions set out the predominantly residential future use of institutional lands. Given that the former institutional uses have ceased on c. 4.5 ha of the site and the site's location immediately adjacent to high-quality public transport linkages and proximity to a number of significant employment centres, we contend that the suitability providing for a residential neighbourhood is compelling.

Figure 7 below outlines the extent of the proposed zoning change for the site.



Figure 7: Proposed Rezoning of Merrion Road Site. Source: O’Connell Mahon Architects.

5.2 Ground of Submission

The Draft Development Plan estimates that the demand for the years 2022 to 2028 is approximately 40,000 residential units over the plan period, highlighting the need for the delivery of an appropriate quantum of residential zonings which can deliver housing within the Development Plan period¹². As outlined above, it is requested that the majority of the subject site be rezoned to ‘Z12 - Institutional Land (Future Development Potential)’. ‘Z12’ lands include sites where the majority of which are or have been in institutional use, and which may be developed for other uses in the future and where redevelopment is suggested, the predominant land-use is to be residential. The objective for the ‘Z12’ land is to *ensure existing environmental amenities are protected in the predominantly residential future use of these lands*.

It is submitted that this land use rezoning will support the delivery of sustainable residential growth and in facilitating a vibrant residential community with the consolidated retention of appropriate

¹² Draft Dublin City Development Plan 2022-2028, Chapter 2: Core Strategy, pg. 61

institutional and community uses within the Merrion Road lands. Therefore, we ask Dublin City Council to consider the below justification as to why the land use zoning amendment should be facilitated for the subject site and what differentiates the subject lands from other institutional lands in the Dublin City administrative area.

Existing Building Stock & Uses on Site

As referred to previously, a large portion of the Merrion Road site consists of obsolete and low-density development which is largely physically and functionally obsolete. The majority of the buildings and facilities are vacant within the lands and are either obsolete or approaching obsolescence due to the inability to comply with HIQA or HSE requirements (see Figure 8 below). Following the liquidation of the St Mary's Nursing Home, the HSE took a short-term licence to facilitate the relocation of the remaining residents (now 2) from the Disability Centre. This has largely been achieved and the HSE licence will expire in May 2022 following which the HSE will vacate the site.

The O'Connell Mahon Architects report (Appendix I) clearly sets out how the existing building stock on the Campus at Merrion Road has developed over the years to respond to the different institutional needs of the RSC and the services that they provided which have changed many times in its 150-year history. The closure of the Nursing Home and the Disability Centre in 2020 means that they are now vacant (except for 2 residents remaining at present) and no longer required for institutional uses. Also, the buildings formerly occupied by the nursing home are not of a suitable standard for modern healthcare requirements and accordingly have become obsolete as confirmed by the subsequent liquidation of the operating company in 2020.

The Sisters of Charity, like many other religious communities, are an aging population and their needs for accommodation on the site are also reducing. While they intend to keep the Marmion Convent open in the short term, they do not have a need to retain the use of the houses (Providence & Shalom) located on the land that is proposed to be rezoned. They have capacity both on site and in other property to accommodate the sisters who currently live there.

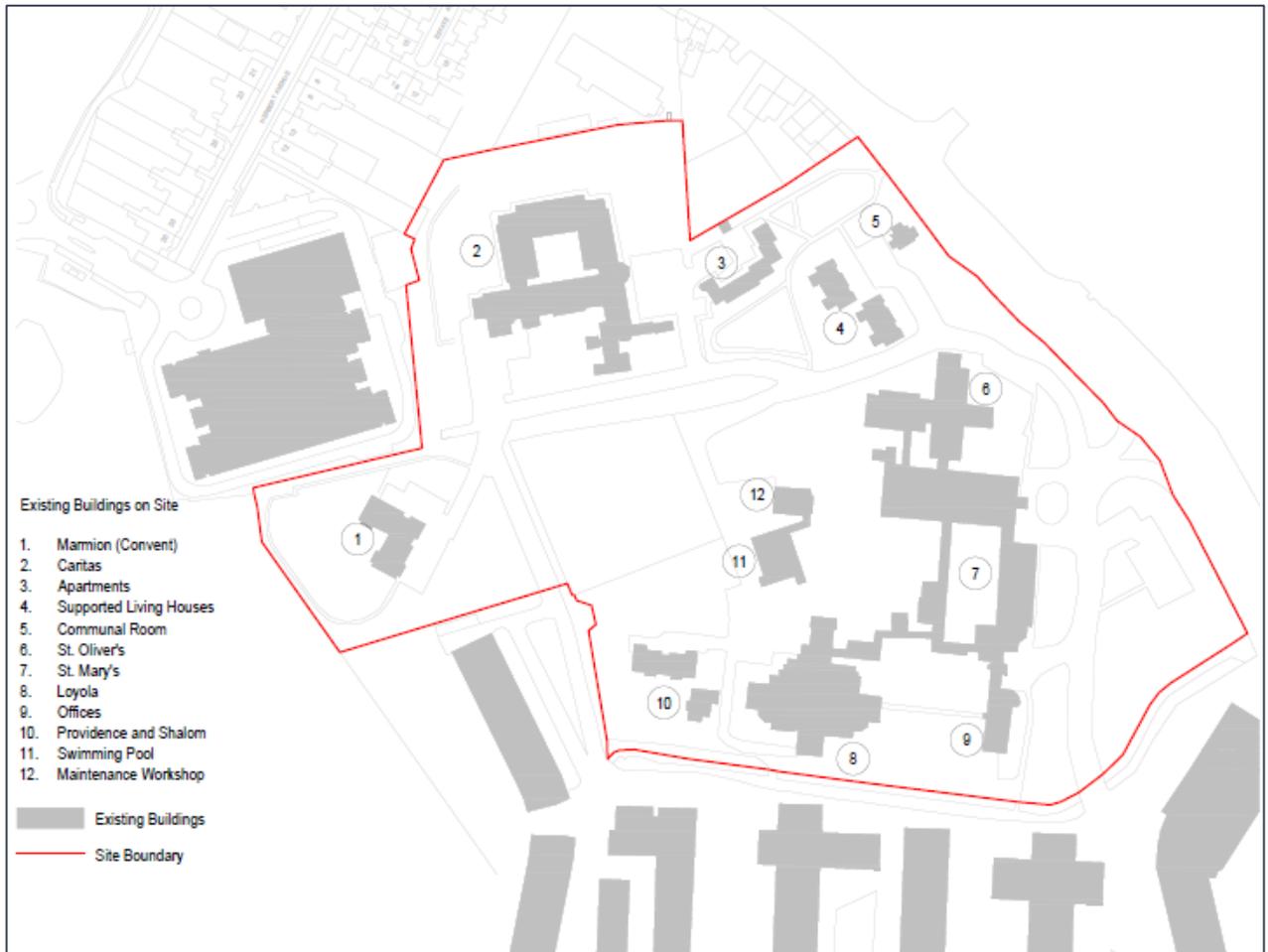


Figure 8: Existing Building on site. Source: O'Connell Mahon Architects.

As a result, the subject site, located in a strategic and prime location in close proximity to Dublin City Centre and other Urban Centres, is extremely underutilised and under the proposed 'Z15' zoning objective, restrictions have been placed on the site which will prevent appropriate future uses at this location.

In this regard, the following objectives as set out in the Draft Development Plan should be noted:

- **QHSN8 Active Land Management:** *To promote residential development addressing any shortfall in housing provision through active land management, which will include land acquisition to assist regeneration and meet public housing needs, and a co-ordinated planned approach to developing appropriately zoned lands at key locations including regeneration areas, vacant sites and underutilised sites. (Avison Young emphasis added).*
- **QHSN9 Urban Density:** *To promote residential development at sustainable densities throughout the city in accordance with the Core Strategy, particularly on vacant and/or underutilised sites, having regard to the need for high standards of urban design and architecture and to successfully integrate with the character of the surrounding area. (Avison Young emphasis added).*

It has been established that only a certain amount of the site is now required in order to support the continued use of the land for institutional and community-based uses. As such, it is considered that the partial rezoning of 4 hectares (identified on Figure 7) of the subject site to 'Z12', will allow for future development potential including residential uses and will act to achieve the key objectives as set out within the Draft Development Plan. The subject lands can contribute to providing sustainable development and to the urban growth management of Dublin City. It is essential that Dublin City Council utilise such sites as this, particularly underutilised pockets close to City Centres, such as at Merrion Road.

Wider 'Z12'/'Z15' Context

There are a number of part 'Z12'/'Z15' land banks in the Draft Development Plan including at Griffith Avenue, Richmond Road, Park Avenue, Coolock Village and Ardlea Road (see Figure 9 below). This highlights how Dublin City Council clearly accept that historic institutional landbanks now have surplus land requirements that are inefficient for use for their original purposes.

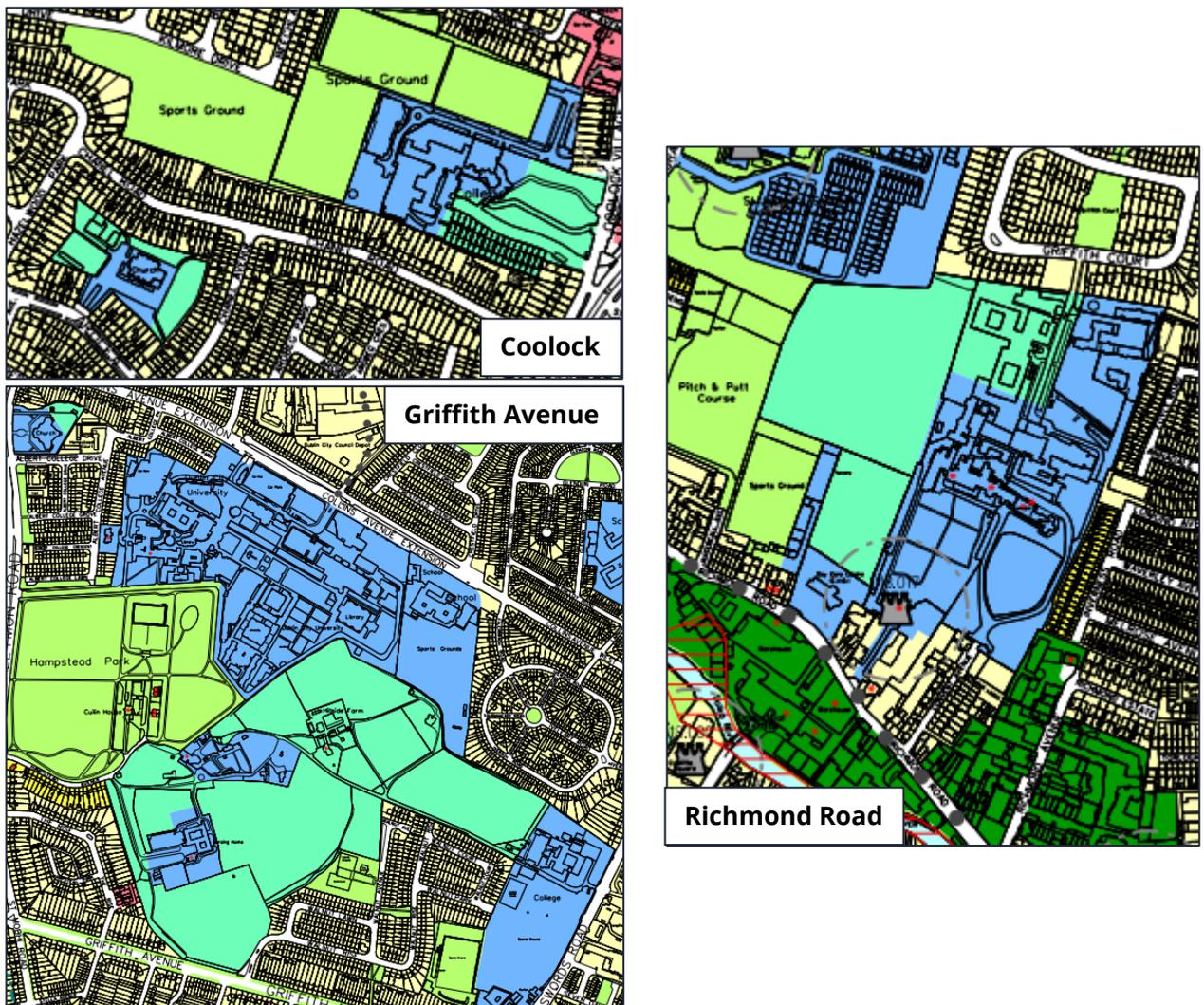


Figure 9: Extract from the Draft Development Plan Zoning Maps showing various Z12/Z15 sites.

In contrast, it can be seen from the previous Dublin City Development Plan 2011-2017 to the current Dublin City Development 2016-2022, a number of 'Z15' to 'Z12' zoning changes occurred and the benefits of these changes are now apparent. One example is a site adjacent to St. Luke's Hospital, Marianella, 75 Orwell Road, Rathgar. This site formed part of the larger grounds owned by the Redemptorist Congregation, a religious organisation. Similar to the Merrion Road lands, the site included a monastery and chapel, and as a result of a significant decline in vocations which was impacting the size of the accommodation required for members of the religious order, permission was sought to redevelop a portion of surplus land for residential accommodation.



Figure 10: Marianella Residential Development. Source: O'Mahoney Pike Architects (omahonypike.ie).

The Marianella site has contributed to the sustainable development of Dublin City by supporting compact growth, developing an underutilised key site and providing a more efficient and intensive use at this location. The efficient use of key sites, such as adjacent to former institutional uses, is an important component for the development of Dublin City.

It is submitted that the subject site is strategically placed and suitable for various redevelopment opportunities in relation to other 'Z12' and 'Z15' lands, in the context of its location adjacent to multiple sustainable transport options serving both the City Centre and connections to the south, including Dun Laoghaire and Bray.

Sustainable Transport Links

As stated previously, the Merrion Road site is in a prime suburban location with excellent transport links, setting it apart from the various other institutional zoned lands. Such strategic development sites need to be taken advantage of to facilitate and fulfil the key objectives set out within the Draft

Development Plan for the Plan period and beyond. As set out in the Draft Development Plan, key transport objectives include:

- **CSO7 Promote Delivery of Residential Development and Compact Growth:** *To promote the delivery of residential development and compact growth through active land management measures and a co-ordinated approach to developing appropriately zoned lands aligned with key public transport infrastructure, including the SDRAs, vacant sites and underutilised areas. (Avison Young emphasis added).*
- **SMT4 Integration of Public Transport Services and Development:** *To support and encourage intensification and mixed-use development along public transport corridors and to ensure the integration of high quality permeability links and public realm in tandem with the delivery of public transport services, to create attractive, liveable and high quality urban places. (Avison Young emphasis added).*

It is considered the rezoning of the Merrion Road site would be consistent with the above objectives and promote sustainable planning and development within the Dublin City administrative area. The Merrion Road lands are an underutilised site situated along excellent transport links, in which the various modes of transport are readily available. This sets the site apart from other institutional lands as the option of bus and rail are available with nearby Dart stations at Booterstown and Sydney Parade Avenue, approximately a 15-minute walk. Additionally, public transport options within the vicinity of the area will improve with the addition of the Bus Connects Core Bus Corridors as corridor no. 15 is proposed to run along Merrion Road. Not only will this provide enhanced bus services but an improved cycle network.

It is imperative to reach our climate target goals including the reduction of Green House emissions by 40% to 2030, that future residential development is facilitated by efficient land use and spatial planning. The requested zoning change to the Merrion Road site will help to achieve this, a strategically located site within a key transport corridor. Additionally, it can be seen the associated physical and social infrastructure such as public transport, schools and amenities are already in place within the surrounding area. This proposed change will further enhance the Local Authority's vision in transitioning to a 'low carbon city', increasing liveability within the City and promoting sustainable development.

International Exemplars

It is submitted that the subject lands, as an underutilised site close to the City Centre, can contribute to providing a sustainable contribution to the urban growth management of Dublin City. The continuing and clear need to provide for quality residential neighbourhoods through placemaking particularly at

sites which are well served by public transport is still an overarching policy objective for Dublin City Council.

The optimum utilisation of such lands similar to Merrion Road has taken place across Europe in successfully achieving compact and sustainable residential development. It can be seen through other European Cities such as London, Copenhagen, Amsterdam and others that have stitched in new residential communities through exemplar architectural design and the linkage of transport and land-use planning.

One such example can be seen within Cambridge City, the Accordia Cambridge is a 9.5-hectare site which includes 378 no. dwellings located c.1.9km from Cambridge City Centre. Originally the site was part of a large garden to a country house. The scheme is set in a mature landscape - previously occupied by 1940s low-rise government offices - and contains over 700 mature trees. These trees are integrated into landscape. The design includes a variety of innovative house and apartment types in the form of terraces, courtyard houses and 'set-piece' apartment buildings, composed within public landscaped gardens that extend to approximately three hectares. Such a design has successfully adapted to the surrounding landscape and provided for much needed residential development while also repurposing and providing a more suitable use at this location.

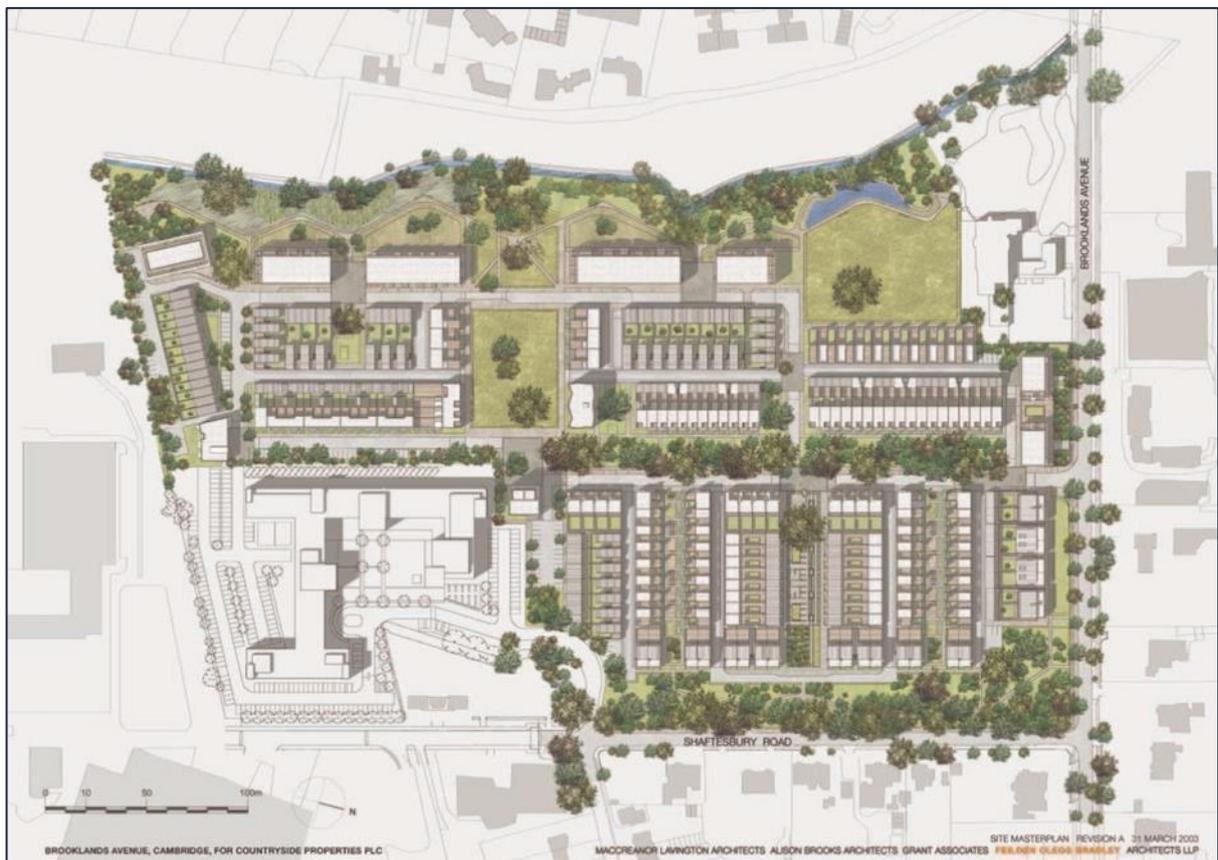


Figure 11: Accordia Cambridge.

Another example within Cambridge City, is a high quality mixed-use and residential development at Great Knighton, a Cambridge suburb. The development is located on a 6.4 ha site and again, demonstrates utilisation of lands within a City and providing for a growing population.

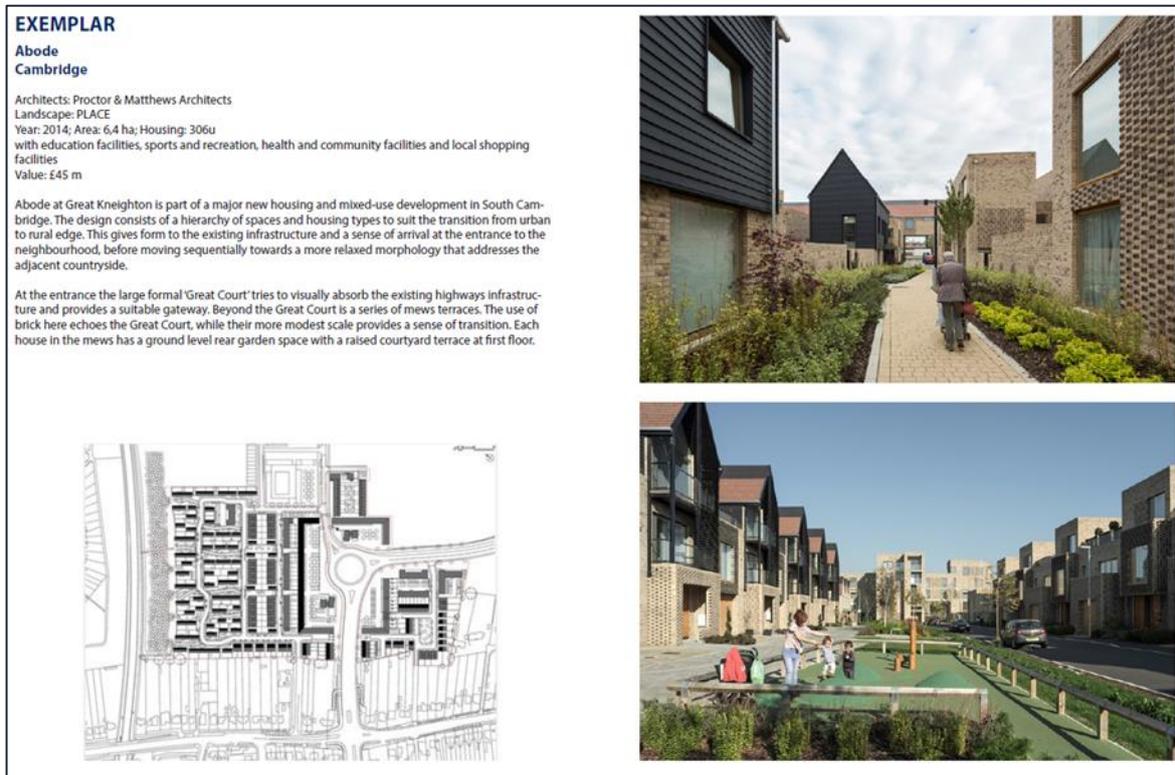


Figure 12: Great Knighton Cambridge.

Furthermore, a core objective of the Draft Development Plan is to promote the principle of the '15-minute city'. The '15-minute city' concept envisages that within 15 minutes, on foot or bike, from where they live, that people should have the ability to access most of their daily needs. The development of such strategically underutilised site can accomplish this, through the delivery of quality mixed-housing developments, increased density with compact growth and regeneration. Key concepts such as the '15-minute city' and the 'lifetime adaptable' neighbourhood which will be the foundations of future urban life.

6. Conclusion

Our client welcomes the publication of the Draft Dublin City Development Plan 2022-2028 and the opportunity to comment on the future development of the City.

It is considered that, in alignment with national, regional and local policies, it is imperative that strategic landbanks are appropriately zoned to enable the future development and expansion of same. The subject site has the capacity to enable the placement of people close to existing services and employment within the existing footprint of Dublin City and its locality, in accordance with compact and sustainable growth within the built-up footprint of existing settlements and also the delivery of 50% of new homes in the five cities including Dublin.

The Merrion Road site is strategically located within proximity to the City Centre along with various modes of sustainable transport which include Dublin Bus stops and Dart stations nearby, enabling safe and convenient alternatives to the car in promotion of healthy communities.

The subject site has the capacity to provide a higher-density development, providing for a more efficient use of strategic lands, achieving a more compact urban form allowing for continued population and economic growth of Dublin City and Suburbs, consistent with RSO1, RSO2, RPO 4.3 and RPO 5.5 of the RSES.

The subject site can support the ongoing consolidation of Dublin City and Suburbs by supporting new urban development within Dublin City in an area that is well served by public transport, local amenities and community infrastructure and supporting the integration of land use with high quality public transport provision.

This submission has requested that Dublin City Council consider the following during the finalisation of the new City Development Plan:

- The institutional buildings on the subject site are physically and functionally obsolete. (See attached Building Appraisal Report as prepared by O'Connell Mahon Architects in Appendix I).
- The institutional uses have ceased and buildings of approx. 6,465 sqm (87 % of the accommodation) on 4.5 hectares is vacant.
- That St Mary's Nursing Home closed in 2020 following the liquidation of the operating company with the liquidators citing insolvency due to regulatory compliance difficulties, concerns over future HSE funding and the cost of compliance with HIQA recommendations

and modernisation.

- The site is underutilised with the current single and 2-storey buildings giving a very low plot ratio of 0.195:1, vis a vis the adjacent 6-8 storey St Vincent's Private Hospital and Elm Park Green. Underutilised 'Z15' lands provide an opportunity to deliver high quality residential development and address housing need.
- Due to their age, construction and footprint many of the buildings are not energy efficient and would require extensive and prohibitively expensive retrofitting to bring them up to current building control standards and in many cases will not be a sustainable option.
- It has been submitted that the zoning of this large site, at a prime location in Dublin City Council's administrative area, for appropriate future redevelopment would align with both NPF and RSES policies, by way of providing a more efficient and intensive use of this key site.
- The site is in a strategic location to high-quality public transport linkages including BusConnects, Dublin Bus, Dart, as well as cycling routes and is in close proximity to Ireland's largest third level campus at University College Dublin and various other centres of employment. As such, in alignment with both the NPF and RSES, the subject site, and any redevelopment of same, has the potential to support sustainable compact growth and accelerated housing delivery, and the integration of transport and land use. It is considered that the subject site has the capacity to support future redevelopment opportunities and the current land use zoning objective of 'Z15' creates a barrier to other future essential and appropriate uses, including housing.
- The 'Z6' zoning on part of the site is remnant of the zoning on the adjacent Elm Park Green site and is inappropriate for the subject lands.
- Recognising the cessation of the previous institutional uses due to physical and functional obsolescence etc., the most appropriate zoning for the bulk of the site is considered 'Z12- Institutional Land (Future Development Potential)'.
• It has been requested that Dublin City Council amend the land use zoning on c. 4 hectares of the site, outlined on Figure 1 overleaf, from 'Z15' (Community and Social Infrastructure) and 'Z6' (Enterprise and Employment) to 'Z12', (Institutional Land - Future Development Potential), leaving c. 40% of the site to remain as 'Z15' in order to support an appropriate level of institutional and community uses.

- It has been further requested that the proposed restrictive 'Z15' land use zoning policy provisions are amended to the existing 'Z15' provisions as per the current Dublin City Development Plan in order to facilitate potential future development.
- In the absence of rezoning the proposed 4.0 ha to 'Z12' and the amendment to the proposed 'Z15' provisions, the opportunity to redevelop this site for alternative uses including housing will be sterilized which is contrary to the objectives of the NPF, RSES and Dublin City Development Plan.

We trust that the matters outlined above will be taken into consideration as part of the finalisation of the Dublin City Development Plan 2022-2028. We are available for discussion on any of the matters referred to above and would also appreciate if you could confirm receipt of this submission by return.

Appendix I

**Building Appraisal Report prepared
by O'Connell Mahon Architects**



O'Connell Mahon Architects |

**Building Appraisal Report for Site at Merrion Rd.
for the Religious Sisters of Charity to support
Re-Zoning Application.**

February 2022

1.0 Introduction:

This report has been prepared by O'Connell Mahon Architects to support a rezoning application for lands at Merrion Road in the ownership of the Religious Sisters of Charity. It should be read in conjunction with the submission prepared by Avison Young seeking the rezoning of 4 hectares within the campus from Z15 to Z12 zoning for the forthcoming review of the Dublin City Development Plan.

The lands are currently occupied by a series of buildings which range in dates from 1866 to the 1990s which have served various institutional uses over the last 150 years. In more recent times a number of the building have become vacant as they are no longer required or suitable for the purpose for which they were originally intended.

This report sets out an overview of the whole campus, with a more detailed account of the buildings that occupy the area this is being proposed for re-zoning.

O'Connell Mahon Architects were previously employed in 2018 to provide an opinion on options to upgrade St. Oliver's Nursing Home on the campus following compliance concerns raised by HIQA. We were also employed in 2021 review the properties and occupation of the the whole campus with a view to rationalising and consolidating services due to the changing needs and challenges of the Religious community and the institutions on their campus

In preparing the report I have recently visited the campus and the buildings that are located on the lands to be re-zoned.



Figure 1 Entrance to St. Marys and Chapel with Elmpark Green in the distance

2.0 Campus Overview:

2.1 Site Description

The subject lands are located on Merrion Road which forms the Eastern boundary of the site. It is bound to the North by a variety of other properties including a number of residences and St. Vincent's Private Hospital, to the West by Elm Park Golf Course, and to the South by the Elmpark Green Development.

It is a 16.17 acre site. The campus is well maintained with landscaped areas and good roads and footpaths throughout.

The campus is comprised of two principal building types,

- 1 The Old Institutional Building, St. Marys and its associated buildings and annexes which until 2020 operated as a Nursing Home. This complex includes a Chapel.
- 2 A series of residential institutional buildings built in the early 1990s including a convent, a convalescent home, houses of varying sizes and apartments, and two additions to the St. Marys complex.

The diagram below illustrates the location of the buildings on the site.



Figure 2 Existing Buildings

2.2 Overview of Existing Buildings

The following is a summary of the Buildings on the campus and their current uses:

1 Marmion	A 14 bed convent building currently occupied by members of the Religious Sisters of Charity.
2 Caritas	Convalescent Home currently occupied by St Vincent's Hospital Group under licence expiring in March 2022.
3 Apartment Building	10 Single Bed apartments which were previously linked to the services provided in the St. Mary's Building. Currently only partially occupied with 2 units currently operated by HSE under short term licence.
4 Houses.	3 No. Semidetached houses which were previously leased as Disability Accommodation by the HSE which were supported by services provided in the St. Mary's complex. Currently vacant. Fourth unit occupied by members of the Religious Sisters of Charity
5 Communal Room	Small building used for community meetings etc. Currently vacant
6 St. Oliver's	Former Nursing Home Wing of St. Marys. Closed in 2020. Currently vacant.
7 St. Mary's	Original Institutional Building which links a number of other buildings together including the Chapel built in 1875. Most recently used for supported living and nursing home services. Currently Vacant.
8 Loyola	Former Nursing Home Wing of St. Marys. Closed in 2020. Currently Vacant
9 Offices	Former Convent Wing now in separately accessed offices under short term licence.
10 'Providence' & 'Shalom'	2 houses which are currently occupied by members of the Religious Sisters of Charity.
11 Swimming Pool	Swimming Pool Building previously associated with the School for the Blind. Closed 2007 Currently Vacant
12 Maintenance Building	Plant and Workshop facilities for the campus.

The diagram below indicates which buildings are vacant and which are currently occupied.



Figure 3 Existing Building Uses

2.3 Campus History:

The Religious Sisters of Charity initially commenced developing the lands at Merrion Road in 1866 through the construction of a new institutional building for the 'Destitute Catholic Blind.' It opened in 1868 and facilitated the relocation of over 40 persons from a smaller facility in Portobello in the city. It developed into a residential care centre for blind and visually impaired girls, over time incorporating a school. A new school building was built in the 1960s which at various times provided pre-school, Primary and Secondary education for blind and visually impaired girls.

Over time the need for the school became obsolete due to new policies of the Department of Education towards integration, locally based provision for handicapped persons, and the recommendation, in the Report on Special Education Needs (December 1993). "that post primary girls who are visually impaired should have access to normal schooling".

Transitional Arrangements were put in place in the early 2000s and the last pupils of the primary and post primary schools transferred to schools in Drumcondra which provide integrated facilities. The school closed almost 20 years ago in 2003. Many of the buildings associated with it have since been demolished.

2.4 Closure:

St Mary's Nursing Home including St Oliver's Wing and the Loyola Wing, together with the Disability Centre, were closed following the High Court's appointment of provisional liquidators of the operating company, St Mary's Centre (Telford) DAC on 24th July 2020

3.0 Existing Buildings Appraisal:

This section sets out a brief statement on the location, condition, function and suitability for purpose of each of the buildings on the campus with more detail given to those on the area of the campus that is proposed to be re-zoned.

3.1 Marmion:



Marmion is a 2 storey 14 bed Convent Building which was completed in 2001. It is located to the rear of the site on the Western Boundary between the St. Vincent's Private Hospital Building and the Rear Block at Elmpark Green.

When it was originally built there were no other buildings adjacent to it. It is now dwarfed by the scale of the buildings that flank it. These buildings are both at least 8 storeys in height. The building is well maintained, in good condition and suitable for its current function as a convent, although it is expected that over time the demand for it will reduce due to the aging profile of the sisters.

The proximity of this area of the site to St. Vincent's Hospital makes it suitable for retention of the existing zoning, allowing the potential for expansion of the hospital in the future, or another, complimentary or independent institutional or healthcare use.

3.2 Caritas Building

The Caritas Convalescent Home is a predominantly single storey structure with a part two storey element which houses staff facilities on the upper level. It has capacity for 52 patients in a combination of single, two bed and 4 bedded rooms. The building appears to be well maintained and in good repair. There are extensive

sitting, dining and catering facilitates for patients. The latest HIQA report on the premises notes the premises are compliant.

This building was previously operated by Caritas Convalescence Centre DAC. The High Court Granted an order to wind up the company on 27th of July 2020. The building is currently operated by St Vincent's Hospital Group under a licence expiring in March 2022.



The Caritas Building is located adjacent to a boundary with St. Vincent's Private Hospital on land proposed to be retained in Z15 Zoning. Its proximity to the hospital could lead to other synergies with SVUH in the future or another, complimentary or independent institutional or healthcare use.

3.3 Houses and Apartments



The Houses and Apartments were opened in 1995. In conjunction with facilities in the St. Mary's Centre Building, they formed part of a Disability Centre providing supported accommodation in the form of shared houses and one bed apartments for

those with disabilities which included blind and visually impaired residents who could access support services and catering from the St. Mary's Centre.



The complex includes 10 one bedroomed apartments over two levels and four semi-detached 4/5 bedroomed houses.

St Mary's Centre DAC ceased trading on the 30th of October 2020 and the premises have since been vacated except for two residents currently remaining in the Disability Centre Apartments which is operated under a short-term licence by the HSE expiring in May 2022.

Three of the houses are currently vacant and one is occupied by members of the Religious Sisters of Charity. There is a small community building adjacent to Merrion Road in front of the houses. It is understood that this is also no longer in use.

The houses and apartments are located on the North of the Site between the Caritas Centre and Merrion Road. This area of the site is proposed to be retained in its current zoning as it has good connectivity back to the Caritas Centre and potentially the hospital campus.

3.4 St. Marys

St. Marys is the largest building on the campus and comprises the original Institutional Building built in 1866 and a complex of other buildings connected to this via a series of corridors that wrap around a large central courtyard.

The central building is a fine stone building built in an East West orientation with the entrance at the Eastern end facing onto Merrion Road. It has generously proportioned rooms and views of the sea.

This building has had many institutional uses over the years, and most recently was used as a nursing home.

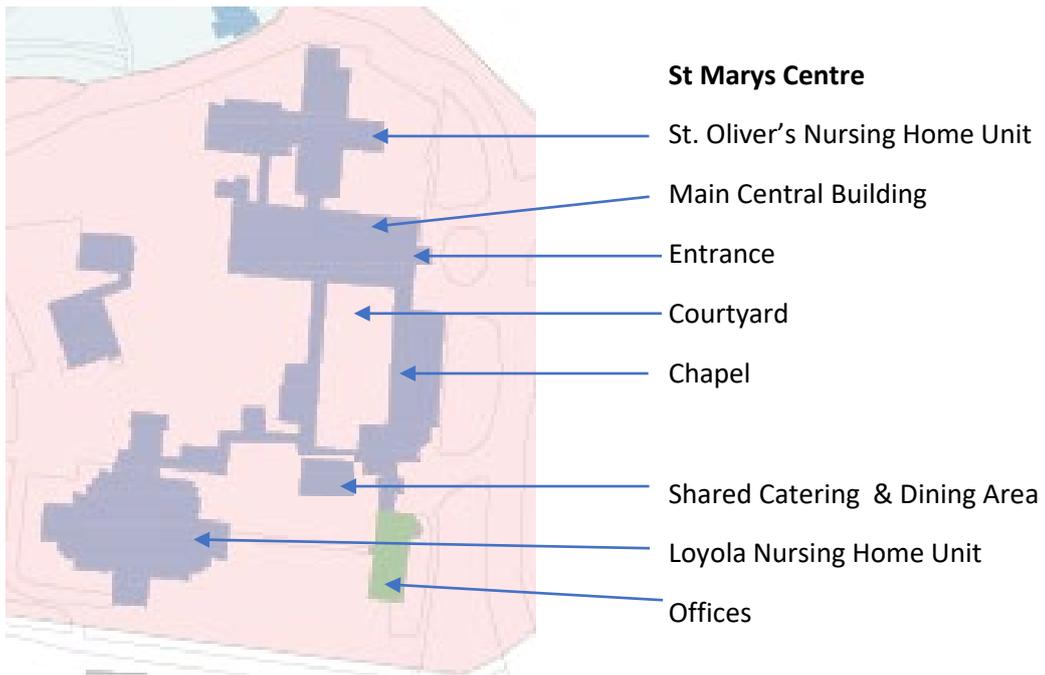


Figure 4 Layout of St. Marys

The central building forms one side of a courtyard which has a link corridor around the other three sides. To the East a two-storey link gives access to a large Chapel and a former Coffee Shop. The Chapel closed in September 2020. To the South is the main kitchen and dining areas which provided services to both units of the nursing home and to the residents of the Disability Centre Apartments and Houses. To the West is a link which connects Loyola and the dining room back to the main staircase of the central building.



Figure 5 View of Central Courtyard looking south towards catering and dining block

Chapel:



The most prominent building on the campus is the chapel which can be seen from Merrion Road.

The Chapel was constructed in 1875. It can be accessed directly from the front of the building complex and is also accessible at ground floor and first floor levels from a two storey link corridor within the St. Marys Centre. The mosaic at the altar shows the date of 1815, which was the date the Religious Order was founded. It was closed with the rest of the centre in 2020.



Central Building

The ground floor of the central building was configured with the main reception for the Nursing Home adjacent to the entrance and a number of activity rooms and other ancillary facilities that were available to residents in addition to a number of offices and support accommodation including staff facilities.

A large staircase and hallway is located approximately half way along the central corridor. A stained-glass window is located high on the southern wall and a large rooflight brings additional day light into the top floor.



A large laundry and associated drying rooms which became redundant prior to the closing of the Nursing Home occupy much of the ground floor in the western end of this building.



The upper-level accommodated offices and conference facilities and a physiotherapy room for residents.



Catering/Dining:

Catering was provided from a central kitchen located, between the two nursing home units with a large dining room located immediately adjacent to it. Residents in the supported accommodation (Houses and Apartments) had access to the facilities in St. Marys including the Main Dining Room. Each nursing unit also had its own dining facilities.



The Nursing Home was split into two Units, Loyola and St. Oliver's. Loyola catered for blind residents with a capacity for 30 beds. The distance between the two units is over 100m through the older central building and link corridors.

3.5 St. Oliver's

St. Oliver's is a single storey cruciform unit located to the North of the Central Building. It is almost self-contained with regard to its amenities. It consisted in 2018 of 26 resident beds accommodated in 11 bedrooms (a mixture of single, two beds, three beds and four bedded rooms).

It was built as an 'infirmary' in 1974-1975. Its original purpose was to provide more suitable accommodation for the 'Elderly Ladies' who were previously accommodated on the first floor of the original building. It opened in 1975 and was registered as a Nursing home in 1994. Further upgrade works were carried out in the 1990s.

A HIQA report file from Dec 2018 notes that

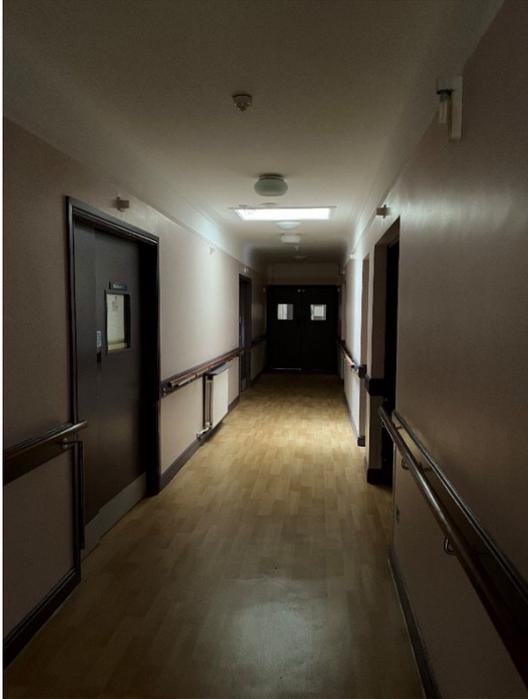
The design and layout of the centre did not meet the needs of the residents.

The following was identified by inspectors:

- *The layout of multi-occupancy bedrooms limited the residents private space around their beds.*
- *Insufficient space for seating / specialist seating in the area around residents' beds in multi-occupancy bedrooms.*
- *Insufficient storage areas on units and equipment being stored in incorrect rooms in St. Oliver's Unit.*
- *The use of signage to support residents needed to be reviewed to maximise its impact and support residents to function optimally.*



While some of these issues may have been subsequently addressed it is clear that the multibed rooms in St. Oliver's were not optimal and that the capacity of the unit would be impacted in order to address these issues, ie bed numbers would have to reduce to below what were already sub-optimal numbers.



3.6 Loyola:

Loyola was opened in 1996 with 20 bedrooms occupied by elderly blind and 10 for retired Sisters. In 2010 Loyola was registered as Nursing Home

It is a more modern building than St. Olivers, laid out as a 2 storey cruciform building built around courtyards. While it was generally considered to be compliant with HIQA standards it was very far away from St. Olivers and did not benefit from the synergy of having two units being operated together.

Loyola was closed in 2020.



Challenges with Operating a Nursing Home in this complex.

The primary issue would appear to be that the overall building complex of St. Marys is very large while the occupancy of a maximum of 56 beds is quite small by current Nursing Home norms. This is best illustrated by looking at the areas of the buildings. Loyola is approximately 2,090sqm for 30 residents. St. Oliver's is approximately 960sqm for 18-26 residents and the balance of the St. Mary's buildings which were really just supporting the services in the nursing wings and the disability centre is over 4,000sqm which is far greater than what a 50-60 bed nursing home would require. Despite this extra space the unsuitability of the older buildings meant that the actual nursing home facilities in the units were under pressure to comply with HIQA standards.

The utilities costs would have been out of proportion given the very large footprint of the building and very high ceilings throughout the older sections of the buildings. Some parts of the buildings were showing evidence of deterioration and would be difficult to maintain.

Overall, the Nursing Home facilities were extremely spread out with many long corridors and large rooms that are not suited to modern nursing home needs. Despite the many facilities that were available throughout St. Mary's, residents spent most of their time in the smaller units of Loyola and St. Oliver's. While Loyola generally satisfied the requirements of HIQA, St. Oliver's had a number of issues with HIQA compliance particularly in relation to a number of the multibed rooms, and having adequate space for individual residents needs in shared accommodation. Further rationalisation of bedspace to reduce the occupancy of the multibed rooms would reduce the overall occupancy to numbers that would be below normal viable operational levels.

Challenges of the Older Buildings

The age and design of the older buildings, which date from the 1860s make them unsuitable for a lot of modern requirements. The large rooms and extremely high ceilings are challenging for splitting spaces up eg into bathroom areas, offices and smaller storage spaces.



Incorporating modern building services requirements into this type of building is also very challenging without major refurbishment works being carried out. This is evidenced in the amount of surface mounted services visible throughout the complex.



The scale of the older buildings meant that most of the facilities were difficult for some residents to access as they were far away from the core nursing home units and thus were under-utilised.

Of all of the buildings on the campus St. Mary's, which is the largest, is the least efficient both as a building and in terms of the amount of the site that it occupies when compared to its potential occupancy. This made for high operational costs, which combined with a need to reduce capacity to make meaningful improvements in order to meet the need of HIQA standards in St. Oliver's would have placed even more pressure on the financial viability of providing a modern compliant Nursing Home service. The buildings were simply no longer suitable or able to serve the best needs of the residents.

3.8 Offices

The most Southerly wing of St. Mary's complex of buildings is a two storey stone section of building which was previously in use as a convent. The building faces Merrion Road. It is linked internally to the rest of the St. Mary's complex, but also

benefits from its own independent entrance from the front. The building is currently occupied as offices under a short term licence.



Figure 6 View of front of Office Wing

3.9 Providence & Shalom



These two houses are located to the rear of Loyola on the area of the site proposed to be re-zoned. They are currently occupied by members of the Religious Sisters of Charity. The buildings are two storey structures and are in good repair, however there is adequate space available in other convent facilities to accommodate the sisters who currently live there. The sisters no longer have a need for these properties.

3.10 Swimming Pool :

The Swimming Pool is a single storey structure which was constructed in the 1960s. It was for the use of the pupils of the school for the blind. It underwent a number of upgrades and renovations over the years and was eventually closed in 2007. It is currently vacant and in disrepair. It is located behind St. Mary's and is near to the large green open space formerly occupied by the School for the Blind.



4.0 Conclusion:

The Campus at Merrion Road has developed over the years to respond to the different institutional needs of the Sisters and the services that they provided which have changed many times in its 150 year history.

Since the closure of the Nursing Home and the Disability Centre there are large areas of the current campus which are underutilised and buildings that are vacant. The sisters do not currently have further institutional uses to put it to.

The buildings formerly occupied by the nursing home are not suitable for modern healthcare standards or environments and thus have become obsolete and are now vacant following the closure and the liquidation of the operating company in 2020.



Figure 7 Proposed Rezoned Land coloured pink

The Sisters themselves like other religious communities are dealing with an aging population so their own needs for accommodation on the site are also reducing. While they intend to keep the Marmion Convent open in the short term, they do not have a need to retain the use of the houses (Providence & Shalom) located on the land that is proposed to be rezoned. They have capacity both on site and in other property to accommodate the sisters who currently live there.

On the basis of the above it seems appropriate that a more flexible zoning for part of the campus (identified in pink in the diagram above) be considered in order to release the site to be of benefit to future generations.

Contact Details

Enquiries

Brian Maher

(01) 6618500

brian.maher@avisonyoung.com

Visit us online

avisonyoung.com