

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1

6 March 2020

Re: Strategic Housing Development Application to An Bord Pleanála

Demolition of Cunningham House, Sports Hall, Shed and part of historic random rubble wall, construction of 358 no. student bed spaces, 4 no. staff apartments and a replacement Sports Hall together with all associated site and development works. Cunningham House, Trinity Hall, Dartry, Dublin 6.

ABP Reference: 305430-19

Dear Sir

This application is made to An Bord Pleanála under the Planning and Development (Housing) and Residential Tenancies Act, 2016. The application is made pursuant to a Notice of Pre-Application Consultation Opinion issued by the Board dated 11 November 2019.

This correspondence identifies the following documentation and information submitted with this application:

1. The documentation submitted in compliance with articles 297 and 298 of the Planning and Development Regulations 2001 to 2019, as amended; and,
2. The information submitted pursuant to the Board's Notice of Pre-Application Consultation Opinion dated 11 November 2019, as required under article 297(3) of the Planning and Development Regulations 2001 to 2019, as amended.

1 Article 297 and 298 Requirements

The documentation required under article 297 is identified below:

- **297(1)** – The planning application form is submitted herewith
- **297(2)(a)** – The Applicant is the owner of the land concerned and accordingly no letter of consent is required. controlled by the Applicant.
- **297(2)(b)** – A copy of the newspaper Notice published in The Herald on 6 March 2020 is attached

Directors:
Declan Brassil &
Sharon Gorman

Reg No.:
329512

herewith.

- **297(2)(c)** – RAU Drawing No. P18-051D-RAU-ZZ-XX-DR-A-MPL-1001 provides a Site Location Map at a scale of 1:1,000 incorporating the requirements of parts (i) to (iv) is submitted herewith.
- **297(2)(d)** – Evidence form Irish Water that it is feasible to provide services is included at Appendix 3 of the Civil Engineering Infrastructure Report for Planning document prepared by Barrett Mahony.
- **297(2)(e)** – It is proposed to connect to a public sewer. As such, there is no requirement to submit documentation under this provision.
- **297(2)(f)** – A full Schedule of Drawings and Documents required under sub-article (4) and submitted with the application is provided on a separate sheet.
- **297(2)(g)** – Student Accommodation development does not give rise to any requirement under Part V of the Planning and Development Act 2000 (as amended).
- **297(2)(h)** – Student Accommodation development does not give rise to any requirement under Part V of the Planning and Development Act 2000 (as amended).
- **297(2)(i)** – the Applicant is the owner of the site and therefore a letter of consent is not required.
- **297(2)(j)** – The appropriate statutory fee of €37,677.40 being the fee payable, is attached herewith.
- **297(3)** – Section 2 below provides a statement of proposals to address the matters set out in the Board's Notice of Pre-Application Consultation Opinion dated 11 November 2019.
- **297(4) and 298(1)** – A full Schedule of Drawings and documents required under sub-article (4) and submitted with the application is provided on a separate sheet.
- **298(2)** – This application proposes works, demolition and construction, to structures immediately abutting a Protected Structure and within the curtilage of Protected Structures. An Architectural Heritage Impact Assessment has been prepared by Mullarkey Pedersen Architects.

It is noted that the application is accompanied by a Natura Impact Statement.

2 Statement of Proposals to Address Issues Raised in the Board's Notice of Pre-Application Consultation Opinion

The Board's Opinion of 11 November 2019 states that the documents submitted with the request to enter into consultations constituted a reasonable bases for an application for strategic housing development. The Opinion identified the following requirements:

1. **Specific information to be submitted with the Application.** The documentation submitted with this application is listed in Section 1 above and on the separate Schedule of Documents. This information includes all of the specific items identified in the Opinion.
2. **Authorities to be notified of the making of the Application.** Copies of the letters sent to these authorities notifying them of the application under section 8(1)(b) of the Act are submitted with this application.

3. The Board's Opinion – Specific Information to be Submitted with Application

The Board's Opinion identifies specific information to be submitted with any application for permission. This information has been included in the documents submitted herewith. To assist the Board and any interested parties in assessing the application the following sections provide a summary of the information submitted to address the matters raised in the Board's Opinion.

3.1 Proposed Height

Item 1 states:

'Notwithstanding that the proposal constitutes a reasonable basis for an application, demonstrate/justify the suitability of the proposed site to accommodate the proposed height particularly in the context of the adjoining residential properties.'

The siting and design of the proposed development has afforded careful consideration to the surrounding residential amenity, the overall visual amenity, and the potential impact on adjoining Protected Structures, while also ensuring the sustainable development of well-connected and serviced suburban lands.

The proposed development seeks to protect the existing residential amenity and the character of the area while ensuring that development takes place at densities appropriate to the suburban location and to the nature of the proposed use. National policy, including the National Planning Framework, the Urban Development and Building Heights Guidelines for Planning Authorities and the Sustainable Urban Housing: Design Standards for New Apartments advocate increased building heights to facilitate the consolidation and strengthening of the existing built up area rather than continuation of unsustainable pattern of development of towns and cities growing outwards. It is considered that any assessment of height at this must be considered in the context of prevailing national policy and the proposed development's function in supporting compact growth, increasing residential density and consolidating and established student residential use.

The height, massing and scale of the proposed have afforded due regard to the existing development forming part of the wider Trinity Hall complex; the need to protect the setting and context of adjoining

Protected Structures; and, in particular the need to protect surrounding residential amenity.

The modest suburban scale of the wider area has been considerably altered by the introduction of 3 no. six and seven storey student accommodation blocks in the early 2000's. The proposed development seeks to recognise and minimise the impact on Oldham, Greenane and Esterel Houses (Protected Structures) by locating the bulk of the accommodation elements at a distance from these structures. The height of each side of the new accommodation quadrangle varies to adapt to its specific location with 4 storeys addressing Esterel House, Temple Road and housing to the east at Temple Square, rising to 6 and the 8 storeys as the northern block moves westwards away from the site boundaries. The scale then changes again as the development extends towards the rear of the three Protected Structures, reducing the three storeys to the rear of Greenane and two storey height equivalent at the covered podium space between the Greenane and Oldham Houses.

The Architectural Response to ABP Opinion, prepared by RAU and submitted as part of this application, provides a detailed assessment and justification of the proposed building height. This Response details the design evolution with particular reference to protecting surrounding residential amenity.

The Architectural Response details how the eastern façade of the quadrangle has been set back 12m from the site boundary with Trinity Square. The eastern boundary benefits from a strong band of existing mature trees. These trees will be retained where possible and supplemented with additional tree planting to provide an adequate level of screening to the adjoining properties. The proposed building height at this location will ensure that the proposed building will not step higher than the existing trees when viewed from Temple Square and therefore will be appropriately screened and any potential overlooking avoided.

With regard to Esterel, Block B has been located approximately 6 m from the rear boundary with Esterel and some 40m from the rear façade of the Protected Structure. The potential for overlooking of the rear garden of Esterel has been mitigated by the use of modified fenestration to the new elevation to the northern and eastern boundaries to control view and to minimise overlooking.

Integrated Environmental Solutions have carried out a Daylight, Sunlight and Overshadowing Study which is submitted with this application. In summary, this Study establishes that the proposed development will result in no additional shading to the properties on Temple Square for the majority of the time with minimal additional late afternoon shading for some properties in March and December. Similarly, the proposal will result in some minor early morning shading of the garden space of Esterel with no additional shading in the afternoon. The analysis confirmed that on the 21 March, all of the existing amenity garden spaces would continue to receive at least 2 hours of sunlight or not less than 80% the former value in line with BRE recommendations.

Michell + Associates, Landscape Architects, have prepared a Landscape and Visual Impact Assessment (LVIA), which is submitted as part of this application. The LVIA notes that the visual impact varies widely in the area but demonstrates a surprising lack of visibility except when close by on Temple Road. The LVIA concludes that the close effects are suitably mitigated by the architectural planning, form, proportion and finishes. The presence of many mature trees in the streetscape and on the application, site also serve to mitigate the effects and increase the capacity of the receiving landscape.

It is submitted that the massing and scale of the proposed development reflects that of the recent multi-storey development at Trinity Hall which generates a more urban character. Inherent in this is a campus defined by the juxtaposition of an urban scale against a lower, earlier suburban one. The proposed

development will continue the positive impact achieved by the existing Trinity Hall development in a manner which is consistent with current planning policy for consolidated development at sustainable development in a manner which protects surrounding residential amenities.

3.2 Elevational Treatment

Item 2 states:

'Notwithstanding that the proposals constitutes a reasonable basis for an application, further consideration (or justification if elevations are to be retained) of the southern elevation to Block C along Temple Road and the elevations of Block B that address the courtyard.'

Further consideration has been given to the southern elevation to Block B and Block C and the northern elevation of Block B that addresses the courtyard. Section 2 of the Architectural Response to ABP Opinion, prepared by RAU, provides a detailed comparison of the elevational treatments of the scheme submitted at pre-application consultation stage and the development now proposed.

It is noted that the Board's Opinion refers to 'the southern elevation to Block C along Temple Road'. However, Block B principally addresses Temple Road with Block C setback beyond the rear garden of 'Esterel'. Notwithstanding, following design review, modifications have been made to the southern elevations of both Block B and C which have been summarised below and are further detailed in the RAU Architectural Response.

Block B (Southern Elevation onto Temple Road): The main body of Block B now steps further back from the stone wall to Temple Road with two gables or 'pavilions' either end. Grey metal façade cladding has been introduced at third floor level to the portion of the building setback. In addition, the selected red brick facade is of a less vibrant shade. The 'pavilions' have been sited to reflect the alignment of 'Esterel' (a Protected Structure). The setback, grey cladding at third floor level and revised brick finish serve to make it the building more recessive, reducing the massing of the building and the overall impact on the streetscape.

Block C (Southern Elevation): Block C has been reduced in height and its proportions enhanced. The height and proportion of Block C has been developed to respect Greenane, protect the outdoor amenity of 'Esterel' and the visual amenity of Temple Road. With respect to views from Temple Road, the proposed 2 storey Block C is seen beyond the garden space, with a relatively bright façade, which is simple and recessive in its execution.

Block B (North Elevation into Courtyard): The north elevation of Block B which addresses the eastern entrance to the Forum Space had been significantly modified. Further consideration of this corner of the building has resulted in the introduction of a door at ground floor, windows, textured brick, brick insets and a step in the plan of the ground floor. The revised fenestration strategy results in an improvement in the daylight available to accommodation and the architectural expression of the building.

3.3 Integration with Trinity Hall Campus

Item 3 states:

'A report that addresses how the proposed development integrates with the existing Trinity Hall campus. In

particular his should address and identify the existing and proposed amenities and facilities and the capacity to accommodate existing and proposed student/staff number, specifically how the development will accommodate access to the facilities/amenities. Details of the management of the sports hall and its users should also be addressed.'

The proposed development provides for a high degree of integration with the adjoining Student Accommodation scheme. The proposed development will form a fully integrated extension to the existing Trinity Hall residences and will have access to, and use of, existing facilities and amenity spaces provided within that scheme, in addition to those proposed as part of this application.

The proposed development provides for the creation of a new space between Greenham and Oldham House creating a connection between the existing campus and the new development. The wide, unobstructed space, framed by the landscape gardens and associated seating areas, will draw existing and future residents to the space and allows for ease of movement to and from the Sports Hall. A physical connection is proposed from the Forum space to the Oldham House and associated existing facilities.

Existing students' facilities on site include dining facilities, student shop, gym, laundry and administrative spaces. The proposed development will provide for a new Sports Hall/multipurpose space, music room, study and amenity spaces. Furthermore, the proposed development also provides formal teaching spaces for Botany students supporting and complementing Botany Departments activities on site.

Further details of existing and proposed amenities and their capacity has been provided at Section 3 of the submitted Architectural Response to ABP Opinion, prepared by RAU. This Report also includes details on access to existing and proposed facilities/amenities and the management of the sports hall and its users.

The proposed development provides for connections to the existing pedestrian and cycle routes through the Trinity Hall campus and will utilise existing access points at Dartry Road, Temple Road and Palmerston Park. Please referred to Architectural Response to ABP Opinion, prepared by RAU which includes and integration diagram illustrating principal routes through the site and connections between various amenities and facilities.

3.4 Arboricultural Report

Item 4 states:

'An Arboricultural Report that address the potential impact of the proposed development on the adjoining facilities, in particular on the Botany Department's arboretum. In this regard comments/observations from the Botany Department of TCD may be of benefit to the application process'.

Please refer to Arboricultural Assessment (Tree Survey) Report prepared by JM McConville + Associates, Arboricultural Consultant submitted with this application.

The approach to the retention and protection of trees, and the assessment undertaken, has been subject to consultation with both the Planning Authority (Dublin City Council, Parks Department) and Trinity College Botany Department.

The Arboricultural Assessment specifically considers the potential impact of the proposed development on existing trees within the Botany Arboretum due to alterations to the environment during the

construction stages and potential loss of light at operational stage. In this respect, the Arboricultural Impact Assessment (Part Two of the Assessment) concludes:

'Based on the available literature and my experience, it is my professional opinion that construction on the site, which is following best international practice in relation to tree retention, and the evidence from the available papers, suggest and confirms that the proposed development will not have an impact on the existing tress within the arboretum'

Furthermore, Mr Jeremy Barrell, Barrell Tree Consultancy, undertook a peer review of the Arboricultural Assessment (Part 2) undertaken by JM McConville + Associates with regard to potential impacts associated with shading. The review states that *'I broadly agree with reasoning set out in that analysis and its main conclusion that there will not be a significant impact from the shading'* and generally considers that changes in light level associated with new buildings is unlikely to give rise to significant impacts.

In response to discussions with the Planning Authority, a detailed tree protection and management methodology has been provided in the Arboricultural Assessment (Part 3). Tree management measures, including the pruning of specific trees, have been proposed to minimise potential impacts associated with the construction of the proposed development where it occurs in close proximity to existing trees.

The proposed development has been subject to ongoing consultation with the Botany Department of TCD. In this respect, correspondence from the Director of Trinity Botanic Garden is submitted herewith.

3.5 Mobility Management Plan

Item 5 states:

'A draft Mobility Management Plan. Also, a site layout plan which clearly identifies the existing car and bicycle parking within the wider Trinity Hall Campus, identifying the spaces to be retained and those to be removed.'

Please refer to Mobility Management Plan prepared by PMCE Consultants in conjunction with Coakley Consulting Engineers and submitted with this application.

3.6 Construction & Demolition Waste Management Plan

Item 6 states:

'A construction and demolition waste management plan'

Please refer to Construction and Demolition Waste Management Plan prepared by Barrett Mahony Consulting Engineers and submitted with this application.

3.7 Student Accommodation Management Plan

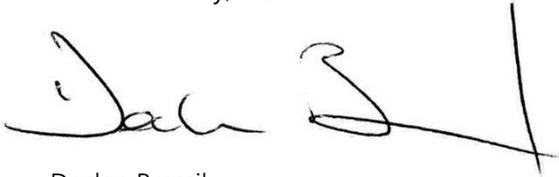
Item 7 states:

'A Student Accommodation Management Plan'

Please refer to Trinity Hall – Dartry Student Accommodation Management Plan prepared by Trinity College Dublin and submitted as part of this application.

I trust that the application documentation is in order and I look forward to a favourable decision from the Board.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Declan Brassil', with a long horizontal stroke extending to the right.

Declan Brassil

Declan Brassil & Co.