

**Strategic Housing Development  
Application for Lands at St. Joseph's House and adjoining  
Properties**

**at:**

**Brewery Road and Leopardstown Road, Dublin 18**

**CASE NUMBER: - ABP-311540-21**

**APPLICANT: Homeland Silverpines Limited**

**STATEMENT OF EVIDENCE**

By: Derek Murphy and Rebecca Adam (O'Mahony Pike Architects)

Project No. 1611A

Project Name Berwick Pines

**Oral Hearing**

ABP-311540-21

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## CONTENTS:

<b>1.0</b>	<b>INTRODUCTION (DM)</b>	page
1.1	Professional Profile	3
1.2	Site History/ Parent Permission	3
1.3	Expanded Site – Opportunities and Key Characteristics	4
<b>2.0</b>	<b>LOCATION + CONTEXT (DM)</b>	
2.1	Emerging Urban Context	4
<b>3.0</b>	<b>SCHEME OVERVIEW + DESIGN APPROACH (DM)</b>	
3.1	Key Design Principles	5
3.2	Scale Transitioning	7
3.3	Streetscape Design Strategy	8
3.4	Building Height Strategy	9
<b>4.0</b>	<b>MODIFICATIONS FOR CONSIDERATION (RA)</b>	
4.1	3D Massing Views	15
4.2	Site Sections + Height Modifications	15
4.3	Site Layout Plan	15
4.4	Detailed modifications to each block explained	15
4.5	Building Height Diagram (Comparative Assessment)	15
4.6	Summary Development Schedule (Comparative Assessment)	15
	Supporting Presentations (Model works/ ARC/ ILTP)	16

## 1.0 INTRODUCTION

### 1.1 Professional Profile

My name is Derek Murphy and I represent O'Mahony Pike Architects (OMP), who are the Architects retained by the applicant, Homeland Silverpines Limited for the proposed development.

I am a Director at OMP and a registered Architect with over 25 years' experience. I hold a degree and postgraduate Diploma in Architecture, obtained from Oxford Brookes University. I am a member of the Royal Institute Architects of Ireland (RIAI) and a chartered member of the RIBA. I am the lead Architect for the project for this SHD application having previously been involved in the original parent permission back in 2018.

I am joined by my Colleague, Rebecca Adam who is an Associate at OMP with 15 years' experience and is also a member of the Royal Institute Architects of Ireland (RIAI). Rebecca is a design Architect who has also worked closely on this project and will also be contributing to our presentation.

Please note that our statement of evidence refers to supporting graphics and imagery in the accompanying brochure. These graphics are listed below relating to specific points in the statement.

### 1.2 Site History/ Parent Permission

[\(Fig.1 aerial location map\)](#)

In 2018 a parent permission was granted by the planning Authority and approved under appeal to An Bord Pleanála on this site area of circa 1.65 Hectares under Reg Ref No: D17A/0337 and ABP Ref No: PL06D.249248.

[\(Fig.2and 3 parent permission\)](#)

The 2018 permission comprises of 131 units consisting of 126 apartments and 5 townhouses incorporating the conversion of St. Joseph's House (a protected structure RPS No.1548) into 8 residential units, a Childcare facility of 268sq.m and a resident clubhouse facility of 112sq.m. The building heights range from 2/3 Storey townhouses along the Western boundary up to 5 Storey's (4 + setback penthouse) on Blocks A and B to the South of St. Joseph's House.

[\(Fig.4 extended site boundary\)](#)

Approved Blocks A and B forming a courtyard development are retained in principle as part of the current proposed SHD scheme and incorporated into the overall expanded landholding and site layout strategy. These buildings maintain the original approved location and footprint on the site. Block A, located immediately South of St. Joseph's house is unchanged in terms of the building design, form and height. The approved Block B seeks permission for additional height to the original design consisting of 2 additional floors providing a building of 7 full Storey's in height. The original Block C building addressing Leopardstown Road is redesigned as part of this SHD application which now takes account of the large corner plot to the Southeast boundary occupied by a single private dwelling named as 'The Crossing' house.

## 1.3 Expanded Site – Opportunities and Key Characteristics

(Fig.5 existing site photos)

The expanded land holding forming this new SHD application comprises 7 individual plots fronting onto Leopardstown road. ‘The Crossing’ house occupies the corner site to the Southeast while 6 other detached dwellings form a row of plots to the West and fronting onto Leopardstown Road. These are known as Alhambra, Calador, Wellbrook, Souk El Raab, Cloonagh and Woodleigh. Together they account for circa 125M of frontage onto Leopardstown road. Collectively, the entire expanded land holding represents an extensive road frontage of circa 262M running from Sir Ivors Mall to the West to the Easterly corner intersection with the old railway line and current greenway link along the Eastern boundary of the site.

The additional site area is circa 0.93 Hectares providing a combined site area of circa 2.58 Hectares.

The existing streetscape is characterized by a high 2.5M granite stone wall along this stretch of Leopardstown road. This provides an oppressive public realm edge with no passive surveillance or active frontage. The wall is only punctuated at each house plot to facilitate private vehicular entrances which amount to 7 in total along this stretch of Leopardstown Road creating a very defensive and negative aspect to the roadside and street.

## 2.0 LOCATION + CONTEXT

### 2.1 Emerging Urban Context

(Fig.6 aerial map and context heights)

The area surrounding the subject site has rapidly changed over recent years with a number of hotels, apartment developments and blue-chip companies such as Salesforce, Vodafone, Mastercard and Microsoft bolstering local employment and opportunities. The emerging urban areas or districts of South County Business Park, Central Park and the fringes of Sandyford centre are all expanding and are in very close proximity to the site. The area along Leopardstown Road and within 500 meters up to the junction with the N31, Burton Hall Road and the Luas bridge overhead is going through significant change and alongside this urban growth, is compact mixed-use developments and neighborhoods of an urban scale.

(Fig.7 emerging context map)

The site is located within the expanded core of Sandyford centre and comprises, South County Business Park and Central Park to the Southwest up to the M50 and stretching Northeastwards to the Sandyford Luas line and by extension, the old railway line now utilized as a greenways network which adjoins the site boundary to the East.

(Fig.8-14 emerging context photos)

A selection of photos within the immediate surroundings along Leopardstown Road to the West illustrate this emerging urban context and changing character of this district. These areas all support higher densities and taller buildings as an accepted good practice approach to planning, compact development and sustainable use of our land resource. Central Park provides for buildings ranging in height from 8-12 Storey’s. By comparison, ‘The Grange’ residential development to the Northeast at the end of Brewery Road at the junction with the N11 supports buildings in the range from 7-11 Storey’s in height.

To the South within the nearby South County Business Park, Vodafone Ireland is 7 Storeys (Commercial) and Microsoft Ireland 6 Storeys (Commercial).

This expanded land holding of 2.58 Hectares occupies a significant urban street frontage providing an opportunity for a new cohesive residential neighborhood, conveniently located in close proximity to high frequency public transport, high employment area in nearby Sandyford and Central Park as well as a host of amenities.

(Fig.15 emerging context aerial)

With reference to **The Urban Development and Building Heights guidelines for Planning Authorities 2018**, the site meets the criteria for increased building heights on the basis that; ***“The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport”***.

With reference to **The Sustainable Urban Housing: Design Standards for New Apartment guidelines 2020**, the site location falls within the criteria for ‘Central and/ or Accessible Urban Location’ on the basis that the Sandyford Luas stop is within 10 minutes walking distance (800 – 1,000 meters) from the subject site. In addition, there are a total of 3No. Luas stops at Sandyford, Stillorgan and Central Park within a 15-minute (1,000 – 1,500 meters) walking distance from the centre of the site.

It is noted that given the central and accessible location of the site, **The Sustainable Urban Housing: Design Standards for New Apartment guidelines 2020** state that; ***“such locations are suitable for large-scale and higher density development that may wholly comprise apartments”***.

These details and the sites accessibility to quality public transport are elaborated on further in the proof of evidence presentation to be provided by Christy O’Sullivan from ILTP.

### 3.0 SCHEME OVERVIEW + DESIGN APPROACH

#### 3.1 Key Design Principles

##### A. St. Joseph’s House – Reinstate as object building in the Landscape.

(Fig.16 masterplan strategy diagram)

In line with the principles developed under the parent permission in 2018, it is an objective of the design to establish St. Joseph’s House as a focal point to the proposals and given a sense of historical importance within the scheme. The buildings surrounding sylvan setting, characterized by the tall Austrian Pines are retained and the buildings is given breathing space as established by the previous approved location and Block A which remains unaltered as part of this SHD application on the expanded land holding. The intention is that St. Joseph’s house as the focal point will be opened up to views to and from the greenways and playing fields to the East while facilitating for direct pedestrian and cycle connection along this boundary.

## **B. St. Joseph's House – Focal Point and Triangulation.**

[\(Fig.16 masterplan strategy diagram\)](#)

The aim is to establish a second line of sight from Leopardstown Road to St. Joseph's house which is located further West along the expanded streetscape.

## **C. Greenways Network**

[\(Fig.17 masterplan strategy diagram\)](#)

To then develop these 2 lines of sights or viewing corridors as part of an expanded greenways network that links with the established greenway that runs along the Eastern boundary on the old railway line. The proposed new routes would facilitate public access through the site and public open space with dedicated pedestrian and cycle lanes provided enabling permeability and connectivity to the wider area.

## **D. Existing trees inform Open Space**

[\(Fig.17 masterplan strategy diagram\)](#)

Working with the established sylvan character and mature trees within the site to allow these to inform building location and the structure and sequence of open spaces.

## **E. Urban Structure (consistency + legibility)**

[\(Fig.18 masterplan strategy diagram\)](#)

To establish a primary grid and alignment of buildings that integrates with the original established development pattern emerging from the 2018 permission and in particular the geometry and alignment of Block A and B.

## **F. Primary + Secondary Elements**

[\(Fig.18 masterplan strategy diagram\)](#)

To introduce secondary elements of a lower height along Leopardstown road to respond to the streetscape and create a street rhythm with variety in form and building height.

## **G. Public Open Space**

[\(Fig.19 masterplan strategy diagram\)](#)

To develop a central public open space which reinforces the public routes and permeability through the site towards St. Joseph's house and connecting to the established greenways network to the East.

## **H. Streetscape – Building Array + Pocket Gardens**

[\(Fig.19 masterplan strategy diagram\)](#)

Establish a series of pocket gardens as visual amenity spaces along the streets, adding a rich landscape element as well as variety and interest.

## **I. Vehicular Access**

(Fig.20 masterplan strategy diagram)

The 2 main points of access retained as per original parent permission with ease of access directly to the basement car park while limiting traffic egress through and across the site.

## **J. Development Phasing**

(Fig.20 masterplan strategy diagram)

Phase 1 would consist of Blocks A and B with Block C in phase 2 completing the Western side of the development in a logical sequence out to Leopardstown Road.

Phase 3 will comprise the remainder of the development consisting of Block D, F and the refurbishment and conversion of St. Joseph's House.

## **K. Residential Facilities**

(Fig.21 masterplan strategy diagram)

An expanded Childcare Facility is provided at the ground floor in St. Joseph's house with vehicular access and drop off via Brewery Road and Silverpines.

Block D ground level activated by a Café and Resident Facilities onto the 2 corners addressing the key routes through the site and animating the streetscape onto Leopardstown road.

## **L. Building Height Strategy**

(Fig.21 masterplan strategy diagram)

Responding to context and scaling down to sensitive edges.

## **3.2 Scale Transitioning**

(Fig.22-23 context / height studies)

We are cognizant of the site's opportunities but also its constraints in terms of achieving a balanced approach to development. The site is a large urban infill site in an established area in close proximity to the commercial core of Sandyford and Central Park.

There are a number of existing residential neighborhoods characterized by 2 Storey dwellings which can be listed as 'Leopardstown Lawns' to the Northeast, The Ann Sullivan Centre, Silverpines and Minstrel Court to the North and 'The Chase' and 'Sir Ivors Mall' to the West.

(Fig.24-27 stepping down to context / separation distances)

In all these interface conditions, the design proposals provide for an appropriate response by way of either stepping down of height or gable-ending (narrow sided elevations) to reduce mass and overlooking at the interface with existing residential dwellings. This transition is also considered in conjunction with the degree of separation distance and extent of existing landscape visual buffer as well as the proposed building disposition/ orientation in respect of reducing any impact in terms of privacy and overlooking and mitigating against undue loss of sunlight and daylight.

We are of the opinion that our design response in each particular interface condition is appropriate and well considered.

### 3.3 Streetscape Design Strategy

(Fig.28 southeast model view along Leopardstown Road)

The design strategy for the new streetscape along Leopardstown road is carefully articulated to provide a sense of rhythm through interesting building forms while ensuring a degree of variation in height and massing.

(Fig.29 streetscape concept approach)

The street frontage is firstly split into 3 zones which are formed by the triangulation of access points and views from Leopardstown road back to St. Joseph's house as the historical focal point to the development. These desire lines of permeability through the site provide for a sense of openness and breathing space along the streetscape.

The principal building form of the 'cranked' plan shape of Block C and D evolved as a result of the initial key design principles applied to the site. The primary element and form are set up parallel to address Leopardstown road and shifts to deflect inwards to respond to the building orientation and grid established from Block A and B on the site. A secondary element of lower height is added to one end to form the building composition. The marriage of these 2 elements forms an in-between pocket green space providing a degree of South facing visual amenity, privacy and setback from the roadside. The primary element is expressed in a light grey brick masonry finish with cantilevered balconies while the secondary element is of a panelized finish with an expressed, light exoskeletal frame supporting the balconies. Upper-level communal gardens on Block D are activated by resident facilities offering access to greenery and additional passive surveillance over the street below. The building heights read consistently with a transition from 5 Storeys up to 7 Storeys on the main building spine. Block D has the addition of a setback penthouse level as its location along the street and within the site is less constrained by the surrounding context and also contains the central public open space to its North.

(Fig.30 Verified View of Block F Streetscape)

Block F to the Western edge completes the overall street composition. This building is an 'L' shaped form which is setback parallel to its boundary on the West and North edge and forms a semi-private courtyard at its centre. The building form is extruded at its interface with Leopardstown road to form a 6 Storey 'book end' element at the corner. Its location and geometry address the entrance to Tudor Lawns on the opposite side of the road and when travelling East from Central Park along Leopardstown road, announces the site and frames the public pedestrian and cycle route between it and the proposed Block D.

(Fig.31 Verified View of Block D Streetscape)

Both ends of Block D is animated at ground level through the provision of non-residential uses in the form of a café and resident amenities to activate these access points into the development. All ground level apartments are 'own door' accessible units and provide passive surveillance to the street. These units along with their private amenity spaces are contained within a rhythm of precast columns which forms a colonnade type structure as a double height layer or foil in front of the façade adding depth and privacy threshold. A darker brown brick expresses the lower 2 levels and adds a further subtle layer of variety and richness in materiality.



(Fig.32 Verified View of Block C Streetscape)

At the Eastern end of the site, Block C completes the overall streetscape composition and marks the access junction into the public Greenways network along the old railway line up to the Sandyford Luas stop further North.

### 3.4 Building Height Strategy

(Fig.33 Proposed Site Layout Plan)

#### National Framework Plan

***National Policy and specifically with the National Planning Framework, NPO.13 seeks; “to base planning on performance criteria rather than blanket numerical restrictions and standards should be subject to a degree of tolerance”.***

***National Policy Objective 11: “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.”***

***National Policy Objective 35: “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”.***

#### Urban Development and Building Height Guidelines (2018)

The ‘Urban Development and Building Heights, Guidelines for Planning Authorities (2018)’ hereafter referred to as ‘Building Height Guidelines’ were issued in December 2018 under Section 28 of the 2000 Act set out national planning policy guidelines on building heights in relation to urban areas. These guidelines post-date the adoption of the Dún Laoghaire Rathdown County Development Plan 2016-2022.

Section 1.14 of the Building Height Guidelines states the statutory position of conflicting Development Plans, as follows:

***“Accordingly, where SPPRs are stated in this document, they take precedence over any conflicting, policies and objectives of development plans, local area plans and strategic development zone planning schemes. Where such conflicts arise, such plans/ schemes need to be amended by the relevant planning authority to reflect the content and requirements of these guidelines and properly inform the public of the relevant SPPR requirements.”***

Under section 3.1 of the Building Height Guidelines, three broad principles or criteria must be applied in considering development proposals for buildings taller than prevailing building heights in urban areas, as follows:

***“Does the proposal positively assist in securing National Planning Framework objectives of focusing development in key urban centres and in particular, fulfilling targets related to brownfield, infill development and in particular, effectively supporting the National Strategic Objective to deliver compact growth in our urban centres”?***

As set out in Section 3.2.1 above, the proposal secures the relevant objectives of the National Planning Framework. The location of the proposed development is a brownfield infill site and is considered a unique opportunity for the delivery of strategic housing and the delivery of compact growth in accordance with national strategic planning policy.

***“Is the proposal in line with the requirements of the development plan in force and which plan has taken clear account of the requirements set out in Chapter 2 of these guidelines”?***

The Statement of Consistency enclosed with this application has also set out how the current proposal complies with the provisions of the Dún Laoghaire Rathdown County Development Plan 2016-2022. We again acknowledge that the Dún Laoghaire Rathdown County Development Plan 2016-2022 was prepared and adopted before the 2018 Building Height Guidelines came into effect. Whilst, the Development Plan is currently the subject of a review process, the plan has not yet been formally adopted or amended with a view to implementing the requirements of Chapter 2 of the Building Height Guidelines.

***“Where the relevant development plan or local area plan pre-dates these guidelines, can it be demonstrated that implementation of the pre-existing policies and objectives of the relevant plan or planning scheme does not align with and support the objectives and policies of the National Planning Framework”?***

With regard to existing policies and objectives of the Dún Laoghaire Rathdown County Development Plan 2016-2022, there is a clear misalignment with the National Planning Framework with regards to height. We note specifically that the National Planning Framework provides for an increased residential density in settlements through a range of measures including increased building heights. National Policy Objective 35 refers. Development Plan policy and objectives on height by comparison are restrictive in that there are particular locations ear marked for building height and blanket limits are set for all other areas unless a set of exceptional circumstances in the form of upward and downward modifiers are met. Even in a case where upward modifiers are met, there is a blanket limit to additional height of 1-2 storeys over and above the baseline height limit of 3-4 storeys.

(Fig.34 Proposed View from South West on Leopardstown road)

**The Dun Laoghaire Rathdown County Council (DLRCC) Development Plan refers to Appendix 9 in relation to County Development ‘Building Height Strategy’.**

It is noted in DLRCC Chief Executive’s report dated 18<sup>th</sup> Nov 2021 that the maximum permissible height that is potentially allowed under the development plan is 6 Storey’s on the subject site. This takes account of upward and downward modifiers that would be considered applicable to this site and would potentially lift the standard 3-4 Storey height limit in the development plan up to 5-6 Storeys with the addition of 2 additional permissible floors. As such, the Planning authority has acknowledged that there are opportunities for increased height given the following upward modifiers that are deemed applicable to this site as follows:

1. **Substantial size of site.**
2. **Proximity to high frequency public transport service and employment centres.**
3. **Potential for improved enclosure/ frontage along Leopardstown Road.**
4. **Opportunities for public realm improvements along Leopardstown Road.**
5. **Potential to facilitate desire lines and provide high quality public spaces.**

Further to the above, we contend that further, additional increased building height is justified under **SPPR3(A) of The Urban Development and Building Heights guidelines for Planning Authorities 2018**,

It is noted that the proposed baseline or average height across the development is 7 Storeys which is 1 floor above the development plan permissible height considered applicable under **Appendix 9 of DLRCC Development Plan**.

This baseline height steps down to 3-5 Storeys to the North, East and West edges of the site to respond to the transition in scale to the existing context. This transition also takes account of the degree of separation distance and performance criteria such as daylight and sunlight access to adjoining dwellings and properties in order to achieve an appropriate response. An increase to 8 Storeys along Block D is proposed as a setback penthouse level which addresses Leopardstown Road and is opposite an open green space at the entrance to Tudor Lawns housing. To the North, this block addresses the central public open space and is circa 41M distance from the rear of the existing houses No. 22 to 25 Silverpines and 29M from the gable end of Ann Sullivane Centre which is considered a generous and acceptable separation distance.

The tallest aspect of the proposed scheme is a 10 Storey element which anchors the corner of Block D and addresses both the home zone street and forms the third elevation overlooking the communal open courtyard between Blocks A and B. This small ‘pop-up’ corner element is located in the centre of the site ensuring it is the furthest distance away from any existing residential properties. This element acts as a visual marker to the immediate surroundings and provides legibility to the development and character of the townscape approaching Leopardstown road from the M50 intersection. This subtle addition addresses this key ‘Gateway’ route and compliments developments in the foreground while contributing positively to legibility of the wider urban structure.

This assists with providing a sense of identity while facilitating good urban design and placemaking.

With reference to **The Urban Development and Building Heights guidelines for Planning Authorities 2018**, *Section 3.0 states that; “it is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in our town/ city cores and in other urban locations with good public transport accessibility”.*

In considering buildings taller than prevailing heights, these proposals meet the **National Planning Framework (NPF)** whose objectives it states is; *“focusing development in key urban centres and in particular, fulfilling targets relating to brownfield, infill development and in particular, effectively supporting the National Strategic Objective to deliver compact growth in our centres”.*

We contend that the proposed development satisfies **SPPR3 (A) of The Urban Development and Building Heights guidelines for Planning Authorities 2018**, and in respect of section 3.2 of the guidelines, we note the following justification in respect of the relevant criteria as listed below:

### **At the scale of the relevant city/ town:**

***“The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport”.***

The site is exceptionally well served by public transport. This has been comprehensively addressed by BMC and ILTP in the submitted application and ILTP will provide further detail in their submission and statement of evidence.

***“Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect”.***

We note the designation of the Architectural Conservation Area (ACA) in proximity to the Northwest of the site known as the Chase and contend the stepping down in height and scale of the proposed 3 Storey Block F along the North and West boundary is in keeping with the scale of the existing surrounding built context. Furthermore, 22M separation distances are maintained between opposing first floor windows.

We also refer to potential concerns raised in the CE report regarding impacts of the development ***“on the identity and ledgibility of Sandyford and Central Park as designated centres for future growth, potentially undermining the primacy of Sandyford District”.*** We contend that the tallest element, proposed at 10 storeys will not unduly impact on legibility of the wider urban area in respect of Sandyford Central District given the relative distances involved to the North and the nature of existing development comprising Woodland residential neighbourhood and light industrial context around Blackthorn Avenue, between the subject site and Sandyford Central District.

These proposals are supported by a landscape visual impact assessment (LVIA) which will be elaborated on further in the proof of evidence presentation to be provided by Richard Butler from Model works.

### **At the scale of district/ neighborhood/ street:**

(Fig.35 Proposed View at Entrance on Leopardstown road)

***“The proposals outlined responds to its overall natural and built environment and make a positive contribution to the urban neighborhood and streetscape”.***

The character and public realm area within the site provides for an openness with high quality public open space at its centre and contained by proposed Block D to the South. This open space is activated by a public pedestrian and cycle route through the site providing permeability and ease of access to connect to the existing greenways route along the Eastern boundary on the old railway line on North to the Sandyford Luas stop. A wide aperture is provided between Blocks F and D along Leopardstown road which provides breathing space and a view towards St. Joseph's house as a focal point in the distance. This arrival space into the development is anchored by a local café facility and sets up an attractive short cut and route through the development for residents and the wider surrounding community. In addition, to this important public route, the arrangement of buildings along Leopardstown road activate this edge and the street by providing 'own door' accessible apartments at ground level combined with a sequence of incidental green pockets and semi mature tree line with additional enhancements to the public footpath and cycle lane along Leopardstown road.

This active public frontage will replace and greatly improve the current edge condition characterized by the continuous abrupt and defensive high stone wall.

***"The proposals are not monolithic and avoid long, uninterrupted walls of building in the form of slab blocks with material/ building fabric well considered".***

As illustrated and described under item 3.3, the consideration of the shape, form and material expression of the series of proposed buildings forming the streetscape along Leopardstown road have been carefully articulated to provide, variety and interest with an attractive streetscape composition.

***"The proposal enhances the urban design context for public spaces and key thoroughfares... thereby enabling additional height in development form to be favorably considered in terms of enhancing a sense of scale and enclosure".***

This is the case with respect to the proposed Block D massing and height. Given its more central position on the site and with respect to its considerable separation distance to any existing surrounding built context, it has the ability to provide additional height without negatively impacting on the residential amenity of existing dwellings. As such, we arrived at 8 Storeys as being appropriate for the principal building element while still meeting the relevant BRE standards for sunlight access to the central public open space to the North. The height and scale of this building is considered appropriate to address the Leopardstown road while also providing a sense of enclosure to the public open space formed to the North.

The provision of a 'pop-up' 10 Storey element at the corner of this building enhances the urban design context by marking the centre of the development and the intersection of the East/ West public pedestrian/ cycle route across the site with the access and home zone further East which connects to St. Joseph's house. This subtle visual marker anchors the main resident facilities at the base of this building.

***"The proposal makes a positive contribution to the improvement of legibility through the site and wider surrounding neighborhood area within which the development is situated and integrates in a cohesive manner".***

***“The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighborhood”.***

The provision of apartments provides for an alternative and affordable model to the more established, traditional 3- and 4-bedroom private housing typology in the immediate vicinity. The proposed development will comprise of a mixture of apartment types and sizes from studios, 1 beds, 2 beds and 3 beds providing additional choice and badly needed supply in the area which is supported by high employment around Sandyford and Central Park in close proximity to the site.

### **At the scale of the site/ building:**

***“The form, massing and height of the proposed development is carefully modulated so as to maximize access to natural daylight, ventilation and views and minimize overshadowing and loss of light”.***

***“Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's ‘Site Layout Planning for Daylight and Sunlight’ (2<sup>nd</sup> edition or BS 8206-2: 2008 - ‘Lighting for Buildings – Part 2: Code of Practice for Daylighting’.***

***“Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanala should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution”.***

These aspects are supported by a detailed daylight and sunlight assessment which will be elaborated on further in the proof of evidence presentation to be provided by Amy Hastings from ARC.

It is noted that specific assessments to support proposals at some or all of the scales described above have been provided with the application and include the following:

- **Micro-Climate Assessment**
- **Architectural Conservation Report**
- **Environmental and Ecological Impact Assessment including EIA**

In summary, we are of the opinion that the height and density is appropriate given the zoning, National Policy and the detailed considered design response and rationale in relation to the developments site-specific characteristics, context and setting as setout above.

## 4.0 MODIFICATIONS FOR CONSIDERATION

**With reference to An Bord Pleanála’s agenda items (a) and (d) specifically and the request to provide further elaboration or justification of the proposals and to consider suggested amendments.**

We contend that the above sections 1-3 of our statement of evidence supported by visual material have provided further elaboration and justification of the proposals. As requested, we hereby present a series of potential amendments to the current proposed scheme design as **‘modifications for further discussion and consideration’**.

We trust the Board will consider these modifications as appropriate, but we remain convinced and fully support the merits of the original submitted application scheme. Notwithstanding this, the applicant is extremely keen to commence development on site and begin to deliver much needed housing in this key location. If the Board considers the modifications necessary to enable a grant of permission, then the applicant is willing to accept a condition to implement the proposed modifications.

OMP will provide an overview of these areas which are tabled for consideration and the design performance aspects will then be further elaborated on from our consultant team in respect of specific specialisms to include visual impact assessment, sunlight and daylight access and traffic/ transport.

### **ABP Item (a)**

***“Quality of Residential Amenity and Open spaces within the scheme as identified in the documents submitted, and as further highlighted by the Planning Authority and third parties, there are a number of areas within the scheme where the amenity afforded the future residents may be less than ideal and may be improved by amendment. The applicant is requested to provide further elaboration or justification of the proposals in respect of these areas and to consider the suggested amendments”***

### **ABP Item (d)**

***“Density, Height and Sustainability, the applicant is requested to consider the appropriateness of this in terms of reduced density and design, and to respond accordingly. This may require presentation/ submission at the oral hearing of further photomontages/ CGIs, sunlight/ daylight analysis in respect of proposed open spaces etc. And analysis of the capacity/ frequency of the public transport network”.***

(Fig.36 amendments for consideration)

As an overview we have tested the following potential amendments for consideration which we will explain in detail in this section. The areas considered are as follows:

### **Block B:**

#### **Removal of the 4 Storey return element to the Southeast of Blocks B.**

- Provide improved separation distance between Block B and Block C while enhancing communal open space provision and quality with the addition of a play space.



**Adjust top floor level to provide a setback penthouse arrangement to articulate the roofscape in line with Block A and D.**

- Reduce visual prominence of built form enhancing the interface with the existing residential area on Leopardstown Lawns to the East.
- Improved sunlight access to communal open spaces between Blocks A + B and B + C.
- Set back on East to Leopardstown Lawns is for maintenance access only therefore limiting any potential overlooking issues that might otherwise arise.

**Block D:**

**Removal of 1 full floor to the primary element thereby reducing the proposed height down to 7 Storeys (6+setback penthouse) and 9 Storey 'pop-up' element on the corner.**

- This reduces density, height and scale and in doing so also reduces the visual impact to private amenity areas and existing residential dwellings to the North.

**Block F:**

**Removal of 3 Apartments to provide greater setback of building from Northeast corner and boundary with existing residential dwellings at 22 – 25 Silver Pines.**

- Increased separation distance enhances privacy and reduces the extent of shadow cast to neighbours.
- Provides for the retention of Austrian Pine tree and Sycamore tree along this boundary while increasing green open space area as buffer to this edge.
- Relocation of access stairs to the gable end provides for improved quality of central communal open space within Block F courtyard.

**Removal of 1 floor from the proposed 6 Storey 'anchor' element at the interface with Leopardstown Road and entrance opposite Tudor Lawns.**

- Reduced height and scale on corner provide for better transition and interface with existing residential at Sir Ivors Mall to the West.
- Additionally the material of this 'anchor' element would change from the SHD submission to use the brown brick of the lower levels of Blocks C & D to create variety to the streetscape.

## 4.1 3D Massing Views

(Fig.37-46 3d massing model views)

The following sequence of massing model views illustrate the comparative changes in height and scale between the baseline SHD scheme of 463 units and the modified option representing a scheme of 428 units.

## 4.2 Site Sections + Height Modifications

(Fig.47,48 site sections)

This series of amended cross sections illustrate the key height changes. The red outline represents the baseline SHD scheme for comparison.



### **4.3 Site Layout Plan**

(Fig.49,50 site layout plans)

Similarly, SHD proposed Site Layout Plan as submitted with building heights referenced numerically compared to the amended version incorporating the above-mentioned potential amendments areas for consideration.

### **4.4 Detailed modifications to each block explained**

(Fig.51-57 block B supporting images)

(Fig.58-60 block D supporting images)

(Fig.61-66 block F supporting images)

The following sequence of slides illustrates clearly, and, in more detail, the specific layout changes identified to each of the building Blocks B, D and F.

### **4.5 Building Height Diagram (Comparative Assessment)**

(Fig.67 height diagram)

For ease of reference, the SHD proposed building height diagram and the modified height diagram are provided for comparison.

### **4.6 Summary Development Schedule (Comparative Assessment)**

(Fig.68 development schedule)

Finally, for ease of reference, summary development schedules as illustrated capture the key development statistics for comparison.

Thank You.

That completes the Statement of Evidence from O'Mahony Pike Architects.  
We would now like to invite our consultant team to further elaborate on these key modification items for consideration, with respect to their specific analysis relating to their specialist discipline.

## **Supporting Presentations**

- **Model works**
- **ARC**
- **ILTP**