Appendix 10
South Dublin County’s
Building Height and Density Guide
Building Height and Density Guide

Assessing Densities and Building Heights in South Dublin

April 2021
This document is a working draft issue of a *Building Height and Density Guide for the purpose of Assessing Greater Densities and Increased Building Heights in South Dublin* prepared by O’Mahony Pike Architects for South Dublin County Council. The draft has been produced with a focus on establishing appropriate assessment criteria that will enable proper consideration of development proposals for increased building height linked to the achievement of a greater density of development as required by the S28 ‘Urban Development and Building Height - Guidelines for Planning Authorities (2018)."
Figure 1: Higher Density Terraced Housing at Abode, Cambridge
1.1 WHAT IS THE PURPOSE OF THIS GUIDE?

This document serves two purposes:

1. To address the requirement under SPPR1 of the Urban Development and Building Height Guidelines (2018) and the need for planning authorities to explicitly identify, through their statutory plan, areas where building height will be actively pursued for redevelopment, regeneration and infill development; and

2. To provide a toolkit for the assessment of proposed increased building heights in development application and development management scenarios.

The National Planning Framework (NPF) articulated a set of shared goals for every community across the country to deliver a programme of compact urban growth. Achieving these goals requires significant change to planning policy in Ireland at national and regional level. The Urban Development and Building Height Guidelines described the planning criteria relevant to the consideration of increased building heights to achieve greater densities in our urban areas as part of this delivery of compact growth, and prohibits the use of explicit numerical height limits.

Determining appropriate building heights in the absence of numerical height limits is challenging for communities, applicants, and for planning officers. For development at higher densities to be successful, it must be informed by a variety of issues from planning policy to physical environment from the early design stages rather than just consider those issues at the planning stage. Similarly, in the absence of numerical height limits, the variety of factors informing the contextual appropriateness of an increased building height will need to be considered from the early design stages. To facilitate this process, this Guide presents a context-based view of building height in which the scale of proposed height increases is described with reference to the prevailing height of existing development and the proposed function of the building from an urban design perspective.

With regard to locating areas for increased building heights, this conceptual framework allows for the proactive consideration of increased heights within areas with specific land zoning designations well as on sites demonstrated as having the capacity to accommodate increased densities in line with national guidance. However, while increased height can be considered in these locations, it must be demonstrated on a case by case basis as that it is contextually appropriate to do so. The conceptual framework by which increased building heights are considered in relation to their context allows the development of urban design parameters by which the appropriateness or otherwise of the increased building height can be assessed.

With regard to this assessment of proposed increased building heights in development application and development management scenarios, the Guide outlines this process of contextual analysis as a ‘toolkit’ for use in design and planning processes. The resultant urban design parameters of the toolkit are then applied to a series of notional development scenarios to illustrate how these design considerations might be demonstrated by applicants in design statements and other associated application or engagement materials.
1.2 HOW SHOULD THIS GUIDE BE USED?

In line with its two stated purposes (Identification and Assessment), the Guide can be used in two ways.

1. Planning Policy and Guidance: Sections 2 & 3 work together to respond to statutory planning policy requirements and to describe the general approach to increased building heights and higher density forms within the South Dublin County Council Administrative Area in the absence of numerical height limits. They describe the ‘thinking’ around height from a planning perspective, providing applicants and decision-makers and all stakeholders with an understanding of how the urban design assessment parameters have been developed.

2. Assessment Toolkit: Sections 4 & 5 describe the key urban design considerations that should inform all proposals for higher density development in general – and for increased building heights in particular – and illustrates how these considerations might be demonstrated. Section 4 provides all stakeholders with a shared ‘vocabulary’ by which the impacts of increased heights and density – and the design strategies informing proposals – can be discussed. Section 5 illustrates how this vocabulary can be used to develop diagrammatic analyses of proposals and their settings to demonstrate contextual fit.

USING THE DOCUMENT

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With regard to the toolkit, the purpose of the assessment element of this document is to guide applicants through a process of contextual analysis by which the suitability or otherwise of different density and height levels can be assessed with reference to the receiving environment of the proposed development. Proposals are required to demonstrate to the satisfaction of South Dublin County Council that the overall positive benefits of the development justify the scale of increased height being proposed. There are two steps to this process:

1. An analysis of existing context; and
2. A demonstration that the proposed height increase is contextually appropriate.
The process of analysis of the existing context and demonstration of the design strategies it informs is intended to complement the Urban Design Manual - A Best Practice Guide (2009) which is already embedded in the design and planning processes for higher density and larger scale development proposals. Rather than introduce new requirements for either applicants or planning officers then, the process described by the toolkit is a complementary expansion of existing criteria-based analysis from the general consideration of higher densities toward the specific reasoned justification of increased heights.

The Guide presents additional questions that are specifically concerned with height as it relates to each of the twelve criteria established by the Urban Design Manual. These questions are intended as a framework by which the contextual analysis and design response can be approached and presented, rather than as an exhaustive checklist.

For applicants and designers, the questions in Section 04 should act as prompts to ensure that their understanding of the receiving environment of their proposals is comprehensive and has been clearly demonstrated, and that critical design strategies that respond to context are being clearly articulated in materials presented in development management scenarios. The indicative development scenarios illustrated in Section 05 meanwhile provide suggestions of how the contextual analysis and resultant design strategies might be illustrated, and provide built examples of design strategies that respond to the various scales of the questions from larger scale urban design to vertical expression or articulation of the facade at the building level.

For development management staff, the questions in Section 04 should act as prompts by which the robustness of the contextual analysis provided by applicants and the appropriateness of their design response proposed is interrogated. The language of the toolkit suggests a vocabulary that can be used at various scales of the project to better identify strengths or weaknesses in both analysis and design response, and by which to make suggestions for further design development if necessary. Section 05 might be of most use in the identification of design strategies that might be explored by applicants where it is suggested that the appropriateness of the response might be improved.

For both applicants and development management staff, it is anticipated that there will be development scenarios where the additional questions in the Guide are not relevant to a particular proposal or where the questions are relevant but suggest an innovative design solution. Similarly, it is anticipated that there will be scenarios where the contextual analysis identifies design sensitivities particular to the proposal that are not captured by the Guide. To this end, the Guide will be best used as a toolkit that requires active engagement by applicant and development management staff rather than a passive checklist. Engagement with the Guide should structure debate around proposals in the design development and pre-application stages of a project and allow assessment of its performance in a development application scenario. Such engagement will be critical to building consensus around a proposal in the absence of statutory numerical height designations.

It is suggested that all proposals for increased building heights will benefit from the structuring of pre-application processes according to an analysis of existing context and a demonstration of contextual appropriateness. This will encourage environmental-led design by ensuring that issues including – but not limited to – strategy; topography; site analysis; sunlight/daylight; wind tunnelling; microclimate; air quality; landscape impacts; protected views and vistas; aviation safeguard zones; etc. are identified at the early stages of a project to inform the proposal, rather than at later stages where such assessments might require wholesale changes and cause delays.
Figure 2: Higher density development with increased building height in a sensitive location at Mount Saint Annes, Dublin.
This Guide addresses the requirements of the Urban Development and Building Height Guidelines (2018) by identifying areas where proactive consideration will be given to increased building heights within the South Dublin County Council administrative area. In line with national guidance, it establishes criteria by which the contextual appropriateness of the proposed height increases will be assessed. The summary of planning policy context provided here focuses on the Building Height Guidelines, but the Guide also informed has regard to complementary policy advice including:

- Sustainable Urban Housing: Design Standards for New Apartments (2018);
- Best Practice Guidelines Quality Housing for Sustainable Communities (2007);
- Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2009);
- Design Manual for Urban Roads and Streets or ‘DMURS’ (2013); and

Additionally, special regard has been given to the Urban Design Manual – Best Practice Guidelines (2009) which identified a set of component questions at various scales which together formed a complete urban design analysis of development proposals at higher densities. In effect, the assessment component of this Guide expands certain parameters of the more general urban design assessment of the Urban Design Manual to more directly address issues to do with increased building heights in the intensification of development densities.

2.1 NATIONAL PLANNING FRAMEWORK

Project Ireland 2040 is the overarching policy and planning framework for the social, economic and cultural development of the country. It includes a 20-year National Planning Framework (NPF), together with a 10-year capital investment plan (the National Development Plan 2018-2027). The NPF is intended as a high level document providing a framework for future development and investment in Ireland – the overall plan from which other, more detailed, plans at regional, county and municipal level take their lead.

The NPF articulates a set of shared goals for every community across the country which are expressed as National Strategic Outcomes (NSOs). Broadly, the NPF seeks ‘good growth’ where a quantitative intensification of the density of our urban areas is accompanied by high quality placemaking and urbanism. NSO 1 – relating to compact growth – states:

- “Carefully managing the sustainable growth of compact cities, towns and villages will add value and create more attractive places in which people can live and work. All our urban settlements contain many potential development areas, centrally located and frequently publicly owned, that are suitable and capable of re-use to provide housing, jobs, amenities and services, but which need a streamlined and co-ordinated approach to their development, with investment in enabling infrastructure and supporting amenities, to realise their potential. Activating these strategic areas and achieving effective density and consolidation, rather than more sprawl of urban development, is a top priority.”

In addition to NSO 1, the NPF features a series of directly relevant National Policy Objectives (NPOs) that set targets around the delivery of a compact urban growth agenda. These include:

- NPO 2(a) relating to growth in our cities that sets the target that 50% of future population and employment growth will be focused in the existing five cities and their suburbs;
- NPO 3(a)/(b)/(c) relating to brownfield redevelopment targets;
• NPO 4 relating to attractive, well-designed livable neighbourhoods;
• NPO 5 relating to sufficient scale and quality of urban development;
• NPO 6 relating to the regeneration and rejuvenation of cities, towns and villages of all types and scale and increased residential population and employment in urban areas in order to sustainably influence and support their surrounding area;

Of specific relevance to this Guide, NPO 13 identifies building height as an important measure for urban areas to deliver and achieve compact growth as required. It states:

• “In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.”

2.2 URBAN DEVELOPMENT AND BUILDING HEIGHT GUIDELINES FOR PLANNING AUTHORITIES

To support the strategic goals of the NPF, the Urban Development and Building Heights Guidelines for Planning Authorities (the Building Height Guidelines) were published in December 2018 under Section 28 of the Planning and Development Act 2000 (as amended). Planning Authorities and An Bord Pleanála are required to have regard to these Guidelines and apply the relevant specific planning policy requirements (SPPRs) in carrying out their functions.

In this regard, SPPRs take precedence over any conflicting policies and objectives of development plans, local area plans and – subject to any necessary review – of strategic development zone planning schemes.

The Building Height Guidelines set relevant planning criteria for considering increased building height to achieve greater densities in various locations, but principally urban and city-centre locations and suburban and wider town locations. To ensure compliance at local level with the overarching planning policy requirements at national level, SPPR1 states:

• “In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/ city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.”

In respect to development plans, the Building Height Guidelines state that:

• “While achieving higher density does not automatically and constantly imply taller buildings alone, increased building height is a significant component in making optimal use of the capacity of sites in urban locations where transport, employment, services or retail development can achieve a requisite level of intensity for sustainability. Accordingly, the development plan must include the
positive disposition towards appropriate assessment criteria that will enable proper consideration of
development proposals for increased building height linked to the achievement of a greater density of
development.”

Broadly, SPPR’s 1 and 2 and their associated commentary can be considered to have implications for the
plan making function of Local Authorities. Taken together, they render mixed use forms of development
as broadly synonymous with intensification of use in a compact growth model, and therefore associated
with increased urban densities. As such, to satisfy the criteria set out in the Building Height Guidelines,
Development Plans must include consideration of these criteria that is sufficiently robust to avoid ongoing
uncertainty about the appropriate height and density of new development which could militate against its
prompt development.

SPPR’s 3 and 4 are directly associated with building height and development management processes. The
Building Height Guidelines include ‘Development Management Principles’ that planning authorities must
apply in considering development proposals for buildings taller than prevailing building heights in urban
areas. These associate higher density, mixed use forms of development in a compact growth model with
wider transport connectivity and urban design considerations derived from broadly locational criteria. In
the event of making a planning application, applicants are required to satisfactorily demonstrate that the
proposed development satisfies certain Development Management Criteria at three scales:

• The scale of the relevant city/town;
• The scale of district/ neighbourhood/ street; and
• The scale of the site/building.

SPPR 3 (A) (1) requires an applicant to demonstrate compliance with Section 3.2 Development Management
Criteria – which indicates in terms of location that the site must be ‘well served by public transport with high
capacity, frequent service and good links to other modes of public transport’. The subsequent High Court
Judicial Review [2020] IEHC 356 took the opinion that this must be existing transport and does not include
any planned future upgrade in public transport services in an area. As such, the locations identified by this
Guide for increased development densities and building heights are focussed within c. 1200m of existing
Multiple Transport Nodes within the County (including Tallaght, Adamstown, Clonburris, Naas Road, and
to a lesser extent Fortunestown given LUAS is main transport network and existing bus service does not
serve the western part of the settlement). Proposals outside of these areas will be generally considered less
appropriate locations for significantly increased scales of development. For the purposes of relevance to
the predominant forms of development expected in these locations, the Guide is focused on mid to higher
density developments.

2.3 SOUTH DUBLIN COUNTY DEVELOPMENT PLAN 2022-2028

The South Dublin County Development Plan sets out the overall core strategy and specific objectives
for the proper planning and sustainable development of the entire administrative area of South Dublin
County Council that extends to 223sq. kilometres. The County has grown around the nine main villages in
Clondalkin, Lucan, Palmerstown, Rathfarnham, Tallaght, Templeogue, Saggart, Rathcoole and Newcastle
and is bounded by adjoining counties of Wicklow, Kildare, Dublin City, Fingal and Dun Laoghaire.

This Guide contributes to the South Dublin County Development Plan 2022-2028 in setting out the land use
framework to guide future development with a focus on the places we live, the places we work, and how
we interact and move between these places while protecting our environment. The Plan describes a future
vision and plan for South Dublin's growing communities, places, housing, jobs, sustainable transport and
the delivery of services. It describes the strategy to co-ordinate and prioritise areas of population growth
as South Dublin moves towards an additional 80,000 people and 32,000 new homes by 2040 in line with
national targets.

This Guide assists the Plan in identifying sites that have the potential to accommodate this residential
growth and to enable decisions to be made on the appropriate density and building height in these
locations. In line with requirements of the Building Height Guidelines, it informs policies and objectives
within the South Dublin County Development Plan incorporated into Chapter 5 Quality Design and Healthy
Place-making.
2.4 PLANNING POLICY REQUIREMENTS

To satisfy the requirements of the Urban Development and Building Heights Guidelines for Planning Authorities, this Guide is required to respond to the provisions of SPPR 1 & 3 in particular, to provide the following:

- To address the requirement under SPPR1 planning authorities to identify, through their statutory plan, areas where building height will be actively pursued for redevelopment, regeneration and infill development; and
- To provide a toolkit for the assessment of proposed increased building heights in development application and development management scenarios.

Four distinct categories of development management criteria are identified as being required to avoid ongoing uncertainty about the appropriate height for buildings on a particular site. These categories are:

1. At the scale of the relevant City/Town:
   - The site must be well served by public transport with high capacity, frequent service and good links to other modes of public transport;
   - Where development proposals incorporate increased building height, these should successfully integrate into or enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, and the protection of key views;
   - On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces and using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.

2. At the scale of the District/Neighbourhood/Street:
   - The proposal must respond to its overall natural and built environment and make a positive contribution to the urban neighbourhood and streetscape;
   - The proposal must not be monolithic and must avoid long, uninterrupted walls of building in the form of slab blocks with materials/building fabric well considered;
   - The proposal must enhance the urban design context for public spaces and key thoroughfares thereby enabling additional height and development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of 'The Flood Risk Management Guidelines';
   - The proposal must make a positive contribution to the improvement of legibility through the site or wider urban area;
   - The proposal must positively contribute to the mix of uses and/or building/dwelling typologies available in the neighbourhood

3. At the scale of the Site/Building:
   - The form, massing and height of proposed developments should be carefully modulated so as to ‘maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light’;
   - Where a proposal may not be able to fully meet all the requirements of the daylight provisions set out above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out.

4. Any identified specific criteria.
   - including micro-climate; biodiversity; telecommunications infrastructure; heritage; etc.
SPPR 3 (A) (1) requires applicants to demonstrate compliance with Section 3.2 Development Management Criteria which, in terms of location, indicates that the site is well served by public transport with high capacity, frequent service and good links to other modes of public transport. As described previously, this Guide incorporates the findings of High Court Judicial Review [2020] IEHC 356 that this must be existing transport and does not include any planned future upgrade in public transport services in an area and therefore identifies suitable sites as being focussed within c. 1200m of existing Multiple Transport Nodes within the County.

The High Court Judicial Review [2020] IEHC 356 further established that applicants are required not only to demonstrate that the criteria of SPPR 3 have been addressed, but also that an appropriate response to them has been incorporated into the design of the development proposa. Effectively, the requirement is for the reasoned justification of the proposed increased height by means of demonstration that the proposal has been designed not only to mitigate any negative impact on the existing urban environment but in fact makes a positive contribution.

It follows that such a demonstration must begin with a contextual analysis of the urban fabric of the receiving environment of the development proposal at the scale appropriate to the increased height proposed, before proceeding to describe how the proposal will make a positive contribution to the urban fabric at that scale.

In line with NPO35 and SPPR1, this Guide supports the objective of the Plan to proactively consider increased building heights on lands zoned Regen, MRC, DC, LC, TC and Res-N as well as sites identified and on sites demonstrated as having the capacity to accommodate increased densities in line with the locational criteria of Sustainable Urban Housing: Design Standards for New Apartments (2018) where it is clearly demonstrated by means of an urban design analysis carried out in accordance with the provisions of the South Dublin Building Height and Density Guide that it is contextually appropriate to do so.
Figure 3: Higher density development making a positive contribution by establishing a new public realm link to a local landmark at Roe Lane Dublin.
3.1 BUILDING HEIGHT TERMINOLOGY

Discussions around increased building heights are often freighted with misunderstanding. The ‘Increased Building Heights’ suggested by the national guidance are not necessarily synonymous with ‘Tall Buildings’. Building height can be described in a variety of ways – in a measure overall height; as an expression of a number of floors; by height of parapet or ridge; etc. Whatever the measure applied, building heights significantly define the character of our urban areas. Unless they are defined by policy, terms such as ‘Tall Buildings’ or ‘Taller Buildings’ or ‘High Building’ risk being subjective descriptions rather than objective terms that enable debate and consensus around this important issue.

To this end, this Guide provides a terminology for the discussion of heights. The aim of providing such a glossary is not to limit debate or delegitimize other conceptions of height that may be appropriate descriptions in other contexts; rather, it is intended to allow a more precise identification of issues attached to building heights in both planning engagement and development management scenarios.

In line with the proscription of numerical height restrictions imposed by the Building Height Guidelines, building heights in this Guide are considered thematically in relation to their context. As such, the key terms for discussion of heights are as follows:

• Prevailing Height:

Any proposal for increased building heights needs first to identify the extent of the increase in height over existing patterns of development in the area in which it is proposed. This is an identification of the prevailing height by means of a contextual urban analysis at the relevant scale of the proposal i.e. at the scale of the city, the neighbourhood, the block or the street depending on the size of the development proposed. The prevailing building height is the most commonly occurring height of buildings within an area of common character and at the contextual scale at which the proposal is to be assessed. The prevailing building height of a specific street may be different to the prevailing building height of the wider neighbourhood and a site might in some instances be large enough to effect a transition between the two.

Figure 4: New development in line with prevailing heights at Prah Road, London.
• Thematic Height:

In certain urban areas, for example Georgian Dublin, the prevailing height may be closely linked to a specific form of development from which the area derives its character. In such instances, it might be appropriate to refer to Prevailing Height as Thematic Height in order to signal the presence of specific contextual issues around built environment heritage or historic concerns.

• Amplified Heights:

There may be existing buildings or parts of buildings within the streetscape or neighbourhood that deviate from the prevailing height but not to such an extent as to be considered a significant, or non-thematic, variation. Often, these amplified heights reflect design strategies by which the buildings seek to make a positive contribution to the variety and visual interest of the streetscape. In some instances, parts of the building may be vertically expressed or ‘popped-up’ to aid in legibility and wayfinding at the local level. Such instances of amplified height do not necessarily denote a contextual precedent to which new developments can respond in kind with increased heights.

Figure 5: New development at Fitzwilliam Place Dublin responding to the thematic heights of adjacent Georgian developments and amplifying height at the corner of the block.

• Apparent Height:

There may be existing buildings or parts of buildings within the streetscape or neighbourhood that deviate from the prevailing height in a more comprehensive fashion than selective amplification of part of the building’s form by instead setting back floors above the prevailing or thematic height as a secondary massing while the primary building façade provides a ‘shoulder’ that maintains the prevailing height of the street. In such instances, it might be appropriate to refer to the apparent height of the building depending on how successfully the secondary mass of increased height has been mitigated by design strategies.

• Contextual Heights:

While the prevailing height is the general measure of heights in the surrounding area, the analysis of contextual height will include and identify all of the variations in apparent height and amplified heights that are relevant to any rationale for or justification of increased building heights in a new development. From such an analysis, it might be seen that there are buildings present that are significantly taller than the prevailing heights. Some of these buildings will likely be the result of historical accidents; equally, some might be performing an intended role within the local environment. These will require careful consideration within the urban analysis as their presence alone does not connote an emerging context of increased heights or a precedent for individual increase of development heights. A comprehensive analysis of prevailing and thematic heights and the function and location of variations to these within the urban area will result in an understanding of the contextual height of the receiving environment of the proposed development.
Contextual Height (CH) Ratio:

This mode of analysis frames building heights relative to their context – so a ten-storey building is ‘tall’ in the context of a two-storey streetscape, but is only ‘taller’ in a block where the prevailing height is eight-storeys. Building heights are increased relative to the prevailing heights in their vicinity. As a rule of thumb, it will be useful to present proposals for increased building heights as an expression of their amplification of prevailing heights by means of a contextual height ratio – a multiplier factor of prevailing heights. For example, a ten-storey building is 5xCH in a two-storey streetscape but 1.25xCH in an eight-storey streetscape. Such a measure provides a clear indication of the scale of change proposed in the built environment without utilizing the more subjective terminology of tall/taller or high/higher buildings. Proposed increased heights should be proportionate to the role and function of the buildings and the scale of their impact on the receiving environment. By this measure, the more prominent a role the development plays at the larger urban scale the more a larger contextual height ratio would be expected; conversely the more locally-oriented a role the building plays the lower the expected contextual height ratio.

Figure 6: Development at Camden Courtyards, London where the apparent height of the building has been reduced by setting back the top two floors.

Figure 7: Contextual Heights at Clancy Quay Dublin - the eight-storey Building C can be expressed as a contextual height ratio of 4xCH relative to the historic buildings A or 1.25xCH relative to the newer development at Building B.
Landmark Buildings:

A common source of misunderstanding is the arbitrary designation of terms such as ‘landmark’ or ‘gateway’ to justify significantly scaled increases in building heights. With reference to the provisions of the Urban Development and Building Height Guidelines, Landmark Buildings are understood as being interventions in the urban fabric that are distinctive in their form of development and provide legibility at an appropriate urban scale to signal the presence of a significant urban function i.e. an important public transport interchange or node; an important gateway to an urban or character or landscape area; a large scale public or civic amenity or facility; etc.

Types of Landmark Buildings:

Landmark Buildings by our definition can function at different scales. This is consistent with our analysis of height as outlined earlier by which proposed increased heights should be proportionate to the role and function of the buildings and the scale of their impact on the receiving environment. From the point of view of contextual height ratios, we can say that the more significant the proposed landmark the more we might expect a larger contextual height ratio; the more locally-oriented the landmark the lower the expected contextual height ratio. The scale of the landmark is then understood as proportionate to its role as a placemaking object within the urban fabric and the extent to which that landmark function extends beyond the local area.

The Urban Development and Building Height Guidelines provides the following classifications for landmarks:

- Metropolitan Landmarks i.e. landmarks with a function at the scale of the relevant City/ Town;
- District Landmarks i.e. landmarks with a function at the level of the District/ Neighbourhood/ Street;
- Local Landmarks i.e. landmarks with a function at the level of the Site/ Building.

There is potential for misunderstanding around the designation of Metropolitan Landmark within the South Dublin County Council Administrative Area given that the county is within the wider metropolitan area of Dublin. As such, for the purposes of discussing proposals for proportionate increases in building height relative to the scale of the landmark this document instead uses the following classifications:

- Primary Landmarks i.e. landmarks with a function at the scale of the urban centre. (An example would include the general increase in building heights in Tallaght Town Centre to signal the civic function and the specific increase in building height of the south-west block in the Belgard Square West development to mark the location of the Luas terminus);
• Secondary Landmarks i.e. landmarks with a function at the neighbourhood scale. (An example would include the amplification of height and vertical expression of the mixed use building on Adamstown Avenue signaling the gateway to the new neighbourhood);

• Local Marker i.e. landmarks with a placemaking function within a streetscape or development area. (An example would be the expression of the tower form in the Carnegie Library on Monastery Road Clondalkin to signal the public function of the building).

3.2 JUSTIFICATION OF LANDMARK BUILDINGS

It follows from the above that not all increases in building heights will connote landmarks and that not all landmarks will justify an increase in building heights. In the local marker example, the height of the tower element is no different to the general building height of the library. The local marker function has been achieved by the articulation of a secondary mass from the main building and its distinct vertical expression. Similarly, the general height increases in the primary landmark example did not preclude an increase in building height within the development block between Cookstown Way and Belgard Square West south of the civic centre. The vertical expression of the increase building height here serves a function at the urban scale to identify the town centre area from the N81 to the south. In the Adamstown example the gateway nature of the site justifies a secondary landmark at the neighbourhood scale. However, the extents of height increase is limited and setback from the primary massing along the Adamstown Avenue streetscape. The gateway function is primarily achieved by means of the vertical expression of a limited articulation of height.
Justification for landmark heights should be seen then as closely linked to their function and the positive contribution they can make to the urban fabric in service of this function.

Any proposal for landmark increases in building heights then will need to demonstrate not only that the increased height proposed is generally contextually appropriate but also that the proportionate function of the landmark justifies it. As such, while landmark heights are a specific class of proposal for increased height derived from a specific urban function, the process by which their appropriateness or otherwise is demonstrated is no different to any proposal for increased building heights – it begins with a contextual analysis of the urban fabric of the receiving environment of the development proposal at the scale appropriate to the increased height proposed, and proceeds to describe how the proposal will make a positive contribution to the urban fabric at that scale.

3.3 ANALYSIS OF EXISTING URBAN CONTEXT

Increased building heights are not automatically required to deliver higher densities, as significant intensification can result from a combination of the use of mid-rise forms of development with incremental densification strategies. However, the 2018 Building Height Guidelines link increased building heights to higher density forms of development and tie both back to considerations of transport interconnectivity, in line with the locational criteria for increased density established by the 2018 Sustainable Urban Housing: Design Standards for New Apartments.

Before increased heights can be considered then, proposals will need to demonstrate firstly that the site is appropriate to the delivery of higher density forms of development and that design strategies are being employed through the higher density development to make a positive contribution to the setting. Justification for increased height follows this initial demonstration, and should show that no lessening of a positive contribution results from the increased height proposed. Indeed, increased heights will preferably enable an increase in the positive contribution made by the proposal. Such an approach encourages context-led design by ensuring that environmental issues including – but not limited to – strategy; topography; site analysis; sunlight/daylight; wind tunnelling; microclimate; air quality; landscape impacts; protected views and vistas; aviation safeguard zones; etc. are identified at the early stages of a project to inform and benefit the proposal (for example by protecting views into surrounding character areas by capturing or framing them by the layout of the proposed development as illustrated in Figure 3 above) rather than at later stages where such assessments might require wholesale changes and cause delays.

The analysis of existing urban context must be undertaken across a variety of scales appropriate to the increases in height and density being sought by the proposal. In light of the linking of increased heights with sustainable densities derived from locational criteria, the scale of the analysis should allow for demonstration that the increased building height proposed is a necessary or desirable component in
making optimal use of the development site over alternative design approaches in line with prevailing heights.

It is anticipated that in most proposals for increased height the urban analysis will rightly have a particular focus on the immediate streets and spaces adjoining the proposal and will identify the prevailing height, scale and massings of surrounding buildings, streets and spaces. It is important to reiterate however that the urban analysis in all cases is expected to take in the three scales of the city, the neighbourhood and the site. By consistently operating across these three scales the rationale for increased height will be more deeply engaged with the urban elements of the existing context that comprise its character and so be more equipped to demonstrate how they are related to and dependent on one another. The urban analysis ultimately aims to better understand the complexity of the setting to ensure that new development does not dilute it.

3.4 Higher densities and placemaking

Effective placemaking practice has been defined by the international 'Project for Public Spaces' as a process that 'capitalises on a local community's assets, inspiration, and potential, and it results in the creation of quality public spaces that contribute to people's health, happiness, and well being'. It identifies placemaking as being 'more than just promoting better urban design' and instead a process that 'facilitates creative patterns of use, paying particular attention to the physical, cultural, and social identities that define a place and support its ongoing evolution'.

Placemaking is of particular importance where higher densities of residential development and intensification of mixed use is being proposed. Placemaking can be understood across a variety of scales. From a larger scale perspective, higher densities support good placemaking because with increased human occupation of the urban area comes increased ridership for public transport infrastructure and increased footfall to support non-residential uses that lend vibrancy to our towns and villages. The critical mass that results from increased density cannot be underestimated in the contribution it makes to the vitality of the urban area.

Figure 12: Project for Public Spaces ‘Placemaking Wheel’.

3.4 HIGHER DENSITIES AND PLACEMAKING

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Conversely however, such critical mass places additional pressures on the performance of our urban spaces. With increased occupation, concepts of ‘neighbourliness’ become critical. The scale of the site or building is the ‘human scale’ of the city – both the strongest social level of the urban area and the scale at which we engage with place. While cities can be strategically planned and neighbourhoods masterplanned, this is the scale at which we physically design and construct. It is at this scale that barriers to movement, severance between districts and inequality of place is enacted.

Proposals for higher densities must ensure that they are enacting design strategies at the tactical level that will improve quality of life. There are many ways this can be achieved. Form, massing and height can be modulated so as to maximise access to natural daylight and ventilation, take advantage of views and minimise overshadowing. Development blocks can be sited to reduce loss of daylight access in existing adjacent development. The layouts of streets and squares within the development can be arranged to provide areas of respite and cross-generational contact to foster a sense of community. The building frontages can be carefully designed to avoid monotonous and provide visual interest. Ultimately, the precise metric of what is an appropriate density is contextually led. A neighbourhood needs to have enough people living in it to support local uses and facilitate growth. If a neighbourhood is vibrant it will encourage visitors from other neighbourhoods. If desire lines are set up between neighbourhoods at a local level then good connections can be made in the public realm. Without critical mass, social infrastructure is hard to support and communities difficult to form. Without local communities, lively public spaces are difficult to achieve. Ultimately, the reasoned justification must show how the increased densities enables a mix of uses and typologies that will ensure that the neighbourhood is sufficiently resilient to support mixed use.

3.5 DEMONSTRATING POSITIVE CONTRIBUTIONS

The Urban Design Manual (2009) identifies a good neighbourhood as one where people can easily satisfy daily needs whilst feeling safe as they do so. At the neighbourhood scale, it suggests the following criteria as prompts toward the promotion of better urban design at the neighbourhood scale:

- Context: How does the development respond to its surroundings?
- Connections: How well connected is the new neighbourhood?
- Inclusivity: How easily can people use and access the development?
- Variety: How does the development promote a good mix of activities?

These urban design criteria align with more recent ideas around settlements of short distances that find expression in County Development Plan aims to strive towards the delivery of connected neighbourhoods and the 10-minute settlement concept through the promotion of a compact settlement form and sustainable movement. The intention of the higher densities and increased building heights associated with a compact growth is to positively contribute to the development of these characteristics in our urban areas. The Building Height Guidelines identify three positive contributions to be made at the scale of the district/neighbourhood/street in any proposal for increased height:

![Figure 13: Increased building heights scaled and oriented to provide supervision of a public open space at Marianella, Dublin.](image-url)
• that the proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009);

• that the proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner; and

• that the proposal positively contributes to the mix of uses and/or building/dwelling typologies available in the neighbourhood.

It is clear from the close correlation between the two sets of criteria that in order to demonstrate the positive contribution required to justify increased development densities and/ or increased building heights, a comprehensive urban design analysis of the receiving environment is required to determine the proportionate scale of increase that can be supported and the appropriate form of development it should take.

It will be particularly important for proposals for Primary Landmark heights within a more general proposal of increased density and building heights will specifically need to present robust analysis at the scales of the relevant district, neighbourhood and street. It is likely that proposals at this scale will take two distinct forms: significantly scaled brownfield opportunity sites and smaller scaled prominent infill sites. Opportunity sites are likely to present opportunities for more significant increases in density. Some, by virtue of their size, will have the potential to define their own setting. Often, such sites will have the ability to present frontages in line with prevailing heights of the existing context and layer non-thematic heights within the depth of the site. Proposals for increased height are obliged to demonstrate the improvements they afford to the legibility of the wider urban area with an expectation that increased densities add to the mix of uses and/ or building/dwelling typologies available in the neighbourhood. To do so, analysis at this scale will need to define key forms of development and the provision of public amenity in the natural and built environment to which the proposals are responding, and identify deficiencies in the setting to which they can make a positive contribution and – where possible – remedy. Specific characteristics of existing built form will need to be described that can be referenced to assist with contextual fit of new development. The intention here is not to describe architectural styles that must be replicated, but rather to understand elements such as vertical expression; streetscape articulation; frontage lengths; layering and filigree; solid wall to window ratios; materials and external assembly; and landscaping, etc. that can inform contemporary design.

Figure 14: Development of a pocket park with street furniture as an area for respite or cross-generational contact within the higher density environment of Marmalade Lane, UK.
3.6 DESIGN STRATEGIES

Given the interaction of different urban design principles across multiple scales of placemaking ideas, the clear articulation of design strategies being employed and the legible demonstration of the positive contribution they make to the resultant higher density environments is critical. The process of contextual analysis and design demonstration described by this Guide is specifically aimed at establishing a ‘vocabulary’ that enables clear communication between applicants and development management staff not only in the discussion of appropriate heights and densities but also in the discussion of design quality in these environments.

Section 04 | Contextual Analysis Toolkit is intended to facilitate the demonstration by the applicant of the design strategies their proposal employs not only in terms of the contextual prompts that have informed them but also how they enable the proposal to make a positive contribution to the urban area. It is understood that the proposal will embody a series of different design strategies at different scales that interact within a cohesive overall approach to the delivery of the positive contribution. As such, a set of urban design principles will be established, each of which might have a variety of detailed design solutions. Within a development management scenario, it should be possible to establish the urban design principles at an early stage while still maintaining flexibility in the final resolution of the design. Similarly, within an agreed set of urban design principles it should be possible for some components to be accepted and others disputed. For instance, it might be that the context supports a general increase in building heights beyond the prevailing height of the receiving environment as this serves to supervise and enclose a well-located and appropriately scaled new public space for the neighbourhood without doing undue harm to the character of the neighbourhood. However, the scale of taller point-height elements proposed may not be accepted as proportionately scaled
in relation to the new space provided. In such a scenario, the aim would be to allow certain elements of the proposal to be decoupled from others so that basic strategies across the site do not need to be constantly revisited.

For applicants and designers, the questions in Section 04 should act as prompts to ensure that their understanding of the receiving environment of their proposals is comprehensive and has been clearly demonstrated, and that critical design strategies that respond to context are being clearly articulated in materials presented in development management scenarios. The indicative development scenarios illustrated in Section 05 meanwhile provide suggestions of how the contextual analysis and resultant design strategies might be illustrated, and provide built examples of design strategies that respond to the various scales of the questions from larger scale urban design to vertical expression or articulation of the facade at the building level.

For development management staff, the questions in Section 04 should act as prompts by which the robustness of the contextual analysis provided by applicants and the appropriateness of their design response proposed is interrogated. The language of the toolkit suggests a vocabulary that can be used at various scales of the project to discuss the proposals with applicants and identify areas strengths or weaknesses of either the analysis or the design response. Section 05 might be of most use in the identification of design strategies that might be explored by applicants where it is suggested that the appropriateness of the response might be improved.

For both applicants and development management staff, it is anticipated that there will be development scenarios where the additional questions in the Guide are not relevant to a particular proposal or where the questions are relevant but suggest an innovative design solution. Similarly, it is anticipated that there will be scenarios where the contextual analysis identifies design sensitivities particular to the proposal that are not captured by the Guide. To this end, the Guide will be best used as a toolkit that requires active engagement by applicant and development management staff rather than a passive checklist. Engagement with the Guide should structure debate around proposals in the design development and pre-application stages of a project and allow assessment of its performance in a development application scenario. Such engagement will be critical to building consensus around a proposal in the absence of statutory numerical height designations.
Figure 18: Vertical expression and facade treatment to a new public space within a higher density proposal for increased building heights in Dublin.
4.1 CRITERIA-BASED ASSESSMENT

The purpose of the assessment element of this document is to guide applicants through a process of contextual analysis by which the suitability or otherwise of different density and height levels can be assessed with reference to the receiving environment of the proposed development. Proposals are required to demonstrate to the satisfaction of South Dublin County Council that the overall positive benefits of the development justify the scale of increased height being proposed. A criteria-based approach is proposed for the toolkit described by the Guide for the clarity it brings to illustrating design strategies and their benefits as reasoned justification for increased heights in a specific location.

The criteria-based approach establishes a set of assessment criteria and requires applicants to comprehensively address these criteria in their planning submissions. They are an established advisory tool in our national planning processes for evaluating the design quality of proposed development. The toolkit is intended to facilitate the structuring of a context-led discussion around the design process and assessment of the design excellence of individual projects. There are two steps to this process:

1. An analysis of existing context; and
2. A demonstration that the proposed height increase is contextually appropriate.

The process of analysis of the existing context and demonstration of the design strategies it informs is intended to complement the ‘Urban Design Manual - A Best Practice Guide’ (2009) which is already embedded in the design and planning processes for higher density and larger scale development proposals.

4.2 URBAN DESIGN CRITERIA & KEY THEMES

The Urban Design Manual is based around 12 Criteria that encapsulate a range of design considerations relevant to the design of larger residential mixed-use developments at higher densities. These 12 Criteria form the basis for a shared vocabulary of widely-accepted best practice urban design and placemaking principles by which contextual analysis can be described. From such a description, a clear graphic demonstration of how these concepts act on and through the development proposal can be provided.

Rather than introduce new requirements for either applicants or planning officers, the process described by the toolkit is a complementary expansion of this existing criteria-based analysis that extends it from the general consideration of higher densities toward the specific reasoned justification of increased heights. The Guide presents additional questions that are specifically concerned with height as it relates to each of the 12 Criteria established by the Urban Design Manual.

The toolkit does not represent an exhaustive list of considerations, as it is expected that the iterative interrogation of proposals will be required through development management processes to determine the most relevant issues specific to individual site. However, key themes can be identified that include:

- the need to identify whether the site is sufficiently served by public transport to meet the requirement that higher densities are supported by good transport connectivity;
- the ability of the proposal to demonstrate a proportionate positive contribution to the overall legibility of the city whether by means of variety, distinctiveness or layout;
- the contribution of local markers to the creation of attractive, distinctive places by helping in the legible navigation of the urban area at the smaller, more local scale;
• the contribution of increased densities to the development of mixed-use environments where the needs of both the resident populations and the transient populations (whether that of workers occupying daytime use or evening visitors) have been considered;

• management of traffic and parking arrangements to meet the community’s needs and allow the safe and free movement of people of all ages and levels of mobility;

• the identification of appropriate densities informed not only by national strategic planning targets but also by transport connectivity and local character.
4.3 CONTEXTUAL ANALYSIS TOOLKIT

4.3.1 CONTEXT

• Is the site well served by public transport with high capacity, frequent service and good links to other modes of public transport by which it links to the wider city and region?

  • High levels of connectivity are a prerequisite for increased densities and increased building heights, with primary landmarks generally only appropriate in locations within c.1200m of existing multiple transport nodes.

  • More generally, transport and mobility infrastructure, and its ability to absorb the impacts related to increases in urban density will be key considerations in assessing the contextual fit. Densities are expected to be higher the closer they are to LUAS and Bus Connects corridors and lower elsewhere. Proposals seeking increased heights in locations that are not well connected by public transport should be avoided.

• Has the proposal adopted an approach to urban intensification proportionate to its setting?

  • Many parts of the administrative area offer opportunities for modest increases in height through sensitive urban infill to achieve more appropriate urban densities. A more limited number of areas will present opportunities for more significant increases in height and density.

  • Proposals for primary landmark heights should identify their landmark function within the wider settlement and determine the appropriate scaled positive contribution such a landmark can make to the urban area. Where these criteria cannot be met, proposals for landmark developments should be avoided.

  • The design objective of the proposal and the nature of the landmark function served should be clearly described with reference to its setting within the settlement hierarchy. Character areas and contextual prompts such as views or distinctive highly trafficked routes within the urban area should be identified to support this objective.

Figure 20: Luas at Tallaght Town Centre

Figure 21: Tallaght Town Centre
• Is the increased height proposed required for density?

• Increased heights are not automatically required to deliver higher densities, as significant intensification can result from a combination of the use of mid-rise forms of development with incremental densification strategies. In light of the preceding questions, a reasoned justification should be made for the increased building height proposed as a necessary or desirable component in making optimal use of the capacity of the development site over alternative design approaches in line with prevailing heights.

• Where increased heights are not required to achieve densities, proposals for increased heights should be limited to individual amplifications of height or vertical expression in locations where they serve a placemaking function.

Figure 22: The development at Marmalade Lane achieves higher densities at a predominately two-storey scale without recourse to increased building heights beyond the limited use of three-storeys.
4.3.2 SETTING

• How does the proposal respond positively to its surroundings?

• Assessment of the positive contributions a proposal can make to its setting cannot be presented without a clear illustration of the receiving environment as it currently exists. A neighbourhood context appraisal should identify characteristic features that have will inform the development proposal, whether these are deficiencies in the existing context or existing assets that can be of benefit to the proposal.

• The context appraisal should have a particular focus on the nearby streets and spaces on which the proposal will have the most impact. It should identify the prevailing height, scale and mass of surrounding buildings, streets and spaces; dominant building lines and articulation of building frontage within the streetscape; whether there are any views or routes into and from the site that are fundamental to the design strategies employed; etc.

• Are there specific issues of character, topography or visual impact to which the proposal should respond?

• The thematic characteristic of the receiving context from a built form perspective should be identified, alongside any specific character area or heritage designations and obligations that pertain and any landform topography that may influence the location of height with respect to overlooking, shadowing and relative height.

• The proposal should provide relevant studies addressing any specific requirements that pertain to the development. These studies should illustrate and evaluate the effects of the proposal on the local environment and microclimate (wind tunnel studies, sun path studies, shadowing, privacy and overlooking, pedestrian comfort analysis, etc); address heritage or conservation concerns; etc.

• A variety of factors may make increased heights or densities particularly prominent in their setting and will require mitigation by design for the proposal to achieve a good contextual fit. Where such mitigation of adverse impacts cannot be achieved, proposals for increased height should be avoided. Analogous recent development that has successfully integrated with the context should be identified and positive characteristics of their spatial strategies or design approaches explored with reference to the current subject site.

• How does the proposal make a positive contribution to its context?

• The context appraisal should avoid reliance on potential routes or connections that it cannot deliver. Proposals should not preclude their development in the future but should instead provide future proofed strategies that allow for connections at a later date.

Figure 23: An example site in the Dublin City and Suburbs area outside the SDCC administrative area has a clearly defined setting in relation to the existing axial route, an amenity route along the canal and a local heritage asset in close proximity.
4.3.3 CONNECTIONS

- Do proposals incorporate new streets to facilitate new links at the local level or improve existing streets and links to local amenities?

  - The ability to get from place to place in the mode of your choosing is a crucial factor in achieving high quality higher density environments. Proposals should avoid layouts that hinder access to social infrastructure such as employment, schools, health care, childcare, playgrounds, and recreational facilities in the wider context and instead provide a permeable layout that makes as many connections to the wider urban area as is practicable.

- Between 25% and 30% of the footprint of an urban area is given over to the street corridor and pavement. With limited room to expand vehicular corridors, better use needs to be made of streets to encourage walking and cycling within the city. By enhancing the context for public spaces and key thoroughfares, proposals will be more likely to demonstrate that additional height and density enhances the sense of scale, enclosure and overall legibility provided by the development.

- Proposals should seek to strengthen and where necessary re-orient routes toward the neighbourhood’s green and blue networks, with high quality green walking and cycling routes linking doorstep play areas with pocket parks, larger parks and green space.

- How does the proposed layout respond to existing streetscape and patterns of development and how are increased heights located in relation to these patterns?

  - The urban block needs to be considered from the scale of pedestrian experience to ensure that the proposal complements patterns of development in the receiving streetscape including apertures between buildings and articulation of primary and secondary massing; and that vertical expression of increased building heights reinforce the spatial hierarchy of the local and wider context in the service of legibility and way-finding. Monolithic layouts that overwhelm the pedestrian experience of the urban area should be avoided.

  - Traffic and parking arrangements need to suit the community’s needs and allow the safe and free movement of people of all ages and levels of mobility. In higher density mixed use environments it is necessary to plan for the needs of both the resident population and the transient population. Car-share and bike-share services can facilitate the intensification of residential use in urban centres without adding to traffic congestion.

Figure 24: Identification of transport connections available in proximity to the Example Site.

Figure 25: Identification of the Key Routes, Amenities and Character Areas in proximity to the Example Site.
4.3.4 INCLUSIVITY

- Does the proposal provide equitable, people-friendly streets, spaces and uses?

- New connections should be attractive, well lit, safe, direct and easy to use to provide access for all. Good places provide the variety of spaces to meet and spend time with others, if we so choose, crucial in the forming of urban communities. Loneliness and social isolation are increasingly identified as hazards within our urban areas, with economic segregation reinforced by spatial separations and badly designed environments limiting the mobility of at-risk groups. Special consideration must be given to children, the elderly and people with disabilities, in order for a space to be accessible and usable by all.

- Proposals that alter existing routes or desire lines in a neighbourhood, particularly where these are well used, or otherwise discourage the use of existing routes by resident communities should be avoided.

- To this end, entrances, uses and frontages should be inviting. Higher density proposals should provide active frontages at the ground floor to animate the streetscape and provide access to new uses to all. Where mixed-uses are not possible, animation of the ground floor by own-door entry to provide overlooking of the street should be the next preference.

- Extensive blank elevations onto the public realm at ground floor are not an acceptable or inevitable outcome of higher density form of development. Similarly, the design of entrances should reflect their intensity of use – entrances with the most use should be the most legible in the streetscape.

- Are routes appropriately-scaled and properly located within the urban environment to encourage maximum use by as many people as possible?

- There are three types of activities that occur in streets and outdoor space: the necessary activities of our day to day lives; optional activities; and, social activities. Optional activities and social activities are more likely to occur in a well-designed space that is favourably oriented with regard to sunlight and that employs a comfortable scale of enclosure consistent with the existing character of the neighbourhood and proportionate to the function of the street.

- Streets with a higher footfall and active frontages need wider pavements; streets that need to be wider to accommodate vehicular traffic should employ placemaking and planting strategies to reduce the perceived scale of the street to the more inviting scale of human activity.
4.3.5 VARIETY

• Does the form of development at higher densities proposed complement or compete with existing built form and local variations of height?

  • Variations in prevailing heights and the vertical expression of taller built elements should serve to promote a sense of legibility and place. Part of this will be managing the transition between existing and new urban fabric by means of a height strategy that fosters a consistent and legible urban form while providing visual interest and avoiding a monotonous intrusion into the streetscape or skyline.

  • Various strategies should be employed to reduce the bulk, massing and scale of higher density proposals and developments at increased building heights to improve integration with the surrounding built form and avoid overwhelming the streetscape.

  • These strategies might include reduction of building height or apparent massing in response to immediate context; vertical expression of building elements in key locations to mark important routes within a development of general height increase; articulation of built volumes into primary and secondary massings to break down the apparent scale of a development; shaping of roof forms or expression of fenestration patterns within a facade to provide visual interest; etc. Specific attention should be paid to such design strategies where new development immediately adjoins existing development at a lower scale.

• Does the increased height proposed facilitate and encourage a wider mix of uses in the development?

  • A key benefit of compact growth models of mixed use higher density developments is their ability to foster sustainable and resilient local communities. Housing choices available locally will affect who lives in an area: good places have a mix of quality homes for families and people of different ages and incomes. An active local economy that provides work opportunities helps create lively places where people want to spend time.

  • The proposal must demonstrate a positive contribution to the mix of uses and/or building/dwelling typologies available in the neighbourhood and how these are enabled by increased heights or densities over prevailing forms of development.

  • Proposals that provide limited types and tenures of residential development should be avoided.

![Diagram showing variety of building heights]

Figure 28: Identifying the variety of building heights within the proposal on the Example Site.

![Diagram showing relationship between landmark height and new public route]

Figure 29: Identifying the relationship between the secondary landmark height and the new public route.
4.3.6 EFFICIENCY

• Is the proposed increase in height enabling the optimal use of the land at a sustainable density?

• The benefits of higher densities are well recognised. National policy seeks to secure compact and sustainable urban growth by focusing on reusing previously developed ‘brownfield’ land, building up infill sites and reusing or redeveloping existing sites and buildings, in well serviced urban locations, particularly those served by good public transport and supporting services, including employment opportunities.

• The optimal density is the most favourable density at which a development has a positive impact on the local community and the environment – sufficiently occupied to create a vibrant neighbourhood which supports the needs of the residents without being oversubscribed to the point where compromises on the liveability of the place are required.

• Factors influencing this balance might include site characteristics and development constraints; sensitivities within the prevailing local character; proximity to a range of employment, services and facilities and the mobility options that support them; and the development mix proposed.

• Development proposals that ignore these constraining factors in proposing increased heights or densities should be avoided.

• Particular attention in this regard should be given to views through or beyond the development site, and views of the development site within the wider context. Proposals may have to constrain heights in certain frontages in order to repair edges or to preserve the local character of their setting; similarly, development may have to employ less than optimal layouts from either a building efficiency or an overall site efficiency perspective in order to provide, preserve or protect important views. Where the development is large enough, it may be possible to organise the layout and massing so that the scale of blocks both in footprint and height in less sensitive parts of the site compensates for the downward modifiers elsewhere.

Figure 30: Proposed development on the Example Site in context showing the reduction in scale of the proposal at the edges of where prevailing heights are lower and the intensification of development in the less sensitive centre of the site.
4.3.7 DISTINCTIVENESS

- How does the development preserve, complement or enhance the character of the area and contribute in a positive manner to the visual setting or built heritage of the area?

- The sensory experience of a place derives from many factors. Proposals should demonstrate in the first instance how they respond to the character of the receiving environment and from there demonstrate a reasoned justification for the proposed distribution of non-thematic heights and higher density building forms and typologies proposed within that urban structure.

- Character is informed by height, not determined by it. Heights are instead considered as thematic (i.e. in line with prevailing heights of an area of strong character) or non-thematic (i.e. deviating from the prevailing heights within the character area).

- Proposals should identify where increased heights are being proposed to create urban design benefits: more general height increases might enclose main public or green spaces to their benefit by providing them with a specific identity; identifiable point heights and vertical expression might mark major amenities or transport interchanges to the benefit of the legibility, appearance or character of the area; heights might beneficially frame an important view or serve to locate important cultural, historic or archaeological sites, landscape and natural features, etc.

- Proposals should avoid any loss of distinctiveness by the intrusion of larger-scaled, undifferentiated monolithic forms into a neighbourhood or streetscape.

Figure 31: Massing strategies employed on the example site to ensure distinctiveness along various frontages and mitigate the insertion of development at a larger scale into the streetscape.

Left: Diagram indicating strategy for edge blocks to lower contextual heights.

Above: Massing strategy to incorporate a secondary landmark height along the new public route to the central through the middle of the proposal.

Top: Downward modification of height and use of a different dwelling typology in response to the heritage adajacency.
4.3.8 LAYOUT

• Is the overall layout making use of forms of development appropriate to higher densities?

  • Many proposals are likely to seek modest general increases in height (c. 1.25xCH) over the prevailing contextual height to achieve more general higher residential densities. These height increases may not be tied to specific placemaking actions. Such proposals should illustrate a height strategy detailing how the layout addresses issues around siting; orientation; changes in scale and separation distances to existing adjacent dwellings, separation distance between buildings, etc.

  • Typically, these higher densities are achieved by means of layouts with recognisable forms of perimeter block; arrayed open or partially enclosed linear block forms of development. In proposals for higher densities and increased heights, specific consideration should be given to design quality issues common with these forms of development that include:

    • Clear definition of public realm (streets) and private realm (space within blocks) and the hierarchy of invited and threshold spaces in procession between the two.

    • Balancing the delivery of a good micro-climate within the proposal with regards to daylight access for dwellings and private open space, etc. with being a good neighbour with regard to public realm, streetscape and views through, etc. by demonstrating that siting and orientation strategies have been decided with reference both to sunlight path and to scale of the adjoining streets.

    • Careful positioning of cores and articulation of the building forms and blocks to reduce reliance on overlong double-sided corridor arrangements within developments that diminish the attractiveness of higher density developments.

    • Communal refuse, recycling and waste containers and enclosures should be well designed. They should be easily accessible to and usable by all residents including children and disabled people, and located on a hard, level surface in a location that satisfies waste collection requirements. When located within a building their storage should allow for cleaning and limit the nuisance cause by noise and smells. Where they are external to the building, waste and recycling areas should be screened, well ventilated, and be integrated by design with equivalent quality of material finish and external assembly as the rest of the facade.

Figure 32: Diagrammatic layout identifying a mix of uses and spaces in the proposal on the Example Site.
4.3.9 PUBLIC REALM

• How safe, secure and enjoyable are the public areas adjacent to higher buildings, and how has the human scale been taken into account?

• *While increased height can identify a new public gain to the neighbourhood accruing from the proposed development, the scale of development blocks and length of frontage within the street edge can serve to modify the building toward the human scale.*

• *Proposals should avoid creating streets or spaces that are not overlooked by development to deter antisocial behaviour but should also ensure that sufficient consideration is given to threshold spaces and building edges to maintain privacy of residential uses at the street edge.*

*Figure 33: Contemporary design as a complement to historic built fabric in a waterside regeneration in Copenhagen.*
4.3.10 ADAPTABILITY

- Are the buildings and layouts designed to accommodate future change?

  - Proposals for higher densities should, insofar as practicable, facilitate changes in use within buildings to foster economic resilience; flexibility within residential units to allow for changing domestic or working from home arrangements; modal shift within their layouts and parking arrangements to transition to active travel modes over time; and energy adaptability to transition to a lower carbon future and an ease in changing building use to foster economic resilience.

4.3.11 PRIVACY & AMENITY

- Has the proposal addressed recognised potential impacts of increased height and densities?

  - These impacts include view loss, over-shadowing of the street and adjoining properties, monotony of streetwall, and decreased daylight access to adjacent sites. Form, massing and height strategies should be demonstrated that carefully modulate the proposal so as to maximise access to natural daylight, ventilation and views and minimise adverse impacts.

  - Where adverse impacts are present the proposal should demonstrate alternative compensatory design solutions to the current proposal.

Figure 34: Housing at Accordia, Cambridge engages a variety of design strategies to balance privacy and openness at higher densities.
4.3.12 PARKING

• Has parking been considered from a people-first perspective?

  • Vehicular parking, if proportionate, has its place. Not all vehicular parking is negative from a public realm perspective as long as it is not being overprovided and that public realm design and accessibility comes before the needs of private car storage.

  • On-street parking can make retail uses more accessible and convenient, and can also function to as a buffer between the pedestrians and the moving vehicular traffic, or can be used to separate cycle lanes from vehicular traffic.

  • Cycle storage outside the home should be located in a convenient and easily accessible storeroom, private garden or secure common space close to the street. Wherever possible, large communal stores and out of the way locations and should be avoided, as they tend to be vulnerable to cycle theft.

  • The type of storage should be carefully considered in relation to the nature of the scheme and road layout, as well as local policy. Where internal cycle storage areas are located behind street facades there should not be an appreciable reduction in design or material quality.
4.3.12 Detailed Design

- Have external material finishes and assembly been well considered?
  - The right choice of materials can be a critical determinant in how well the building performs in its setting over time. Materials should be practical, durable and attractive.
  - The scale, form and use of a building will influence what materials may be appropriate to its construction, but choice of materials should also be informed by context. Reflecting the material character of the surrounding neighbourhood can create a dialogue with the surrounding buildings, forging a connection.
  - The proposal should provide a richness to the detailing and high quality materials and create a material palette that is sympathetic to surrounding urban fabric and builds on the established sense of place, whilst also creating order between the elements.
  - Materiality should be considered in conjunction with facade proportions. The proposal must not be monolithic and must avoid long, uninterrupted walls of building in the form of slab blocks. A simple and clear material palette can create order between the built elements and establish the connection to its context.
  - Where individual larger buildings are proposed, they should be of contemporary architectural design and finish (including use of colour).
  - Has the relationship between street width and building height been considered?
    - Development proposals where the building height exceeds the width of the street will not normally be acceptable if they cause a canyon effect and inhibit sufficient light and air reaching the buildings and street below. Nevertheless, consideration may be given to those streets with a north-to-south orientation where they allow more sunlight to permeate than streets with an east-to-west axis.
    - Along narrower streets, it may be necessary to maintain a lower apparent height to improve pedestrian experience of the street, setting back levels above this frontage. Such solutions will also need to work in terms of its impact from longer views where it may be more visible.
    - Where building frontages face onto public open spaces and squares, they should normally provide sufficient sense of enclosure and a suitable backdrop to define and overlook the space while not overpowering it.

Figure 36: Colour and enclosure at Stortoget, Stockholm.
Figure 37: The Oakfield Hub, U.K. development amplifies height and employs a dynamic roof profile to foster distinctiveness at the local marker scale.
5.1 OVERVIEW

To illustrate how the concerns of the toolkit might be applied and illustrated in a development application and development management scenario, the Guide describes a number of notional development scenarios based on typical contexts found across the South Dublin County Council administrative area wherein increased building heights and higher densities might be accommodated.

These typical locations have been determined with reference to the County Development Plan and anonymised by selective editing of the actual site conditions to omit identifying features that are not relevant to the exercise. The aim of these indicative scenarios is not to determine the appropriate height for a development proposal but instead to demonstrate how such a determination might be illustrated and rationalised. The scenarios were chosen to cover a representative mix of locations and character area types.

Their selection was informed by the locational criteria of the Sustainable Urban Housing: Design Standards for New Apartments (2018) but predominately derive from the identification in Section 02 | Planning Policy Context above of those sites within the South Dublin County Council Administrative Area where building height will be actively pursued for redevelopment, regeneration and infill development.

For the purposes of relevance to the predominant forms of development to which the contextual analysis process will apply, the illustrative examples concentrate on locations where mid- to high-density and higher density ranges of +50d/Ha would be expected in line with national guidance.

The selected indicative locations are:

- I. District Centre;
- II. Village Centre;
- III. Town Centre;
- IV: Suburban Infill (Medium);
- V. Suburban Infill (Small);
- VI. Local Centre;
- VII: District Centre.

All diagrams are for the purposes of illustrating contextual analysis only and do not represent approved development strategies or acceptable development proposals for any of the subject sites. Their aim is to illustrate the type of analysis and design response by which applicants should structure design statements and other materials for discussion with the local authority in development application and pre-application scenarios in order to ensure meaningful and useful discussion of proposals.
I: LARGE OPPORTUNITY SITE | DISTRICT CENTRE

SETTING

The site is a brownfield opportunity site with frontage with onto two roads and access to public transport. Public transport connectivity is not sufficient to support primary landmark classification of heights. The site has a history of mixed uses and is within a local context of smaller commercial mixed uses surrounded by prevailing two-storey residential development without a unified or historic character.

Height Strategy

- Prevailing Contextual Height
- Local Amplification of Height
- Increased Height relative to Prevailing Context and derived from existing height in proximity
- Amplification of height within dominant streetwall
- Vertical expression of secondary landmark at prominent juncton.
URBAN DESIGN RESPONSE

1. Development of Edge Block at prevailing height to terminate terrace block from east and allow transition in scale at prominent corner.

2. Development of pedestrian linkage through site.

3. One-storey amplification of height (1.5xCH) to bookend existing terrace, signal new pedestrian route, and turn the corner with built form.

4. Development at contextual height of 3-storeys to improve existing street edge to south-west.

5. Development of new public space within block with permeable edges.

6. Development of mixed-use block appropriate to District Centre setting with retail to ground floor to turn the corner and residential development above.

7. Increased height and vertical expression of prominent corner to c.3xCH beyond prevailing heights, sufficient to mark the location from district park to the north-west. Potential for amplified height between new height insertions into streetwall to provide variety and visual interest.

8. Retention/continuation of existing building lines; development of new building line as vertically expressed corner is approached.
RELEVANT DESIGN STRATEGIES

Figure 38: The development at Agar Grove UK (above) uses variation of building heights and material expression to add visual interest along the new public route between the blocks. The development of an infill terrace in Ranelagh, Dublin uses a combination of vertically expressed bays, recessed volumes at upper levels and material variation to achieve variety within the streetscape.
Figure 39: The development at Goldsmith Street, Norwich provides dense, low-rise low-carbon and Passivhaus certified dwellings and won the 2019 RIBA Stirling Prize.
II: INFILL SITE | VILLAGE CENTRE

SETTING

The site is a brownfield opportunity site within a Village Centre with frontage onto three roads. The village centre has generally a strong local character and prevailing height, however the immediate context of the island site is mixed with the street frontage to the east picking up development patterns from the south with a contextual height of c.2xCH over the western frontage. Topography rises from south to north. Public transport connectivity is potentially sufficient to support a primary landmark but heights are constrained by character sensitivities. A small public space and significantly scaled mature trees are located on the secondary junction to the east across from the development site.

Height Strategy

- **Prevailing contextual height**
- **Amplification of height corresponding to main street frontage height**
- **Vertical expression to bookend development and create marker at roads intersection.**
URBAN DESIGN RESPONSE

1. Development in line with prevailing heights along the western frontage preserves the character of the street as secondary to the major route along the eastern frontage.

2. Development steps back from existing adjacent building to facilitate access off the secondary street and a potential integration of the intersection as a unified public realm.

3. Development to the southern frontage in line with existing heights to the south. Height of the linear block is constrained to preserve sunlight access to the interior courtyard of the block. The block is setback from the junction to the west to allow an extension of the public realm at the intersection and potential integration with the public space opposite. Mixed uses are suggested at street level.

4. Amplification of height as a local marker at the junction of the primary north-south route. Increased height is consistent with existing development to the north; c.1.25xCH of heights to the south; and c. 2xCH to the prevailing height of the Village Centre.

5. Development of interior courtyard within the perimeter block with daylight access from south, aspect to the mature trees to the west as a result of the lower height to that frontage, and apertures to the western and eastern frontages to develop a new pedestrian link.
RELEVANT DESIGN STRATEGIES

Figure 40: The developments at Sutherland Road (above) and Caudale (below) each amplify the corner above the prevailing contextual height of the rest of the block to provide a local marker height.
EXEMPLAR DEVELOPMENT PRECEDENT

Figure 41: The development at Marmalade Lane, Cambridge provides adaptable homes in a pedestrian-focussed environment where cars are parked remote from dwellings to allow the use of streets by pedestrians and families and the provision of a shared communal garden for food-growing and play.
III: INFILL SITE | TOWN CENTRE

SETTING

The site is a large brownfield opportunity site within a Town Centre with single road frontage along its full length to the east and vehicular access by means of an interior road that meets the site from the south-west. The context is varied with significant retail development to the south, parkland to the north, and a variety of large scale commercial and industrial development to the east. Public transport connectivity is potentially sufficient to support a primary landmark and the opportunity site is sufficiently large to be able to create its own context of height and density with the minimum of constraint arising from its surroundings. Civic amenities and other town centre uses are located south-east of the site within walking distance.

Height Strategy

- Prevailing contextual height
- Increased height fronting onto public park
- Vertical expression at North-Eastern corner
URBAN DESIGN RESPONSE

1. Development in line with prevailing heights along the eastern frontage repairs the deficient streetscape to provide enclosure and returns to establish a new pedestrian link through the site that will link village centre and civic uses in the south east with parklands to the north west.

2. The new street created by stepping development back from the retail use to the south maintains the prevailing height and provides mixed uses at ground floor to establish it as an extension of the town centre area. The block is broken open to provide a more intimate length of frontage and to establish the connection through the development.

3. A new street frontage is developed to continue the interior access road with building height increased in the order of c.1.5xCH to provide an appropriate edge and appropriate overlooking of the park. The new street frontage is again broken into smaller building lengths to facilitate the new public route.

4. Development of a landmark height with strong vertical expression at the intersection of the new road with the existing route to the north to signal the presence of a major new public space and route to a significant bank or parkland and to identify the gateway to the town centre area when approached from the north.
RELEVANT DESIGN STRATEGIES

Figure 42: The developments at Abode (above) and Caudale (below) each use dynamic gabled forms and articulations of the building mass to lessen the apparent heights of developments in which modest height increases assist reaching more sustainable densities.
Figure 43: Accordia is a substantial development of c.3Ha predominately residential dwellings that won the 2008 RIBA Stirling Prize. High density, mostly low-rise dwellings are provided in a variety of house and apartment types with a focus on environmental sustainability and a strong landscape framework.
IV: SUBURBAN INFILL | MEDIUM

SETTING

The site is a relatively large infill site in a suburban setting with a long single road frontage to the north. The site extends in some depth to the south in a haphazard arrangement. Prevailing heights and uses are exclusively two-storey residential of low character value and relatively low density form of development. However, the depth of the site and the back to back arrangement to existing adjacent development to the south is such that it is suited to higher density development. The site is moderately well served by public transport but is not well connected enough to be considered for primary landmark height. There is a protected structure to the rear of the site in line with the T-junction to the north. A positive contribution could be made to the setting by the adaptive reuse or restoration of the historic asset as appropriate. This in turn could justify increased height to the local marker scale to signal the presence of the restored historical asset.

Height Strategy

- Prevailing contextual height - residential character area
- Amplification of contextual height
- Vertical expression at to bookend development, on axis with local street
URBAN DESIGN RESPONSE

1. Adaptive reuse of the protected structure as a positive gain and development of a public realm forecourt leading to new local green links.

2. Development of new residential in a low rise high density model maintaining prevailing residential heights and back to back arrangements with existing residential to the south. The development block forms a new access street into the eastern extents of the site, initially taking the building line of the protected structure before stepping the building line to the south to open up the eastern extents of the site.

3. Development of a standalone block at higher densities with increased building height of c. 1.5xCH once separation distance to existing development to the east is maintained to prevent overlooking concerns.

4. Development of a new higher density street frontage with local amplifications within the streetwall or articulation of primary and secondary massing to preserve apparent height while allow extra residential densities.

5. Vertical expression of a local marker at c.2.5CH to prevailing heights to signal the presence of the protected structure behind the streetline.

6. Potential development of new green links at the block level.
RELEVANT DESIGN STRATEGIES

Figure 44: The developments at Marston Way (above) and Moray Mews (below) each employ deep articulations of primary and secondary massing to achieve privacy, daylight access and private open spaces in higher density developments on tight infill sites.
EXEMPLAR DEVELOPMENT PRECEDENT

Figure 45: The Timberyard in Dublin employs a variety of design strategies within the new higher density streetwall.
V: SUBURBAN INFILL | SMALL

SETTING

The site is a small linear infill site in a suburban setting that runs perpendicular to the primary street frontage but extended to a depth sufficient to connect two parallel streets to open up access. The development is located within walking distance of limited local mixed uses. In its current arrangement the site cannot be considered well served by public transport, however if new routes can be established then walking distance to local bus stops would be halved. Prevailing heights and uses are exclusively two-storey residential.

Height Strategy

- Prevailing contextual height - residential character area
- Amplification of height relative to prevailing context
URBAN DESIGN RESPONSE

1. Orientation of a new development block perpendicular to the primary street to establish a new pedestrian and cycle mews lane extending east-west to span the gables of existing adjacent development. Development does not exceed prevailing contextual heights.

2. Development of a new standalone block in a location free of rear garden adjacency and overlooking at c.1.5x CH to allow parking at the ground floor accessed from the vehicular route to the south.

3. Development of the standalone block allows the completion of the new street network in the space between the two built interventions.
Figure 46: Vaudville Court (above) and Fitzwilliam Square (below) are each deeply engaged with the different ways new infill forms can integrate with existing built fabric. Each maintains the prevailing thematic heights of their context within the streetscape but neither mimics the historical expression of the character buildings.
Figure 47: The Signal Townhouses make use of innovative housing typologies in which each townhouse has one ‘blind’ wall which gives privacy to the terraces between the expressed volumes, while back-to-back typologies accommodate rooflighting at the centre of the plan. Such design innovation can be required to unlock smaller suburban infill development without causing harm.
The site is a local centre with single storey retail and surface car parking in a residential context with an extensive landscaped edge to the south and local park to the north. The site has a relatively low service by public transport but has good local walking connections between active and passive recreational areas. Intensification of the landuse while preserving local mixed uses is in line with brownfield development goals.

**Height Strategy**

- **Prevailing contextual height - residential character area**
- **Amplification of height relative to prevailing context within dominant streetwall.**
- **Increased height to bookend development.**
- **Vertical expression at prominent corner with scaled height increase as a local marker.**
URBAN DESIGN RESPONSE

1. Increased height and vertical expression of prominent corner beyond prevailing heights.
2. Securing edges of block at prevailing height.
3. Potential for increased height along street edge to bookend development.
4. Public realm improvements for development of pedestrian linkage through site.
5. Connection to residential park to the north, establishing relationship between new development and existing amenity.
Figure 48: The development at Dickens Yard, Islington (above) reinforces the enclosure of the street and the framing of the church by emphasising the pedestrian experience of the storefront level while Church View, Athlone (below) amplifies the height of the corner block to draw attention to a new view of the church opened up by new development.
Figure 49: The twelve dwellings at St. George’s Place, Dublin provide high quality energy efficient A1 rated dwellings with front and rear garden space that are suitable for families. A higher density of 67 dwellings per hectare maintains own door entry and a low-rise form of development.
**VII: DISTRICT CENTRE | DUBLIN CITY AND SUBURBS**

**SETTING**

The site is a large brownfield district centre with significant surface carparking around the edges. The site provides for road frontages on three sides with the rear of the site adjoining two-storey housing. Prevailing heights are predominately two-storeys in a low density and relatively dispersed form of development with existing vehicular movement patterns causing severance for pedestrians between local services and their homes. To the south the context is of larger light industrial use behind enclosed behind fences and obscured from view by mature landscaping.

**Height Strategy**

- Repairing of edges with end of terrace development, maintaining prevailing height of residential context.
- Amplified height within development to support mixed-use retail and high density residential.
- Increased height at streetwall to East-West transport corridor, overlooking Industrial Park.
- Vertical Expression at site corners - marking development and prompting key circulation routes.
Urban Design Response

1. Increased height at prominent corner overlooking East-West transport corridor and identifying pedestrian connection to District Park.

2. Vehicular connection tying into existing local street network.

3. Green link connection providing access for pedestrians and cyclists

4. Termination of terraces with prevailing height of 2 storeys to allow transition in scale to new development.

5. East-West pedestrian connection to local community buildings. Reduction in scale to minimise impact on existing facilities.

6. Termination of vista with end of terrace block.

7. Increased height to site corner terminating public space to west and creating desire-line through new development site.

8. Potential for retail use to activate residential street.
Figure 50: Various design strategies are employed at Millennium Tower, Dublin including the vertical expression of the primary landmark tower element, the setting back of the upper floor to reduce the apparent height of the seven-storey element, articulation of the brick element at the corner as a local marker at the pedestrian scale.
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