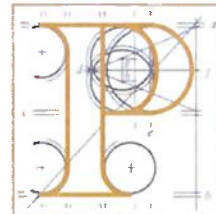


Our Case Number: ABP-318607-23

Your Reference: SID-OBS-001476



An
Bord
Pleanála

Paul Leech
184 The Sacton Wood Building 9F
Heuston Quarter
Kilmainham
Dublin 8

Date: 2nd February 2024

Re: Proposed construction of a residential led mixed use scheme across 16 blocks within 9 buildings ranging in height from 4 to 15 storeys
Lands at Park West Avenue, Cherry Orchard Dublin 10. Bound by Cloverhill Road to the north, Cedar Brook Avenue and Park West Avenue to the east, Park West Cherry Orchard Rail Station to the southeast & the M50 to the west

Dear Sir,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

Please note that the proposed development shall not be carried out unless the Board has approved it or approved it with conditions.

If you have any queries in relation to the matter, please do not hesitate to contact the undersigned officer of the Board at laps@pleanala.ie

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Eimear Reilly
Executive Officer
Direct Line: 01-8737184

JA02

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



PAUL LEECH : GAÏA - ECO TECTURE

architecture

consulting engineering

project management

ecotechnics

184 The Sancton Wood Building 9F,
Heuston South Quarter, Kilmainham, Dublin D08 X33

Tel. 01 6610957
087 234 0010

www.gaia-ecotecture.eu

Bord Pleanála Case reference: JA29N.318607 OBSERVATION

Cherry Orchard - LDA DCC Proposals

Bord Pleanála Case reference: JA29N.318607

Lands at Park West Avenue, Cherry Orchard Dublin 10. Bound by Cloverhill Road to the north, Cedar Brook Avenue and Park West Avenue to the east, Park West Cherry Orchard Rail Station to the southeast & the M50 to the west

Dear Madam or Sir,

Please see below my original feedback on the Cherry Orchard LDA proposals ; I stand by all of that, and it forms an important part of this Observation under the Planning Act, by the deadline today: I will spare you the repetition of it all, but ask you to take it on board . I reserve the right to reluctantly contemplate a JR, on the subject application and its processing, IN RELATION TO Aarhus and EU law matters, *inter alia* . This site is that important.

As I am pressed for time today, our key overarching formal Observation is on the paucity of design quality here ; If one strips away all the, rather cosmetic, greenery etc we are looking at very banal **blocks** , with which we are all too familiar . They seem dull and placeless in design , developer lead rather than plan-led , and will lead inevitably to the *ennui* experienced globally in the *banlieue* , all over Europe and beyond . This is a slight piece , an exhibited watercolour of mine at *Uillinn* Arts with that title '*banlieue* ' ; the alienation of vulnerable youth is something we simply cannot afford, societally and environmentally . If such occurs we can expect yet more demolition of this scheme of **blocks** within forty years or so ; what another waste ? What a failure to learn?



There is direct causal link with quality place-making and averting this alienation phenomenon in our very unequal societies .

I expect more from the LDA . If Herbert Simms could design and manage realisation of quality Housing in 1930s and 1940s , poverty stricken, war-straitened Dublin ; (still in use and greatly valued, however technically challenged 80 years later- but being methodically addressed by DCC putting '3 into 2' ; adding lightweight additional floors etc) then WHY can LDA not do better than this in 2024? . DCC itself has many fine realised design examples of social and affordable housing, throughout Dublin city, which uphold that noble standard .

I would urge Refusal here and a strong suggestion of rapid urban design iteration. Being particularly conscious of the pragmatics and time lines of this application and also the overwhelming need for social and affordable housing, I urge An Bord Pleanála to fully explore and avail of the design development stages / modifications possible here, within the legal and regulatory protocols available ; permitting, with modifications, may be felt to be the only realistic option, before An Bord -perhaps with signals, in the Reasons given and Planners Report , about later phases of development of this 'blue-line', overall site . Is it too late for parametric design such as shown generically here and to

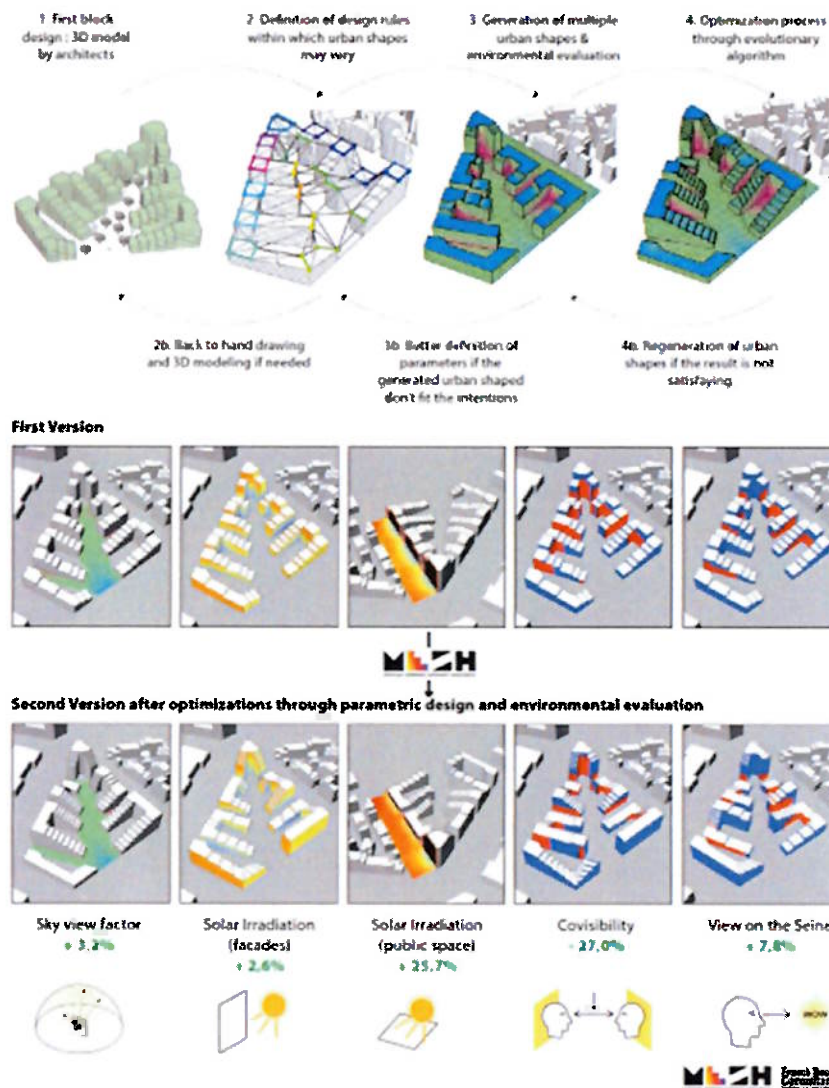
which the site is eminently suitable :

MESH AS A TOOL FOR COLLABORATIVE PARAMETRIC DESIGN TO PRODUCE HIGH QUALITY HOUSING

PROJECT IN IVRY-SUR-SEINE, PARIS, FRANCE

LEAD ARCHITECTS : AGENCE NICOLAS MICHELIN ASSOCIÉS - CLIENT : SADEV 94

OPTIMIZATION CRITERIA : MAXIMUM SKY VIEW FACTOR, SOLAR IRRADIATION, VIEW ON THE SEINE, MINIMUM COVISIBILITY



The subject site requires particular sensitivity to biodiversity parameters, but also to place making, which can often turn on matters of nuance and detailing; the universal IS in the particular ?

Le gach dea mhéin ,

Paul D | Leech BE BArch(Hons) RIBA MIEI WCSI

Consultant | Director

www.gaia-ecotecture.eu

----- Original Message -----

Subject: RE: Cherry Orchard - Feedback on LDA Proposals

Date: 2023-08-31 10:42

From: LDA - Cherry Orchard <cherryorchard@lda.ie>

To: "paulleech@gaia-ecotecture.eu" <paulleech@gaia-ecotecture.eu>

Dear Mr. Leech and Gaia Ecotecture

Thank you for your email submission and comments on Cherry Orchard Point.

All comments and feedback received during our public consultation period will be collated and compiled for consideration for the planning and design team in coordination with the LDA and DCC.

We would be very interested in meeting with you and discussing your submission and comments in more detail. Would you have time the week of Sept 18th that we can come to meet you or host you here in the LDA?

Thank you

Best Regards

Cherry Orchard Point Team

The Land Development Agency

2nd Floor, Ashford House, Tara Street, Dublin, D02 VX67

T: +353.1.9103400 | cherryorchard@lda.ie | www.lda.ie

From: paulleech@gaia-ecotecture.eu <paulleech@gaia-ecotecture.eu>

Sent: Friday, August 4, 2023 1:18 PM

To: LDA - Cherry Orchard <cherryorchard@lda.ie>

Cc: Michael Goan <mgoan@lda.ie>; Planning <planning@dublincity.ie>

Subject: Cherry Orchard - Feedback on LDA Proposals

You don't often get email from paulleeche@gaia-ecotecture.eu. [Learn why this is important](#)

CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi, We have taken some time and trouble, *pro bono*, to study your proposals, by the deadline of today Aug 4th, and appreciate this progressive consultation stage.

These remarks are intended to be constructive - We are supportive of LDA and it's *raison d'être* - we have previously met with your Michael Goan and Ciara Slattery, re another LDA scheme, (Pear Tree,) and many parameters of our discussion, in that matter, also apply here, although the context is quite different . (See our submission to LDA on Pear Tree, which will not be repeated here.)

Our remarks are grounded in ongoing studies and experiences dating from my own thesis on urban design, in my native Dublin city, and examples such as the 'eco residential business zoning' and structure plan (Laytown, also around a rail station) , as adopted by Meath CoCo (and developed in dialogue with Niall Cussen , current Planning Regulator), and the structure plan, with many others, for Cloughjordan ecovillage ; see attached various summary images from this work . Its too late for isolated ecovillages - the proven thinking must now proliferate.

References here are to your **Draftv2.12_online** <https://lda.ie/uploads/images/Cherry-Orchard-Public-Feedback-PDF-FINAL-June-2023.pdf>

Study of the existing context shows it to be a windswept, alienating environment where young people would find it very tough to get any 'foothold', sense of belonging or home- coming ?

So 'development' could be multidimensional to generate new city within the M50, on a green-blue grid : the mandatory planning base layer, quite strong here already, within the subject site ?.

Whereas we acknowledge your good intentions we cannot support your outcomes on this green field site : We hereby give notice that we would intend to make formal observations , possibly appeal and possibly see JR on the outcomes, depending on your further process from here.

We believe that your handling of such a greenfield site structure-plan should broadly include

1/3 wild woodland, water body , high-biodiversity, oxygenation and amenity space - probably remote from rail station proper, but 'buffering' to M50/ rail line .

1/3 agronomy allotments etc. mid site and buffer to M50.

1/3 Urbanism of mixed use with high proportion of dwellings supported by services and community facilities - economic activity, biased toward noisy/ dusty rail mainline and M50.

We miss in your analysis & outcomes, the likes of Biotope Area Factor
<https://www.sdcc.ie/en/services/planning/planning-applications/make-a-planning-application/green-space-factor-guidance-note.pdf>

or

BNG <https://www.gov.uk/government/collections/biodiversity-net-gain> .

(It's now too late in our human destiny not to have such, in our capital city.)

We believe that whereas, your overall admirable and acceptable population target can be met on the subject site , your low density is too low and your high density too tall, and further alienating . We cannot accept that the image on p 22 is 'landmark , (as eg Calatrava's tower at Western Harbour Malmö , which we also visited some months ago, with a wide variety of densities and generally modest heights, in really successful thriving urbanism.)

We find it striking that when you choose to emphasise 'sustainability' you show the 'playground' of page 30 rather than the dominant tropes in page 22

Architecturally we note a wide variety of form-language much of it rather alienating flat-top 'blocks', (which lack any particular sense of place, being ubiquitous worldwide) - we would refer you *inter alia* to work at Lund Brunnshög by Cord Siegel <https://www.siegel.nu/en/home/det-goda-vattnet/> which we recently visited as part of GAIA International: provides high density in 'familiar form language', without alienation- much more 'sustainable'?, however imperfect

We again refer you to the work of Prof Philip Steadman UCL/Bartlett, also having formally reporting to DCC on density and height <https://www.ucl.ac.uk/bartlett/energy/news/2017/jun/ucl-energy-high-rise-buildings-energy-and-density-research-project-results>

<https://www.cibsejournal.com/news/carbon-emissions-rise-with-height-of-a-building/>

Jan Gehl is good on the topic on loss of contact with ground as datum , (and effective 'passive policing') , as heights exceed these levels; alienation results .

Many examples precedents show that high density of up to circa 100 uph can be achieved at mid rise; in this case: 12.1 hA X 100 = 12100 units utilising heights up to 6 very locally 7 /8 storeys and no objection to a localised landmark such as wind vane/ solar tower.

So, in conclusion, we encourage you to think again: quickly apply parametric design methodologies, in an iterative process, along the lines indicated (and as eg MESH attached) : we believe a truly exemplary scheme could result.

If you wish to have a short ZOOM discussion of this submission, please let us know so that we could find a suitable time; our demeanour is collegial .

le gach dea mhéin

Paul D Leech BE BArch(Hons) RIBA MIEI WCSI

www.gaia-ecotecture.eu

The information contained in this email, and any attachments to it, is confidential and may contain commercially sensitive and/or legally privileged material. The information may not represent the views of the Land Development Agency. This communication is intended solely for the addressees. If you have received this email in error, please notify the sender immediately and delete this email

from your system. If you are not the intended recipient, please be aware that any review, disclosure, copying, distribution or any action taken or omitted to be taken in reliance on it, is prohibited and may be unlawful. The Land Development Agency accepts no liability for actions or effects based on the prohibited usage of this information. Please be aware that email communications may be susceptible to data corruption, interception and unauthorised amendment. The Land Development Agency accepts no responsibility for changes to or interception of this email after it was sent or for any damage to the recipient's systems or data caused by this email or any of its attachments. Please also note that communications to or from the Land Development Agency may be monitored to ensure compliance with Land Development Agency policies and standards and to protect our business. Unless specifically stated otherwise, this communication is not an offer capable of acceptance or acceptance of an offer and it does not form part of a binding contractual agreement.