

Proposed Build to Rent Mixed Use Development Strategic Housing Development Application

APPENDIX: RESPONSE TO ABP AND DCC OPINION

FASSAUGH AVENUE, CABRA



The following appendix documents sets out the significant amendments made to the proposed scheme as a result of the Tripartite Meeting which took place between An Bord Pleanala, Dublin City Council, and the applicant design team, on 20th October 2021.

The document is structured to align with the structure of the Notice of Pre-Application Consultation Opinion issued by An Bord Pleanala following the tripartite meeting. The document therefore sets out the design changes within the following chapters:

1 Design Strategy

- A Height, Scale, and Massing
- Open Space Strategy
- C Issues Raised by Dublin City Council Opinion
- F Proposed Materiality

2 Residential Amenities

5 Services, Facilities, and Amenities

This appendix is to be read in conjunction with the full planning submittal, including the Architectural Design Statement and proposed drawings prepared by BDP.



CURRENT RESIDENTIAL UNIT QUANTUM PRE-APP RESIDENTIAL 117 **UNIT QUANTUM** 137

PRE-APP **TOTAL GROSS** FLOOR AREA

12936sqm

15%

AREA REDUCTION

TOTAL GROSS FLOOR AREA REDUCTION

1884sqm

1-2 LEVEL REDUCTION IN **HEIGHT**

CURRENT TOTAL GROSS FLOOR AREA

11052sqm

CURRENT PUBLIC OPEN SPACE

CURRENT

PLOT RATIO

1.81

PRE-APP

PLOT RATIO

2.13

582sqm

PRE-APP **PUBLIC OPEN** SPACE

372sqm

Α HEIGHT, SCALE, AND MASSING

Further consideration and/or justification of the documents as they relate to the design strategy for the site in respect of:

The proposed height, scale and massing of the proposal, having regard to its locational context. This should include a contextual layout plan which indicates the layout of adjoining developments, photomontages and sections at appropriate levels, including details of how the proposed development interfaces with contiguous lands (within and outside the applicants ownership/control), adjoining roads and rail line and residential properties.

Particular regard should also be had to creating suitable visual relief in the treatment of elevations and interface with adjacent lands. An architectural report, urban design statement and additional CGIs/visualisations should be submitted with the application.

-An Bord Pleanala Opinion

APPLICANT RESPONSE

In response to items raised by ABP and DCC, the proposed scheme has been reduced in scale, height, and massing, comparative to the scheme submitted at pre-app stage. Overall, there has been a 15% reduction in the total GFA of the proposed scheme, with a concentrated reduction in massing. This includes a 1-2 level drop in height, with the scheme now a maximum of 6 levels above ground level, as opposed to 7 levels above ground level in the pre-app. The plot ratio has decreased accordingly from 2.13 to 1.81.

The proposed site coverage has reduced by 383sqm, including a reduction in the building footprint around Fassaugh Avenue, allowing for the incorporation of an additional 210sqm of public open space.

The revised scheme maintains a regard for its locational context by responding to both the two-storey suburban context to the east, and the increased height of the Hamilton Gardens development to the south-west. This is demonstrated in the following pages through comparative photo-montages and drawings between the current scheme and pre-app scheme.

As requested, an architectural report, urban design statement and additional CGIs/ visualisations have been submitted within this application.



REDUCTION IN SCALE, HEIGHT, AND MASSING

A total of 15% of the GFA has been removed from the building, including a 1-2 level reduction in height, and significant reduction in scale and massing to the northern end of the building. At this northern end, the north-east corner of the building has been set back to maintain a minimum 11m setback from the boundary to St Attracta Road properties, reducing the potential for overlooking and impact of the scheme on its context, with screened balconies offering further reductions.

Reducing the height of the scheme by 1-2 levels further reduces the visual impact of the scheme from St Attracta Road and Fassaugh Avenue, and has also allowed for the simplification of the roof profile, with previous stepping along the parapet regularised into a consistent height.

CURRENT SCHEME, WITH PREAPP SCHEME AS A FADED OVELAY

1-2 level reduction in height, and simplification of building profile

Significant reduction in scale and massing to northern end, to decrease impact on St Attracta Road properties



LEVEL 00

At ground level, the building footprint has been reduced by 383sqm, representing a 22% reduction from pre-app. This reduction has been concentrated in two locations so as to reduce the scheme's scale and massing.

To Fassaugh Avenue, the footprint on ground level has been set back by 2700mm to increase the quantum of public open space. To the north east, the building has been considerably set back by circa 5m to maintain a minimum 11m distance from the site boundary to St Attracta Road properties. The scheme has also been broken into three distinct blocks on this floor: a commercial/amenity block towards Fassaugh Avenue, a render-clad residential block to the middle, and a brick-clad townhouse block to the north.



Outline of pre-app scheme



CURRENT SCHEME

EAST ELEVATION

The scale, height, and massing has been revised along the east elevation to improve the scheme's relationship with St Attracta Road. A 1-2 level reduction in height reduces the visual impact, as does a simplified roof profile to L05 and L06. To the north-east, the building undergoes a change in materiality and scale through a detached building block of townhouses, thus further fragmenting the scheme along the east elevation and avoiding the perception of a monolithic mass.

FASSAUGH AVENUE, CABRA



Simplified form, Profile of pre-app detached massing, 2-level height 2-level height Simplified Simplified roof profile to 1-level height Increased scheme reduction material change reduction balconies articulation improve legibility reduction material variation Outline of pre-app scheme

CURRENT SCHEME

WEST ELEVATION

Along the west elevation facing the railway, the scheme has been reduced in height between 1-2 levels. The articulation of residential balconies has been refined to reduce their potential for visual impact, which combines with a simplified roof profile to create a more refined, less impactful elevation. To the north, the building has been fragmented to two blocks with differing materials, further reducing the massing and scale of the scheme, as can be seen in the west elevation drawing opposite, noting in red the outline of the pre-app scheme.

FASSAUGH AVENUE, CABRA



CGI - SOUTH ELEVATION

The scheme's scale, height, and massing has been reduced through the following measures:

- Simplification of balcony articulation
- Further emphasis of brick material to reflect wider context
- Setback of glazing to ground level to increase quantum of public open space
- Reduction in use of coloured metal to further assimilate with surroundings.





CGI - EAST ELEVATION

The scheme's scale, height, and massing has been reduced through the following measures:

- 1-2 level reduction in height
- Minimum 11m setback from east boundary with St Attracta Road
- Incorporation of additional lower building block to north, creating a more fragmented massing





VERIFIED VIEW 02

The scheme's scale, height, and massing has been reduced through the following measures:

- 1-2 level reduction in heightSimplification of roof profile





VERIFIED VIEW 03

The scheme's scale, height, and massing has been reduced through the following measures:

- 1-2 level reduction in height
- Simplification of roof profile





VERIFIED VIEW 05

The scheme's scale, height, and massing has been reduced through the following measures:

- 1-2 level reduction in height
- Simplification of roof profile
- northern element of the scheme is no longer visible in the current scheme when compared to pre-app





VERIFIED VIEW 06

The scheme's scale, height, and massing has been reduced through the following measures:

- 1-2 level reduction in height
- Simplification of roof profile
- Simplification of balcony articulation
- Further emphasis of brick material to reflect wider context
- Removal of balconies to boundary with Lanigans Funeral Home
- Windows along boundary to Lanigans Funeral Home changed to high-level to avoid overlooking



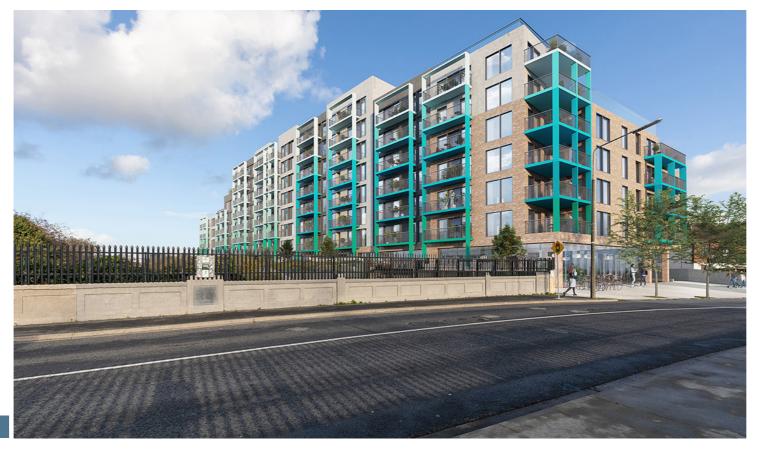


VERIFIED VIEW 07

The scheme's scale, height, and massing has been reduced through the following measures:

- Removal of balconies to boundary with Lanigans Funeral Home
- Windows along boundary to Lanigans Funeral Home changed to high-level to avoid overlooking
- Simplification of roof profile
- Simplification of balcony articulation
- Further emphasis of brick material to reflect wider context
- Setback to ground level to increase quantum of public open space





VERIFIED VIEW 08

The scheme's scale, height, and massing has been reduced through the following measures:

- 1-2 level reduction in height
- Simplification of roof profile
- Simplification of balcony articulation
- Fragmenting of building massing to north
- Further emphasis of brick material to reflect wider context
- Reduction in use of coloured metal to further assimilate with surroundings.
 Setback of glazing to ground level to increase quantum of public open space





VERIFIED VIEW 09

The scheme's scale, height, and massing has been reduced through the following measures:

- 1-2 level reduction in height
- Simplification of roof profile
- Simplification of balcony articulation
- Further emphasis of brick material to reflect wider context



B OPEN SPACE STRATEGY

Further consideration and/or justification of the documents as they relate to the design strategy for the site in respect of:

Open space strategy.

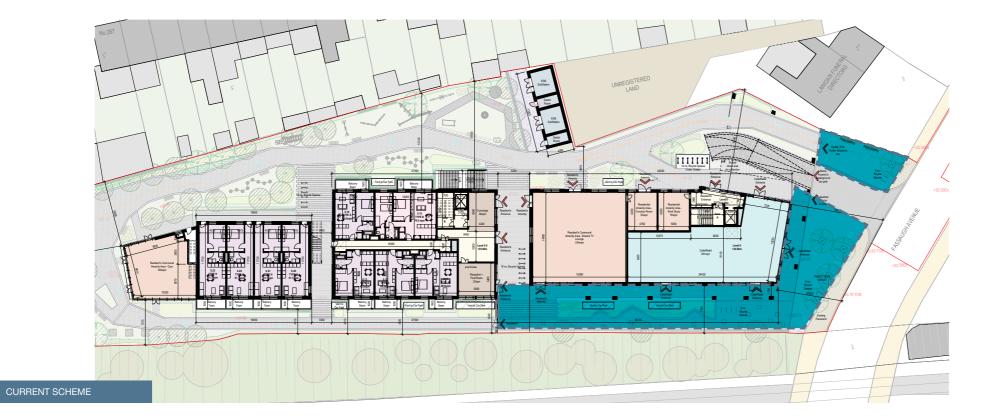
-An Bord Pleanala Opinion

APPLICANT RESPONSE

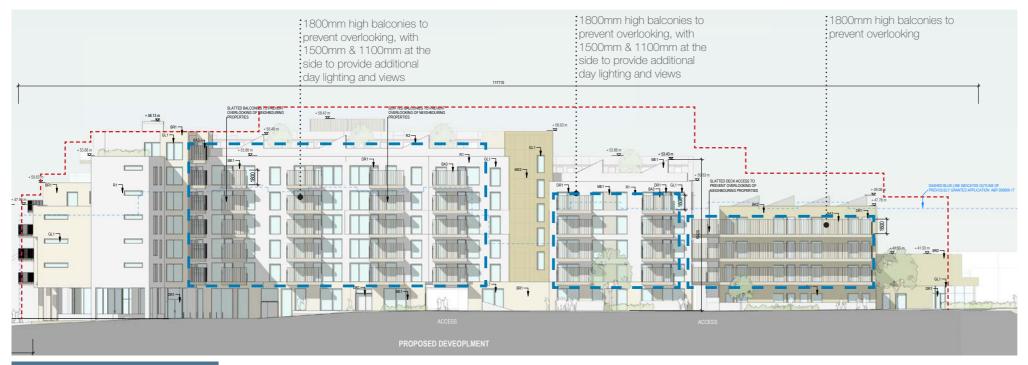
The proposed scheme increases the quantum of public open space from 372sqm to 582sqm, representing an increase of 56%. The proposal therefore allocates 10% of the site area to public open space.

This increase has been achieved through a reduction in the building footprint to the south and west on ground floor, creating high-quality public realm adjacent to the ground floor commercial unit. This space's usability has been enhanced through the incorporation of bicycle parking, planting, and seating. Please refer to the Landscape Vision report prepared by BDP for further details on the proposed open space strategy.





EAST ELEVATION - PRE-APP SCHEME



EAST ELEVATION - CURRENT SCHEME

C ISSUES RAISED BY DUBLIN CITY COUNCIL OPINION

Further consideration and/or justification of the documents as they relate to the design strategy for the site in respect of:

Response to the issues raised by the Planning Department of Dublin City Council, as contained in the Planning Authority's Opinion dated 6th September 2021.

-An Bord Pleanala Opinion

APPLICANT RESPONSE

Issues raised by the DCC Planning Department related to scale, height, and massing have been addressed through the measures outlined in Section A of this appendix. In response to additional issues raised by the DCC Planning Department, the scheme has been revised in response to the following points:

DCC: Plot Ratio is 2.13, while Development Plan calls for 0.5 - 2.0, Plot Ratio is excessive Response: Plot ratio has been reduced to 1.81 which is within the Development Plan parameters

DCC: Too much overlooking of St Attracta gardens. Balcony screens below 1800mm ineffective

Response: All balcony screening has been increased to 1800mm. Building's east elevation set back by circa 5m to be a minimum of 11m from boundary with St Attracta gardens. Slatted treatment to balcony screening prevents overlooking while allowing natural light to private open spaces.

DCC: West elevation monolithic from railway bridge on Fassaugh Ave, regarding length, height, massing, material

Response: The west elevation has been refined with a reduced and fragmented mass, a decreased height of 1-2 levels, and a refined balcony and material treatment

DCC: Render, coloured metal and steel does not compliment surrounding brick neighbourhood

Response: Coloured metal treatment to balconies has been significantly reduced, while the use of brick across the scheme has been increased, particularly on elevations visible from Fassaugh Avenue.

DCC: Roof level requires greater architectural refinement

Response: The roof profiles across the scheme has been simplified with fewer changes in parapet height. To further refine the roof profile, a detached block to the north features pitched skylight profiles reflecting the pitches incorporated along the east elevation. These pitches to the east elevation have been stepped back from the parapet in order to simplify the roof



PRE-APP SCHEME



DCC: 42% dual aspect units not acceptable. Must meet 50%

Response: The number of dual aspect units has been increased to 54% (63 units) aided by fragmenting of building into three blocks, and changes in massing to Levels 05, 06

DCC: Balcony depths are below 1.5m without rationale

Response: All balconies are a minimum depth of 1.5m. This discrepancy was due to a dimensioning error on the pre-app submission drawings.

DCC: Separate ground floor private amenity from public amenity with soft planting. Landscape

Response: Soft planting has been incorporated as suggested. Details of this are available in the landscape plan and landscape strategy document which accompanies this submission. A 1.5m privacy strip is now identified on the proposed landscape arrangement submitted in this application.

DCC: Clarify how applicant will address shortfall in public space - financial contribution in lieu? Response: The quantum of public space has been increased to 10% of the developable site

DCC: Residential amenity space in place of proposed apartment 23 on ground floor would be

Response: Residential amenity space has been added in this location as suggested. The removal of this apartment in place of amenity has provided an additional 100sqm of residential communal amenity (gym) overlooking outdoor amenity on the east, north, and west.

DCC: Overlooking conflict between recreational use of roof terraces (north terrace) and private

Response: The north terrace has been removed, negating this issue.

DCC: Detail on Resident Support Facilities not adequate

Response: Specific uses for each resident support facility has been noted on GA plans, chapter 5.5 of the Architectural Design Statement, and on the schedule of accommodation.

DCC: Gym does not appear feasible to operate given size and amount of doors Response: The gym, previously located in the basement, has been relocated to the ground floor communal space on the northern end of the building and opens out onto the communal open space. The number of doors has reduced and the shape has been regularised for ease of use. The size of the space has increased from 62sqm to 100sqm.

DCC: Layout of public open space gives rise to serious conflict between vehicles, pedestrians, cyclists

Response: The public open space allocation has been revised to exclude any area of vehicular movement. Vehicles will now enter the site to perform turning manoeuvres, as set out in the attached transport strategy. Private vehicles proceed directly to the basement car



PRE-APP SCHEME



DCC: The gross density is 252 residential units per hectare. This is very high and is over 2.5 times the density of the recently approved SHD apartment that is undergoing construction on the opposite side of the road at Hamilton Gardens where the approved residential density is 108uph. While the planning authority is not adverse to such high density schemes the applicant must comprehensively demonstrate that the quality of the scheme is also very high. The planning authority does not consider that the proposal results in a high quality, high density residential scheme as detailed in various sections of this Opinion report

Response: The units per hectare has been reduced to 220uph. The number of dual aspect units has been increased to 54% (63 units) with no single-aspect north facing units. 36 No. (or 31%) of the apartments will exceed the minimum floor area by 10%. Cumulatively, the apartment floor area throughout the scheme is 7.5% higher than the minimum standard. Finally, the quantum of external communal amenity space is 2.5 times higher than required by development standards. The density is acceptable on this core urban site located in proximity to public transport, employment locations, services and facilities.

DCC: The apartment guidelines 2020 allow for flexibility in some quantitative standards for BTR schemes including storage space on the basis of the provision of alternative, compensatory communal and support facilities within the development at the discretion of the planning authority. Hotpresses or boiler space will not count as general storage; storage should be additional to kitchen cupboards and bedroom furniture, but may be partly provided in these rooms. In such cases this must be in addition to minimum aggregate living/dining/kitchen/ or bedroom floor areas. The drawings submitted do not clearly identify where internal storage areas are proposed and it is not clear if minimum storage areas have been met or exceeded. If not met, alternative, compensatory communal and support facilities should be provided within the development. The applicant should address the above issue – sections 3.30 – 3.33 of the Apartment Guidelines refer.

Response: In response to this point, we have included in this submission additional 1:50 scale unit type layouts covering all 117 proposed units. See FAS-BDP-A-PL-20-4100 and FAS-BDP-A-PL-20-4101. These unit type plans clearly identify allocation of storage within units, and storage figures (of which all units exceed required standard) are included on the accompanying Housing Quality Assessment prepared by BDP. Storage is provided in addition to minimum floor areas.

DCC: Overshadowing / Sunlight Hours: Note: The legibility of the shadow plans are not considered acceptable and would prove difficult for non-experts / 3rd parties to read.

Response: All queries related to overshadowing and sunlight drawings have been addressed in the daylight report prepared by BDP which accompanies this submission which includes a shadow diagram.

DCC: From the results presented it is noted that a section of 'Existing Property I' (nos. 305 – 311 Saint Attracta Road) would suffer adverse impacts as a result of the development in particular on the VSC levels and excessive overshadowing of rear gardens. The planning authority considers the scheme as proposed should be amended to protect these modestly-sized properties as these properties will also suffer from excessive overlooking and diminished outlook should the scheme be built as proposed. This is not considered acceptable.

Response: The proposed scheme has been reduced by 1-2 storeys, and set back a minimum of 11m from the boundary with St. Attracta Road properties, to improve the VSC and overshadowing impacts. These improvements are set out in reports accompanying this submission, including the Daylight report prepared by BDP.



PRE-APP SCHEME



DCC: The extent of works along the footpath differ between the proposed site layout plan, landscape plan and swept path analysis. Clarification of the full extent of the works to the public road is required.

Response: All drawings and reports have been aligned to show consistent proposals along the public road and throughout the entire development.

DCC: It is unclear how the spaces are intended to operate and the management of same; how they are accessed; the intended users of same etc. The planning authority does not consider these spaces as primary communal open spaces nor are they considered as 'Resident Support Facilities' or 'Resident Services and Amenities". A detailed description of functionality of same would be expected in the Landscape Vision document.

Response: A detailed description of the function, location, and size of all internal and external amenity spaces, and residential support facilities, is included in Sections 5.5 of the Architectural Design Statement prepared by BDP.

DCC: A number of balconies and windows of adjacent apartments have an unsatisfactory relationship with one another e.g. the balcony of Apt No. 1.01 is immediately outside the kitchen of an adjoining apartment (1.03) - this situation occurs for all equivalent apartments on levels 1-3; Apartment no. 1.01 and 1.08 have balconies in very close proximity to one another orientated in an angled arrangement – direct overlooking from one to another will occur. This arrangement occurs on equivalent apartments on levels 1-3.

Response: The relationship between Apartment 1.01 and 1.19 (previously 1.08) has been revised, with the balcony of 1.19 moved 1355mm away from 1.01 to prevent overlooking. The balcony of 1.02 has been replaced with an internal winter garden with east aspect, and no overlooking of apartment 1.03. This arrangement has been reflected on all relevant levels.

DCC: Vents from underground car park are positioned directly outside balconies/private open space. Review of location is required to protect residential amenities of these private terraces while also ensuring the non-fragmentation of the communal open space

Response: The ventilation is now surrounded by a min. 450mm planted buffer to protect the private open spaces and communal amenity.



PRE-APP SCHEME



F MATERIALITY

The response should also include a report that specifically addresses the proposed materials and finishes and the requirement to provide high quality and sustainable finishes and details Particular attention is required in the context of the visibility of the site and to the long-term management and maintenance of the proposed development. A Building Life Cycle report shall also be submitted in accordance with section 6.13 of the Sustainable Urban Housing: Design Standards for New Apartments (2020).

-An Bord Pleanala Opinion

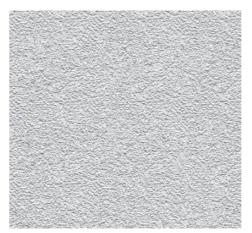
APPLICANT RESPONSE

In response to this item, the materiality strategy has been revised to reduce the prevalence of coloured metals, and increase the use of brick in order to assimilate further with the surrounding context.

Three predominant materials (brick, render, and metal) are proposed to assimilate the scheme with its surrounding context. Within this palette, gentle differences in material types give variation across the scheme, such as a distinct brick type for the townhouses to the north, and a differing brick type for Fassaugh Avenue to the south.





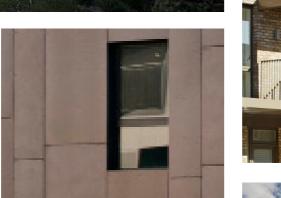


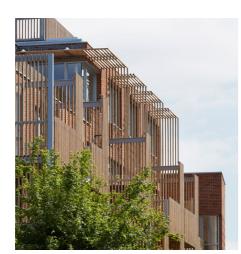
The materiality palette proposed draws on direct influences from site context. Studies of the suburban realm uncovered a wide use of both brick and render throughout. This is reflected in the proposed scheme, utilised in contemporary and specific ways; to playfully define height and massing strati, to break up the volume and reduce its visual impact, and to draw the eyes to interesting locations of activity at both the ground and upper levels.

A Building Lifecycle Report has been prepared by Aramark and is enclosed separately.











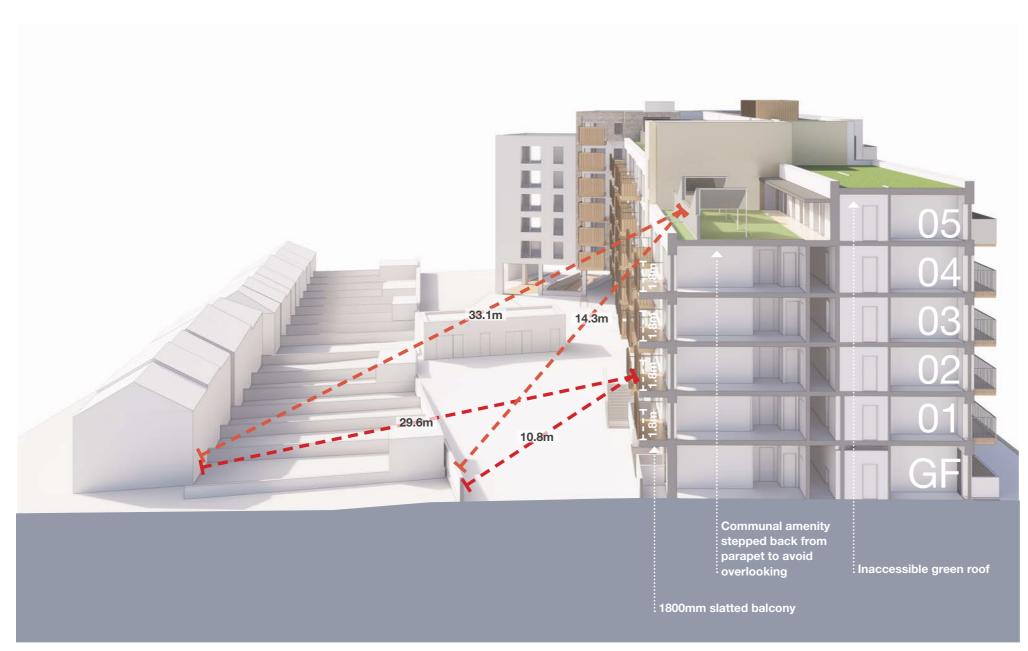


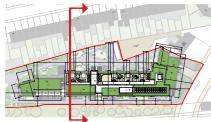
BRICK TO Fassaugh AVENUE FACADE

PUBLIC STREETSCAPE



Residential Amenities





Further consideration and/or justification of the documents as they relate to residential amenity, having particular regard to the potential for overlooking, overshadowing, and overbearing impacts on existing adjoining residential properties and proposed residential units within the scheme. The response should include a detailed Sunlight, Daylight and Shadow Assessment of inter alia units proposed, communal open spaces, public open spaces, and adjoining lands an properties.

The further consideration of these issues may require an amendment to the documents and/or design proposals submitted at application stage.

-An Bord Pleanala Opinion

APPLICANT RESPONSE

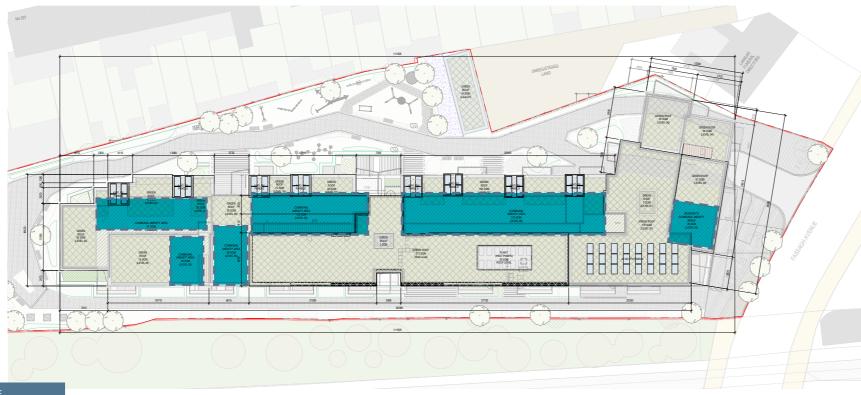
The scheme has been revised from pre-app stage in order to reduce the potential for overlooking, overshadowing, and overbearing impacts on residential properties adjacent to and within the development. The proposed scheme has been reduced by 1-2 storeys, and set back a minimum of 11m from the boundary with St. Attracta Road properties, to improve the VSC and overshadowing impacts. These improvements are set out in reports accompanying this submission, including the Daylight report prepared by BDP.

Private amenity balconies on the east elevation that face St Attracta Road which were 1500mm high at pre-app stage have been increased to 1800mm in order to ensure said balconies do not create overlooking issues onto St Attracta Road rear gardens. These balconies have been designed with slatted screens to ensure outlook from the resident private amenity is not compromised, and are views directed away from the St Attracta gardens.

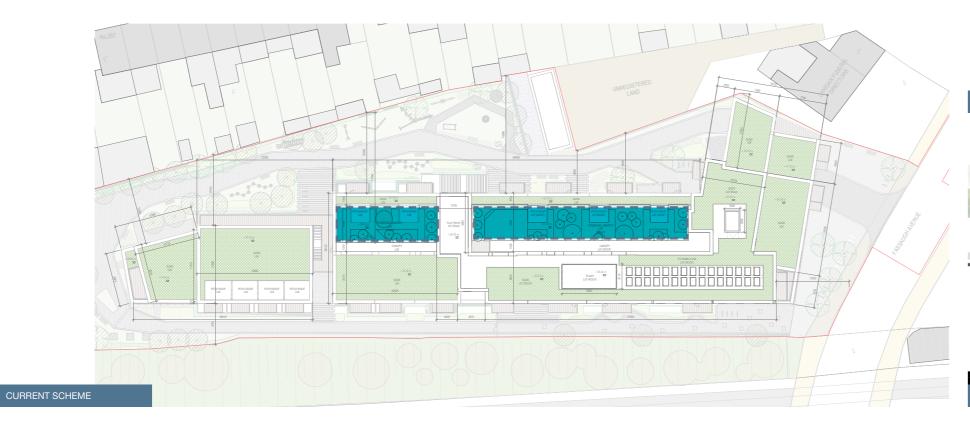
The quantum of communal open space at roof levels has been significantly reduced from 568sqm to 310sqm. The two communal open space spaces at roof levels which have been retained have both been treated with a parapet screening to prevent overlooking, including a setback of 1.95m from the parapet edge.

Communal open space at roof level to the northern area of the building has been removed, due to its proximity to St Attracta Road.

Private amenity balconies overlooking Lanigans Funeral Home have been removed in order to prevent overlooking, facilitate future development, and increase the boundary distance of the proposed development to the neighbouring property.



PRE-APP SCHEME



ROOFTOP AMENITY PLAN

The revised proposal simplifies the communal open space strategy by removing several rooftop amenity spaces, thus reducing overlooking onto St Attracta Road, and onto proposed units within the development.

The quantum of communal open space at roof levels has been significantly reduced from 568sqm to 310sqm. The two communal open spaces at roof levels which have been retained have both been treated with a parapet screening to prevent overlooking, including a setback of 1.95m from the parapet edge.







PRE-APP SCHEME



CURRENT SCHEME

EAST ELEVATION

Private amenity balconies on the east elevation that face St Attracta Road which were 1500mm high at pre-app stage have been increased to 1800mm in order to ensure said balconies do not create overlooking issues onto St Attracta Road rear gardens.





EAST-WEST SECTION

The building has been considerably set back by circa 5m to maintain a minimum 11m distance from the site boundary to St Attracta Road properties. The quantum of communal open space at roof levels has been significantly reduced from 568sqm to 310sqm. The two communal open space spaces at roof levels which have been retained have both been treated with a parapet screening to prevent overlooking, including a setback of 1.95m from the parapet edge.





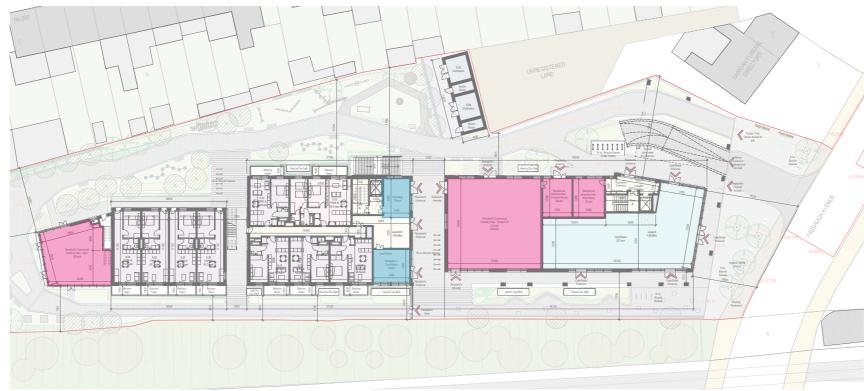


CURRENT SCHEME

Services, Facilities + Amenities



Proposed Basement Level -01



Proposed Ground Level 00

A Report that addresses the quantum and quality of services, facilities and amenities proposed having regard to the future needs of the occupants of the proposed development and a Site Specific Management Plan which includes details on management of the communal areas, public space, residential amenity and apartments.

-An Bord Pleanala Opinion

APPLICANT RESPONSE

A Site Specific Management Plan has been prepared by Aramark and is enclosed separately. The proposed development offers internal amenity spaces across the ground level, in addition to residential support facilities across the basement and ground level as follows:

Residential Internal Amenity Level 00

Gym (100sqm) Overlooking and accessible to outdoor amenity to

north, east, west

Shared TV Lounge (234sqm) Dual aspect to east and west

Function room (33sqm) Work area (35sqm) Accessed off TV lounge, aspect and access to east Accessed off residential stair core A, aspect to east

Residential Support Facilities Level 00

Concierge (30sqm) Located at entrance to Core B, with access from

residential outdoor amenity area and indoor residential

lobby

Reception + Post Room (32sqm) Located at entrance to Core B, with access from

residential outdoor amenity area and indoor residential

lobby

Residential Support Facilities Level -01

Bicycle storage (118sqm) Secure indoor cycle storage for 170no. bikes,

accessed from basement cores with direct connection to bike maintenance area. Additional 4no. cargo bike spaces with additional space allowance in close

proximity to bike maintenance room.

Electric bike lockers + maintenance (21sqm) Secure indoor storage for 10no. electric

bikes, accessed from basement core. Direct

connection to main bike storage facility

Management + Repair (37sqm) Close proximity to residential core A

Residential Bin Store (61sqm) Close proximity to residential core A and ramp for

transport to LOO for collection

Residential internal amenity





Proposed gym space



The images opposite show examples of the communal amenity spaces within the development. The gym, located to the north end of the building, overlooks the communal outdoor area to the north, east, and west, offering 100sqm of flexible space with high natural light.

The TV lounge offers 234sqm of flexible space, with dual outlook to the east and west, with full-length glazing fronting onto communal outdoor space.

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