Townscape and Visual Impact Assessment

Proposed Gowan House Student Accommodation Development, Naas Road, Dublin 12

Prepared by Model Works Ltd for

Malclose Ltd

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MODEL WORKS

Contents

1.0 Introduction

This report assesses the potential townscape and visual effects of a proposed student accommodation development on the Gowan House site, Naas Road, Dublin.

1.1 Development Description

Malclose Limited intend to apply to Dublin City Council for a 7-year permission for a large-scale residential development principally comprising student accommodation at this 0.962 Ha site at Gowan House, Carriglea Business Park, Naas Road, Dublin 12, D12 RCC4.

Works to upgrade of the access road to the west of the site on an area measuring c. 0.081 Ha are also proposed comprising new surfacing to the carriageway, the provision of inbound and outbound bicycle lanes from the development entrance to the Naas Road, the provision of a controlled pedestrian crossing on the access road at the Naas Road junction, and the provision of a further uncontrolled pedestrian and bicycle crossing linking the subject site with the approved Concorde SHD development (ABP Ref: TA29S.312218) to the west.

On the Naas Road, works are proposed on an area measuring c. 0.086 Ha comprising the realignment and widening of the existing pedestrian footpath along the westbound carriageway of the Naas Road and the provision of linkages from the realigned footpath to the development site, and the provision of new controlled pedestrian crossings across the eastbound and westbound carriages of the Naas Road and the provision of a new uncontrolled crossing of the Luas tracks.

The development site area and roadworks areas will provide a total application site area of c. 1.13 Ha.

The proposed development will principally consist of: the demolition of the existing two-storey office/warehouse building and outbuilding (5,172 sq m); and the construction of a development in two blocks (Block 1 (eastern block) is part 2 No. storeys to part 15 No. storeys over lower ground floor and basement levels with roof plant over and Block 2 (western block) is part 9 No. storeys to part 11 No. storeys over basement with roof plant over) principally comprising 941 No. Student Accommodation bedspaces (871 No. standards rooms, 47 No. accessible studio rooms and 23 No. studios) with associated facilities, which will be utilised for short-term lets during student holiday periods. The 871No. standard rooms are provided in 123 No. clusters ranging in size from 3 No. bedspaces to 8 No. bedspaces, and all clusters are served by a communal living/kitchen/dining room.

The development also provides: ancillary internal and external communal student amenity spaces and support facilities; cultural and community floor space (1,422 sq m internal and 131 sq m external) principally comprising a digital hub and co-working space with ancillary cafe; a retail unit (250 sq m); public open space; the daylighting of the culverted River Camac through the site; an elevated walkway above the River Camac at ground floor level; a pedestrian bridge link at first floor level between Blocks 1 and 2; vehicular access at the south-western corner; the provision of 7 No. car-parking spaces, 2 No. motorcycle parking spaces and 2 No. set down areas; bicycle stores at ground and lower ground floor levels; visitor cycle parking spaces; bin stores; substations; hard and soft landscaping; green and blue roofs; new telecommunications infrastructure at roof level of Block 1 including antennas and microwave link dishes, 18 No. antennas and 6 No. transmission dishes, together with all associated equipment; boundary treatments; plant; lift overruns; and all associated works above and below ground.

The gross floor area of the development is c. 33,140 sq m comprising c. 30,386 sq m above lower ground and basement level.

1.2 Townscape and Visual Impact Assessment Methodology

The assessment was carried out with reference to the Landscape Institute *Guidelines for Landscape and Visual Impact Assessment* 2013 (GLVIA) and the EPA *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports* 2022.

The GLVIA requires that the effects on views/visual amenity be assessed separately from the effects on landscape, although the topics are linked:

- Visual impact assessment is concerned with changes that arise in the composition of available views, the response of people to those changes and the overall effects on the area's visual amenity. The effects on 13 no. representative viewpoints in the receiving environment are assessed in Chapter 4, informed by verified photomontages (provided under separate cover).
- The European Landscape Convention defines landscape as "*an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors"*. Different combinations of physical, natural and cultural components create variations in landscape character (or 'townscape' character in urban areas). The GLVIA defines townscape as *"the landscape within the built-up area, including the buildings, the relationships between them, the different types of urban spaces, including green spaces and the relationship between buildings and open spaces"*. Townscape impact assessment is concerned with the effects of a proposed development on the *character and value* of the townscape as an environmental, cultural and economic resource. The potential effects on the townscape are assessed in Chapter 5.

A detailed explanation of the TVIA methodology, including explanation of the criteria and terms used, is provided in Appendix 1. The assessment was carried out by Richard Butler MILI MIPI of Model Works Ltd.

2.0 The Site and Receiving Environment

2.1 The Site

The site is located on the south side of the Naas Road in Dublin 12, along the stretch between the Walkinstown Avenue and Muirfield Drive junctions (and between the Kylemore and Bluebell Luas stops).

The site is roughly rectangular in shape, with frontage of 80m to the Naas Road and 100m to a local road to the west. It is occupied by a motor warehouse (Gowan Motors) positioned in the centre of the site, with parking areas to the front and rear, enclosed by palisade security fencing. There are rows of trees inside the boundaries and these provide some screening and visual amenity in summer, but like much of the surrounding townscape the site is unsightly.

Figure 1: The Site and immediate environs

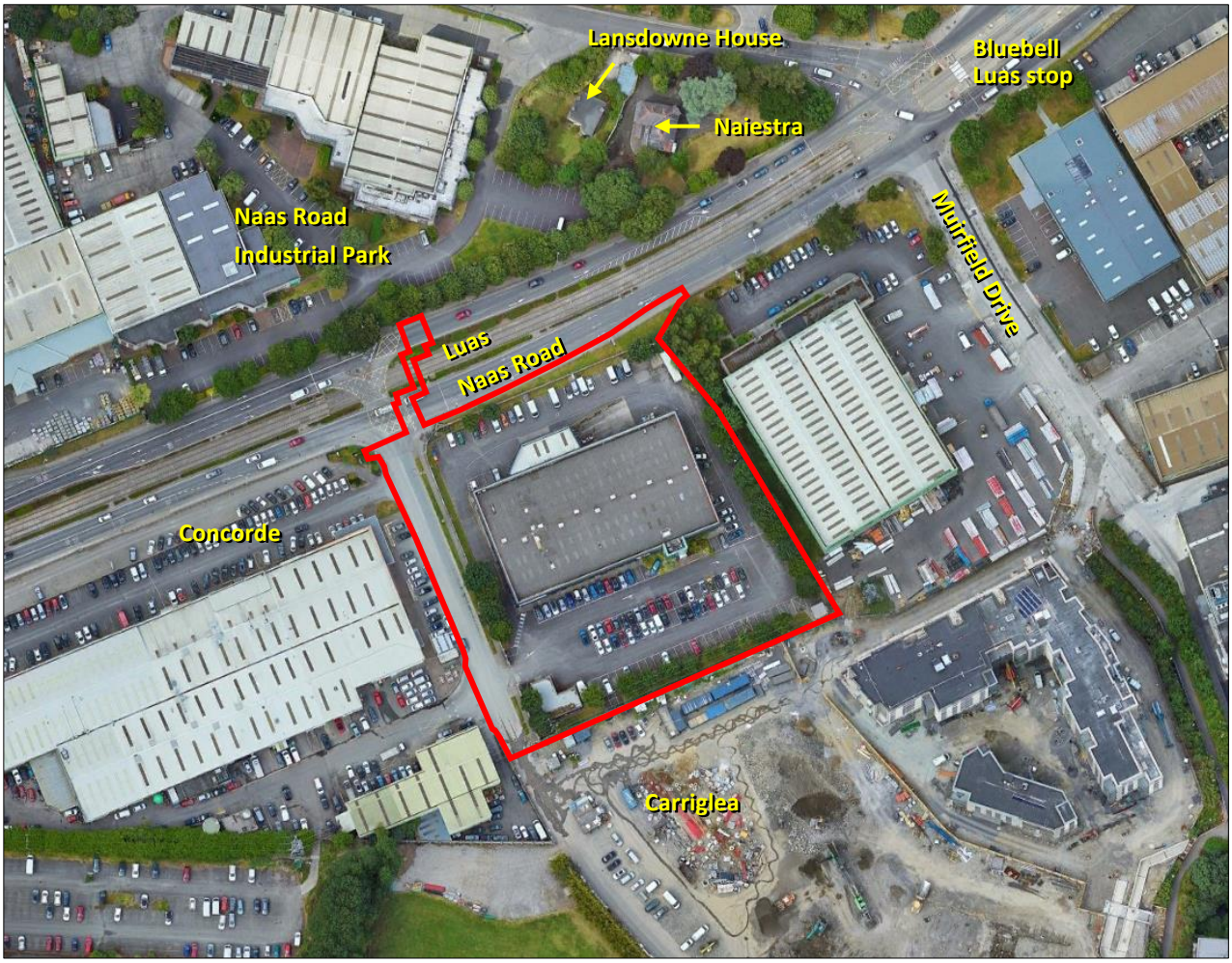
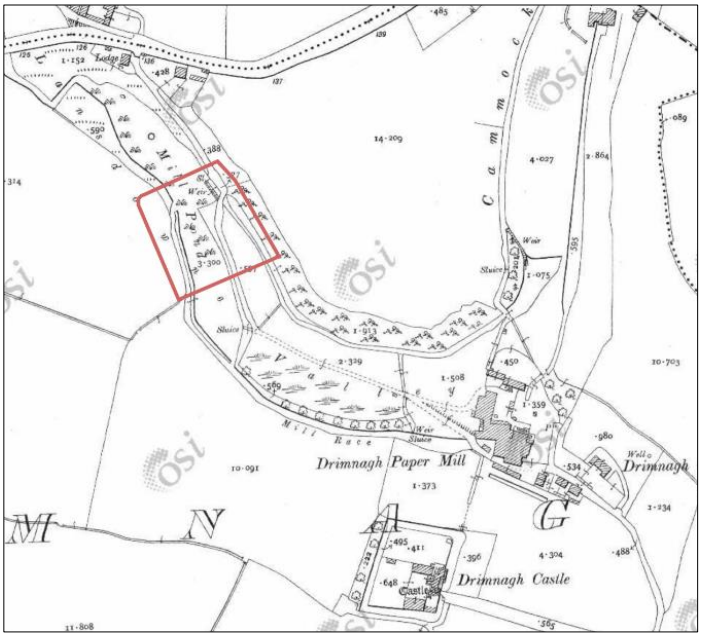


Photo 1: The Site as seen from the Naas Road

An important aspect of the site is that it was historically traversed by the Camac River (and a mill race leading to the Drimnagh paper mill). When the area was urbanised in the 20th century the stream was culverted, and it now runs beneath the site. It is an objective of the Dublin City Development Plan 2022 (DCDP 2022) that opportunities for river restoration should be exploited where they occur in Strategic Development and Regeneration Areas (SDRAs) such as the Naas Road area.

Also of note on the historic map is Drimnagh Castle located 300m to the south east of the site. Today the castle stands beside a school campus which fronts the Long Mile Road to the south, and is separated from the site by the school playing fields and the former Carriglea industrial estate (see Section 2.3.1 below).

Figure 2: OS 25 inch map showing the site (indicative boundary) in the 'Lansdowne Valley' traversed by the Camac River and a millrace



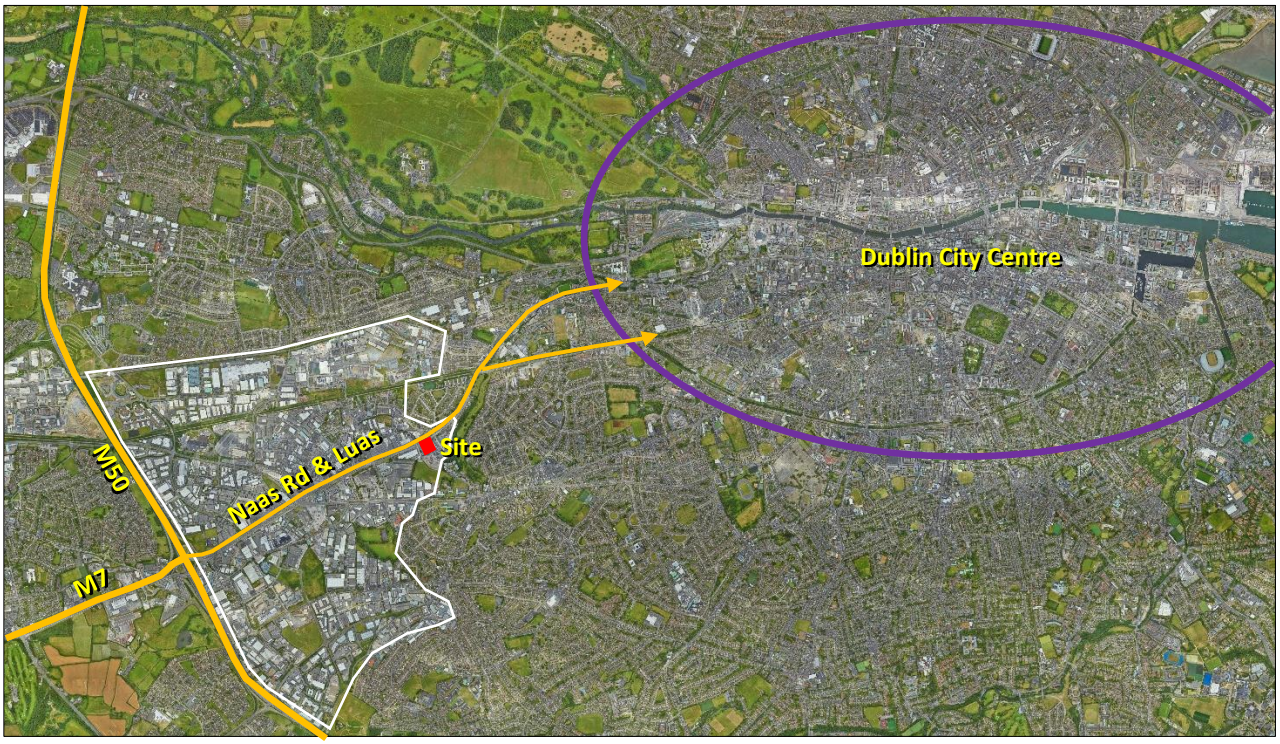
The site is flanked by similar industrial/commercial buildings to the east and west on the south side of the Naas Road (see Figure 1 above). There is similar development also to the north west across the road. However, directly to the north across the road are two houses ('Naisetra' and 'Lansdowne House'). Naisetra is an Edwardian House now used as offices. The building is a protected structure. Lansdowne House is a 1950s building that is listed on the National Inventory of Architectural Heritage.

2.2 Surrounding Townscape Character

The site is part of an extensive industrial and commercial district that developed in the latter half of the 20th century along the Naas Road, Long Mile Road and Kildare mainline railway, inside the M50. The location gave the area access to Dublin and the west via the motorway and rail networks. Figure 3 shows the strategic location of

this vast western industrial district in the context of the city, with the Naas Road (leading to/from the M7) as its central spine. The site is on this spine near the interface with the 20th century suburbs surrounding the city centre.

Figure 3: The Site location in the context of the western industrial/commercial district, the Naas Road and the city centre



The industrial/commercial district was built for the manufacture and distribution of goods. The roads are wide, the plots are large, the buildings large, low and designed with little concern for the aesthetic, and there is minimal green or blue infrastructure. Overall, the townscape is unsightly and inhospitable to pedestrians (see Photo 2).

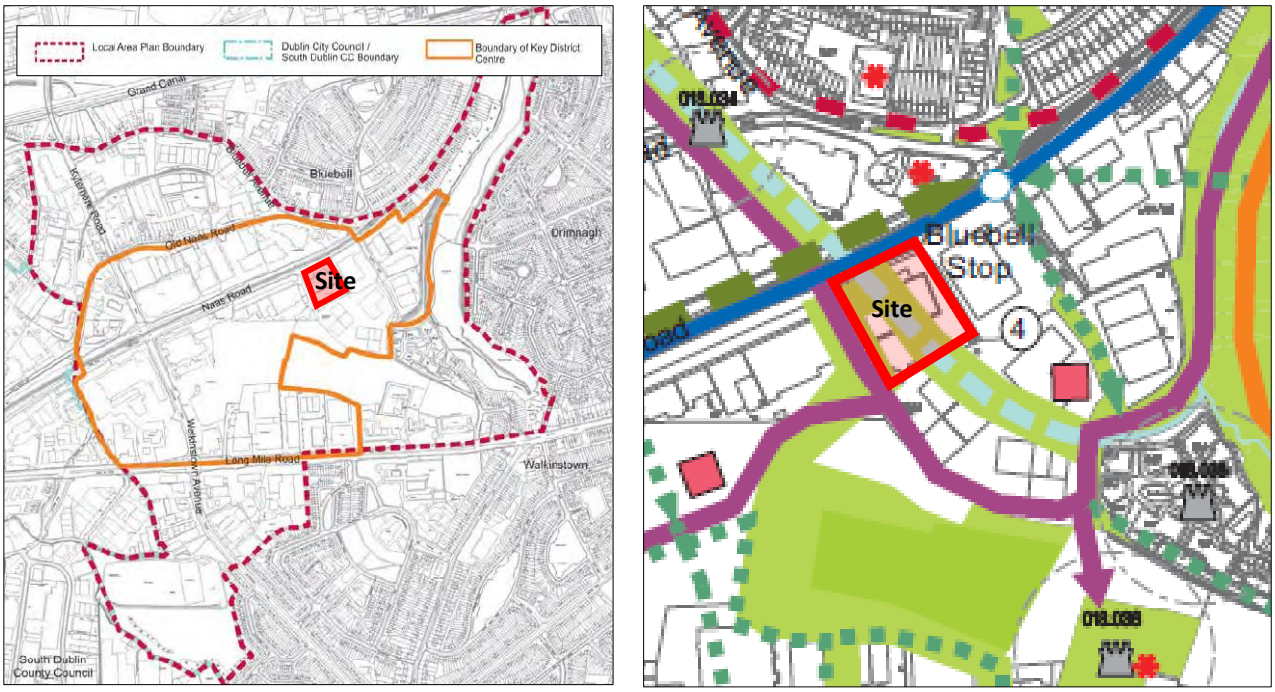
Photo 2: The Naas Road approaching the site from the west, showing the low quality urban environment

Many of the characteristics identified above - the strategic location, access to transport infrastructure and utilities/services, the 20th century urban grain and land ownership pattern, and a relative lack of sensitivities such as natural and cultural heritage sites and residential neighbourhoods - make this area suitable for regeneration. The opportunity is heightened by the area's gateway location with respect to the city.

This has been recognised for some time, and a part of the area - including the site - is designated a Strategic Development and Regeneration Area (SDRA 5) in the DCDP 2022 (as it was in several previous cycles of the plan). A Local Area Plan (the Naas Road LAP) was prepared for the area in 2013. The LAP expired in January 2023 but it set the course for the transformation of the townscape from an industrial and commercial zone to a modern, high density, mixed use urban district.

Figures 4 a and b: Figures 1.4 and 4.12 of the Naas Road LAP (now expired) showing:

- ***the site[1] as part of the 'Key District Centre' (outlined orange) within the wider LAP area;***
- ***the objective to 'uncover' the Camac River as part of the LAP Green Infrastructure Strategy***



The Naas Road LAP has expired but planning permission has been granted for a number of regeneration developments (coloured red on Figure 5) in line with the overall spatial and land use framework established by the LAP. These developments are briefly described in Section 2.3 below.

Figures 5 a and b: Key permissions granted in the site environs (red), and the permitted urban grain and building heights

These permitted developments in combination will realise a substantial part of the Key District Centre envisioned in the Dublin City Development Plan and the (now expired) Naas Road LAP. The redevelopment of the site has the potential to deliver another important piece of the future townscape.

[1] The site boundary in these maps is indicative. Refer to Figure 1 for the accurate red line boundary.

2.3 Permitted Developments in the Area

2.3.1 Carriglea/'Castleview'

The former Carriglea industrial estate to the south east of the site is in the process of redevelopment. The project comprises 10 no. apartment blocks, up to eight storeys tall, in two clusters. The two clusters are separated by a linear open space featuring a linear water feature (representing the culverted Camac River below ground).

Figure 6: Layout of the Carriglea development under construction adjacent to the site

This green corridor is the main arranging element of the development. The built form responds to the corridor, which crosses the site diagonally, south east to north west on a similar alignment to the culverted Camac River. The subject site lies adjacent, to the north west, of Carriglea and there is potential for the a green/blue corridor to continue between the two sites (with the river actually restored on the subject site as opposed to 'represented' by a water feature as it is on Carriglea).

Photos 3 & 4: The 'Castleview' development on a part of the former Carriglea industrial estate adjacent to the site

2.3.2 Concorde

The Concorde site lies to the west of the subject site across a shared side/access road off the Naas Road. It is a long, wedge shaped site with some 200m frontage to the Naas Road. Permission has been granted for a 10 storey development on the Concorde site. The main building is L-shaped, fronting the Naas Road and the side/access road, with 'finger blocks' extending to the rear forming a series of courtyards. There is a linear green space incorporating a wide pedestrian path and cycleway inside the southern boundary

Such greenways are a common feature of the permitted developments in the area. These were promoted by DCC through the Naas Road LAP and will be realised in the impending developments, in response to the poor permeability of the existing townscape. The objective is to layer a new, finer grained pedestrian and cycle network over the existing urban grain and give this equal or greater status to the road network. This requires the provision of public pedestrian and cycle routes across the typically large private development sites in the area.

Figures 7 & 8: CGIs of the permitted 10 storey frontage to the Naas Road, and the greenway passing to the rear of one of the finger blocks, which step down in height towards the south boundary

2.3.3 Nissan Site/'Southwest Gate'

To the west beyond the Concorde site is the c. 6ha former Nissan site on which the 'Southwest Gate' development is permitted. The scheme is comprised of 13 no. buildings in two clusters separated by a wide green corridor. One of the clusters is a mixed use, town centre-type development of large-footprint buildings, featuring a central plaza and a landmark tower of 15 storeys at the junction of Naas Road and Walkinstown Avenue. The other cluster is a residential neighbourhood of linear blocks to the south of the Concorde site.

Figures 9 & 10: Layout and aerial view of the permitted Southwest gate development on the former Nissan site at the junction of the Naas Road and Walkinstown Avenue

Similar to the Carriglea and Concorde developments this scheme is characterised by a high degree of pedestrian and cycle permeability, with the built form responding to this principal objective. The development also uses building height and high quality contemporary architecture to overcome weaknesses in the existing townscape (e.g. over-scaled road infrastructure and poor quality buildings) and generate the contemporary urban character that was envisioned in the Naas Road LAP.

Figure 11 below shows the permitted Naas Road streetscape. The wide road is fronted by buildings of sufficient scale to achieve urban street enclosure, but also sufficient diversity in height to create visual interest and legibility. These qualities are enhanced by the varied architectural treatments and materials.

Figure 11: The permitted Naas Road streetscape as seen from the approach to the Walkinstown Avenue junction (Source: Photomontages for LVIA for Concorde 2 SHD application (ABP Ref. TA29S.312218)

2.3.4 Royal Liver Site/'Project Royal'

To the north of the Naas Road, across the road from Southwest Gate, is the Royal Liver Retail Park site. Permission has been granted for a mixed use development comprised of nine buildings from seven to 18 storeys on this site. Like the Southwest Gate development this is a mixed use scheme of town centre character, and it will combine with Southwest Gate to form a substantial urban core, and a gateway in the urban structure.

Figure 12: The permitted development on the Royal Liver Retail Park site

2.4 Summary of Townscape Sensitivity and Key Receptors

The site is a motor warehouse facility in an extensive 20th century industrial and commercial zone along the Naas Road and Long Mile Road inside the M50. The environmental quality of the area is poor but it is of significant strategic value as an urban land asset and it is designated for regeneration. The transformation of the townscape into a new high density, mixed use urban district has begun with the granting of planning permission for several key development sites, and construction is underway on the Carriglea development beside the subject site.

The redevelopment of the site has the potential to deliver another important piece of the emerging townscape. The site is important for two reasons:

(1) It is one of the plots fronting the Naas Road and as such it will contribute to the character and quality of the central spine and the new district centre.

(2) It is *the* site – on the spine and in the centre – which also has potential for restoring a stretch of the Camac River, and bring the restored river corridor into the public realm. The site is the (only) location where the primary linear feature of the planned Green Infrastructure network and the primary elements of the road and public transport networks intersect. This node is an important 'place' in the future townscape.

Figure 13: The key receptors of townscape and visual change in the receiving environment

There are relatively few sensitivities in the area. The nearest potentially sensitive receptors of townscape and visual change (see Figure 13) are:

(1) The two houses ('Naisetra' and 'Lansdowne House') to the north across the Naas Road. Both of the buildings are of architectural heritage value but there are several factors that lessen their sensitivity. These are (a) the

character and quality of their existing townscape context, which is dominated by industrial and commercial use and transport infrastructure; (b) their separation and buffering from the site by the c. 35m wide Naas Road corridor; (c) their enclosure by mature trees in their gardens. Additionally, Naisetra (the protected structure) is now in office use. Permission for this was granted in 2001.

(2) The residential neighbourhood of Bluebell to the north of the Naas Road and the Old Naas Road. This is a 20th century low density suburb at the interface with the industrial and commercial zone. The nearest houses to the site are on Bluebell Avenue some 135m from the site. There is also a church ('Our Lady of the Wayside') along Bluebell Avenue between the terraces of houses. As a gathering place for a sector of the community the church is a potential receptor of change.

(3) The residential neighbourhood of Drimnagh to the east. Over 300m to the east of the site, beyond an area of industrial and high density residential development (along Muirfield Drive south of the Naas Road) and the Lansdowne Valley Park, is the 20th century suburb of Drimnagh. Due to the separation distance from the site and the wooded parkland and mixed urban development in the intervening landscape there is limited potential for significant townscape or visual effects on this area.

(4) Drimnagh Castle. The castle is a cultural and architectural heritage site of high value, and a visitor attraction. Its sensitivity is lessened somewhat by the existing and emerging urban context. It is also well removed from the site (by c. 300m) and buffered from it by school playing fields and the development under construction on the former Carriglea industrial park.

3.0 Relevant Policy

Since the Naas Road LAP 2013 has expired, the most relevant statutory plan covering the site and environs is the DCDP 2022.

3.1 Dublin City Development Plan 2022-2028

3.1.1 Land Use Objective

The site is zoned Z14 (Strategic Development and Regeneration Areas – SDRAs) with the objective *"To seek the social, economic and physical development and/or regeneration of an area with mixed-use, of which residential would be the predominant use".*

"These are areas where proposals for substantial, comprehensive development or redevelopment have been, or are in the process of being, prepared… Z14 areas are capable of accommodating significant mixed-use development, of which residential would be the predominant use. Therefore, developments must include proposals for additional physical and social infrastructure/facilities to support same." (emphasis added)

3.1.2 Strategic Development and Regeneration Areas

The DCDP 2022 includes an objective, SDRAO1, which applies to all SDRAs. The following are the points from SDRAO1 that are relevant to landscape/townscape and visual amenity:

"To support the ongoing redevelopment and regeneration of the SDRA's in accordance with the guiding principles and associated map; the qualitative and quantitative development management standards set out in Chapter 15; and in line with the following overarching principles:

- ***Architectural Design and Urban Design:*** *All development within the SDRAs must be of the highest architectural quality and adhere to the key architectural and urban design principles set out in Chapter*

15 in order to create long term, viable and sustainable communities aligned with the principles of the 15- minute city.

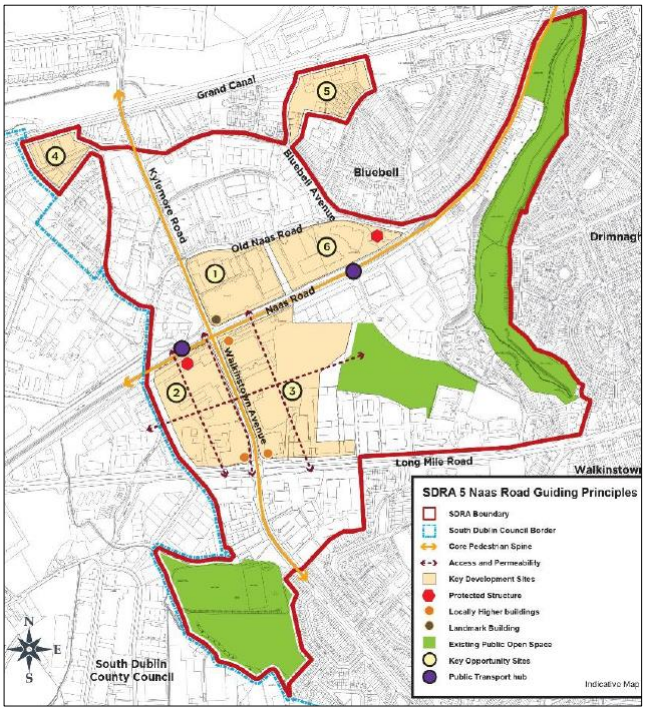
- ***Access and Permeability:*** *Development proposals should ensure adequate permeability and connectivity to surrounding neighbourhoods and public transport infrastructure through the provision of high quality, accessible public realm and high-quality walking and cycling infrastructure. Access and layout should accord with the principles of DMURS.*
- ***Height:*** *Guiding principles regarding height are set out for each SDRA. Where development adjoins lower scaled residential communities, development must be appropriately designed so that no significant adverse impacts on the residential amenities of adjacent residential properties arises. The performance criteria set out in Appendix 3 should be adhered to for developments of significant scale and/or density.*
- ***Urban Greening and Biodiversity:*** *Development proposals within the SDRA must ensure the integration of greening and biodiversity measures including high quality public open space as well as micro greening measures including green walls, green roofs, parklets etc. In general, unless otherwise specified under a separate LAP/SDZ Planning Scheme/other statutory plan policy/objective or site-specific guiding principle, a minimum of 10% public open space should be provided as part of all development proposals in SDRAs. A financial contribution in lieu of same will only be considered in exceptional circumstances.*
- ***River Restoration:*** *Opportunities for enhanced river corridors are applicable to the following Strategic Development and Regeneration Areas (SDRAs) in order to harness significant opportunities for river restoration where feasible:… SDRA 5 Naas Road…. See Chapter 9, Policy SI12 for further detail.*
- ***Cultural Infrastructure:*** *All new regeneration areas (SDRAs) and large-scale development above 10,000 sq. m. in total area must provide at a minimum 5% community, arts and culture predominantly internal floorspace as part of their development. See Objective CUO25..."* (emphasis added)

3.1.3 SDRA 5 Naas Road and the City Edge Project

The DCDP 2022 guiding principles for the Naas Road SDRA focus on a number of key re-development sites. There is no guidance provided for the other areas (including the subject site) that make up the remainder of the SDRA. The generic objectives for SDRAs (quoted in Section 3.1.2) do however apply to the site.

A number of points are worthy of note from the guiding principles map (Figure 14). These include (a) the site's location on the Naas Road, the central spine of the SDRA; (b) its position within walking distance of two Luas stops; (c) its position within walking distance of the district's central junction (Naas Road and Walkinstown Avenue) and mixed use urban core; (d) its position within walking distance of two of the main public open spaces in the area.

Figure 14: Dublin City Development Plan 2022 Figure 13-8 'guiding principles' for SDRA 5 Naas Road



The DCDP 2022 also notes that a new statutory plan is to be prepared for an area incorporating the Naas Road lands. This will be informed by the 'City Edge Project', which is a non-statutory plan that has been prepared for the entire 700 ha industrial/commercial district identi-fied in Figure 2 above.

3.1.4 Urban Consolidation and Density

Section 4.5.3 of the DCDP states:

"The NPF recognises that there is a need to increase densities on underutilised lands within core urban areas in order to promote consolidation and compact growth, prevent further sprawl and address the challenges of climate change… The RSES and Dublin MASP also promotes greater densification and more intensive forms of development particularly on infill, brownfield and underutilized lands along key strategic public transport corridors…

"It is acknowledged that good quality, higher density developments can make a positive contribution to the evolving urban form and structure of the city and can help to achieve sustainable land use and movement patterns. Increasing density can however, bring challenges in terms of ensuring appropriate levels of amenity for existing and future residents and integrating higher density schemes successfully with the existing built fabric…

"The objective is to provide opportunities for increased density in a sustainable manner whilst ensuring the highest standards of design as well as the protection of existing amenities and the natural and historical assets of the city…"

Policy SC 11 on Compact Growth: *"In alignment with the Metropolitan Area Strategic Plan, to promote compact growth and sustainable densities through the consolidation and intensification of infill and brownfield lands, particularly on public transport corridors, which will:*

- *enhance the urban form and spatial structure of the city;*
- *be appropriate to their context and respect the established character of the area;*
- *include due consideration of the protection of surrounding communities and provide for enhanced amenities for existing and future residents;*
- *be supported by a full range of social and community infrastructure such as schools, shops and recreational areas;*
- *and have regard to the criteria set out in Chapter 15: Development Standards, including the criteria and standards for good neighbourhoods, quality urban design and excellence in architecture."* (emphasis added)

3.1.5 Building Height

Policy SC16 states: *"To recognise the predominantly low rise character of Dublin City whilst also recognising the potential and need for increased height in appropriate locations including the city centre, Strategic Development Zones, Strategic Development Regeneration Areas, Key Urban Villages and other locations as identified in Appendix 3, provided that proposals ensure a balance with the reasonable protection of existing amenities and environmental sensitivities, protection of residential amenity and the established character of the area."*

The introduction to Appendix 3: 'Achieving Sustainable Compact Growth - Policy for Density and Building Height in the City' states:

"It is adopted planning policy at both national and regional level to promote compact growth and provide for increased density and height on underutilised lands within core urban areas in order to promote

consolidation, prevent further sprawl and address climate change. Increasing height and density however, can also bring challenges in terms of design and sustainability." (emphasis added)

Identification of Areas for Increased Height and Density

"The general principle is to support increased height and higher density schemes in the city centre, Strategic Development Regeneration Areas, key urban villages, areas close to high frequency public transport and some other areas (as identified) considered as suitable for increased intensity of development…

"In considering locations for greater height and density, all schemes must have regard to the local prevailing context within which they are situated. This is particularly important in the lower scaled suburban areas of the city where broader consideration must be given to potential impacts such as overshadowing and overlooking, as well as the visual, functional, environmental and cumulative impacts of increased building height…" (emphasis added)
In Section 5 below the proposed development is evaluated against the criteria contained in the DCDP Appendix 3 Table 3 ('Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale').

3.1.6 Urban Design and Architecture

Section 4.5.5 of the DCDP 2022 states: *"Well-considered urban design and architecture, including use of high quality materials and finishes, and well-designed buildings, spaces and landscapes make a positive contribution to the urban environment and improve the environmental performance, competitiveness and attractiveness of the city…*

"The City Council will strive to ensure exemplar design quality across the city, with the aim of achieving excellence in the ordinary, including the creation of new landmarks, streets and public spaces where appropriate…

Quality design and healthy placemaking are core principles of the NPF and the RSES, improving quality of life for all. The strategic approach is also to ensure that the principles of healthy placemaking are embraced and that high quality urban design that supports active lifestyles through good quality pedestrian and cycle links, particularly to places of work, education and recreation are promoted. Placemaking and sustainable communities are also supported through the creation of vibrant, safe and accessible spaces which facilitate recreation and social interaction*."*

Policy SC 19 on High Quality Architecture: *"To promote development which positively contributes to the city's built and natural environment, promotes healthy placemaking and incorporates exemplar standards of high-quality, sustainable and inclusive urban design and architecture befitting the city's environment and heritage and its diverse range of locally distinctive neighbourhoods."*

Policy SC 21 on Architectural Design: *"To promote and facilitate innovation in architectural design to produce contemporary buildings which contribute to the city's character and which mitigates and is resilient to, the impacts of climate change."* (emphasis added)

3.1.7 Public Realm and Green Infrastructure

Policy CCUV 38 on High Quality Streets and Spaces: *"To promote the development of high-quality streets and public spaces which are accessible and inclusive in accordance with the principles of universal design, and which deliver vibrant, attractive, accessible and safe places and meet the needs of the city's diverse communities regardless of age, ability, disability or gender."*

Policy CCUV 39 on Permeable, Legible and Connected Public Realm: *"To deliver a permeable, legible and connected public realm that contributes to the delivery of other key objectives of this development plan namely active travel and sustainable movement, quality urban design, healthy placemaking and green infrastructure."*

Policy CCUV 43 on New Development: *"That development proposals should deliver a high quality public realm which is well designed, clutter-free, with use of high quality and durable materials and green infrastructure. New development should create linkages and connections and improve accessibility."*

Policy SC 13 on Green Infrastructure: *"To recognise and promote Green Infrastructure and landscape as a key mechanism to address climate change and as an integral part of the form and structure of the city, including streets and public spaces".* (emphasis added)

4.0 Proposed Development

The proposal is described in detail in the Architectural and Landscape Design Statements and drawings accompanying the planning application. The following are the aspects of the proposal most relevant to the TVIA.

4.1 Arrangement of Built Form, Height and Massing

The layout and built form are determined principally by the objective to de-culvert the Camac River along its diagonal course across the site. The restored river, in a deep cutting, is the defining feature of a large courtyard space at the centre of the site, enclosed by two buildings. The central corridor opens out onto a plaza space at the site frontage to the Naas Road, and connects to the open space corridor (including a river feature) on the neighbouring Carriglea development to the south east.

The development is conceived as the marker of the intersection of the road, public transport, pedestrian and green infrastructure networks in the townscape (see Figure 15). As an intended landmark, the buildings are tall; the western building (Block 2) is 11 no. storeys and the eastern building (Block 1) is 15 no. storeys tall.

Figure 15: Conceptual motivation for layout and built form

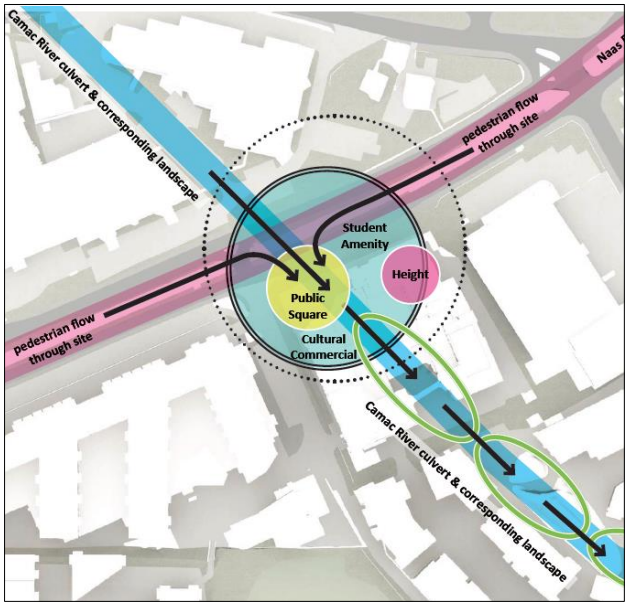
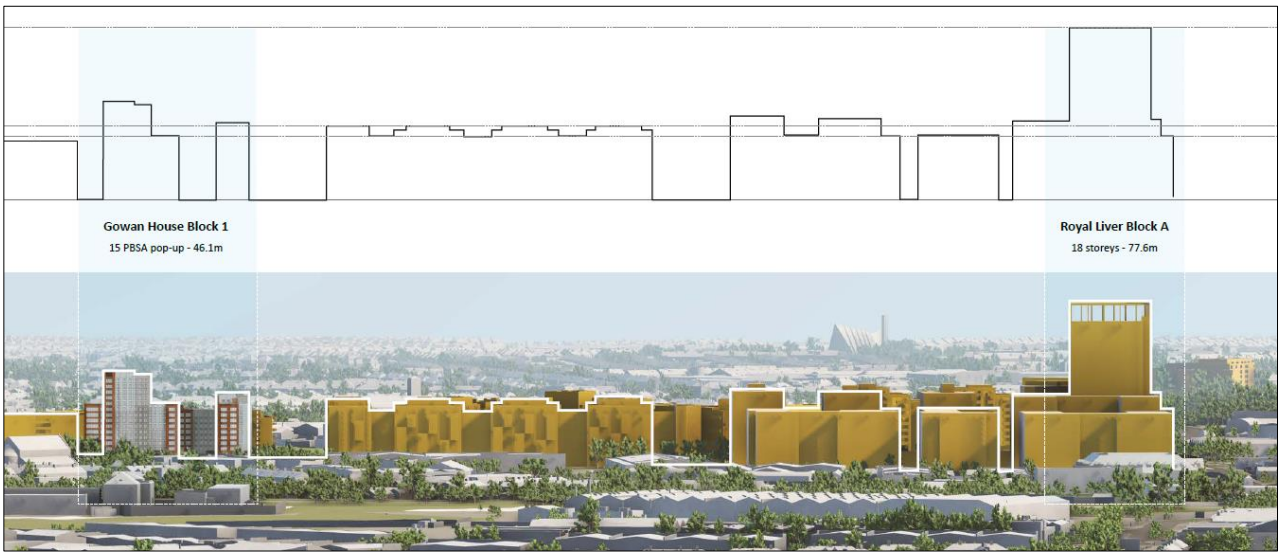


Figure 16: Aerial CGI showing the overall design concept

The proposed height also takes account of the site's location in the emerging Naas Road district centre, and the height of the permitted developments in that area. The proposal is conceived as a 'bookend' to the main street, complementing the 'Southwest Gate' and 'Project Royal' developments at the Walkinstown Avenue junction (see Sections 2.3.3 and 2.3.4 above).

Figure 17: Diagram from the Architectural Design Statement showing the height relationship of the proposed development with the permitted developments to the west along the Naas Road



While stepping up to achieve landmark height in the Naas Road/district centre context, the proposal also seeks to tie in to the height and massing of the adjacent sites/developments without excessing stepping:

- Both Blocks 1 and 2 are ten storeys tall at the their frontage to the square in the north west corner of the site on the Naas Road. The ten storey height matches the nine storey frontage of the permitted Concorde development extending to the west along the Naas Road (due to the lower floor to ceiling height of student accommodation compared to apartments – see black dashed line, Figure 18, and Figure 19).
- Block 1 steps up from 10 storeys to the 15 storey landmark volume in the north east corner of the site.
- Behind a setback fronting the square, Block 2 steps up to 11 storeys, approximately matching the 10 storey set-back height of the neighbouring Concorde development (see blue dashed line, Figure 18, and Figure 19).

Figure 18: Height relationship with the neighbouring (permitted) Concorde development fronting the Naas Road

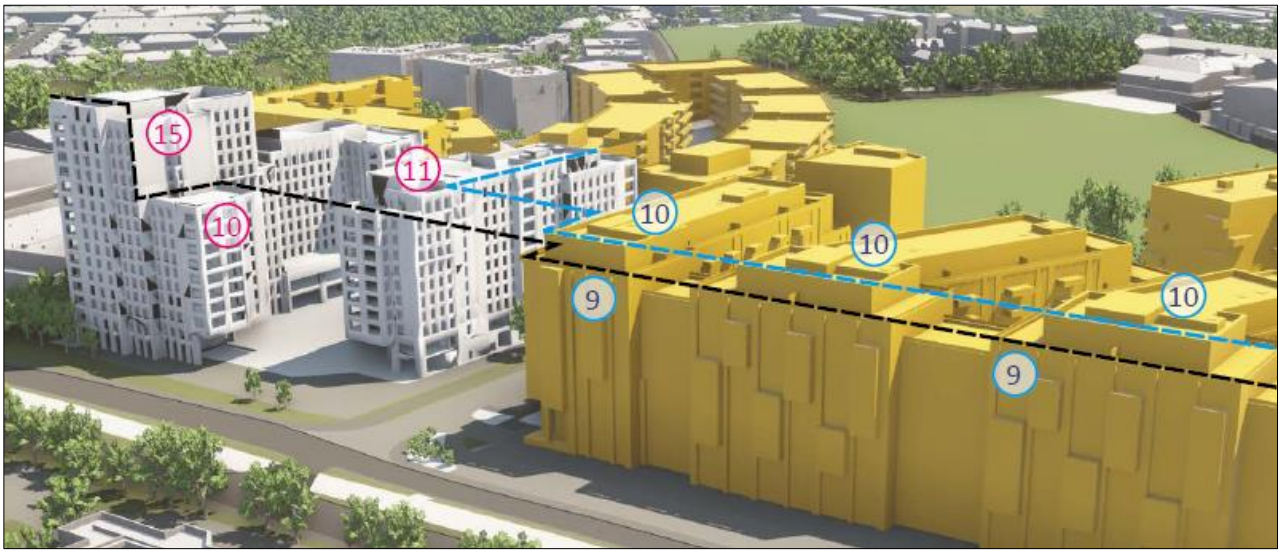


Figure 19: Height relationship with the neighbouring (permitted) Concorde development fronting the Naas Road

- Both Blocks 1 and 2 are up to ten storeys tall at the their southern frontage where they interface with the neighbouring Carriglea development (see 2.3.1 above). This step in height is justified by the subject site's more prominent position in the urban structure, i.e. fronting the Naas Road (the main road and public transport corridor) at its intersection with the main green/blue infrastructure corridor (the de-culverted Camac River).

Figure 20: Height relationship with the neighbouring Carriglea/Castleview development to the south

In order to reduce the perceived scale of the buildings their massing is disaggregated – by the use of steps/ setbacks in height, and steps and recesses in the building line.

These measures are emphasised by variations in façade treatment and materials (see Figures 19, 20, 21), so that each elevation is divided into lesser vertical volumes, and these in turn into three strata – a base, middle and top.

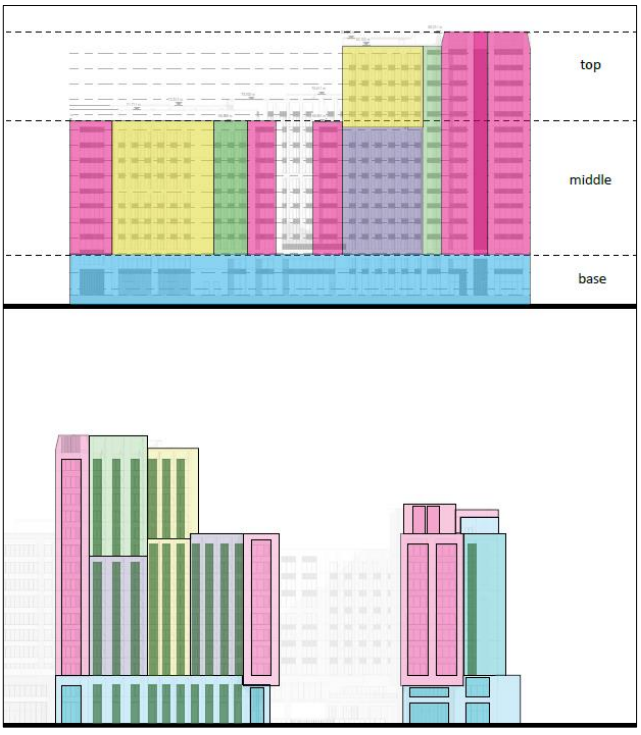
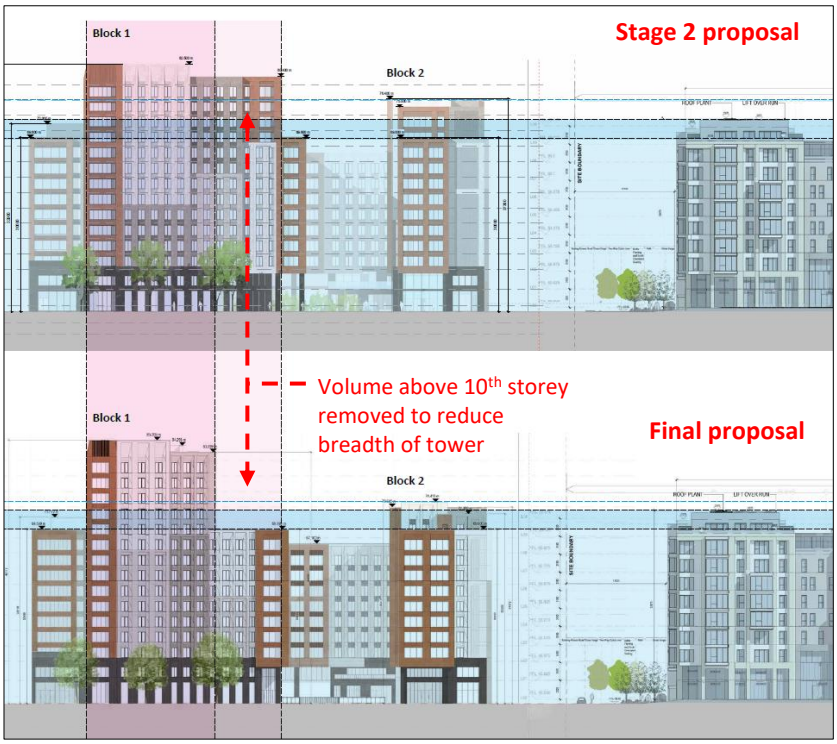


Figure 21: The use of disaggregated massing and complementary variations in façade treatment to divide the built form into smaller visual units, thereby reducing the perceived scale

In the final stage of design, following receipt of DCC's Opinion, particular emphasis has been given to the creation of a slender accent tower in the north east corner of the site.

A substantial volume (above the 10th storey) was removed from the Naas Road frontage of Block 1 to reduce its breadth. This can be seen to be effective in views from the Bluebell residential neighbourhood to the north (Viewpoints 4 and 5 in the Visual Effects Assessment).

Figure 22: Removal of volume from Block 1 frontage to Naas Road to create a more slender accent tower



4.2 Facade Treatment

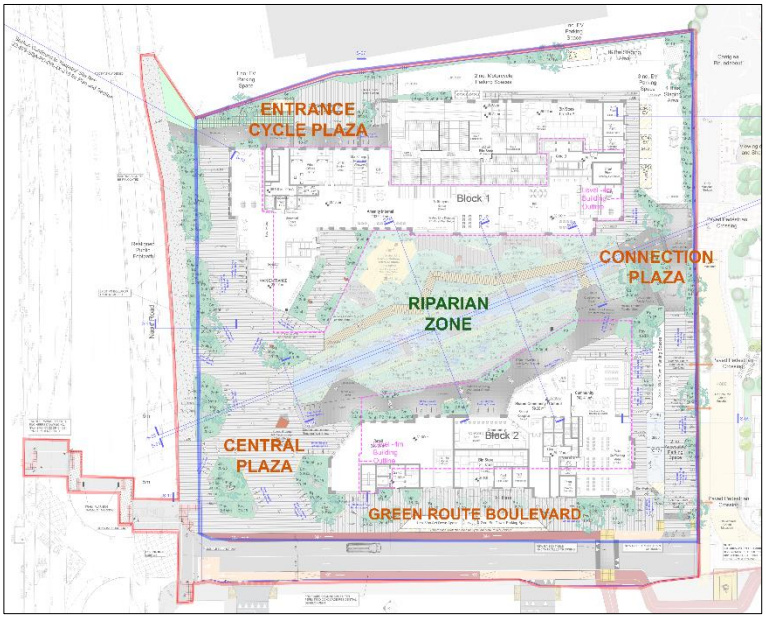
The principal proposed façade material is pre-cast concrete. This is a high quality, durable material that can be coloured and textured as required. The proposed colours include terracotta for accent elements (e.g. the tower, the volumes forming gateways to the Camac River corridor), shades of white and grey to differentiate between other vertical elements, and dark grey for the base (to offset the extensive interior-lit glazing).

Figure 23: CGI view showing the disaggregated form and variations in colour to (a) emphasise certain elements, (b) divide the buildings into smaller visual units

4.3 Public Realm and Green/Blue Infrastructure

The 'daylighting' of the Camac River is a key aspect of the proposed development. It is proposed to create a river corridor (or 'riparian zone') in a deep cutting at the centre of the site, forming the central feature of a large, diagonal linear courtyard providing communal and public open space and circulation routes. Plaza spaces are provided at either end of the courtyard, connecting the open space of the scheme to the Naas Road and the neighbouring Carriglea scheme.

Figure 24: Conceptual division of open space



The buildings are set well back from the Naas Road to the north and the local road to the west. This allows for beds of low planting and trees to be provided along the Naas Road frontage, and for trees in the streetscape to the west. In combination with the riparian zone and green roofs on the buildings, this amounts to a significant increase in vegetation cover on the site.

Figure 25: Proposed ground/street level masterplan

The approach to the use and design of the open space is three dimensional: The lowest level contains the 76m stretch of restored river within a densely vegetated riparian zone. An elevated walkway runs along the valley, providing views over the riparian zone and close contact with the tree canopy. At lower ground level, balconies and terraces extend from the buildings over the riparian zone, providing communal space for the cultural facility on one side and the residents on the other. A further level up is the publicly accessible ground level space that runs along one side of the river corridor, fronted by retail and public/community spaces in Block 2, and connects to the public realm to either side of the site.

Figure 26: Section showing the three dimensional approach to the use and design of the river corridor

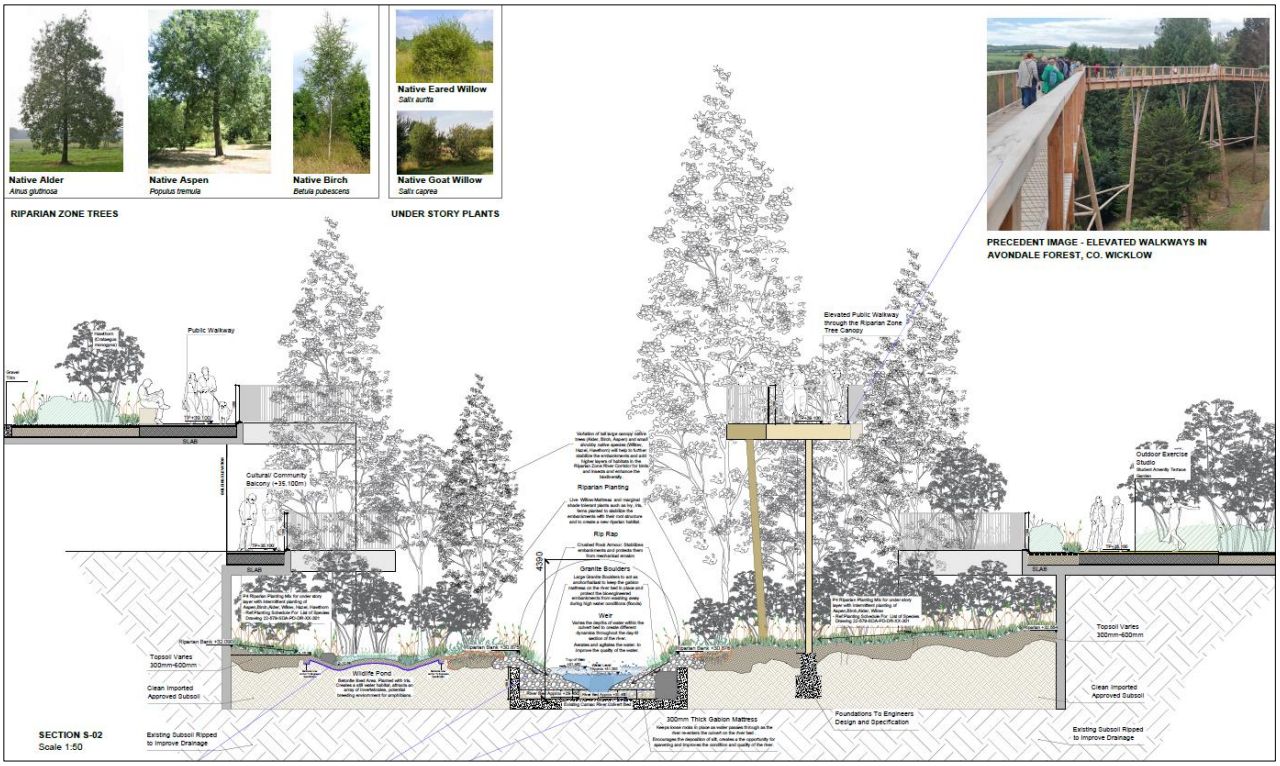


Figure 27: CGI view of the riverine zone

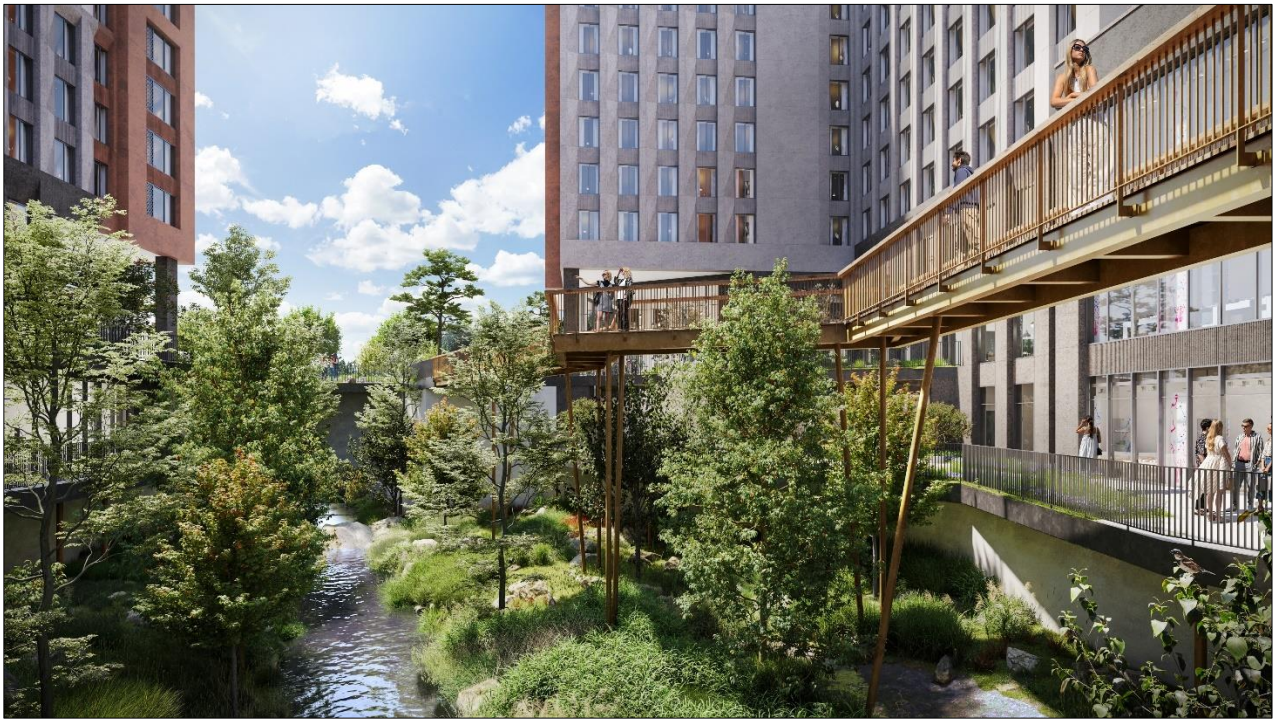


Figure 28: CGI view of the restored river corridor at the centre of the site, overlooked by communal spaces, cantilevered walkways and the student accommodation

Figure 29: CGI view of the 'connection plaza' between the site and the neighbouring Carriglea development, showing (a) the legibility of the restored river corridor in the landscape, and (b) the publicly accessible walkway alongside the river corridor, leading across the site to the Naas Road

5.0 Visual Effects Assessment

13 no. viewpoints (see Figure 30) were selected for visual impact assessment informed by verified photomontages. The viewpoints were selected to represent the key receptors in the receiving environment and to provide visualisations of the proposal from all directions and a range of distances.

The effects on the viewpoints are individually assessed below. For the methodology, terms and criteria used in the assessment refer to Appendix 1. In the commentary on the proposed change the focus is the cumulative scenario as this is the relevant consideration in this case.

The assessment should be read in conjunction with the verified photomontages (produced by 3D Design Bureau) provided under separate cover. For each view the following images are provided:

- Baseline view (existing photograph).
- Baseline & Permitted view (existing photograph + all permitted developments in massing model form).
- Proposed view (existing photograph + the proposed development).
- Cumulative view (existing photograph + proposed development + all permitted developments in massing model form).

The assessment of visual effects focusses on the cumulative scenario.

Figure 30: Viewpoints for visual effects assessment

Table 1: Visual effects assessment

No	Viewpoint Location	Existing and Permitted View	Sensitivity	Proposed/Cumulative View	Magnitude of Change	Significance of Effects
01	Naas Road approaching Walkinstown Avenue junction	<u>Existing</u> - The viewpoint represents the large number of people that travel into the city along the Naas Road and the Luas. - The very wide road corridor is dominated by traffic, cluttered with signage, street furniture and lighting and lacking in built frontage/enclosure. The level of visual amenity is extremely low. <u>Permitted</u> - The permitted buildings on the Nissan and Concorde sites to the right and Royal Liver to the left (a) form a gateway, (b) mark the district centre, (c) establish strong building lines and urban-type street enclosure. - The landmark buildings at the junction are tall but are comfortably accommodated by the wide road corridor. - The variations in height add visual interest as well as legibility and these qualities will be enhanced by the varied architecture and materials.	Low	- At this distance (500m), in the cumulative view, the development is a relatively minor addition to the view. - However, it achieves visual presence and a distinct identity in the street elevation due to: (a) the noticeable step up in height from the Concorde development; (b) the gap between the site and the Concorde building; (c) the variation in form and materials, and (d) the fact that the 'gable' of Block 1 addresses the view *along* the Naas Road. - **These factors contribute to the development having a 'marker effect', incidating a place of importance in the townscape (the intersection of the road/public transport and green/blue infrastructure networks) and 'bookending' the main street of the new Naas Road distict centre**. - The development strengthens the emerging townscape character, adds visual interest and enhances legibility, with no negative impact on any valued/sensitive element or characteristic of the view.	Low	**Slight-moderate positive**
02	Naas Road bus stop opposite Concorde site	<u>Existing</u> - The viewpoint represents a gathering place (the bus stop) where people typically have time to observe their surroundings. - The view again illustrates the poor townscape and visual quality of the area. <u>Permitted</u> - The Concorde building is a significant presence in the road corridor, establishing urban-type street enclosure and elevating the quality of the built environment overall (refer to Figure 7 above). - Being located on a stretch of the road	Low	- The development is a significant addition the view. It achieves a distinct presence and identity in the street elevation due to: (a) the step up in height from the Concorde; (b) the gap between the site and the Concorde, emphasised by the setback of Block 2, forming the plaza at the entrance to the courtyard/river corridor; (c) the variation in form and materials (from the Concorde), and (d) the fact that the west façade of Block 1 has a 'principal façade' treatment, addressing the view *along* the Naas Road. - These measures mark the site as a place of importance in	Medium	**Moderate positive**

No	Viewpoint Location	Existing and Permitted View	Sensitivity	Proposed/Cumulative View	Magnitude of Change	Significance of Effects
		between junctions, the Concorde building has a long, linear form with only minor variations in height. - **The Concorde does not seek to mark/identify any particular node in the townscape; its main design objectives are to provide street enclosure and a high quality built frontage**.		the townscape (the intersection of the road/public transport and green/blue infrastructure networks). - The development will be seen as a counterbalance to the two landmark buildings at the Walkinstown Avenue junction ('Southwest Gate' and 'Project Royal'), which mark (a) the gateway to the city and (b) the distirct centre on the Naas Road. The development will read as the other end of the main street/linear urban core, appropriately located at the river corridor junction.		
03	Naas Road opposite north west corner of the site	<u>Existing</u> - This view shows the site's frontage to both the Naas Road and the local road (to Carriglea) between the site the Concorde site to the west. - It is taken from a signalised junction so it represents a static view that would be experienced by a large number of people travelling by road and Luas. - The view illustrates the poor townscape and visual quality of the area, and the site's contribution to that condition. <u>Permitted</u> - The Concorde building is prominent to the right, fronting the Naas Road and the side road leading to Carriglea. - The permitted Carriglea apartment buildings can be seen rising behind the existing building on the site. Together with the Concorde they initiate a shift in townscape character towards a more urban condition (with a better balance between built form and roads, improved street enclosure, legibility, etc.).	Low	- The development is a significant addition, changing the character of the townscape in view. The design is particularly successful seen from this angle, due to the following: (a) the plaza at the corner is well defined by the setbacks of Blocks 1 and 2, and the colour variation emphasising the frontage of each building to the space; (b) however, there is sufficient built frontage to provide definition/enclosure to both the Naas Road and the road to Carriglea; (c) the central courtyard can be seen through the gap between the buildings so that there is a continuity of spaces – from the Naas Road to the corner plaza to the central courtyard; (d) the buildings are tall but their massing is articulated (by steps in height and building line), reducing the perception of scale; (e) this is emphasised by the variations in façade treatment and materials; (f) the generous tree planting softens the built frontage and adds greenery and visual amenity to the streetscapes. - **Overall the composition of form and space/streets, architecture and landscaping is pleasing, interesting, and complements the neighbouring permitted developments**. The development is of suitable character and quality to function as (a) a part of the district centre (on the main street), and (b) the marker of the Naas Road-Camac River junction, as intended.	High	**Moderate positive**

No	Viewpoint Location	Existing and Permitted View	Sensitivity	Proposed/Cumulative View	Magnitude of Change	Significance of Effects
04	Bluebell Avenue in front of church	Existing - This view represents the neighbourhood of Bluebell, which lies to the north of the Naas Road. The church is located between terraces of houses facing south towards the site. The viewpoint represents the church and the houses. - Across the street to the left are the two houses, 'Naisetra' (a protected structure, now used as offices) and 'Lansdowne House'. These houses lie to the north of the site across the Naas Road. They are enclosed from their surroundings by dense, mostly evergreen garden vegetation. - To the right is a building in the Naas Road industrial park, which is typical of development in the area. Permitted - The Concorde building is visible above the industrial building to the right. Although not prominent, it adds a new typology (high density residential/mixed use) to the townscape, shifting the character slightly towards a more contemporary, higher quality urban condition.	Medium	- The development is a prominent addition beside the Concorde building, rising above the houses and factory in the foreground, becoming co-dominant with these elements in the view. - Block 1 steps up in height towards the east (towards the city) and although large, the massing and facades are highly articulated, which moderates its presence (and adds quality to the building itself). - **Being of similar typology to the Concorde, and strongly contrasting with the factory and the houses, the two developments side by side form a new character area in the townscape (i.e. the Naas Road district centre).** - **The building's height suggests a place of importance (marking the Camac River corridor and the eastern edge of the district centre). It therefore contributes to legibility (by identifying the Naas Road, the district centre, and the intersection of the road with the restored river corridor)**. - **In every aspect the development contrasts with the two houses across the road**. However, these houses are no longer dwellings in a suburban environment; they are located on the main street of an evolving high denisty, mixed use urban centre. While the houses (and their gardens/cutilage) themselves warrant protection from change/harm, it is not sustainable that they determine the typology or scale of development in this location. In 21st century urban environment, such juxtapositions - of type, scale and architecture - are not unusual and are in fact desirable in that they add character and visual interest.	Medium	**Moderate positive**
05	Bluebell Avenue – distant view from the north west	Existing - This view is taken from a position further to the north along Bluebell Avenue. The alignment of the road frames a view towards the site. - Bluebell Avenue is the boundary between the residential neighbourhood and the industrial zone to the west and south. To the left in the view are the terraced houses of Bluebell and to the right a large-footprint industrial building	Low-Medium	- The development is a prominent addition in the distance, framed by the houses and factory in the foreground. - Block 1, the intended landmark fronting the Naas Road, faces the viewer. The steps in height and division of the elevation into vertical strips of different colour: (a) break up the massing into visual units not dissimilar in proportions and rhythm to others in the townscape (e.g. the terraced houses), and (b) emphasise the tower element. - It is nonetheless a large building in a focal-point position, contrasting (in type, use, scale, architecture) with the	Medium	**Slight positive**

No	Viewpoint Location	Existing and Permitted View	Sensitivity	Proposed/Cumulative View	Magnitude of Change	Significance of Effects
		enclosed by security fencing. - There is limited quality in the built environment and visual amenity and legibility are lacking. <u>Permitted</u> - The Castleview building on the Carriglea site is visible but not prominent in the distance, and it has little effect on the character and quality of the view.		foreground elements, thus changing the townscape character. This is not inappropriate in an area designated for change, and the development's evident design and material quality (compared to parts of the context, i.e. the industrial sites) elevates the quality of the built environment overall. - It also improves legibility by identifying the Naas Road (including its alignment), the district centre (by its town-centre typology), and the intersection of the road and the restored river corridor. - Importantly, due to the separation distance, it avoids dominance of the neighbouring (low density residential) character area despite the contrast in scale. Such compositions are not unusual in a 21st century urban area, and there is no loss of visual amenity.		
06	Naas Road to north east of site	<u>Existing</u> - This view shows the site in the Naas Road elevation when approaching from the east, departing the city and entering the Naas Road district centre (refer to Figure 4a above). - The protected structure 'Naisetra' (an Edwardian house now in office use) is behind a high wall and trees to the right. - Across the road is the long, low office frontage to a warehouse beside the subject site. The existing site building is filtered by trees (mostly on the neighbouring site) and its white security fence. Beyond the site is the equally unsightly Concorde site. - Typical of views along the Naas Road corridor, visual amenity is very limited. <u>Permitted</u> - The permitted Concorde building is prominent ahead along the Naas Road frontage and turning the corner onto the road to Carriglea. - Located on a stretch of the Naas Road between junctions, the Concorde building has a long, linear form (see Figure 5a and b). With	Low	- The development is a significant addition to the view, becoming co-dominant with the road corridor, and combining with the Concorde to transform the townscape. - Block 1 is tall in comparison to the Concorde. The height reflects its intended landmark function, and the view shows that the wide road can accommodate the height without excessive enclosure. - **The massing is articulated by steps in height and building line, complemented by variations in façade treatment and materials, with the tallest volume in the north east corner given emphasis.** - The generous tree planting combines with the trees on the neighbouring site to soften the built frontage and add greenery and visual amenity to the streetscape. - The depth of the development, extending back from the streetfront to the south, is notable. This indicates the development is more than just a transformed street front, but is part of a wider urban district. - The development is a bold change to the view, creating an event in the built form along the Naas Road, marking the eastern entry to the distinct centre and the road's intersection with the river corridor. It also shows that, due to its design and material quality, its meaningful response to the context and avoidance of any negative impact	High	**Moderate positive**

No	Viewpoint Location	Existing and Permitted View	Sensitivity	Proposed/Cumulative View	Magnitude of Change	Significance of Effects
		its strong building line, high quality architecture and streetscape improvements, and active uses in the ground floor frontage, it will initiate a shift in character along this stretch of the Naas Road towards that of an urban street.		onsensitive receptors, the development would be a positive intervention in the townscape.		
07	Naas Road at Muirfield Drive junction and Bluebell Luas stop	<u>Existing</u> - This view is taken from the junction of the Naas Road and Muirfield Drive near Bluebell Luas stop. The viewpoint represents the middle distant view when approaching the Naas Road district – by road or Luas - from the city. - The view shows the diverse and transitional townscape character: (a) Across the junction, to the right behind the trees is the protected structure 'Naisetra' (an Edwardian house now in office use). (b) To the left is an unsightly office-fronted industrial building beside the site. Similar development extends into the distance along the road. (c) In the middle distance to the left is the Castleview development on the Carriglea site. (d) **Overall, the Naas Road is the dominant element in the view**. <u>Permitted</u> - The permitted Concorde building is visible beyond the site. **This complements Castleview in shifting the character towards a more urban condition (although it is notable that both developments have a horizontal form)**. The other, taller developments to the west are not visible from this location.	Low	- The development is a prominent addition to the view, becoming a focal point/landmark in the already diverse context. - Block 1 is tall in comparison to the Concorde and Castleview. This adds diversity and visual interest to the collective built form, and the height suggests a place of importance in the townscape (the intersection of road/public transport and green infrastructure networks). - The massing is articulated by steps in height and building line, complemented by variations in façade treatment and materials, with the tallest volume in the north east corner given particular emphasis. - Due to its height the 'depth' of the development, extending back from the Naas Road, allows the connection between the site/Naas Road to Carriglea/Castleview to be seen. - An important point illustrated by this view is the separation distance between the site and the protected structure 'Naisetra' across the Naas Road, and the buffering of the house from its surroundings by its garden vegetation. - **The development is a bold and significant change to the view, creating an 'event' in the built form of the Naas Road corridor, marking (a) the eastern entry to the distinct centre, and (b) the road's intersection with the restored river corridor. It thus improves legibility. It also adds visual interest to the view and reduces the adverse influence of the road and the remaining industrial development. The overall effect on the view is positive**.	Medium	**Moderate positive**

No	Viewpoint Location	Existing and Permitted View	Sensitivity	Proposed/Cumulative View	Magnitude of Change	Significance of Effects
08	Naas Road – distant view from the east	Existing - Along this stretch the Naas Road is lined on both sides by terraced two storey houses, which appear incongruous fronting the wide road and Luas corridor. - A low industrial building is discernible in the distance and this is the only divergence in development typology in the view. Permitted - The permitted Concorde building is visible – and quite prominent due to its focal-point position, relative scale and its being the first of its type in the view. Both its north and east elevations, to the Naas Road and the road to Carriglea, can be seen. It therefore has the effect of strengthening townscape legibility.	Low-Medium	- Despite the distance from the site (c. 400m) the development is a prominent addition to the view due to its framed, focal-point position, its scale, and its ditinctive form and architecture. - It combines with the Concorde to achieve a critical mass of contemporary urban development, thereby establishing a new character area, the Naas Road district centre. - The building is tall in comparison to the Concorde, reflecting its intended landmark function. It is effective in this regard – announcing the entry to the main street of the new district centre. - The north elevation combines with the Concorde to indicate the alignment of the road beyond the curve in the middle distance, thus improving legibility. - **Overall, similar to View 07, the composition - including the juxtapositions (of building type, scale and character) - is visually pleasing and interesting. The development also contributes to a reduction in the dominance of the road in the view. Additionally, there is no harm done to any sensitive element or characteristic of the view. The net effect is positive**.	Medium	**Moderate positive**
09	Lansdowne Valley Park	Existing - The park is a long linear space on the valley side above the wooded banks of the Camac River, lying between the Naas Road area and Drimnagh. - In the north eastern part of the park its alignment frames a view towards the site and the emerging Naas Road district centre. However, the visibility of the surroundings is limited by the tall, dense tree belts around the park, even in winter. Permitted - Only the Castleview development (on the Carriglea site) will be visible from the park. The taller permitted developments further west along will be hidden by the trees.	Medium	- The proposed building protrudes very marginally above the treeline (most likely only in winter) - to a lesser extent than the existing Castleview building on the neighbbouring site. - It may slightly contribute to the impression of a more contemporary, higher density townscape surrounding the park, but it has no effect on the visual amenity of the park.	Negligible	**Not significant neutral**

No	Viewpoint Location	Existing and Permitted View	Sensitivity	Proposed/Cumulative View	Magnitude of Change	Significance of Effects
10	Mourne Road, Drimnagh	Existing - This viewpoint was selected to assess whether the development would have any effect on the residential neighbourhood of Drimnagh. The western end of Mourne Road is the nearest point in Drimnagh to the site. - The houses frame the view west towards the site but the vegetation in Lansdowne Valley Park closes the vista, even in winter. Permitted - None of the permitted developments in the Naas Road area will be visible from this location.	Medium	- The development is hidden by the vegetation in Lansdowne Valley Park, which lies between Drimnagh and the Naas Road area. - There may be certain locations around the western edge of Drimnagh where the development would be discrenible, but due to the separation distance it would have no effect on the visual amenity of the neighbourhood.	None	**No effect**
11	Drimnagh Castle	Existing - Drimnagh Castle is a site of cultural and architectural heritage value and a visitor attraction. It lies 300m to the south east of the site on a school campus off the Long Mile Road. - The castle and garden are surrounded by a belt of trees which combine with the castle itself and the boundary walls to enclose the historic site from the surrounding townscape. Permitted - In winter, when the deciduous trees are bare, the permitted developments in the Naas Road area will be discernible through the trees, but distant, and not prominent. - There will be an impression of change in the surrounding townscape but this will not affect visual amenity or the visitor experience at the castle - as (a) it is removed and buffered from the developments, and (b) it is already within and a part of the urban complex (it is accessed from the Long Mile Road, a busy urban thoroughfare).	Medium-High	- Like the permitted developments, the proposed development will be discernible (although heavily filtered) through the foreground trees in winter. In summer it will be screened. - It will contribute slightly to the shift in the surrounding townscape towards a higher density, contemporary urban condition, but it will have no effect on visual amenity or the visitor experience at the castle.	Negligible	**Not significant neutral**

No	Viewpoint Location	Existing and Permitted View	Sensitivity	Proposed/Cumulative View	Magnitude of Change	Significance of Effects
12	Approach to Drimnagh Castle through school campus off Long Mile Road	Existing - This is a view from the approach road to the castle from the Long Mile Road entrance, through the school campus. - Being just off the Long Mile Road and adjacent to modern school buildings (as opposed to within the castle walls), the sensitivity of this view is lower than Viewpoint 11. Permitted - The permitted developments will be largely screened or heavily filtered by the trees around the castle in winter. In summer they will be screened.	Medium	- Block 1 protrudes above the wall of the castle enclosure to the side of the keep. - Seen from a distance of 400m the building will be a minor intrusion in the view (in a composition that includes the impressive castle keep and several eye-catching trees in the foreground) and not out of character in the urban environment. - The building would have no effect on the legibility of the historic structure, or the visual amenity experienced in the castle environs (the school campus). - It should be borne in mind that this view is experienced only meters from the Long Mile Road, a busy urban thoroughfare. Any view of or from Drimnagh Castle is experienced in this context.	Low	**Slight neutral**
13	'Castleview' development on former Carriglea site	Existing - The viewpoint represents the new high density residential neighbourhood under construction on the former Carriglea industrial park beside the site. - The Castleview building and surrounding landscape lift the overall quality of the environment and stand in stark contrast (in quality and typology) to the neighbouring industrial sites. Permitted - A part of the 2nd phase of Carriglea can be seen beyond the corner of Castleview, and the Concorde buildings are visible further west, beyond the subject site.	Medium	- The development is a prominent addition to the view, 10 storeys tall at its interface with Carriglea and stepping up to the 15 storey landmark volume fronting the Naas Road. - The opening between the two buildings can be seen and this opens into the courtyard/river corridor that crosses the site to provide a link to the Naas Road. - The building is large but the steps in height, variations in façade treatment and materials moderate its presence and the overall composition is pleasing. - In combination with the other developments it will make a significant contribution to transforming the character and quality of the townscape, also providing visual interest and improving legibility.	Medium	**Moderate positive**

6.0 Townscape Effects Assessment

6.1 Townscape Sensitivity

The *GLVIA* states that landscape sensitivity should be classified with consideration of 'the particular project or development that is being proposed', and 'the location in question'. Sensitivity of the townscape is determined by two factors:

1. **Susceptibility to change**: *"This means the ability of the townscape receptor (whether it be the overall character or quality/condition of a particular landscape type or area…) to accommodate the proposed development without undue consequences for the maintenance of the baseline situation and/or the achievement of landscape policies or strategies"*.
2. **Value of the landscape/townscape receptor**: This can be indicated by designations or, where there are no designations, by judgements based on criteria that can be used to establish landscape value.

The sensitivity of the receiving environment can be classified 'low' (definition: *Areas where the landscape has few valued elements, features or characteristics and the character is weak. The character is such that it has capacity for change; where development would make no significant change or could make a positive change. Such landscapes are generally unrecognised in policy and the principal management objective may be to facilitate change through development, repair, restoration or enhancement)*.

This reflects that (a) the majority of the context is poor quality, 20th century urban environment dominated by road infrastructure and industrial and commercial premises, (b) the area has few townscape features (e.g. buildings, open spaces/green infrastructure assets, streetscapes, etc.) of value; (c) visual interest, visual amenity and legibility are poor; (d) the area is designated a Strategic Regeneration and Development Area, i.e. fundamental townscape change is encouraged by planning policy.

6.2 Magnitude of Townscape Change

The *GLVIA* states that the magnitude of landscape change should be classified based on (1) the size or scale of the physical change which would take place in the townscape, (2) the geographical extent over which that change would be perceived, and (3) the duration and reversibility of the townscape effects.

6.2.1 Size/Scale of Change

The site is a small to mid-sized plot compared to the other development sites (and remaining industrial and commercial premises) in the area. However, it is given prominence/importance by (a) its position fronting the Naas Road, within the district centre as defined in the Naas Road LAP (now expired), and (b) its position in the former Lansdowne Valley with the Camac River culverted beneath the site.

The proposed development comprises two buildings rising to 11 no. and 15 no. storeys. This is tall for the existing context but within the range of height of the buildings permitted on several nearby sites. The step up in height from the permitted neighbouring Carriglea and Concorde developments (eight and ten storeys respectively) reflects the site's more prominent position in the townscape (at the intersection of the road/public transport and restored river/green infrastructure networks).

6.2.2 Geographical Extent Over Which the Change Would be Perceived

The visual effects assessment indicates that the development would be visible from a distance (c. 500m) to the east and west along the Naas Road. This is due to its prominent position along the road and the proposal is designed in response to this. It would also be visible from some distance to the north along

Bluebell Avenue, affecting a part of the Bluebell residential neighbourhood. Visibility from other sensitive areas is however limited. The less affected areas include Drimnagh Castle, Lansdowne Valley Park and the residential neighbourhood of Drimnagh. Where the development is visible, it would generally be seen in the context of several other developments of similar typology and scale, and its visual presence would be moderated by this context.

6.2.3 Duration and Reversibility

The development would cause a permanent, irreversible change to the townscape (transformation of the site from industrial/commercial in use to residential/mixed). However, this change is (a) planned/ prescribed in the DCDP 2022 (and in several previous cycles of the Development Plan, and the now expired Naas Road LAP), and (b) in keeping with the established trend of change in the area.

In summary, the magnitude of townscape change which would result from the proposed development is classified 'medium' (definition: *Change that is moderate in extent, resulting in partial loss or alteration to key elements, features or characteristics of the townscape, and/or introduction of elements that may be prominent but not necessarily substantially uncharacteristic in the context. Such development results in change to the character of the townscape*). The development would take its place comfortably in the emerging context but would serve a landmark function.

6.3 Significance and Quality of Townscape Effects

Measuring the magnitude of change against the sensitivity of the receiving environment, **the significance of the townscape effects is predicted to be 'moderate'**, i.e. *"an effect that alters the character of the environment in a manner that is consistent with existing and emerging baseline trends"* (EPA definition – see Table 4, Appendix 1).

The more pertinent question is whether the effects of the development can be considered positive, neutral or negative. The visual effects assessment indicates that the development would generally have positive effects on views from the surroundings.

This assessment can be supplemented by analysis of the proposal against the criteria set out in Table 3 of Appendix 3 of the DCDP 2022. The table provides criteria that can be used for assessing schemes of high density, to evaluate whether they may be considered to be of high urban design and architectural quality, and would achieve positive placemaking. The proposal is considered against these criteria in Table 2 below.

Table 2: Assessment of proposal against DCDP 2022 Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale

Performance Criteria	Assessment
1. To promote development with a sense of place and character… Enhanced density and scale should:	
1a • respect and/or complement existing and established surrounding urban structure, character and local context, scale and built and natural heritage and have regard to any development constraints,	As a contemporary, high density residential development in a predominantly industrial/commercial townscape, the proposal diverts from the existing character of the area. However, (a) the area is designated for such change in the DCDP 2022 and the Naas Road LAP (now expired), (b) it respects those elements of the existing urban structure which are to be retained in the area's transformation into a sustainable, high density urban district centre, and (c) it complements various aspects of the permitted developments on other redevelopment sites in the vicinity. For example: - The buildings provide strong built frontage to the Naas Road and the road to Carriglea, giving definition and enclosure to the streets and thereby reinforcing the urban structure. - The use of the perimeter block typology, to provide street definition/enclosure and contain communal or public space internal to development plots, is common to a number of the permitted developments in the area. It can be considered characteristic of the 'established' (i.e. permitted) urban structure. - The buildings are set back sufficiently from the roads to allow for the provision of trees and other planting in the streetscapes, to provide greening/amenity to the wide road corridors that are currently infrastructural in character and dominated by vehicular traffic. - The main arranging element of the proposed development is the de-culverted Camac River, running diagonally through the site in a deep cutting in the central courtyard. This restores a key natural/topographical feature (which was buried for decades) to the townscape – as the defining feature of the development and a key element of the green infrastructure network of the new/future district centre. - This concept, of new high density buildings defining new green infrastructure and pedestrian movement corridors, is common to all of the permitted developments in the area (Carriglea, Concorde, 'Southwest Gate', 'Project Royal'), in keeping with the Naas Road LAP. The proposed development complements this 'established' character conceptually and functionally, by connecting to a similar corridor on the neighbouring Carriglea site, thereby expanding the green infrastructure and pedestrian networks. - The development does step up in scale from the neighbouring permitted developments (Concorde and Carriglea, 10 and 8 storeys respectively), but this reflects the site's more prominent position in the townscape and the related objective to function as a landmark – identifying (a) the intersection of the main road and green infrastructure elements in the area (the Naas Road and the restored Camac River) and (b) the eastern gateway to the district centre. **The proposed development thus respects and reinforces the main elements of the existing urban structure and seeks to complement the key elements and character of the planned/permitted townscape**. **It is important to note that due to its existing use/condition and that of its context, the site is relatively unencumbered by development constraints**. There is an industrial premises to the east and two permitted high density residential developments to the south and west. To the north is the Naas Road. These surrounding conditions are not sensitive. There are no low density residential receptors in close proximity to the site. There are two houses across the Naas Road, one of which is a protected structure – but that building is now in use as offices. Both these buildings are located adjacent to the Naas Road in a predominantly industrial/ commercial townscape. This lessens their sensitivity to change, and in fact they would benefit from change such as that proposed.

1b • have a positive impact on the local community and environment and contribute to 'healthy placemaking',	The proposed development includes several 'placemaking' elements supporting physical and community health, including: - The provision of a new plaza space at the north west corner of the site –at the junction of the Naas Road, the road to Carriglea and the Camac River/GI corridor across the site. This introduces a new 'place' to the public realm, benefitting the residents and the wider community. The plaza is complemented by a commercial unit in the ground floor of Block 2. - The provision of a section of restored river corridor in a linear courtyard/corridor crossing the site, connecting the Naas Road to Carriglea. This green infrastructure corridor provides a public pedestrian link across the site and thus promotes sustainable movement not only for the residents but also the wider community. 
1c • create a distinctive design and add to and enhance the quality design of the area,	**The de-culverting and restoration of the Camac River to the surface is central to the proposal and results in a distinctive, bespoke design – of both the built form and the open space – which will enhance the character, quality and functioning of the townscape (through enhanced ecosystem services delivery, permeability, etc.)**. The proposal seeks to make use of the site's prominent location in the Naas Road corridor (at the eastern edge of the district centre) and is intended to function as a landmark - to identify the intersection of the road and green infrastructure networks and the eastern gateway to the district centre. It employs height to make the buildings distinct from the neighbouring developments (Concorde and Carriglea) and thereby achieve visibility/prominence.  The massing of the buildings is disaggregated, with steps in height and building line and recessed elements to provide articulation, soften the form and moderate the buildings' visual presence. These measures are complemented by variations in façade treatment and materials. As a result the proposal has a distinctive, bespoke design. The CGIs and photomontages provide evidence of the high quality of design and materials. The net effect of the development would be to elevate the quality of the built environment locally.

Performance Criteria	Assessment
1d • be appropriately located in highly accessible places of greater activity and land use intensity,	The site is in a highly accessible location, within the high density, mixed use district centre identified in the Naas Road LAP (i.e. a place of greater activity and land use intensity), minutes' walk from two Luas stops (Bluebell and Kylemore) and bus stops in both directions on the Naas Road.
1e • have sufficient variety in scale and form and have an appropriate transition in scale to the boundaries of a site/adjacent development in an established area, • not be monolithic and should have a well considered design response that avoids long slab blocks,	The development includes a 15 storey landmark element in the north east corner. This seeks to make use of - and emphasise - the site's prominent location in the Naas Road corridor (at the eastern edge of the district centre) and is intended to function as a landmark - to identify the intersection of the road and green infrastructure networks and the eastern gateway to the district centre. The proposal thus employs scale/height to make the buildings distinct from the neighbouring developments (Concorde and Carriglea) and thereby achieve visibility/prominence. However, the proposal also seeks to tie in with the scale of the neighbouring buildings. For the final application (in response to DCC's Opinion) the height of Block 2 has been reduced by a level to 11 storeys (stepping down to 10 storeys fronting the north and south boundaries). Due to the lower floor to ceiling height of the student accommodation building vs. the Concorde apartment building, the two buildings are approximately the same height. Both buildings step down one floor at their Naas Road frontage.  At the southern site boundary where the proposed development interfaces with Carriglea/Castleview, there is a greater step in height (from eight to 9/10 storeys). The transition is considered appropriate as the site occupies a prominent location in the townscape and is intended to function as a landmark. The elevations, photomontages and CGIs show that the measures taken to articulate the form and facades would result in (a) transitions in scale (from the neighbouring developments) that are not excessively pronounced, (b) the development having a landmark presence, as intended, and (c) avoidance of a monolithic appearance.

Performance Criteria	Assessment
1f • ensure that set back floors are appropriately scaled and designed.	There are setbacks used in both buildings to transition in scale to the neighbouring developments and to soften the buildings' profile and create an interesting form. In places the setbacks are large enough to serve as roof gardens. These are designed to provide a range of seating and gathering options in addition to visual amenity, which is provided by ornamental planting and trees in raised planters.
2. To promote appropriate legibility… Enhanced density and scale should:	
• make a positive contribution to legibility in an area in a cohesive manner, • reflect and reinforce the role and function of streets and places and enhance permeability.	The development would contribute to legibility in the following ways: - **As a landmark (due to its height and distinctive design) the development would mark an important place in the townscape, where (a) the Camac River corridor intersects with the Naas Road, and (b) the Naas Road enters the district centre form the east**. - **It would reinforce the urban structure by providing built frontage to the Naas Road and the road to Carriglea**. A number of the photomontages (e.g. Viewpoints 3, 5, 8) show how the increased height along these street-fronts would cause the townscape to be more legible from far as well as near.  - The plaza formed by the setback of the buildings in the north west corner of the site provides an on-street public open space at the main entrance to the development. The plaza opens into the central courtyard/corridor, which includes a public pedestrian route alongside the restored river, across the site and linking to Carriglea to the south. This improves permeability locally. - The streetscapes of both the Naas Road and the side road to Carriglea would be enhanced by street trees and planting beds, with sufficient space for seating. This would contribute to changing the character of the road corridors from vehicular routes to spaces for pedestrian movement and other activity.

Performance Criteria	Assessment
3. To provide appropriate continuity and enclosure of streets and spaces … Enhanced density and scale should:	
• enhance the urban design context for public spaces and key thoroughfares, • provide appropriate level of enclosure to streets and spaces, • provide adequate passive surveillance and sufficient doors, entrances and active uses to generate street-level activity, animation and visual interest. • not produce canyons of excessive scale and overbearing of streets and spaces, • generally be within a human scale and provide an appropriate street width to building height ratio of 1:1.5 – 1:3,	The Naas Road corridor is wide (c. 35m) and has a distinctly infrastructural character. It is to be the central spine of the new urban district and **for its character to become that of a town centre street it needs built enclosure, active frontage, passive surveillance and an intensity of land use in the surrounding townscape to generate activity/animation.** **The road is wide enough to accommodate buildings of substantial height.** Such buildings will be needed in places to generate urban-type street enclosure and character (and to **balance the proportion of built form to road space**). **The road is also long enough to accommodate – and benefit from – variations in height across its length, to enhance legibility and provide visual interest**. The proposed development would contribute to all of the above, i.e. built frontage and enclosure to the Naas Road, passive surveillance, active frontage (with the commercial unit fronting the plaza which is contiguous with the street), and high intensity land use. The photomontages for Viewpoints 1-3 and 6-8 all show that the scale of the buildings, and the enclosure of the street would not be excessive, and that the development would rather constitute an 'event' in the built form of the road corridor, appropriately located to mark a place of importance and provide visual interest.

4. To provide well connected, high quality and active public and communal spaces… Enhanced density and scale should:	
• integrate into and enhance the public realm and prioritises pedestrians, cyclists and public transport, • be appropriately scaled and distanced to provide appropriate enclosure/ exposure to public and communal spaces, particularly to residential courtyards, • provide for people friendly streets and spaces.	The provision of new public realm and enhancement of the existing public realm are key objectives of the proposed development. The diagram to the right shows the publicly accessible space at ground/street level (shaded orange; the green area is for visual amenity and ecosystem services only, not public access). There are four key benefits of the proposal: - The enhancement of the Naas Road streetscape with (a) a wide, high quality (granite) pavement providing sufficient room for outdoor seating in addition to pedestrian movement, strips of lawn and ornamental planting, and rows of trees; - The enhancement of the road to Carriglea with a similar high quality pavement wide enough for outdoor seating and pedestrian movement, and a double row of trees; - The creation of a 'restored river corridor' in the central courtyard crossing the site, in which the de-culverted Camac River would flow through a densely vegetated constructed valley; - The provision of a public pedestrian route alongside the river corridor, linking the Naas Road to Carriglea across the site, with the two developments' green infrastructure corridors aligned. 
Items 5-8 and 10 of the DCDP Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale are not directly relevant to landscape/townscape and visual amenity. The proposal is assessed against those criteria elsewhere in the application documents.	
5. To protect historic environments from insensitive development… Enhanced density and scale should:	
• not have an adverse impact on the character and setting of existing historic environments including Architectural Conservation Areas, Protected Structures and their curtilage and National Monuments… • assess potential impacts on key views and vistas related to the historic environment.	There are two houses ('Naisetra' and 'Lansdowne House') of architectural value to the north of the site across the Naas Road. Lansdowne House is a 1950s house listed on the National Inventory of Architectural Heritage. Naisetra is an Edwardian house (early 20th century). It is a protected structure but is in use as offices after permission for a change of use was granted in 2001. While the two buildings have recognised architectural heritage value, there are several factors that lessen their sensitivity to the proposed development. These are (a) the character and quality of their existing townscape context, which is dominated by industrial and commercial use and transport infrastructure; (b) their separation and buffering from the site by the 35m wide Naas Road corridor; (c) their enclosure by mature trees in their gardens. An Architectural Heritage Impact Assessment carried out by Historic Building Consultants (May 2023) concluded as follows: *"As has been shown above, the distance between the protected structure and the proposed buildings, together with the dense belt of evergreen trees between the house and the proposed development, ensure that the character and setting of the protected structure will not be affected by the proposed development".* The site's redevelopment would in fact benefit the historic buildings by enhancing their townscape context. Their value as townscape features and land use assets could also be enhanced as the surrounding area transforms into a high density, mixed use urban quarter. In that context the houses and their gardens, located at the eastern edge of the district centre and across the road from a large residential development (the proposed development) could house one of a number of complementary uses (e.g. restaurant) and this would heighten their value to the community.

7.0 Conclusions

Based on the significance assessment in Section 6, and the analysis of the proposal against the relevant criteria of Table 3 of Appendix 3 of the DCDP 2022 in Table 2 above, **the townscape effects of the proposed development can be classified as 'moderate positive'**.

The visual effects assessment also found that the effects would be neutral to positive on a range of viewpoints representing the key receptors in the receiving environment.

Table 1: Summary of visual effects assessment

No.	Description	Sensitivity	Magnitude of Change	Significance of Effect
01	Naas Road approaching Walkinstown Avenue junction	Low	Low	**Slight-moderate positive**
02	Naas Road bus stop opposite Concorde site	Low	Medium	**Moderate positive**
03	Naas Road opposite north west corner of the site	Low	High	**Moderate positive**
04	Bluebell Avenue in front of church	Medium	Medium	**Moderate positive**
05	Bluebell Avenue – distant view from the north west	Low-Medium	Medium	**Slight positive**
06	Naas Road to north east of site	Low	High	**Moderate positive**
07	Naas Road at Muirfield Drive junction and Bluebell Luas stop	Low	Medium	**Moderate positive**
08	Naas Road – distant view from the east	Low-Medium	Medium	**Moderate positive**
09	Lansdowne Valley Park	Medium	Negligible	**Not significant neutral**
10	Mourne Road, Drimnagh	Medium	None	**No effect**
11	Drimnagh Castle	Medium-High	Negligible	**Not significant neutral**
12	Approach to Drimnagh Castle through school campus off Long Mile Road	Medium	Low	**Slight neutral**
13	'Castleview' development on former Carriglea site	Medium	Medium	**Moderate positive**

APPENDIX 1 LANDSCAPE/TOWNSCAPE & VISUAL IMPACT ASSESSMENT METHODOLOGY

The TVIA methodology is informed by the *Guidelines for Landscape and Visual Impact Assessment,* 3rd edition 2013 (GLVIA) and the EPA *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports*, 2022.

The European Landscape Convention defines landscape as "*an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors"*. This expands beyond the idea that landscape is only a matter of aesthetics and visual amenity. It recognises landscape as a resource in its own right, providing a complex range of cultural, environmental and economic benefits to individuals and society.

The word 'townscape' is used to describe the landscape in urban areas. The GLVIA defines townscape as *"the landscape within the built-up area, including the buildings, the relationships between them, the different types of urban spaces, including green spaces and the relationship between buildings and open space".*

1.0 Key Principles of the GLVIA

1.1 Use of the Term 'Effect' vs 'Impact'

The GLVIA requires that the terms 'impact' and 'effect' be clearly distinguished and consistently used. 'Impact' is defined as the action being taken, e.g. the introduction to the landscape of buildings, infrastructure or landscaping. 'Effect' is defined as the change resulting from those actions, e.g. change in landscape character or in the composition of views.

1.2 Assessment of Both 'Landscape' and 'Visual' Effects

The GLVIA prescribes that effects on views and visual amenity should be assessed separately from the effects on landscape/townscape, although the two topics are inherently linked.

- 'Landscape/townscape' results from the interplay between the physical, natural and cultural components of our surroundings. Different combinations and spatial distribution of these elements create variations in landscape/townscape character. 'Landscape/townscape character assessment' is the method used in LVIA to describe landscape/townscape and by which to understand the effects of development on the landscape/townscape as a resource.
- Visual assessment is concerned with changes that arise in the composition of available views, the response of people to these changes and the overall effects on the area's visual amenity.

2.0 Townscape Effects Assessment

Assessment of potential landscape/townscape effects involves (a) classifying the sensitivity of the receiving environment, and (b) identifying and classifying the magnitude of landscape/townscape change which would result from the development. These factors are combined to arrive at a classification of significance of the landscape/townscape effects.

2.1 Landscape/Townscape Sensitivity

The sensitivity of the landscape/townscape is a function of its land use, landscape patterns and scale, visual enclosure and the distribution of visual receptors, and the value placed on the landscape/townscape. The nature and scale of the development in question is also taken into account, as are any trends of change, and relevant policy. Five categories are used to classify sensitivity (Table 1).

Table 1 Categories of Landscape/Townscape Sensitivity

Sensitivity	Description
Very High	Areas where the landscape exhibits very strong, positive character with valued elements, features and characteristics that combine to give an experience of unity, richness and harmony. The landscape character is such that its capacity to accommodate change in the form of development is very low. These attributes are recognised in landscape policy or designations as being of national or international value and the principle management objective for the area is protection of the existing character from change.
High	Areas where the landscape exhibits strong, positive character with valued elements, features and characteristics. The landscape character is such that it has limited/low capacity to accommodate change in the form of development. These attributes are recognised in landscape policy or designations as being of national, regional or county value and the principle management objective for the area is the conservation of existing character.
Medium	Areas where the landscape has certain valued elements, features or characteristics but where the character is mixed or not particularly strong, or has evidence of alteration, degradation or erosion of elements and characteristics. The landscape character is such that there is some capacity for change. These areas may be recognised in landscape policy at local or county level and the principle management objective may be to consolidate landscape character or facilitate appropriate, necessary change.
Low	Areas where the landscape has few valued elements, features or characteristics and the character is weak. The character is such that it has capacity for change; where development would make no significant change or could make a positive change. Such landscapes are generally unrecognised in policy and the principle management objective may be to facilitate change through development, repair, restoration or enhancement.
Negligible	Areas where the landscape exhibits negative character, with no valued elements, features or characteristics. The landscape character is such that its capacity to accommodate change is high; where development would make no significant change or would make a positive change. Such landscapes include derelict industrial lands or extraction sites, as well as sites or areas that are designated for a particular type of development. The principle management objective for the area is to facilitate change in the landscape through development, repair or restoration.

2.2 Magnitude of Landscape/Townscape Change

Magnitude of change is a factor of the scale, extent and degree of change imposed on the landscape/ townscape with reference to its key elements, features and characteristics (also known as 'landscape receptors'). Five categories are used to classify magnitude of change (Table 2).

Table 2 Categories of Landscape/Townscape Change

Magnitude of Change	Description
Very High	Change that is large in extent, resulting in the loss of or major alteration to key elements, features or characteristics of the landscape and/or introduction of large elements considered totally uncharacteristic in the context. Such development results in fundamental change in the character of the landscape.
High	Change that is moderate to large in extent, resulting in major alteration to key elements, features or characteristics of the landscape and/or introduction of large elements considered uncharacteristic in the context. Such development results in change to the character of the landscape.
Medium	Change that is moderate in extent, resulting in partial loss or alteration to key elements, features or characteristics of the landscape, and/or introduction of elements that may be prominent but not necessarily substantially uncharacteristic in the context. Such development results in change to the character of the landscape.
Low	Change that is moderate or limited in scale, resulting in minor alteration to key elements, features or characteristics of the landscape, and/or introduction of elements that are not uncharacteristic in the context. Such development results in minor change to the character of the landscape.
Negligible	Change that is limited in scale, resulting in no alteration to key elements features or characteristics of the landscape, and/or introduction of elements that are characteristic of the context. Such development results in no change to the landscape character.

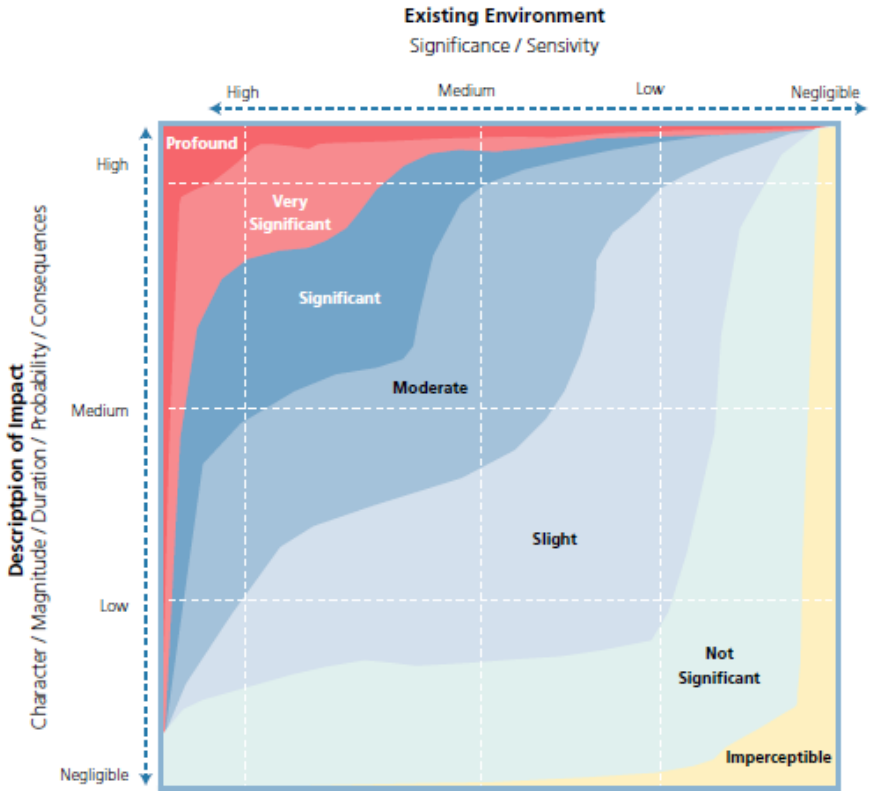
2.3 Significance of Landscape/Townscape Effects

To classify the significance of effects the magnitude of change is measured against the sensitivity of the landscape/townscape using Table 3 and Figure 1 as a guide. The significance classification matrix (Table 3) is derived from the EPA's Guidelines on the Information to be Contained in Environmental Impact Assessment Reports, 2022 (specifically Figure 3.4 of the Guidelines – see Figure 1 below). In addition to this guidance the assessor uses professional judgement informed by their expertise, experience and common sense to arrive at a classification of significance that is reasonable and justifiable.

Table 3 Guide to Classification of Significance of Landscape/Townscape and Visual Effects

		Sensitivity of the Landscape Resource/View				
		Very High	**High**	**Medium**	**Low**	**Negligible**
Magnitude of Change	**Very High**	*Profound*	*Profound to Very Significant*	*Very Significant to Significant*	*Moderate*	*Slight*
	High	*Profound to Very Significant*	*Very Significant*	*Significant*	*Moderate to Slight*	*Slight to Not Significant*
	Med-ium	*Very Significant to Significant*	*Significant*	*Moderate*	*Slight*	*Not Significant*
	Low	*Moderate*	*Moderate to Slight*	*Slight*	*Not significant*	*Imperceptible*
	Negli gible	*Slight*	*Slight to Not Significant*	*Not significant*	*Imperceptible*	*Imperceptible*

Figure 1: 'Chart showing typical classifications of the significance of impacts' (Source: Figure 3.4 of the EPA's Guidelines on the Information to be Contained in Environmental Impact Assessment Reports, 2022)



The impact significance classifications are taken from the EPA Guidelines, which define the classifications as follows (Table 4):

Table 4 EPA definitions of environmental impact classifications

Significance Classification	Description
Imperceptible	An effect capable of measurement but without significant consequences.
Not significant	An effect which causes noticeable changes in the character of the environment but without significant consequences.
Slight	An effect which causes noticeable changes in the character of the environment without affecting its sensitivities.
Moderate	An effect that alters the character of the environment in a manner that is consistent with existing and emerging baseline trends.
Significant	An effect which, by its character, magnitude, duration or intensity alters a sensitive aspect of the environment.
Very Significant	An effect which, by its character, magnitude, duration or intensity significantly alters most of a sensitive aspect of the environment.
Profound	An effect which obliterates sensitive characteristics.

3.0 Visual Effects Assessment

Assessment of visual effects involves identifying a number of key/representative viewpoints in the site's receiving environment, and for each of these: (a) classifying the viewpoint sensitivity, and (b) classifying the magnitude of change which would result in the view. These factors are combined to arrive at a classification of significance of the effects on each viewpoint.

3.1 Sensitivity of the Viewpoint/Visual Receptor

Viewpoint sensitivity is a function of two main considerations:

- ***Susceptibility of the visual receptor to change***. This depends on the occupation or activity of the people experiencing the view, and the extent to which their attention is focussed on the views or visual amenity they experience at that location. Visual receptors most susceptible to change include residents at home, people engaged in outdoor recreation focused on the landscape (e.g. trail users), and visitors to heritage or other attractions and places of community congregation where the setting contributes to the experience. Visual receptors less sensitive to change include travellers on road, rail and other transport routes (unless on recognised scenic routes), people engaged in outdoor recreation or sports where the surrounding landscape does not influence the experience, and people in their place of work or shopping where the setting does not influence their experience.
- ***Value attached to the view***. This depends to a large extent on the subjective opinion of the visual receptor but also on factors such as policy and designations (e.g. scenic routes, protected views), or the view or setting being associated with a heritage asset, visitor attraction or having some other cultural status (e.g. by appearing in arts).

Five categories are used to classify viewpoint sensitivity (Table 5).

Table 5 Categories of Viewpoint Sensitivity

Sensitivity	Description
Very High	Iconic viewpoints (views towards or from a landscape feature or area) that are recognised in policy or otherwise designated as being of national value. The composition, character and quality of the view are such that its capacity for change in the form of development is very low. The principle management objective for the view is its protection from change.
High	Viewpoints that are recognised in policy or otherwise designated as being of value, or viewpoints that are highly valued by people that experience them regularly (such as views from houses or outdoor recreation features focused on the landscape). The composition, character and quality of the view may be such that its capacity for accommodating change in the form of development may or may not be low. The principle management objective for the view is its protection from change that reduces visual amenity.
Medium	Views that may not have features or characteristics that are of particular value, but have no major detracting elements, and which thus provide some visual amenity. These views may have capacity for appropriate change and the principle management objective is to facilitate change to the composition that does not detract from visual amenity, or which enhances it.
Low	Views that have no valued feature or characteristic, and where the composition and character are such that there is capacity for change. This category also includes views experienced by people involved in activities with no particular focus on the landscape. For such views the principle management objective is to facilitate change that does not detract from visual amenity, or enhances it.
Negligible	Views that have no valued feature or characteristic, or in which the composition may be unsightly (e.g. in derelict landscapes). For such views the principle management objective is to facilitate change that repairs, restores or enhances visual amenity.

3.2 Magnitude of Change to the View

Classification of the magnitude of change takes into account the size or scale of the intrusion of development into the view (relative to the other elements and features in the composition, i.e. its relative visual dominance), the degree to which it contrasts or integrates with the other elements and the general character of the view, and the way in which the change will be experienced (e.g. in full view, partial or peripheral view, or in glimpses). It also takes into account the geographical extent of the change, as well as the duration and reversibility of the visual effects. Five categories are used to classify magnitude of change to a view (Table 6).

Table 6 Categories of Visual Change

Magnitude of Change	Description
Very High	Full or extensive intrusion of the development in the view, or partial intrusion that obstructs valued features or characteristics, or introduction of elements that are completely out of character in the context, to the extent that the development becomes dominant in the composition and defines the character of the view and the visual amenity.
High	Extensive intrusion of the development in the view, or partial intrusion that obstructs valued features, or introduction of elements that may be considered uncharacteristic in the context, to the extent that the development becomes co-dominant with other elements in the composition and affects the character of the view and/or the visual amenity.
Medium	Partial intrusion of the development in the view, or introduction of elements that may be prominent but not necessarily uncharacteristic in the context, resulting in change to the composition but not necessarily the character of the view or the visual amenity.
Low	Minor intrusion of the development into the view, or introduction of elements that are not uncharacteristic in the context, resulting in minor alteration to the composition and character of the view but no change to visual amenity.
Negligible	Barely discernible intrusion of the development into the view, or introduction of elements that are characteristic in the context, resulting in slight change to the composition of the view and no change in visual amenity.

3.3 Significance of Visual Effects

To classify the significance of visual effects, the magnitude of change to the view is measured against the sensitivity of the viewpoint, using the guidance in Table 3 and Figure 1 above.

4.0 Quality of Effects

In addition to predicting the significance of the effects on the landscape and views, EIA methodology requires that the quality of the effects be classified as positive/beneficial, neutral, or negative/adverse.

For landscape/townscape effects to a degree, but particularly for visual effects, this is an inherently subjective exercise since landscape and views are perceived and therefore subject to variations in the attitude and values of the receptor. One person's attitude to a development may differ from another person's, and thus their response to the effects of a development on a landscape or view may vary.

Additionally, there might be policy encouraging a particular development in an area, in which case the policy is effectively prescribing landscape change. If a development achieves the objective of the policy the resulting effect might be considered positive, even if the landscape character is profoundly changed. The classification of quality of landscape and visual effects should seek to take these variables into account and provide a reasonable and robust assessment.