

Townscape and Visual Impact Assessment

Proposed White Heather Large-Scale Residential Development, Dolphin's Barn, Dublin 8

Prepared by Model Works Ltd

For Green Urban Logistics 3 White Heather
Propco Limited

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WORKS**

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1.0 Introduction

This report assesses the potential townscape and visual impacts of a proposed Large-Scale Residential Development (LRD) at the White Heather site off South Circular Road, Dolphin's Barn, Dublin 8. The report should be read in conjunction with the verified photomontages, provided under separate cover.

1.1 Townscape and Visual Impact Assessment Methodology

The TVIA 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 methodology is described in detail in Appendix 1 of this report.

The GLVIA requires that the effects on views/visual amenity be assessed separately from the effects on the landscape (or 'townscape'¹ in urban areas), although the topics are linked:

- Visual impact assessment is concerned with changes that arise in the composition of available views², the response of people to those changes and the overall effects on the area's visual amenity. The effects on 21 no. representative viewpoints in the receiving environment are assessed in Section 5, informed by verified photomontages (provided under separate cover).
- 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 townscape effects of the proposed development are assessed in Section 6.

1.2.1 TVIA Author Credentials

The TVIA report was prepared by Richard Butler (BLArch (Hons) (Landscape Architecture), MSc (Spatial Planning), Member of the Irish Landscape Institute, Member of the Irish Planning Institute) of Model Works Ltd. The author has over 25 years' experience in development and environmental planning, specialising in LVIA/TVIA. In the last number of years he has prepared LVIA/TVIA reports and EIAR chapters for the following projects among others:

- Bluebell Waterways (DCC & LDA), Dublin;
- Project Montrose LRD, former RTE lands, Donnybrook, Dublin;
- Pembroke Quarter (Irish Glass Bottle and Fabrizia sites) Phases 1, 1B, 2, A, Poolbeg West SDZ, Dublin;
- St Vincent's Hospital and Residential Development, Fairview, Dublin;
- Guinness Quarter, the Liberties, Dublin;
- Independent House LRD, Abbey Street, Dublin;
- Prussia Street LRD, Stoneybatter, Dublin;
- Gowan House LRD, Naas Road, Dublin;
- Sandford Road LRD, Dublin;
- O'Devaney Gardens SHD, Dublin.

¹ 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*". 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 spaces*". Since the subject site is in the urban area, the word townscape is used in this report.

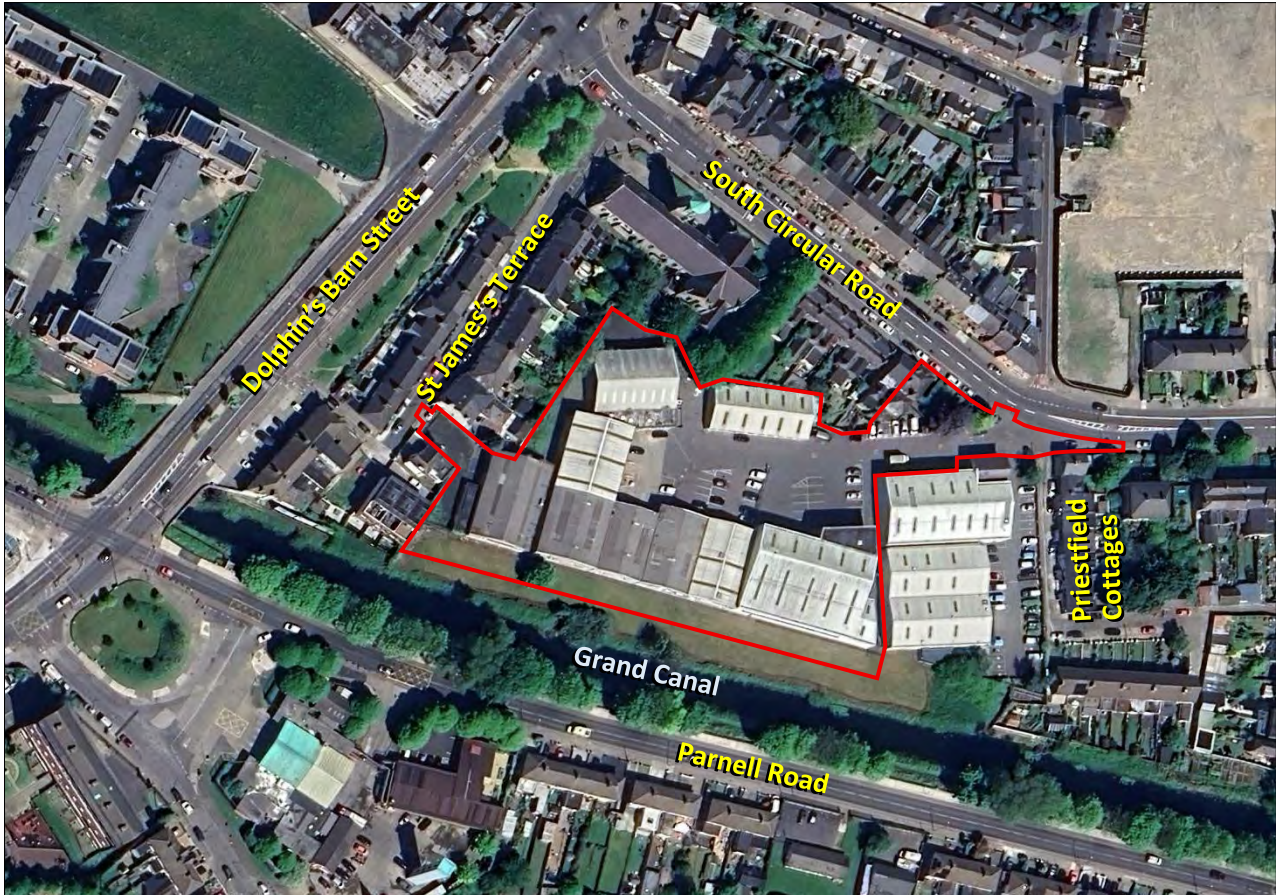
² The GLVIA emphasises that assessment should focus on views from publicly accessible places such as public roads, footpaths and public open spaces. Paragraph 6.17 of the GLVIA states: "*The emphasis in assessing visual effects should be on public visual amenity, although it may sometimes be appropriate to consider private views, especially where the change would be particularly severe or affect a large number of people*".

2.0 The Receiving Environment

2.1 The Site

The site is a brownfield land parcel of irregular shape, currently in use as an industrial estate. The estate is comprised of several large warehouses arranged around a central hardstanding area (see Figure 1). The entrance to the estate is from South Circular Road, which passes to the north. There is an unused entrance on St James's Terrace to the west. **The site's most notable attribute is its frontage to the Grand Canal.** The southern boundary runs some 150m along the canal (see Photo 1).

Figure 1: The site (main development area; for the full accurate red line boundary refer to the site location plan)



The canal frontage is significant from a townscape perspective. The canal is an important cultural-historic element in its own right, but **it also shaped the urban structure, land use and resulting character of the adjacent lands** - and of the city as a whole (the area within the 'canal ring' is commonly recognised as the 'city centre').

The canal is also important from the perspective of the site's land use potential. **The site has 150m frontage to a broad green-blue infrastructure corridor, with a southern aspect, and with views over the canal towards the Dublin Mountains.** Combined with the site's central, accessible location (and compact growth policy), this contributes to a high residential land use value.

Photo 1: The site frontage to the Grand Canal



The site includes an end-of terrace house fronting South Circular Road beside the entrance to the industrial estate (see Photo 2). Apart from this house, the buildings on the site are of large footprint, low (equivalent to approximately three storeys) and unsightly. **Apart from the house, the site makes no positive contribution to the character or visual amenity of its townscape context.**

Photo 2: The industrial estate entrance on South Circular Road, alongside the end-of-terrace house included in the site



2.2 Dolphin's Barn Strategic Location

The site is located in Dolphin's Barn in Dublin city centre (as traditionally defined, i.e. the area within the canal ring). It is less than 3 km by road from city centre destinations such as St Stephen's Green, Trinity College, O'Connell Street Bridge, Heuston Station, Dublin Castle and Wood Quay. The Fatima Luas stop is less than 800m from the site, and Dolphin's Barn is well served by Dublin Bus services, with routes into the city along both Dolphin's Barn/Cork Street and South Circular Road.

Figure 3: Dublin City Development Plan 2022-2028 'Core Strategy Map' (Figure 2-1)

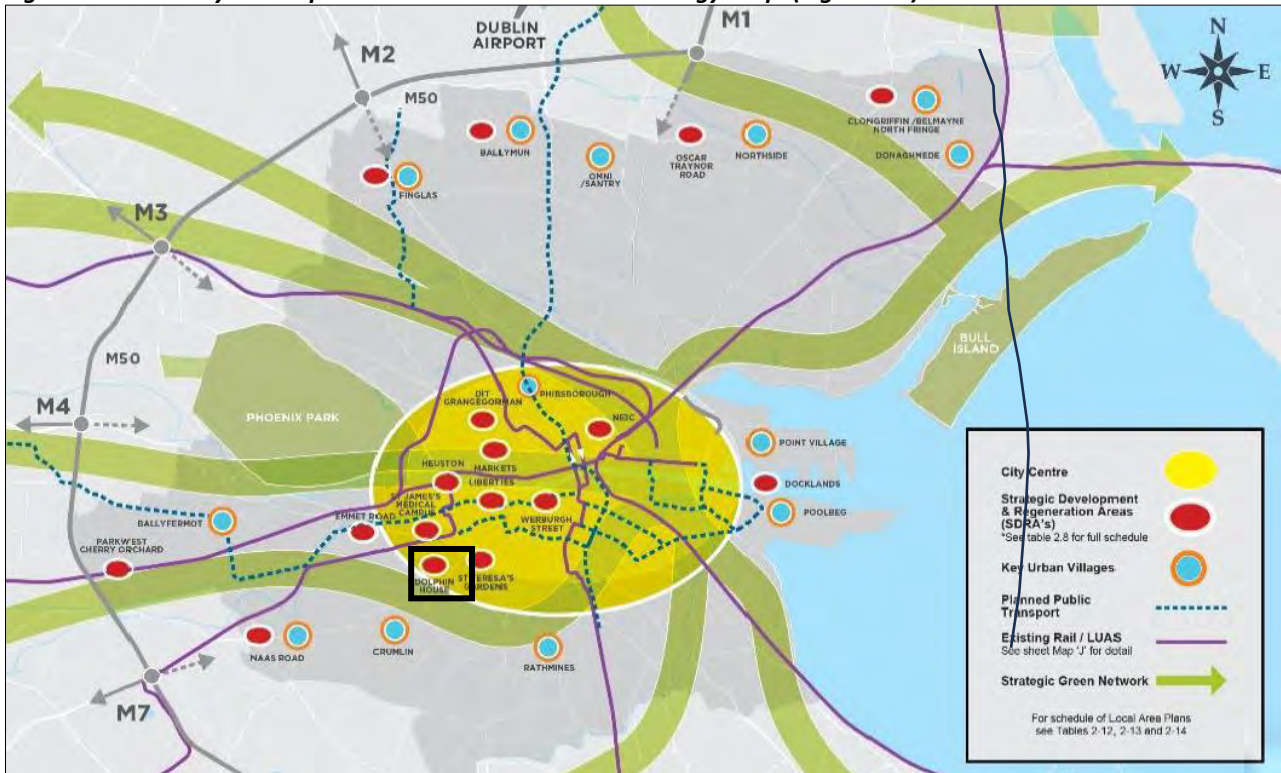
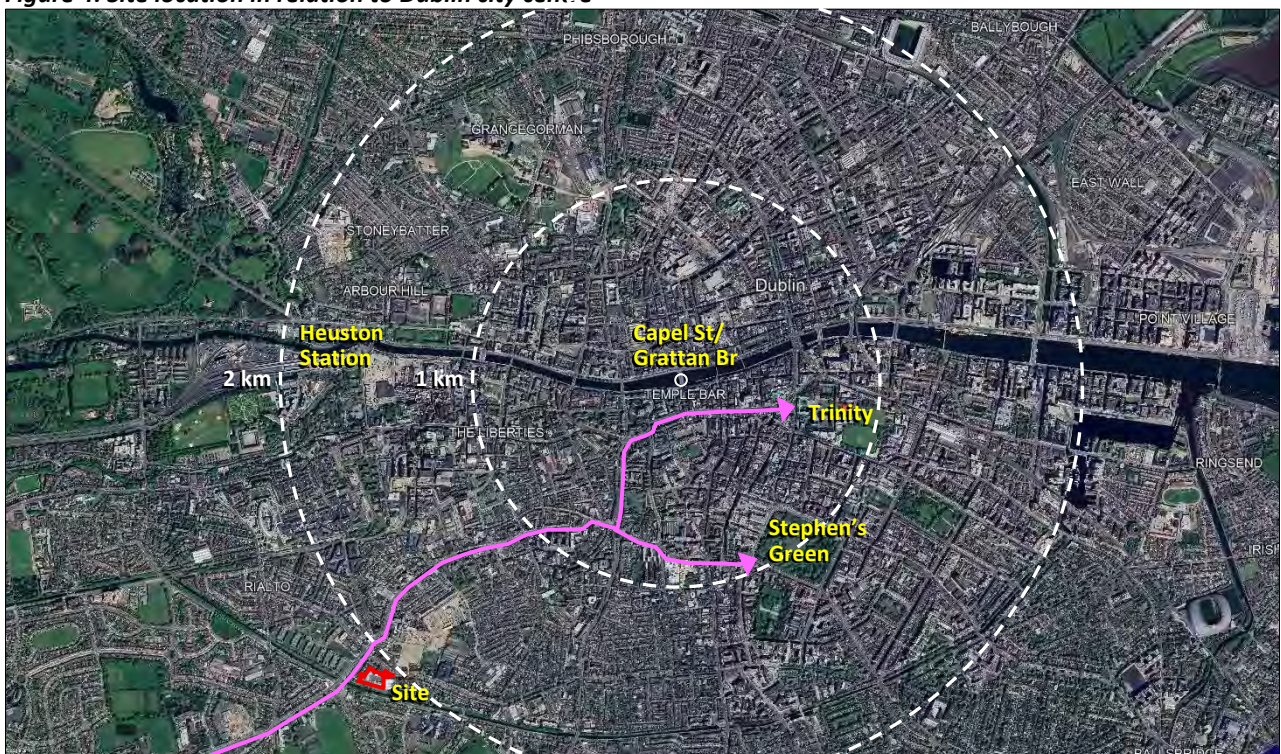


Figure 4: Site location in relation to Dublin city centre



2.3 Townscape Character

2.3.1 Historic Development

The urban development of Dolphin's Barn began in the late 18th century following the construction of the Grand Canal. Bridges over the canal became nodes in the transport network, around which development took place. The 1st edition Ordnance Survey 6 inch map (surveyed 1837) shows an emerging cluster of development, with the site part-occupied by 'canal docks' and partly by an orchard to the rear of what is now St James's Terrace. The 2nd edition 6 inch map (surveyed 1906-09) shows the consolidation and diversification of the urban area that took place over the course of the 19th century. **Dolphin's Barn had become a distinct urban village with a strong industrial/employment element (laundries on the site, a printing works, tobacco factory and brick and tile factory), as well as schools, a church, two cinemas and extensive housing.** The area had a complex urban grain and a wide variety of plot and building sizes and typologies.

Figure 4: Ordnance Survey 1st edition 6 inch map (surveyed 1837) (site boundary is approximate)

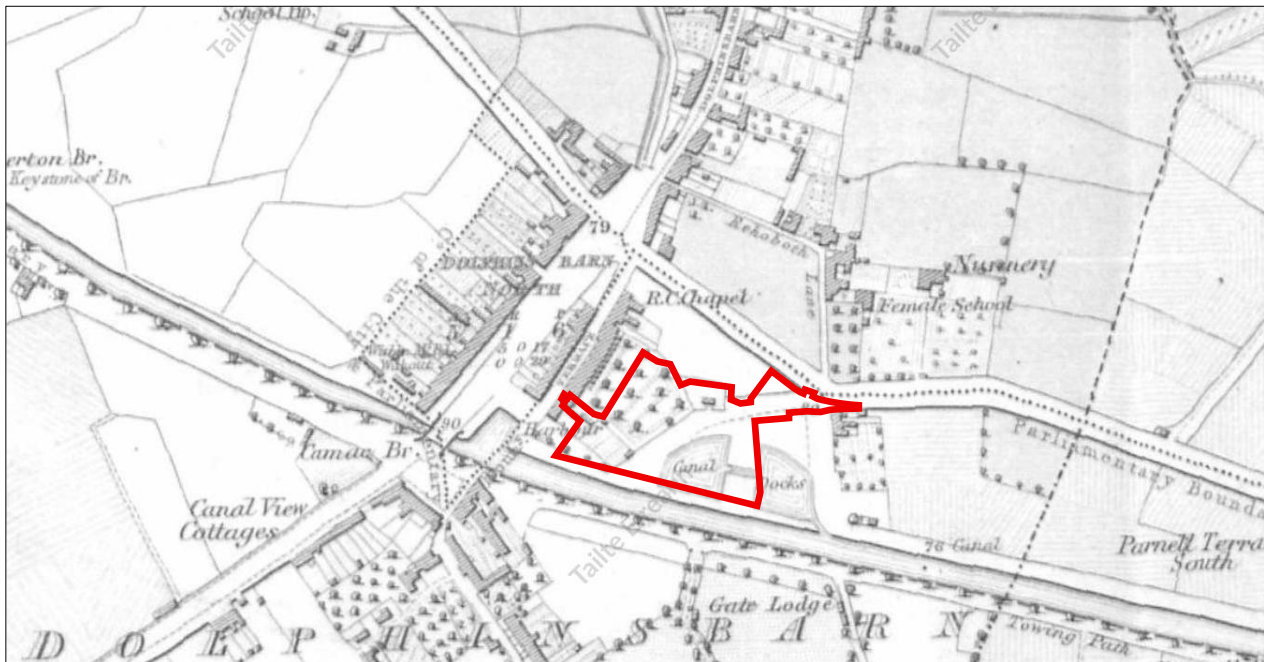
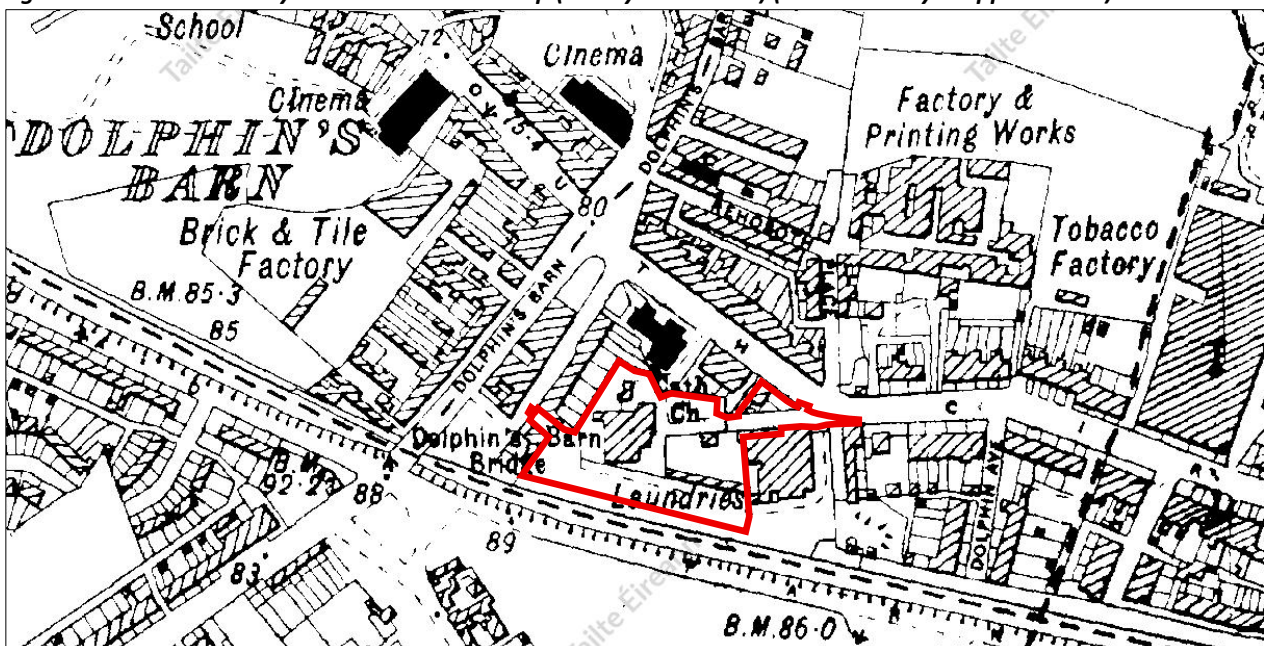
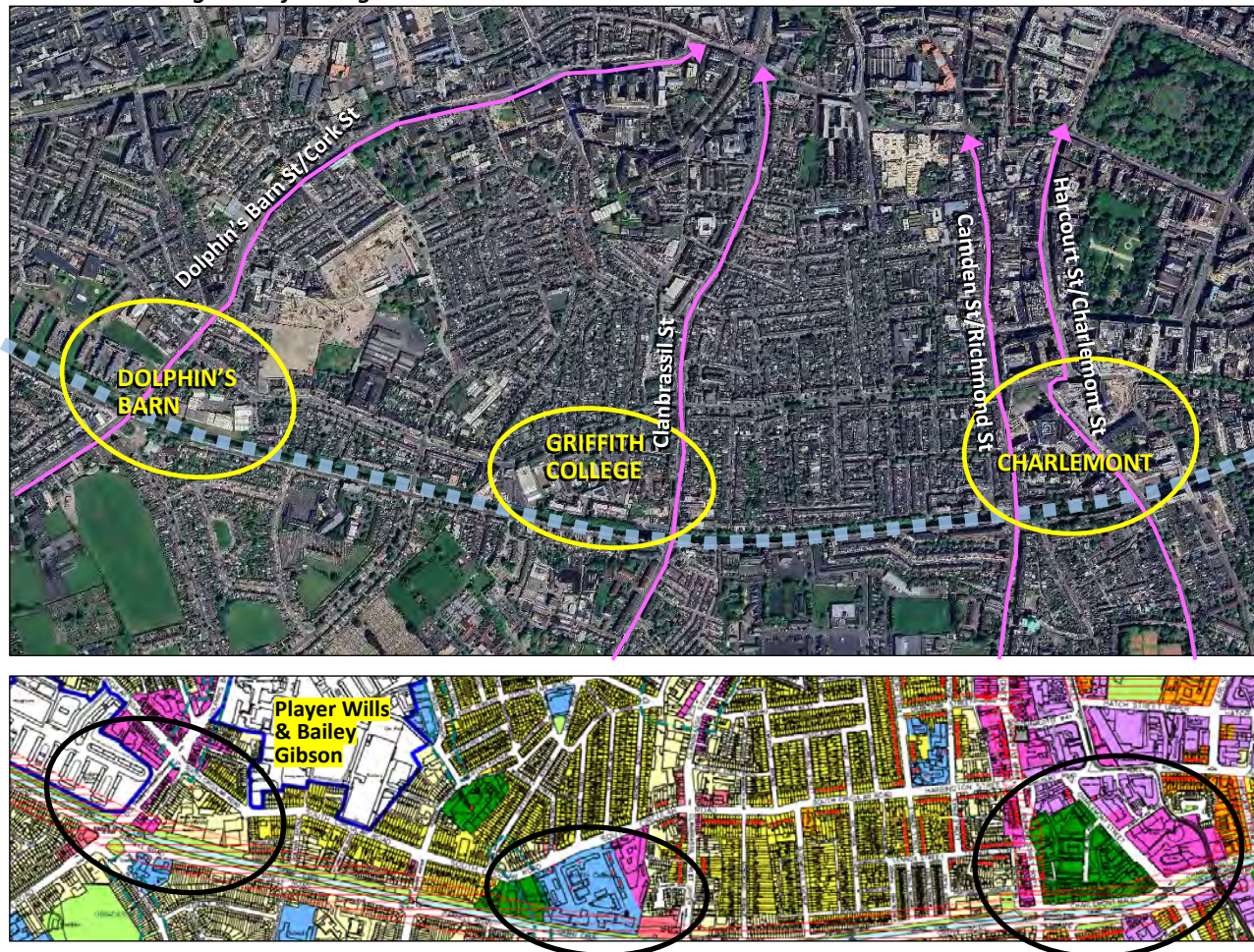


Figure 5: Ordnance Survey 2nd edition 6 inch map (surveyed 1906-09) (site boundary is approximate)



This land use pattern – of intensive mixed use development around the canal bridges and fronting the canal - occurred elsewhere along the canal, and remains a feature of Dublin’s townscape. The aerial photograph and land use map below show similar areas of variation in townscape character inside the canal at Clanbrassil Street and Charlemont to the east. Between these nodes are large areas of more uniform character and smaller scale.

Figure 6a, 6b: Aerial photo and DCDP land use map showing areas of variation in townscape character around the Grand Canal bridges and fronting the canal



Over the course of the 20th century, Dolphin’s Barn remained a centre of industrial use, but another significant change occurred with the development of large-scale social housing projects on some of the former industrial sites. The large plots and precedent for large buildings facilitated this development.

Entering the 21st century, many of the industrial premises ceased to operate and some the Council housing projects, which had suffered social problems, were closed. This heralded a further, plan-led phase of change in the townscape. **Two large areas in Dolphin’s Barn were designated Strategic Development and Regeneration Areas (Dolphin House and St Teresa’s Gardens and Environs SDRAs), and a number of high density residential projects have since been granted planning permission.** Part of the Dolphin House Council housing estate has been redeveloped to the west of the site across Dolphin’s Barn Street, and construction is underway on Bailey Gibson site to the north east of the site across South Circular Road.

2.3.2 Current Townscape Character

The key characteristics of the Dolphin’s Barn townscape remain (a) its complex urban grain (ranging from fine grained to coarse grained, orthogonal to irregular, and lacking legibility), and (b) the wide variety of plot and building typologies, scale/height and architecture. It is a townscape of juxtapositions and an area undergoing change.

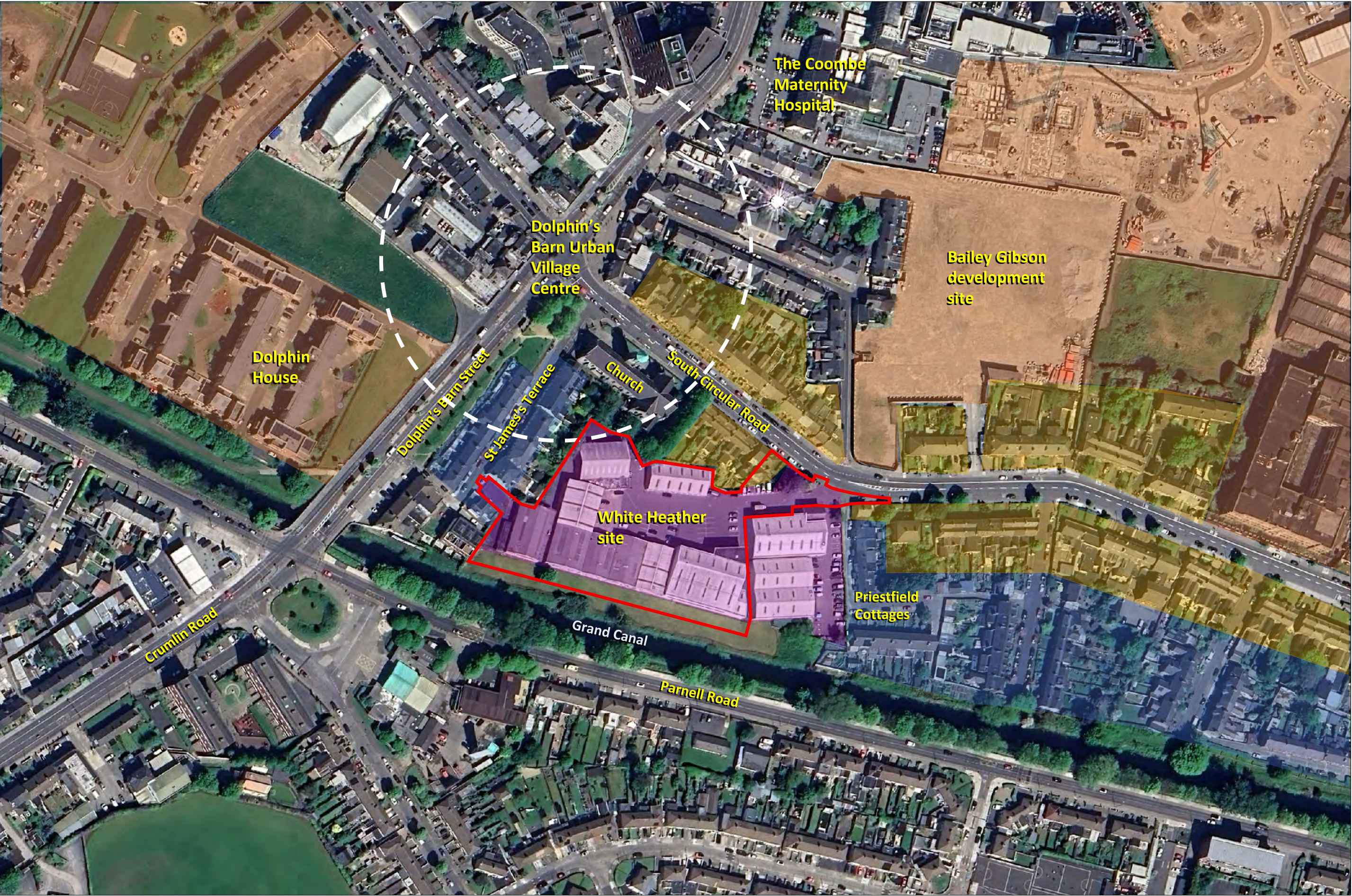
The key townscape character areas in the receiving environment are as follows:

- White Heather Industrial Estate. The estate is large enough that it reads as a character area itself. Although largely hidden from view from the north and west (where it is screened behind adjacent housing), it is prominent in views from the south (Grand Canal and Parnell Road, see Photos 4 and 5) and east (Priestfield Cottages) – where it defines the character of those adjoining areas. The estate’s main attributes are (a) its c. 150m frontage to the canal, (b) its location adjacent to the Dolphin’s Barn Urban Village (Z4) zoned area, and (c) its position behind houses to the north (fronting South Circular Road) and west (St James’s Terrace).

Photos 4, 5: Views towards the site from across Parnell Road to the south. These photographs were taken in winter. In the summer the trees form a dense screen.



Figure 7: The proposed development's receiving environment



- The Grand Canal corridor (including Parnell Road) to the south of the site. The canal corridor - including the canal itself, its vegetated banks (with mature trees), green verges (former towpaths) and footpaths – is one of the defining elements of the townscape, having initiated and shaped the development of the area. Parnell Road runs parallel to the canal on its south side. Together, they form a wide, linear space along which views towards the site are afforded from the east and west, as well as directly from the south (Photos 4 and 5). **The trees on the canal banks filter the site in these views, and these trees – along with the open space of the canal corridor – provide favourable context for development of scale on the site.**

Photo 6: A view along the Grand Canal from Dolphin's Barn Bridge just to the west of the site. Parnell Road is to the right. Together they form a wide corridor of space that is favourable to building height



- The residential neighbourhood south of Parnell Road. On the south side of Parnell Road is a row of terraced houses facing the site across the canal corridor. There are also a creche and a fire station along the road. The houses have views of the site from their front windows and gardens (see Photos 4, 5) – although they are buffered from any future development by the combined Grand Canal and Parnell Road corridor, and the trees on the canal bank.

- South Circular Road to the north and east of the site. South Circular Road, from which the site is accessed, was constructed in the early 19th century not long after the Grand Canal (see Figure 4 above). It is a mainly residential street, with the notable exception of Our Lady of Dolours Church beside the Dolphin's Barn Street junction at the centre of the urban village. The houses along the street date from the 19th century and are zoned Z2 Residential Conservation Area. Some of these houses back onto the site, and one of the houses (at the end of the terrace beside the site entrance) is included in the site. A notable characteristic of the street is its winding alignment as it passes the site. **This shortens the distance of views along the street, although taller development could protrude above the roadside rooflines.**

Photo 7: The Victorian houses, fronting South Circular Road, that back onto the site beside Our Lady of Dolours church



Photo 8: A view towards the site from South Circular Road to the east



- Priestfield Cottages to the east of White Heather. This is a narrow cul-de-sac lane that passes to the east of the site, lined by small, terraced houses. The lane forms part of a distinct character area between the Grand Canal and South Circular Road to the east of White Heather and the Dolphin's Barn urban village centre. The view west towards the site from Priestfield Cottages is blocked by the large, bulky form of the Post Office Parcel Delivery facility, which forms part of the White Heather industrial estate but is excluded from the subject site/proposed development.

Photo 9: A view towards the site from the nearest houses on Priestfield Cottages. The warehouse in the foreground is excluded from the site and screens the site from view



Photo 10: The view towards the site from the eastern end of Priestfield Cottages



- St James's Terrace to the west of the site. St James's Terrace is a narrow street lined by small, terraced cottages and two storey houses. Due to the narrow width of the street and the positioning of the houses at the street edge, there is a high degree of visual enclosure on the street, but the houses on its east side back onto the site boundary and have views of the site from their rear windows and gardens. Towards the southern end of the street, the uniformity of development breaks down. There is a single detached house, which backs onto the site beside a disused entrance to White Heather (see Photo 12), and a small three storey apartment block at the end of the street, fronting the Grand Canal beside the site.

Photo 11: The terraced houses on St James's Terrace, which back onto the site's west boundary



Photo 12: An unused entrance to the site near the southern end of St James's Terrace



- Dolphin's Barn urban village centre, including Dolphin's Barn Street. At the centre of Dolphin's Barn is a wide junction where Dolphin's Barn Street, South Circular Road and St James's Terrace converge. The buildings around the junction include Our Lady of Dolours church and a variety of business premises. **There is a notable lack of place-identity due to (a) the dominance of road infrastructure, (b) the lack of buildings of stature (apart from the church, which has a positive presence), and (b) a degree of disuse/dereliction in the surrounding buildings.** Looking north along Dolphin's Barn Street towards the Coombe and the city centre, there is a shift in character towards a higher density urban condition (Photo 14).

Photo 13: A view of Our Lady of Dolours church (across the broad junction at the centre of Dolphin's Barn. The subject site is beyond the church and the houses of St James's Terrace to the right



Photo 14: A view north along Dolphin's Barn Street showing (a) the poorly defined village centre dominated by the road junction, and the taller contemporary development along the street towards the city centre



- Player Wills and Bailey Gibson development sites. Just to the north east of White Heather, diagonally across South Circular Road, is the southern edge of the combined Player Wills and Bailey Gibson sites, two former industrial sites for which permission has been granted for large, high density residential-led developments. This includes several tall buildings, up to 19 no. storeys. **These developments constitute a new urban quarter, causing a shift in character in the wider townscape, including along South Circular Road, affecting the Dolphin's Barn area.**

Figures 8, 9: CGI views of the permitted Player Wills development



- Crumlin Road to the south west. The Crumlin Road/Dolphin's Barn Street/Cork Street corridor is a key thoroughfare, connecting the city centre to the south western suburbs, the Long Mile Road and Naas Road, the M50 and the N7. **The road's crossing of the Grand Canal, just to the west of the site, is a gateway to the city centre, although this is not reflected in the surrounding built form, which is somewhat underwhelming.**

Photo 13: A view from Crumlin Road approaching its crossing of the Grand Canal. This is a gateway to the city centre but this is not reflected in the townscape. The site is to the right behind the row of trees on the canal bank



The above describes a townscape of mixed character with a relatively high capacity to accommodate change (due to the central urban location, the mix of land use, plot and building typologies, and an established trend of change in the area (regeneration, consolidation and densification)). There are certain sensitivities in the area, most notably the smaller scale houses surrounding the site (on South Circular Road, St James's Terrace and Priestfield Cottages), the neighbouring church (a protected structure) and the Grand Canal CA. While sensitive on the one hand, the canal also presents an opportunity for increased building height on the site, if coupled with environmental improvement (from the current use).

3.0 Relevant Policy

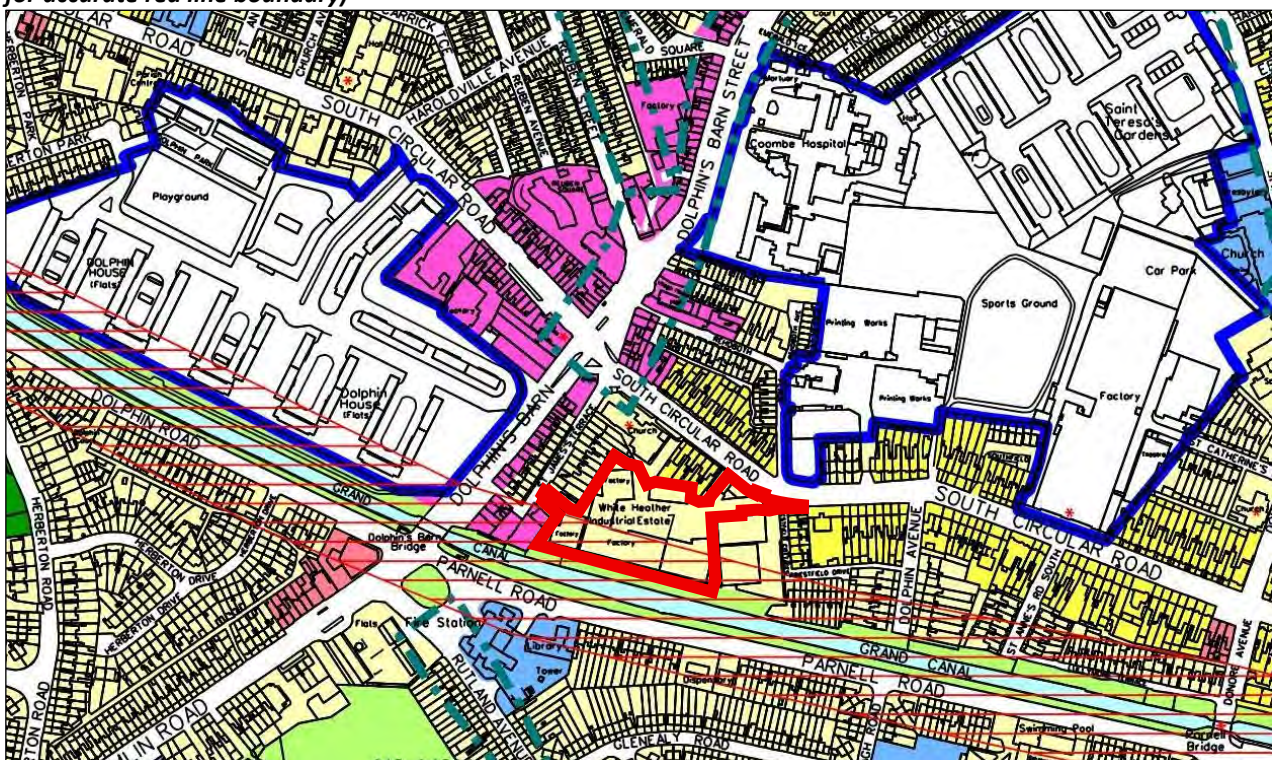
3.1 Dublin City Development Plan 2022-2028 (DCDP)

3.1.1 Land Use Zoning

The site is zoned Z1 Sustainable Residential Neighbourhoods: *"To protect, provide and improve residential amenities"*. The DCDP states: *"The vision for residential development in the city is one where a wide range of high quality accommodation is available within sustainable communities, where residents are within easy reach of open space and amenities as well as facilities such as shops, education, leisure and community services..."*

"The objective is to ensure that adequate public transport, in conjunction with enhanced pedestrian and cycling infrastructure, provides such residential communities good access to employment, the city centre and the key urban villages in order to align with the principles of the 15-minute city."

Figure 10: Dublin City Development Plan Land Use Zoning (site boundary is approximate; refer to site location map for accurate red line boundary)



Also of note on the zoning map are the following:

- The 'red lined' **Conservation Area (CA) designation of the Grand Canal corridor**. This designation extends onto the adjacent lands, including the subject site.

- The **Z2 Residential Neighbourhoods (Conservation Areas)** zoning of the houses along **South Circular Road** to the north and east of the site (including a terrace of houses backing onto the site – one of which is included in the site).
- The **Z4 Key Urban Village/Urban Village** zoning to the west of the site around the junction of Dolphin's Barn Street and South Circular Road.
- The **Z14 Strategic Development and Regeneration Areas** zoning of **Dolphin House to the west of the site and St Teresa's Gardens and Environs to the north east** (the Player Wills and Bailey Gibson development sites).

3.1.2 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."*

3.1.3 Urban Design and Architecture

Section 4.5.5 of the DCDP 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..."*

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).

3.1.4 Building Height and Appendix 3: ‘Achieving Sustainable Compact Growth - Policy for Density and Building Height in the City’

Section 4.5.4 of the DCDP 2022 states: *“Aligned with the principle of greater densification, will be the requirement to consider greater height in appropriate locations. It is important to note however, that higher density does not necessarily equate to high rise buildings and plot ratio and site coverage all contribute to the density of a particular built form. Appropriate higher density schemes can often be achieved by using mid-rise typologies and key to the success of such development is high quality design and place-making...”*

“Policy and guidance regarding building height is set out in Appendix 3. The City Council advocates that when considering building height, regard must be had to the prevailing context within which the site is located...”

“The appropriateness of building heights is also a key consideration within the historic core, particularly in key sensitive areas of the city such as the Georgian core, the Liffey Quays and medieval centre. Proposals for increased height in these areas must demonstrate that they do not have an adverse impact on these sensitive environments and that they make a positive contribution to the historic context. The City Council remains committed to the need to protect and enhance conservation areas, Architectural Conservation Areas and the historic core of the city...”

“Furthermore, the strategic approach pursued under this plan will be to ensure a design led approach to optimising height. Appropriate heights should be based on an evaluation of the sites attributes and its function, its surrounding context and capacity for growth and the most appropriate development form.”

In Appendix 3 of the DCDP 2022, the Strategic Approach to height is discussed:

“The main determining factor in considering appropriate heights is the need to create exemplar urban development with attractive streets, spaces and public areas that integrate successfully with the surrounding area. The key factors that will determine height will be the impact on adjacent residential amenities, the proportions of the building in relation to the street, the creation of appropriate enclosure and surveillance, the provision of active ground floor uses and a legible, permeable and sustainable layout...”

“At a European level, best practice examples indicate that appropriate density and layouts that create appropriate street scale and enclosure are achieved with mid-rise typologies of buildings 4 to 8 storeys in height...”

Regarding the ‘City Centre within the Canal Ring’, it is stated:

“In general, and in accordance with the Guidelines, a default position of 6 storeys will be promoted in the city centre and within the canal ring subject to site specific characteristics, heritage/environmental considerations, and social considerations in respect of sustaining existing inner city residential communities. Where a development site abuts a lower density development, appropriate transition of scale and separation distances must be provided in order to protect existing amenities...”

“Proposals for increased height within key sensitive areas of the city including the city centre, the River Liffey and quays, Trinity College, Dublin Castle and medieval quarter, the historic Georgian core and squares and the canals etc. must demonstrate that they do not have an adverse impact on these sensitive environments and that they make a positive contribution to the historic context. Heights greater than 6 storeys within the Canal Ring will be considered on a case by case basis subject to the performance criteria set out in Table 3.”

3.1.5 Conservation Areas

The Grand Canal corridor and adjacent lands (including part of the site) are designated CA, and the houses on South Circular Road to the north of the site are Z2 Residential Conservation Areas.

Section 11.5.3 of the DCDP states: *“The Z8 Georgian Conservation Areas, Z2 Residential Conservation Areas and red-lined Conservation Areas are extensive throughout the city. Whilst these areas do not have a statutory basis in the same manner as protected structures or ACAs, they are recognised as areas that have conservation merit and importance and warrant protection through zoning and policy application. The special interest/value of Conservation Areas lies in the historic and architectural interest and the design and scale of these areas. Therefore, all of these areas require special care in terms of development proposals. The City Council will encourage development which enhances the setting and character of Conservation Areas”.*

Policy BHA9 states: *“To protect the special interest and character of all Dublin’s Conservation Areas... Development within or affecting a Conservation Area must contribute positively to its character and distinctiveness and take opportunities to protect and enhance the character and appearance of the area and its setting, wherever possible.*

Enhancement opportunities may include:

1. Replacement or improvement of any building, feature or element which detracts from the character of the area or its setting.
2. Re-instatement of missing architectural detail or important features.
3. Improvement of open spaces and the wider public realm and reinstatement of historic routes and characteristic plot patterns.
4. Contemporary architecture of exceptional design quality, which is in harmony with the Conservation Area.
5. The repair and retention of shop and pub fronts of architectural interest.
6. Retention of buildings and features that contribute to the overall character and integrity of the Conservation Area.
7. The return of buildings to residential use.

“Changes of use will be acceptable where in compliance with the zoning objectives and where they make a positive contribution to the character, function and appearance of the Conservation Area and its setting. The Council will consider the contribution of existing uses to the special interest of an area when assessing change of use applications, and will promote compatible uses which ensure future long-term viability”. [emphasis added]

3.1.6 Overlooking and Overbearance

Section 15.9.8 of the DCDP 2022 states: *“‘Overbearance’ in a planning context is the extent to which a development impacts upon the outlook of the main habitable room in a home or the garden, yard or private open space service a home. In established residential developments, any significant changes to established context must be considered. Relocation or reduction in building bulk and height may be considered as measures to ameliorate overbearance”.*

3.2 National Policy

3.2.1 National Planning Framework

The 1st ‘Shared Goal’ and intended ‘National Strategic Outcome’ of the NPF is compact growth. Compact growth means *“making better use of under-utilised land and buildings, including ‘infill’, ‘brownfield’ and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport”* (NPF p.22).

Compact growth policy encourages higher density - and therefore taller - development in urban areas where supporting infrastructure and services are available. National Policy Objective 11 of the NPF states: *"In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth."*

The NPF states further: *"To enable brownfield development, planning policies and standards need to be flexible, focusing on design led and performance-based outcomes... Although sometimes necessary to safeguard against poor quality design, planning standards should be flexibly applied in response to well-designed development proposals that can achieve urban infill and brownfield development objectives in settlements of all sizes".*

3.2.2 Urban Development & Building Height Guidelines

The Guidelines state: *"Implementation of the National Planning Framework requires increased density, scale and height of development in our town and city cores... to meet the needs of a growing population without growing our urban areas outwards requires more focus in planning policy and implementation terms on reusing previously developed 'brownfield' land, building up urban infill sites... and either reusing or redeveloping existing sites and buildings that may not be in the optimal usage or format taking into account contemporary and future requirements..."*

In Section 3.2 of the Guidelines 'development management criteria' are set out to guide the evaluation of development proposals for buildings taller than the prevailing heights in the area: *"In the event of making a planning application, the applicant shall demonstrate to the satisfaction of the Planning Authority/ An Bord Pleanála, that the proposed development satisfies the following criteria:*

At the scale of the relevant city/town:

- *"The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.*
- *Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.*
- *On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape."*

At the scale of district/neighbourhood/street:

- *The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.*
- *The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.*
- *The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/marine frontage... thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure...*
- *The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.*
- *The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood."*

4.0 Proposed Development

4.1 Development Description

The proposed mixed-use Large-Scale Residential Development (LRD) will comprise the demolition of all existing commercial and warehouse buildings and structures on the site, and the construction of 250 no. residential units within six blocks (Blocks 01, 02(A/B), 03(A/B), 04(A/B), and two duplex blocks) ranging in height up to seven storeys. The development will include 12 no. studio apartments, 148 no. one-bedroom apartments, 74 no. two-bedroom apartments, 8 no. one-bedroom duplex units, and 8 no. two-bedroom duplex units.

All residential units will include private balconies or terraces, oriented north, south, east, or west.

The proposal also includes the conversion of the existing residential dwelling at 307/307A South Circular Road to a crèche with an associated external play area. A new kiosk/café and adjoining open space will be provided adjacent to 307/307A South Circular Road, along with car and bicycle parking. The development will provide public open spaces between Blocks 03 and 04, as well as to the north and south of the apartment blocks, the latter overlooking the Grand Canal, together with communal open spaces throughout the scheme. Vehicular, pedestrian, and cyclist access will be provided from the northeast of the site via South Circular Road, with additional pedestrian and cyclist access from the west via St James's Terrace.

The proposal also includes landscaping, public and communal open spaces, and all associated site development works required to facilitate the project. These works include boundary treatments, plant and waste management areas, and other service provisions, including ESB infrastructure. Demolition of all existing commercial/warehouse buildings and structures on site.

4.2 Layout, Built Form and Height

The proposed development is comprised of:

- four apartment blocks arranged in a row along the Grand Canal;
- a duplex terrace positioned to the rear of the neighbouring houses on St James's Terrace;
- a creche in the converted end-of-terrace house fronting South Circular Road;
- a cultural/community space in a kiosk beside the site entrance on South Circular Road;
- extensive soft and hard landscaping, including green roofs.

Figure 11: Site layout



Blocks 01-04 are finger blocks aligned perpendicular to the canal, with the courtyard spaces between them opening onto the canal corridor to the south.

At the canal frontage, Blocks 01-04 range from five to seven storeys in height:

- Block 01, furthest west and closest to the smaller scale buildings on St James's Terrace, is five storeys. The 5th storey is set back behind a four storey shoulder to the west. The setback is sufficiently deep that the building would appear four storeys tall from close-up.
- Blocks 02 and 04 are six storeys tall fronting the canal. At their northern end, to the rear of the neighbouring houses fronting South Circular Road, they step down to five storeys.
- Block 03 is centrally positioned in the White Heather estate, furthest from any houses to the east or west of the site. A 7th storey is added to Block 03 fronting the canal. Towards its northern end the building steps down to six then five storeys.

Figure 12: Proposed variation in height of Blocks 01-04 fronting the Grand Canal.

- **Block 01, closest to St James's Terrace is 4-5 storeys.**
- **Block 03, furthest from the houses to east and west of the site, is seven storeys. This responds to the varied sensitivities and opportunity, and adds visual interest**



Figure 13: West elevation of Block 03 showing the stepping from seven storeys fronting the canal, to five storeys to the rear of the neighbouring houses fronting South Circular Road



4.3 Façade Treatments

A number of design measures are used to reduce the perceived massing of the buildings (see Figures 12, 13, 14). These include (a) steps in height, (b) recesses and projections in the elevations, (c) variations in material to emphasise the disaggregated form, and (d) highly articulated facades (with variously boxed/recessed or projecting balconies, generously sized windows to increase the void to solid ratio, etc.).

The principal façade material is brick, in two colours. The main bodies of the buildings are buff, and the canal-front volumes are white. Panels of patterned brick are used to give additional texture to the facades. The top floors of Blocks 01 and 03 are clad in bronze coloured metal with standing seams. The balcony soffits and window frames match the penthouse cladding.

Figure 14: CGI view of Blocks 01-04 along the Grand Canal frontage



Figure 15: CGI view of Blocks 03 and 04 seen from across the canal



Figure 16: CGI view of the three storey duplex terrace to the rear of St James's Terrace, and Block 02 to the right



4.4 Landscape Proposals

The key elements of the landscape proposals (from the perspective of potential townscape and visual impact) are as follows (see Figure 17):

- Canal-side linear park: Blocks 01-04 retain the building line of the existing industrial buildings fronting the canal. Therefore, a canal-side space is provided inside the site, alongside the former canal towpath. This linear space includes a pedestrian and cycle path (allowing fire tender access), seating, ornamental planting in raised planters against the buildings (providing a privacy screen for ground floor apartments), and a large number of trees (see Figures 14, 15 above).
- Courtyard spaces: The courtyards and access routes between the four finger blocks (Blocks 01-04) open onto the canal-side linear park (see Figure 15).
- Northern landscape buffer: Inside the northern boundary, to the rear of the neighbouring houses fronting South Circular Road, is an irregularly shaped linear space formed by the setback of Blocks 01-04 from the boundary. This space accommodates vehicular circulation and parking, ancillary facilities such as the substation, bike and bin storage, and a pocket of communal open space beside the duplex terrace. Importantly, this space includes extensive tree planting as a visual screen between the proposed development and the South Circular Road houses (see Figure 18).
- Entrance/creche/community plaza: A key element of the proposal is the conversion of the Victorian house no. 307/307a South Circular Road, beside the White Heather entrance, into a creche. It is proposed to create a plaza space beside the entrance and the creche. The plaza would include a retained copper beech tree (from the garden of the house) as its central feature, and a community/cultural facility in a kiosk of contemporary design and materials (see Figure 19).

Figure 17: Proposed landscape masterplan



Figure 18: The five storey northern elevations of Blocks 02 and 03, set back from the site boundary (and the neighbouring houses) behind the internal access road, with tree planting for visual screening



Figure 19: The plaza beside the site entrance and creche (in repurposed Victorian house), featuring a retained copper beech tree and a kiosk containing a community/cultural facility



Roof gardens and green roofs: The stepped height of the apartment blocks creates a series of roof terraces on each building. It is proposed that these spaces be used as amenity space for the apartments, with seating, shelter in the form of pergolas, and perimeters of ornamental planting and small trees. As well as providing amenity for the roof gardens, this planting is intended to soften the elevations and profiles of the buildings in views from the surroundings (see Figure 18). The inaccessible top level of each building roof would be a green roof.

Figure 20: Proposed roof gardens and green roofs



4.5 Justification for Proposed Height

At seven storeys, the proposed Block 03 is a storey taller than what Dublin City Council recommended in its LRD Stage 2 Opinion. In the applicant's Stage 2 submission, Blocks 02 and 04 were seven storeys and Block 03 was eight storeys. In response to that proposal, Item 1 A. of DCC's stated:

"The applicant is required to explore a reduced overall height of the blocks (maximum 6 storey with lower height at edges of site) with regard to the Z1 zoning of the site and Appendix 3 of the City Development Plan 2022 -2028 given that the prevailing residential environment is quite low and given that this site is not within an SDRA. Serious concern with proposed 7 and 8 storey blocks..." [emphasis added]

However, given (a) the site's city centre location³ (within the canal ring), (b) the site's frontage to the Grand Canal⁴, (c) the mixed townscape character including variety in building height in and around Dolphin's Barn, and (d) the national policy of compact growth, the applicant sought to determine whether exceeding six storeys on part of the site (specifically the location of Block 03) may be acceptable.

A study, using Vu.City (<https://www.vu.city/cities/dublin>), was carried out to compare the zones of theoretical visibility (ZTV⁵) of two versions of the proposal. One version had Blocks 02, 03 and 04 all limited to six storeys (as recommended by DCC in the Opinion). The other version had Block 03 increased to seven storeys. Figures 21a and 21b overleaf are the two ZTV maps produced for the two versions of the development.

³ **Building Height and Appendix 3: 'Achieving Sustainable Compact Growth - Policy for Density and Building Height in the City':**

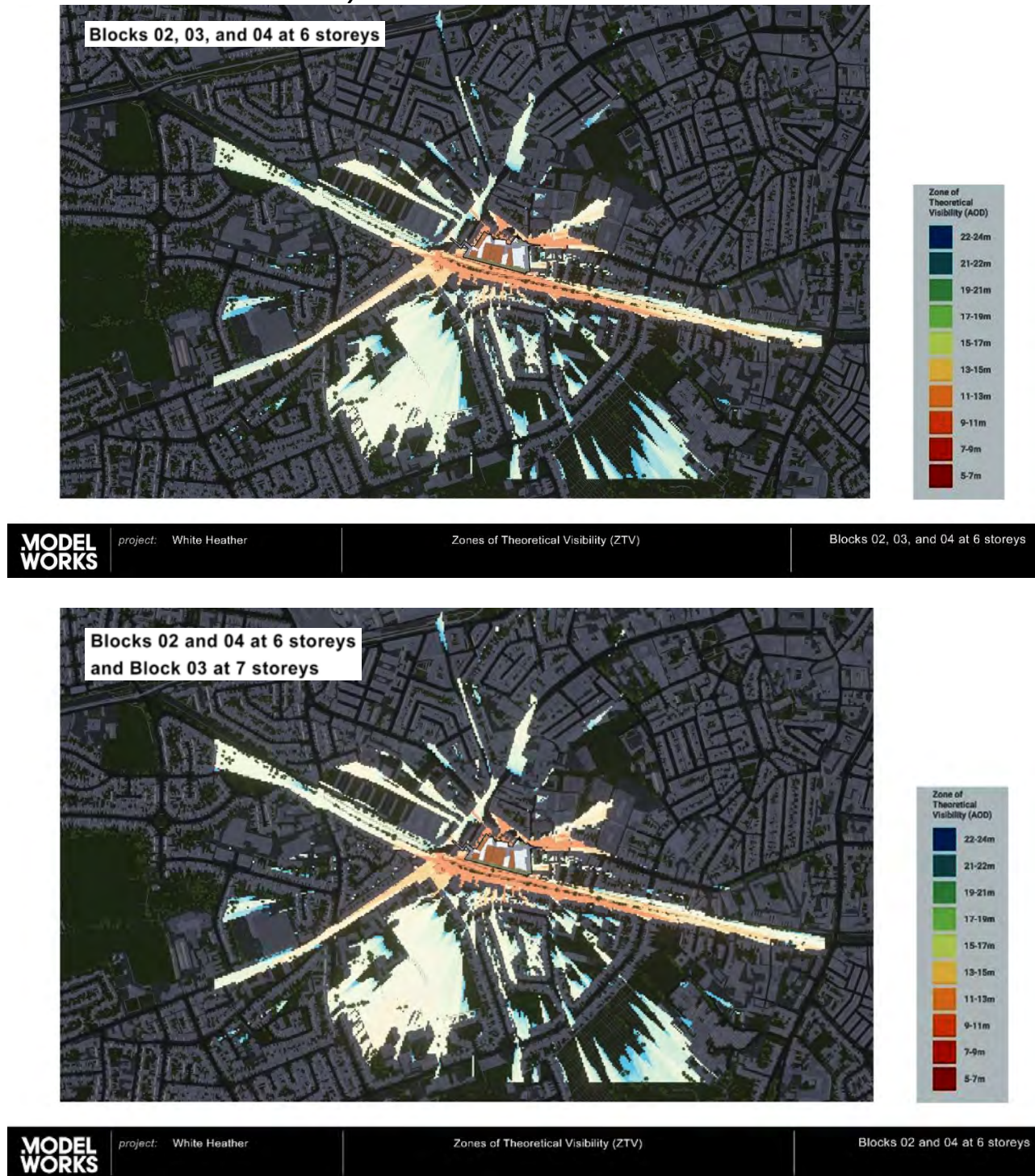
"In general, and in accordance with the Guidelines, a default position of 6 storeys will be promoted in the city centre and within the canal ring subject to site specific characteristics, heritage/environmental considerations, and social considerations in respect of sustaining existing inner city residential communities..."

⁴ **Urban Development & Building Height Guidelines** development management criteria for the evaluation of proposals for buildings taller than the prevailing heights in the area:

"The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway... frontage... thereby enabling additional height in development form to be favourably considered..."

⁵ ZTV mapping involves placing a 3D model of the proposed development into the model of the city and plotting the area from which the development would be visible, taking account of the surrounding built form. ZTV mapping using Vu.City does not take account of vegetation. In reality, the visual screening provided by vegetation can be significant, reducing the area from which a development would be visible. This is the case with the subject site, which benefits particularly from the trees along the canal to the south.

Figures 21a, 21b: Zones of theoretical visibility of the proposed development limited to six storeys, and the proposal with Block 03 increased to seven storeys




Comparison of the two ZTVs shows that increasing the height of Block 03 would not substantially increase the area from which the proposed development would be visible.


Figure 22 overleaf shows the two ZTVs overlaid. The areas highlighted red show where the ZTV would be increased if Block 03 were increased to seven storeys. **The increase in the ZTV, i.e. the increase in the area from which the proposed development would be visible, is negligible.**

Figure 22: Increase in ZTV (red) of a development with Block 03 seven storeys tall



 Blocks 02, 03, and 04 at 6 storeys



 Blocks 02 and 04 at 6 storeys and Block 03 at 7 storeys



Focussing in on the site, the comparative ZTVs show that **an increase in height of Block 03 would cause effectively no increase in the area from which the development would be visible in the immediate environs**, including from South Circular Road, St James's Terrace or Priestfield Cottage.

This does not mean that the increase in height of Block 03 would have no visual impact at all. Where Block 03 is visible, it would be visibly taller (see Figures 14, 15).

However, the question is whether that variation in height would have any negative effects (e.g. dominance of surrounding smaller buildings, or overbearance). This is unlikely given the physical separation of the seven storey element of Block 03 from the surrounding sensitivities. This is considered in the visual effects assessment in Section 5.

Figure 23: Increase in ZTV (red) of a development with Block 03 seven storeys tall



5.0 Visual Impact Assessment

5.1 Study Area / Zone of Influence

Informed by the ZTV analysis (Figures 21, 22 above) - and by the previous planning process for the site (specifically the An Bord Pleanála Inspector's Report on the SHD application⁶) - 21 no. representative viewpoints were selected for visual impact assessment.

In accordance with the GLVIA, the assessment focusses on the impacts on the public realm/publicly accessible views. Additional commentary is provided on the effects on private houses/views where relevant.

Figure 24: Viewpoints for visual impact assessment



The effects on each view are assessed in the tables below. For the methodology, terms and criteria used in the assessment refer to Appendix 1.

The assessment should be read in conjunction with the verified photomontages provided in A3 format under separate cover. For relevant viewpoints, a 'Cumulative View' is provided in addition to the 'Proposed View', showing massing of the permitted developments on the Bailey Gibson and Player Wills sites.

Note: The baseline photographs for the photomontages were taken in early spring before the trees came into full leaf. The photomontages thus present the 'worst case scenario' as regards screening by summer foliage.

⁶ The Inspector's Report on the SHD application noted that nearby residential receptors (Priestfield Cottages, St James's Terrace) and the South Circular Road Residential Conservation Area were underrepresented by the photomontages and assessment of visual impacts. Viewpoints 06 and 06b (St James's Terrace), 07 and 07b (South Circular Road) and 09 and 10 (Priestfield Cottages) are included to address these receptors.

5.2 View Assessments

Table 1: Visual effects assessment

No	Viewpoint Location	Existing View	Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
01	Cork Street/ Dolphin's Barn Street opposite Coombe Hospital	<ul style="list-style-type: none">Cork Street is a broad urban thoroughfare lined by a variety of uses, plot and building typologies, scale (including tall buildings) and architecture.At this point on the street, the Coombe Hospital to the left and a variety of commercial buildings to the right frame the view south. The distinctive, red brick 6-12 storey Earl's Court apartment building is visible ahead to the right.Viewpoint sensitivity: Low:<ul style="list-style-type: none">This is a view along a broad street of mixed character and limited visual amenity, in the city centre. There is a high capacity to accommodate change with no compromise of valued features or characteristics.	Low	<ul style="list-style-type: none">The top floors of Block 03 and a part of Block 02 protrude above the distant, low roofscape.Magnitude of change: Low.Significance of Effect: Slight neutral:<ul style="list-style-type: none">The minor intrusion of a row of moderately tall buildings on the distant skyline would have no significant effect on the composition of the view, or visual amenity at this location.However, the development would have positive effect on legibility - by (a) identifying the Dolphin's Barn urban village centre, and (b) marking the alignment of the Grand Canal (and the edge of Dublin's central urban area) in the townscape.	Low	Not significant neutral



Larger format photomontages are provided under separate cover

No	Viewpoint Location	Existing View	Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
02	Junction of Dolphin's Barn Street and South Circular Road	<ul style="list-style-type: none"> The junction of Dolphin's Barn Street and South Circular Road is very wide, and there is a lack of built form around the junction to counterbalance the road infrastructure and mark the place. One building of stature is Our Lady of Dolours Church on the south east side of the junction, with its distinctive copper-roofed tower. The church is a protected structure. The site lies behind the church in this view. The copse of trees beside the church adds some visual amenity, with the houses of St James's Terrace visible through the bare tree canopies in winter. Viewpoint sensitivity: Medium-High: <ul style="list-style-type: none"> The composition of the church, terraced houses, trees and an old-style shop is visually pleasing, but visual amenity is somewhat diminished by the road infrastructure. Given the context (an urban neighbourhood core within the city centre canal ring), there must be some tolerance for change in the townscape/view. 	Medium-High	<ul style="list-style-type: none"> The tops of Blocks 01 and 02 would be discernible through the bare tree canopies to the side of the church, protruding marginally above the St James's Terrace roofline (in winter only – in spring and summer the development would be screened). <u>Block 03 (the seven storey building) would not be visible.</u> Magnitude of change: Negligible. Significance of Effect: Not significant neutral: <ul style="list-style-type: none"> There would be no significant change to the composition, character or quality of the view. Importantly, the buildings would not protrude above the church's roofline. 	Negligible	Slight neutral



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No	Viewpoint Location	Existing View	Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
03	South Circular Road at junction of Haroldville Avenue	<ul style="list-style-type: none">The view again shows the mixed character of Dolphin's Barn, typical of a neighbourhood within the central urban area.To the left is a terrace of Victorian houses. To the right is a block of 20th century council flats and the distinctive Rialto Cinema building (disused) alongside a terrace of shops forming part of the neighbourhood centre.In the distance, marking the junction at the centre of Dolphin's Barn, is the tower of Our Lady of Dolours Church.Viewpoint sensitivity: Medium:<ul style="list-style-type: none">The view features a protected structure (the church) and other buildings of interest, but the context is urban and the there is sufficient variety (in use, built form, architecture) for the townscape/view to have some capacity to accommodate change.	Medium	<ul style="list-style-type: none">The top two floors of Block 03 protrude above the low roofline of the terrace of shops, to the side of the church. This is a minor, barely discernible intrusion in the view.The variation in materials between the levels (brick and bronze), the setback of the 7th storey (away from the church) and the vegetation on the roof terrace break the massing into smaller visual units, so that the building is easily integrated into the complex townscape.Magnitude of change: Negligible.Significance of Effect: Not significant neutral:<ul style="list-style-type: none">There would be no significant change to the composition, character or quality of the view.Importantly, the buildings would not protrude above the church's roofline.	Negligible	Not significant neutral



Larger format photomontages are provided under separate cover

No	Viewpoint Location	Existing View	Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
04	Dolphin's Barn Street	<ul style="list-style-type: none"> This is the view across the wide street from the Dolphin House Council housing estate on its west side. The road has just crossed the Grand Canal (out of view to the right), entering Dublin's central urban area and arriving in Dolphin's Barn. The rear elevations and garden wall of the houses on St James's Terrace are on the far side of the street, with a small apartment building to the right behind a shop fronting the street. Viewpoint sensitivity: Low-Medium: <ul style="list-style-type: none"> This is a view from a busy street in a zoned 'Key Urban Village' within the canal ring. The view features a number of building typologies, and there are no protected structures or other features of note in the view. 	Medium	<ul style="list-style-type: none"> The tops of Blocks 01 and 02 rise behind the roofline of St James's Terrace, well to the rear of the houses. <u>Block 03 (the seven storey building) would not be visible.</u> The degree of intrusion is not substantial, and the stepped profile and variations in material soften the buildings' presence. However, the contemporary urban typology and architecture change the character of the townscape/view. Magnitude of change: Medium. Significance of Effect: Moderate neutral: <ul style="list-style-type: none"> While the development would change the character of the townscape, there would be no compromise of any valued feature or characteristic of the view, therefore no loss in visual amenity. In this location – in a 'Key Urban Village' within the defined city centre, the change is not inappropriate. 	Medium	Moderate neutral



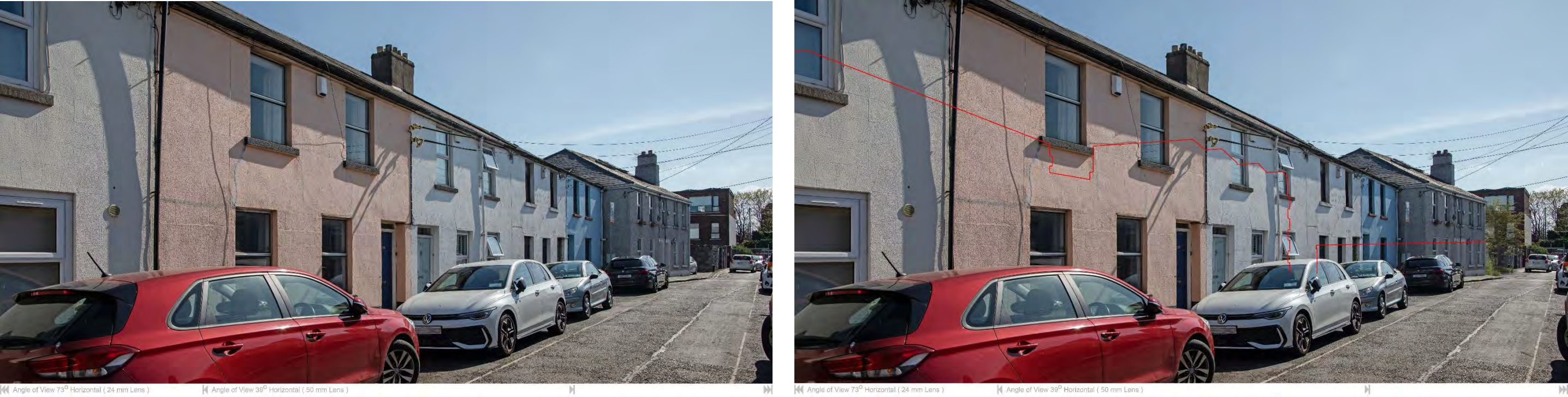
Larger format photomontages are provided under separate cover

No	Viewpoint Location	Existing View	Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
05	St James's Terrace outside Our Lady of Dolours Church	<ul style="list-style-type: none">This is a view from in front of the church, a protected structure, along St James's Terrace towards the Grand Canal.Viewpoint sensitivity: Medium-High.	Medium-High	<ul style="list-style-type: none">The development is screened by the church and the houses of St James's Terrace.Magnitude of change: None.Significance of Effect: No effect.	None	No effect



Larger format photomontages are provided under separate cover

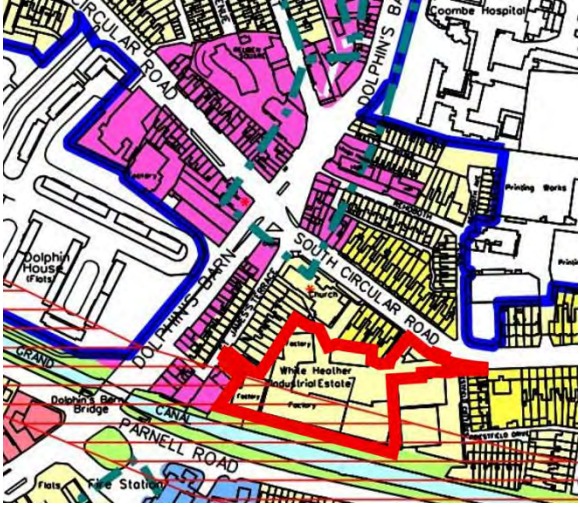
No	Viewpoint Location	Existing View	Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
06	St James's Terrace mid-way along street	<ul style="list-style-type: none"> This is a view from mid-way along the street, showing the high degree of visual enclosure generated by the two storey houses positioned close to the street. At the end of the street (beside the canal), a small three storey apartment block can be seen. Viewpoint sensitivity: Medium. <ul style="list-style-type: none"> The street has an old inner city character, but there is evidence of change, and the location adjacent to a 'Key Urban Village' demands a degree of tolerance for change. 	Medium	<ul style="list-style-type: none"> In views from the street, the development is screened by the houses of St James's Terrace. Magnitude of change: None. Significance of Effect: No effect. While the development is entirely screened from the public realm, there would be views of the development from the rear windows and gardens of the houses on the east side of the road (i.e. the houses in view). The three storey duplex block is positioned inside the site boundary, back-to-back with these houses, to function as a buffer and transition in typology and scale. 	None	No effect



No	Viewpoint Location	Existing View	Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
06b	St James's Terrace at White Heather entrance	<ul style="list-style-type: none"> The view is taken from the street outside a disused entrance to the White Heather industrial estate. The gable wall of an end-of-terrace house is to the left of the wide gateway. To the right is a single detached house enclosed by high boundary walls, and beside that is the three storey apartment building that fronts the canal. A large, low industrial building can be seen on the site inside the security gate and fencing. Viewpoint sensitivity: Low-Medium. <ul style="list-style-type: none"> The character of St James's Terrace is diluted towards the southern end of the street (compared to Views 04 and 05), and visual amenity is limited. There are no valued features or characteristics in the view, but the viewpoint does represent residential receptors. Therefore the sensitivity is classified low-medium as opposed to low. 	Low-Medium	<ul style="list-style-type: none"> The untidy, unsightly landscape of an industrial site entrance is replaced by a new entrance to a high quality residential scheme: <ul style="list-style-type: none"> A wide, shared pedestrian and cycle path is flanked by a wide green verge with shrubs and trees against the end of terrace house. On the other side of the path is a green roofed bin and bike store set against the wall of the neighbouring house. Inside the site is the 4-5 storey Block 01 apartment building: <ul style="list-style-type: none"> The setback of the 5th storey (in combination with a change in material) is effective in disaggregating the massing and reducing the apparent height. The near wall of the building has no windows, to avoid overlooking of the neighbouring house. Magnitude of change: High. Significance of Effect: Moderate positive. <ul style="list-style-type: none"> While the view into the site is transformed, the qualitative improvements to the townscape, resulting from design and material quality of the buildings and landscaping, outweigh the increase in built/visual enclosure. Townscape character and visual amenity would be considerably enhanced. 	High	Moderate positive




Larger format photomontages are provided under separate cover

No	Viewpoint Location	Existing View	Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
07	South Circular Road beside Our Lady of Dolours Church	<ul style="list-style-type: none"> The view is taken from South Circular Road where a gap between the church and the neighbouring terrace of houses affords a view towards the White Heather site. The houses to the left are zoned Residential Conservation Area, and the church is a protected structure. The trees in the church grounds add to the visual amenity, while also largely screening (even in winter) the industrial buildings on the site from view. Viewpoint sensitivity: Medium-High. <ul style="list-style-type: none"> The view represents road users and the houses of South Circular Road. The houses are sensitive receptors. The church and Victorian houses in the view are valued elements of the townscape. However, (a) the industrial site is discernible in the view, and (b) the urban location – adjacent to a ‘Key Urban Village’ within the canal ring, and between two large regeneration sites - indicates that this is a changing, densifying townscape in which diverse typologies, scale and architecture will be represented. Hence the medium-high sensitivity classification (as opposed to high). 	Medium-High	<ul style="list-style-type: none"> Parts of Blocks 02 and 03 are discernible in the gap between the church and houses - although heavily filtered by the foreground trees in winter, and entirely screened in summer. <u>The setback of the buildings from the site’s northern boundary, and the step down in height towards South Circular Road ensures that excessive height/enclosure and overbearance are avoided.</u> <u>The seven storey element of Block 03 would not be visible.</u> Magnitude of change: Low. Significance of Effect: Slight-Moderate neutral. <ul style="list-style-type: none"> The valued elements of the view (the church, the houses, the trees), would be unaffected by the development. The replacement of the large, low industrial buildings in the background with contemporary apartment buildings (a) is not inappropriate in the location, and (b) would make no significant change to the composition or to visual amenity. Such combinations of development typologies add to the character (and sustainability) of the townscape 	Low	Slight-Moderate neutral



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No	Viewpoint Location	Existing View	Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
07b	South Circular Road directly north of site	<ul style="list-style-type: none"> The view is taken from South Circular Road to the north of the site, with the view angled to show the houses and the church (which marks the centre of Dolphin's Barn). Viewpoint sensitivity: Medium-High. <ul style="list-style-type: none"> The view represents road users and the houses of South Circular Road. The houses are sensitive receptors. The church and houses are valued elements of the townscape. However, the urban location – adjacent to a 'Key Urban Village' within the canal ring, and between two large regeneration sites - indicates that this is a changing, densifying townscape in which diverse typologies, scale and architecture will be represented. Hence the medium-high sensitivity classification (as opposed to high). 	Medium-High	<ul style="list-style-type: none"> The setback of Blocks 01-04 from the northern boundary, combined with the stepping down in height towards the north, ensures that the buildings would not protrude above the roofline of the South Circular Road houses. <u>The seven storey element of Block 03 would not be visible.</u> Magnitude of change: None. Significance of Effect: No effect. 	None	No effect



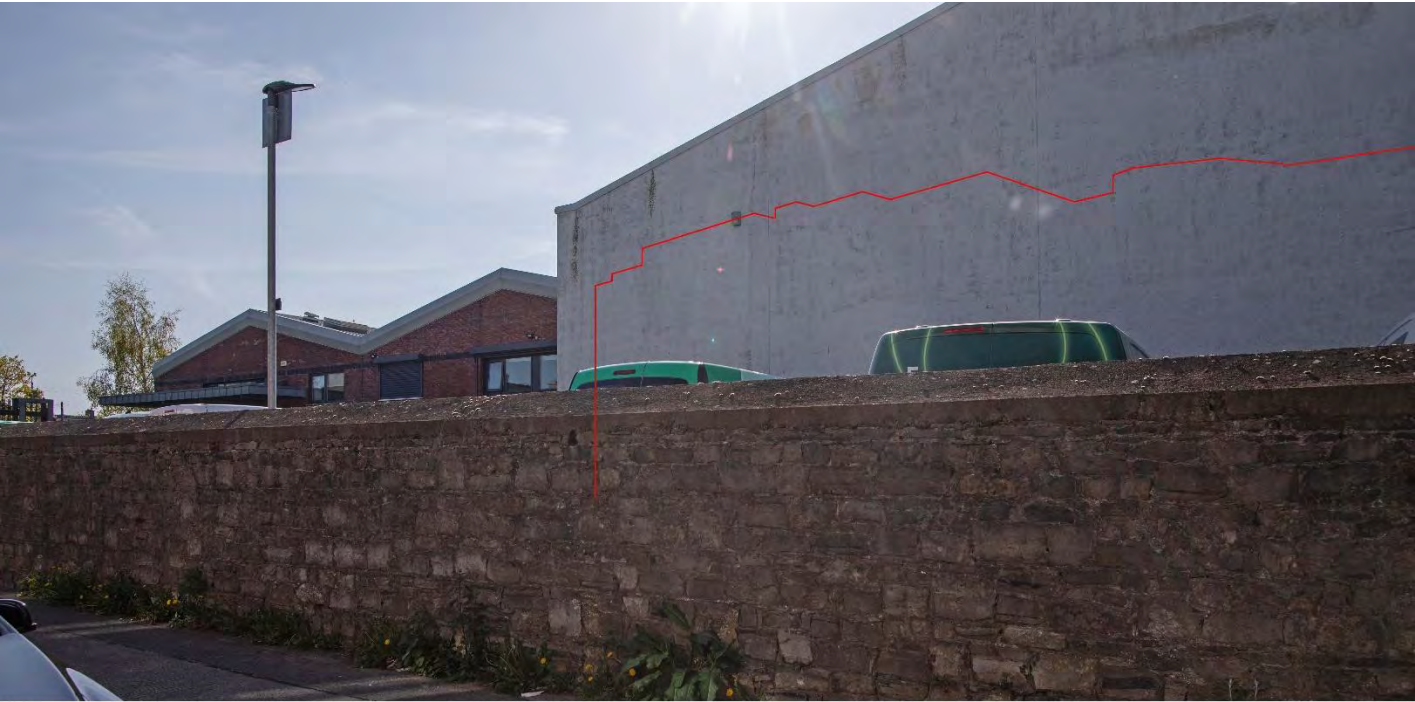
Larger format photomontages are provided under separate cover

No	Viewpoint Location	Existing View	Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
08	South Circular Road approaching site from the east	<ul style="list-style-type: none"> The view illustrates the already mixed character of Dolphin’s Barn, typical of the mixed use urban cores that developed around the canal bridges (refer to Figures 6a, 6b above). To the left is the entrance to the White Heather industrial estate. Large (in footprint) but mostly low warehouse-type buildings are arranged around a central yard to the rear of the neighbouring houses. To the right is South Circular Road with its handsome Victorian houses (zoned Residential Conservation Area) and Our Lady of Dolours Church (a protected structure) ahead, marking the centre of Dolphin’s Barn. Viewpoint sensitivity: Medium. <ul style="list-style-type: none"> The viewpoint represents road users, and was positioned to show the spatial and scale relationship between the proposed buildings and the neighbouring houses. The diversity in land use and building typologies contributes to a relatively high capacity to accommodate change, despite the presence of some sensitive townscape elements. It is also a factor that this location is at the entrance to the Bailey Gibson site (to the right of the road) – a large regeneration site contributing to the shifting character of Dolphin’s Barn and the city centre as a whole. 	Medium	<ul style="list-style-type: none"> The development replaces part of the industrial estate with a series of apartment buildings, set back from the boundary to the rear of South Circular Road houses. The buildings step down from 6-7 storeys fronting the canal, to five storeys at their northern ends. Their profile is softened by vegetation on the roof terraces, and the facades are highly articulated (by large windows, recessed panels and patterned brickwork). These measures reduce the perceived massing. <u>The seven storey element of Block 03 would not be visible.</u> <u>The streetscape at the site entrance is improved, and the large tree retained beside the house which is repurposed as a creche. The kiosk beside the entrance adds to a pleasing composition of built form, old and new architecture and improved public realm.</u> Magnitude of change: Medium-High. (While the development is prominent, a discrete and important part of the view, South Circular Road, is unchanged.) Significance of Effect: Significant positive. <ul style="list-style-type: none"> The character of the townscape/view would be significantly altered – but not inappropriately for the location – and visual amenity would be improved. 	Medium-High	Significant positive



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No	Viewpoint Location	Existing View	Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
09	Priestfield Cottages - A	<ul style="list-style-type: none">Priestfield Cottages leads south from South Circular Road along the side of the White Heather industrial estate, before turning east to run parallel to the canal and ending in a cul-de-sac.This view represents the houses (zoned Residential Conservation Area) across the lane from the industrial estate.Directly across the lane is a high stone boundary wall and the An Post Parcel Delivery facility that lies between Priestfield Cottages and the site.Viewpoint sensitivity: Medium.<ul style="list-style-type: none">The viewpoint represents residential receptors, but visual amenity is limited by the industrial estate across the lane.	Medium	<ul style="list-style-type: none">The entire development is screened by the An Post facility.Magnitude of change: None.Significance of Effect: No effect.	None	No effect



Angle of View 73° Horizontal (24 mm Lens) Angle of View 39° Horizontal (50 mm Lens)



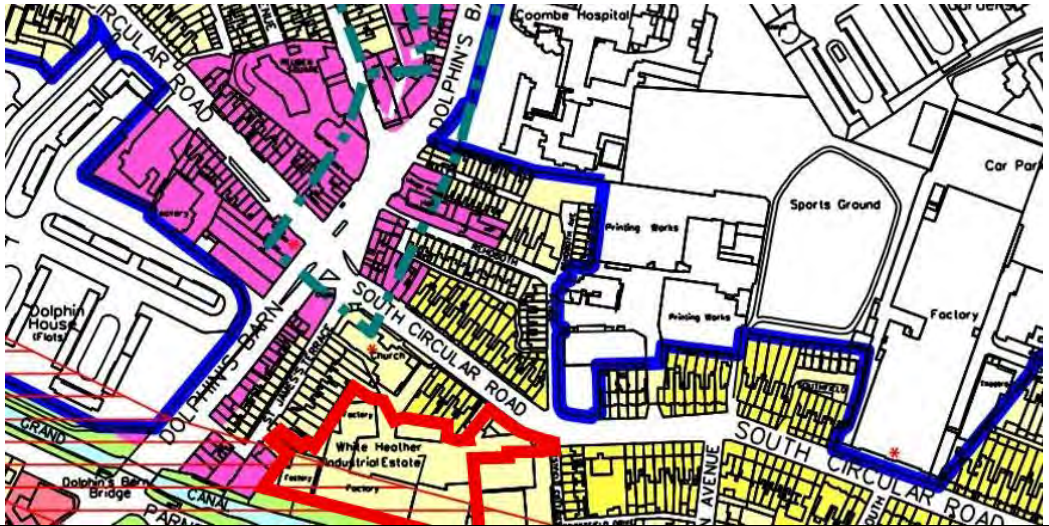
Angle of View 73° Horizontal (24 mm Lens) Angle of View 39° Horizontal (50 mm Lens)

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No	Viewpoint Location	Existing View	Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
10	Priestfield Cottages - B	<ul style="list-style-type: none"> This view represents the stretch of the lane that runs parallel to the Grand Canal, and the terrace of houses along the lane. These houses fall into the Conservation Area that covers the canal and adjacent lands. A view west towards the site is framed by the houses, garages and trees on the lane. A two storey red brick warehouse (part of the An Post facility that lies between Priestfield Cottages and the site) is visible in the middle distance, closing the vista. Viewpoint sensitivity: Medium. <ul style="list-style-type: none"> The viewpoint represents residential receptors and the Grand Canal CA, but visual amenity is limited by the industrial facility framed in the view. 	Medium	<ul style="list-style-type: none"> The six storey Block 04 protrudes above the low roofline of the An Post warehouse in the middle distance. The perceived massing is reduced by the setback of the top floor and the variation in materials. The gable wall is windowless in order to preserve the redevelopment potential of the An Post site. Patterned brickwork adds some texture to this wall. <u>Block 03 (the seven storey building) would not be visible.</u> Magnitude of change: Low-Medium. Significance of Effect: Moderate neutral. <ul style="list-style-type: none"> A new development typology (high density residential) would be introduced to the view, causing a shift in townscape character. In the context, fronting the Grand Canal, in an urban village within the canal ring, the change is not inappropriate. The building is of appreciable design and material quality and would cause no reduction in visual amenity, nor any effect on any valued feature or characteristic of the view. Due to the separation distance and the buffering effect of the An Post facility, there would be no sense of excessive height or enclosure. 	Low-Medium	Moderate neutral



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No	Viewpoint Location	Existing View	Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
11	South Circular Road east of the site	<ul style="list-style-type: none"> The view shows the winding alignment of South Circular Road, Before (east of) the bend in the foreground, the site is not visible. At this point, approximately 150m from the White Heather entrance, the road alignment frames a view towards the site. Victorian houses (zoned Residential Conservation Area) enclose the wide street, and mature trees add to the visual enclosure and amenity. Viewpoint sensitivity: Medium. <ul style="list-style-type: none"> The viewpoint represents road users (as opposed to the houses, which are orientated north-south and don't have views toward the site from their windows). Road users in the city are less sensitive than residential receptors; hence the medium sensitivity classification. 	Medium	<ul style="list-style-type: none"> The apartment buildings are visible in the middle distance, between the street trees and protruding above the houses' roofline towards the end of the terrace, closer to the site. While visible, the development is not at all prominent and does no harm to the foreground elements of the view. While of low magnitude in this view, the impact will increase closer to the site (ref. View 08). Magnitude of change: Low. Significance of Effect: Slight neutral. <ul style="list-style-type: none"> The character of the townscape/view would be altered by the introduction of the high density residential typology. As the buildings become more prominent on approach, they will signal the street's arrival in the centre of Dolphin's Barn. It should be recognised that similar change is planned (as indicated on the zoning map below) or ongoing elsewhere along South Circular Road and other historic streets in the 21st century city. This is an unavoidable consequence of compact growth policy. 	Low	Slight neutral



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No	Viewpoint Location	Existing View	Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
12	Parnell/Sally's Bridge, Grand Canal to east of site	<ul style="list-style-type: none"> This is an attractive view of the Grand Canal corridor between the urban nodes that developed around most of the bridges in the city (e.g. Dolphin's Barn, Charlemont – see Figures 6a, 6b above). The wide waterway corridor features the canal itself, wide grass verges, numerous mature trees, and handsome period houses on the city-side. Parnell Road is visible to the left between the trees. Viewpoint sensitivity: High. <ul style="list-style-type: none"> The canal corridor is covered by Conservation Area designation, and this view is particularly attractive (although it will change when the Bailey Gibson and Player Will sites are developed – in the distance to the right). 	High	<ul style="list-style-type: none"> The development is just discernible in the distance, largely screened by trees in the canal corridor, but protruding marginally above the roofline of the distant houses. Magnitude of change: Low. Significance of Effect: Slight neutral. <ul style="list-style-type: none"> While the key elements of the view (the canal corridor and houses in the foreground) and the overall visual amenity would be unaffected, the visibility of the development in the distance would cause a slight shift in character in the view. This is not inappropriate, nor unusual along the canal. There are nodes of diversity and higher density from the centre to the outer edge of the city along the canal. 	Low	Slight neutral



Larger format photomontages are provided under separate cover

No	Viewpoint Location	Existing View	Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
13	Parnell Road south east of site	<ul style="list-style-type: none"> This view represents road users and walkers along the canal-side footpath. Parnell Road is to the left. Across the canal is the White Heather industrial site. A series of large-footprint, low warehouse-type buildings are positioned along the canal. The rooftop of the tower of Our Lady of Dolours Church and the top of the Earl’s Court apartment building on Cork Street protrude marginally over the warehouses’ roofline. Viewpoint sensitivity: Low-Medium. <ul style="list-style-type: none"> The townscape in view is covered by Conservation Area designation. <u>However, the industrial estate is unsightly and this limits the visual amenity of the canal – and its appreciation by people.</u> The graffiti on the warehouses shows that this stretch of the canal is not widely used, most likely due to the lack of attractiveness, access and passive surveillance. The under-utilisation and under-appreciation of the green/blue infrastructure resource are amplified by the city centre location. There is a high capacity for change in the view. 	Low-Medium	<ul style="list-style-type: none"> The row of unsightly warehouses are replaced by apartment buildings of appreciably high design and material quality, appropriately positioned fronting the canal. The width of the combined canal and road corridor, combined with the canal bank trees, provides favourable context for height. There is no sense of excessive height or enclosure arising from the development. While scale is not of concern in this view, the photomontage shows the effectiveness of the disaggregated form, variations in materials, and highly articulated facades in breaking down the massing into smaller visual units. The taller but more textured residential buildings are more comfortably integrated into the landscape than the low but plain warehouses. The trees and ornamental planting in front of the buildings complement the trees on the near-side of the canal, and soften the built frontage. The additional height (7th storey) on Block 03 has no negative effect. This adds visual interest to the collective built form, and creates a gradation from the centre of the former industrial estate to the edges. Magnitude of change: High. Significance of Effect: Significant positive. <ul style="list-style-type: none"> The view would be positively transformed by the development, with the Grand Canal’s potential as a townscape and visual amenity asset fully realised. There would be no negative effects on the canal CA, nor any valued feature or characteristic of the view. This view shows the benefits not just to the surrounding receptors but the future residents of the development. 	High	Significant positive



Larger format photomontages are provided under separate cover

No	Viewpoint Location	Existing View	Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
14	Parnell Road south west of site	<ul style="list-style-type: none"> This view represents the houses on the south side of Parnell Road. Across the road in the foreground is a row of mature trees on the canal bank. In winter these filter the view and in summer they form a dense screen. The canal itself is hidden (being sunken), but the width of the canal corridor is apparent. On the far side, approximately 55m from the houses, are the warehouse buildings of the industrial estate. The tower of Our Lady of Dolours Church protrudes over the warehouse roofline. Viewpoint sensitivity: Medium. <ul style="list-style-type: none"> The townscape in view is covered by Conservation Area designation, and the viewpoint represents residential receptors. However, the combination of the wide road and the unsightly warehouses limits visual amenity. The graffiti on the warehouse walls indicates that this stretch of the canal is not widely used or appreciated. There is a high capacity for change in the view. 	Medium	<ul style="list-style-type: none"> The row of unsightly warehouses are replaced by apartment buildings of design and material quality, appropriately positioned fronting the canal. (The canal corridor is a townscape and visual amenity asset. Along this stretch its value is not realised.) The width of the combined canal and road corridor, along with the canal bank trees, provides favourable context for height. There is no sense of excessive height or enclosure arising from the development. While scale is not of concern in this view, the photomontage shows the effectiveness of the disaggregated form, variations in materials, and highly articulated facades in breaking down the massing into smaller visual units. The additional height (7th storey) on Block 03 has no negative effect. This adds visual interest to the collective built form, and creates a gradation from the centre of the former industrial estate to the edges. Magnitude of change: Medium. Significance of Effect: Moderate positive. <ul style="list-style-type: none"> The transformative effect of the development is lessened in this view (compared to View 13) by the buffering effect of the road and trees. Nonetheless, the development enhances the townscape context of the canal, realising its amenity potential. The top of the church tower is screened from view, but this is not a key element of the view. There would be no negative effect on the Grand Canal CA. 	Medium	Moderate positive



Larger format photomontages are provided under separate cover

No	Viewpoint Location	Existing View	Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
15	Dolphin's Barn Bridge, Grand Canal to west of site	<ul style="list-style-type: none"> Dolphin's Barn Bridge, where the Crumlin Road crosses the Grand Canal, is a gateway to the city centre. This is an important node/place in the townscape. The view east along the canal is less attractive than the view from Sally's Bridge (View 12). The built frontage to the canal is unsightly and this counteracts the visual amenity of the canal and the green verges and trees. Viewpoint sensitivity: Medium. <ul style="list-style-type: none"> The canal corridor is covered by Conservation Area designation. However, (a) the road users crossing the bridge are not highly sensitive receptors, and (b) there are elements that detract from the visual amenity. There is some capacity for change in the view. 	Medium	<ul style="list-style-type: none"> The apartment buildings protrude above the roofs of a pub and a low (three storey) brown brick apartment building beside the site. The buildings visibly extend along the canal, but their canal-side presence is somewhat muted by the trees in the linear open space. The width of the combined canal and road corridor, along with the canal bank trees, provides favourable context for height. There is no sense of excessive height or enclosure arising from the development. The additional height (7th storey) on Block 03 has no negative effect. This adds visual interest to the collective built form and creates a gradation from the centre of the former industrial estate to the edges. Magnitude of change: Low-Medium. Significance of Effect: Slight neutral. <ul style="list-style-type: none"> Seen from this distance and acute angle, the development has more limited effects than at Viewpoints 13 and 14. Nonetheless, the appropriateness of the development's siting is evident, with the buildings providing enclosure and passive surveillance of the canal corridor, and the canal providing landscape/visual amenity for the residents - realising its untapped potential along this stretch. The development also reinforces the visible 'edge' to the city centre, which is clear elsewhere on the north side of the canal. This improves legibility. 	Low-Medium	Slight positive



Larger format photomontages are provided under separate cover

No	Viewpoint Location	Existing View	Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
16	Crumlin Road approaching Grand Canal and Dolphin's Barn	<ul style="list-style-type: none">• The Crumlin Road's crossing of the Grand Canal to enter the city centre (as defined in the DCDP) is an important node and gateway in the townscape. This is not reflected in the surrounding built form however, and the road's approach to the canal is underwhelming.• Having passed the Rutland Avenue flats the Dolphin's Barn fire station is to the right, the trees along the canal are a key feature of the view, and to the very left of the view is the tower of Our Lady of Dolours church.• For the central urban location, there is a lot of open space in the view (due to the width of the roads, the canal corridor, and the low density of built form).• Viewpoint sensitivity: Low-Medium.<ul style="list-style-type: none">- The area in view is covered by Conservation Area designation. However, the townscape lacks cohesion and buildings of stature to mark the gateway to Dolphin's Barn and the city centre. Only the church tower and the fire station tower provide any sense of place. There is a high capacity for change in the view.	Low-Medium	<ul style="list-style-type: none">• Parts of Blocks 01 and 02 protrude above the low roofline of the buildings on the far side of the canal. The development's frontage to the canal is hidden by the trees in the canal corridor. The stepped height and variations in materials reduce the perceived massing,• Magnitude of change: Low-Medium.• Significance of Effect: Slight neutral.<ul style="list-style-type: none">- While limited in prominence (due to the breadth of the view and the screening effect of the canal bank trees), by introducing buildings of contemporary urban typology and scale the development cause a slight shift in character, towards a more urban condition.- This change is not inappropriate, and it would cause no negative effects on any valued feature or characteristic of the view.	Low-Medium	Slight neutral



Larger format photomontages are provided under separate cover.

No	Viewpoint Location	Existing View	Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
17	Herberton Road bridge, Grand Canal west of site	<ul style="list-style-type: none"> The Herberton Road bridge is the next bridge over the Grand Canal to the west of Dolphin's Barn Bridge. To the left of the canal in the view is the Dolphin House council housing estate. This is a very large estate with nearly 400m frontage to the canal. It is designated a Strategic Development and Regeneration Area and is to be redeveloped by the LDA. The Grand Canal Walkway follows the former towpath on the north side of the canal. A row of trees beside the path partly screens the council flats facing the canal. Viewpoint sensitivity: Medium. <ul style="list-style-type: none"> The canal corridor is covered by Conservation Area designation. However, Dolphin House detracts from the visual amenity of the canal, and is designated for redevelopment. This prospect of significant townscape change creates capacity for change in the view. 	Medium	<ul style="list-style-type: none"> The proposed development is screened by the canal-side trees along the Dolphin House frontage. Magnitude of change: None. Significance of Effect: No effect. 	None	No effect



Larger format photomontages are provided under separate cover.

No	Viewpoint Location	Existing View	Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
18	Crumlin Road distant view	<ul style="list-style-type: none"> As the Crumlin Road approaches Dolphin’s Barn Bridge over the Grand Canal, where the road enters the city centre, the character of the road corridor is mixed – with a variety of houses, institutional buildings and commercial premises lining the road. The Rutland Avenue Flats are prominent towards the far end of the road. Viewpoint sensitivity: Low. <ul style="list-style-type: none"> The Crumlin Road is a busy urban thoroughfare lined by a variety of land uses and plot and building typologies. Views are dominated by the road and traffic, and visual amenity is limited. 	Low	<ul style="list-style-type: none"> The proposed development is screened by the Rutland Avenue Flats on the near side of the canal. Magnitude of change: None. Significance of Effect: No effect. 	None	No effect



Larger format photomontages are provided under separate cover.

No	Viewpoint Location	Existing View	Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
19	Rathdrum Road, Crumlin	<ul style="list-style-type: none">Rathdrum Road is an estate to the south of Parnell Road and the Grand Canal, directly south of White Heather. There is generally a high degree of visual enclosure on the narrow streets of the estate, but a more expansive view north – towards the city centre - is afforded across the central greenViewpoint sensitivity: Medium.<ul style="list-style-type: none">The uniformity of character limits the capacity of the estate to accommodate change internally. However, as an inner suburb of the city, there must be some tolerance for change in the surrounding context.	Medium	<ul style="list-style-type: none">Parts of Blocks 01, 02 and 03 protrude above the roofline of the estate houses. The degree of intrusion in the view is minor and causes no significant increase in built/visual enclosure.<u>The cumulative view shows the more significant protrusion of the permitted buildings on the Bailey Gibson and Player Wills sites, also within the canal ring and in the same part of the skyline.</u>Magnitude of change: Low.Significance of Effect: Slight neutral.<ul style="list-style-type: none">The minor intrusion of a row of moderately tall buildings on the distant skyline would have no significant effect on the visual amenity of the estate.The visibility of higher density typologies this close to the city centre is appropriate.The main effect of the development would be to improve legibility - by marking the alignment of the Grand Canal and the edge of the central urban area.	Low	Slight neutral



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6.0 Townscape Impact Assessment and Conclusions

6.1 Townscape Sensitivity

The townscape sensitivity⁷ of the receiving environment can be classified ‘medium’.

(Definition of medium sensitivity (See Appendix 1, Table 1): *Areas where the landscape/townscape 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 townscape policy at local or county level and the principal management objective may be to consolidate landscape character or facilitate appropriate, necessary change.*)

This classification is based on the following factors:

- The site is an industrial estate in Dolphin’s Barn, a ‘Key Urban Village’ within Dublin’s canal ring, the area commonly referred to as the city centre.
- In its current use and condition, the site detracts from the townscape character and visual amenity of its immediate environs, including the adjacent stretch of the Grand Canal and the nearby residential streets.
- The site is zoned for residential use.
- Historically, Dolphin’s Barn had a strong industrial/employment element in its townscape (laundries on the site, a printing works, tobacco, brick and tile factories), as well as schools, a church, two cinemas and housing (from terraced and detached houses to large estates of council flats). The area is characterised by a complex urban grain and a wide variety of plot and building typologies, scale and architecture. (This pattern occurs elsewhere in Dublin around the canal bridges.) Such diversity creates capacity for change as there is no norm with which new development can or should conform.
- Around the turn of the century, many of the industrial premises closed, along with some of the council housing estates. This created opportunities for regeneration, and two large sites in Dolphin’s Barn were designated Strategic Development and Regeneration Areas (Dolphin House and St Teresa’s Gardens and Environs SDRAs). A number of high density residential projects have since been granted planning permission and construction is underway, initiating a new phase in the evolution of the townscape.
- There are several sensitivities in the site environs:
 - Adjacent to the north, marking the centre of Dolphin’s Barn (the junction of South Circular Road and Dolphin’s Barn Street), is Our Lady of Dolours Church, a protected structure.
 - South Circular Road passes to the north of the site. The road is lined by Victorian houses, zoned Z2 ‘Residential Conservation Area’. While denoting townscape value, this zoning does not preclude change in the area. For example, the Z2 zoned area adjoins the Bailey Gibson development site

⁷ The GLVIA states that townscape sensitivity should be classified with consideration of ‘the particular project or development that is being proposed’ and ‘the location in question’. Sensitivity 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 the judgement of the assessor.

diagonally across the road from White Heather. The road corridor (including the Z2 zoned houses) will experience significant townscape and visual change as the former industrial site is regenerated.

- To the west and east of White Heather are two narrow lanes (St James's Terrace and Priestfield Cottages) lined by small terraced houses. These streets have an intimate, 'urban village' character and the houses are sensitive residential receptors. It should be recognised, however, that in the current scenario, they are negatively affected by their proximity to the industrial estate.
- The Grand Canal passes along the site's southern boundary (White Heather has approximately 180m frontage to the canal). The canal is an important piece of the city's industrial heritage, and it shaped the urban structure, land use pattern and resulting townscape character of the adjacent lands. More recently, its value as a green-blue infrastructure asset has been recognised and developed. The canal corridor provides habitat, an active travel route and recreation and visual amenity. The canal is covered by Conservation Area designation, which extends onto the adjacent lands, including part of the site.
- While the Grand Canal is a sensitivity, it is also an opportunity in townscape and visual terms, and is an important factor in the site's land use potential. The site has 150m frontage to the broad green-blue infrastructure corridor, with a southern aspect, and views over the canal towards the Dublin Mountains. Combined with the site's central, accessible location, this contributes to a high residential land use value.
- It is recognised in policy (the Building Height Guidelines) that inland waterways provide favourable context for increased building height. The Guidelines state that additional height at waterway frontage can 'enhance the waterway's urban design context, sense of scale and enclosure'.
- The canal could benefit in other ways from the site's redevelopment. The graffiti on the canal-side industrial buildings indicates that this stretch of the canal is not optimally used, likely due to the lack of attractiveness (of the industrial estate), lack of access and passive surveillance. The site's redevelopment presents an opportunity to realise the canal's untapped value.

6.2 Magnitude of Townscape Change

The magnitude of townscape change which would result from the proposed development can be classified 'medium'.

(Definition of medium magnitude (See Appendix 1, Table 2): *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.*

This classification is based on the following factors:

- At 1.13 ha and delivering 250 no. homes, the proposed development can be considered moderate to large in extent for an urban infill site.
- With buildings ranging from 3-7 no storeys, the proposed development is tall for the current context. The height is concentrated along the Grand Canal to the south, and in the centre of the site (Block 03), stepping down to the east, west and north.

While taller than the *current* context, the Dolphin's Barn area is undergoing a phase of regeneration which will see buildings of seven storeys and taller introduced to the townscape (e.g. on the Bailey Gibson, Player Wills and Dolphin House sites). The development would not therefore initiate a change in character, but would rather contribute to an established trend of densification through increased building height.

- The visual impact assessment (informed by verified photomontages) shows that, despite the development's scale, any significant visual effects would be localised. The most directly affected areas would be:
 - The Grand Canal and Parnell Road directly to the south of the site (Viewpoints 13 and 14). In this area, the development would be exposed to view, and the replacement of the industrial estate with a high quality, high density residential scheme would alter the townscape character and visual amenity for the better.
 - South Circular Road approaching the White Heather entrance from the east (Viewpoint 8). Along a stretch of South Circular Road, the development would be prominent, replacing (part of) the industrial estate to the rear of the Victorian houses and Our Lady of Dolours Church. The photomontage for Viewpoint 8 shows that the development would result in an attractive composition of built form, old and new architecture and improved public realm.
 - St James's Terrace at disused White Heather entrance (Viewpoint 6b). The unsightly industrial estate entrance would be replaced by a new entrance to a high quality residential scheme. The qualitative improvements to the townscape would outweigh any negative effects of the increase in built/visual enclosure. The height of the westernmost buildings, Block 01 and the duplex terrace, is moderated to avoid excessive impact.
- The visual impact assessment shows that key sensitivities in the receiving environment would not be negatively affected. These include:
 - Our Lady of Dolours Church. There is sufficient separation distance between the proposed buildings and the church to avoid negative impacts in views of and from the church (refer to Viewpoints 02, 03, 05, 07, 07b, 08).
 - South Circular Road. The only significantly affected views from the street are those in which the existing industrial estate is prominent (e.g. Viewpoint 08). By setting the buildings back from the northern boundary and stepping down to five storeys at their northern ends, the proposal avoids crowding or overbearance of South Circular Road and its Victorian houses (see Viewpoints 07, 07b). The landscaping and kiosk at the site entrance would enhance the streetscape locally.
 - St James's Terrace. The majority of St James's Terrace would experience no visual impact (see Viewpoints 05, 06). Only at the northern end of the lane (Viewpoint 06b), where the character weakens and the industrial estate affects visual amenity, would the development have any significant effect. The effect would be positive.
 - Priestfield Cottages. The houses of Priestfield Cottages nearest to the site (Viewpoint 09) would experience no impact, with the development entirely screened by the An Post facility. The houses on the section of the lane parallel to the canal (Viewpoint 10) are further from the site, and would experience a moderate neutral effect.

Table 2: Summary of visual effects assessment

No	ViewpointLocation	Sensitivity	Magnitude of Change	Significance of Effects
01	Cork Street/ Dolphin's Barn Street opposite Coombe Hospital	Low	Low	Not significant neutral
02	Junction of Dolphin's Barn Street and South Circular Road	Medium-High	Negligible	Slight neutral
03	South Circular Road at junction of Haroldville Avenue	Medium	Negligible	Not significant neutral
04	Dolphin's Barn Street	Medium	Medium	Moderate neutral

No	ViewpointLocation	Sensitivity	Magnitude of Change	Significance of Effects
05	St James's Terrace outside Our Lady of Dolours Church	Medium-High	None	No effect
06	St James's Terrace mid-way along street	Medium	None	No effect
06b	St James's Terrace at White Heather entrance	Low-Medium	High	Moderate positive
07	South Circular Road beside Our Lady of Dolours Church	Medium-High	Low	Slight-Moderate neutral
07b	South Circular Road directly north of site	Medium-High	None	No effect
08	South Circular Road approaching site from the east	Medium	Medium-High	Significant positive
09	Priestfield Cottages - A	Medium	None	No effect
10	Priestfield Cottages - B	Medium	Low-Medium	Moderate neutral
11	South Circular Road east of the site	Medium	Low	Slight neutral
12	Parnell/Sally's Bridge, Grand Canal to east of site	High	Low	Slight neutral
13	Parnell Road south east of site	Low-Medium	High	Significant positive
14	Parnell Road south west of site	Medium	Medium	Moderate positive
15	Dolphin's Barn Bridge, Grand Canal to west of site	Medium	Low-Medium	Slight positive
16	Crumlin Road approaching Grand Canal and Dolphin's Barn	Low-Medium	Low-Medium	Slight neutral
17	Herberton Road bridge, Grand Canal west of site	Medium	None	No effect
18	Crumlin Road distant view	Low	None	No effect
19	Rathdrum Road, Crumlin	Medium	Low	Slight neutral

In summary, while the proposed development is of substantial scale, its townscape and visual impacts would (a) be localised, (b) avoid negative effects on the key sensitivities in the area, and (c) be consistent with the established, plan-led trend of change in Dolphin's Barn and similar areas of the city.

6.3 Significance and Quality of Townscape Effects

Measuring the magnitude of change against the sensitivity of the receiving environment (refer to Appendix 1, Table 3 and Figure 1), **the significance of the townscape effects can be classified 'moderate'**. (EPA definitio: *An effect that alters the character of the environment in a manner that is consistent with existing and emerging baseline trends*).

Informed by the analysis of the receiving environment (Section 2), consideration of relevant policy (Section 3), analysis of the proposed design including the response to the key sensitivities (section 4), assessment of the visual effects on 21 no. representative viewpoints (Section 4), and assessment of the townscape change in Section 6.2 above, **the proposed development can be considered a positive intervention in the townscape; no negative townscape or visual effects have been identified.**

- The proposed development would realise the residential land use objective for the site, making optimal, sustainable use of its considerable residential amenity value.
- The height on the canal-front is appropriate, taking advantage of the open space and vegetation buffer that exists in the combined Grand Canal and Parnell Road corridor.
- The seven storey volume on Block 03 causes no negative effects. It is well removed and buffered from any sensitive receptors, and adds visual interest to the collective built form.
- The stepping down in height towards the north, west and east boundaries avoids overbearance on the nearest streets and houses.
- The buildings and landscape are of high quality design and materials. They would enhance the townscape context, particularly the canal corridor, which would benefit from improved spatial enclosure/definition, physical and visual access and appreciation, realising its value as a green-blue infrastructure asset.
- In principle, the development typology is appropriate for the location. The Grand and Royal Canals are recognised (including in DCDP policy on building height) as the boundaries of Dublin city centre. In urban design terms, it makes sense for that edge to be expressed in the built form, particularly at the bridges, which are the gateways to the city centre. The proposed development would have this edge- and place-defining effect in Dolphins Barn.

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 visual amenity.

1.2 Assessment of Both Landscape/Townscape 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 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 principal 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 principal 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 principal 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 principal 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 principal 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.

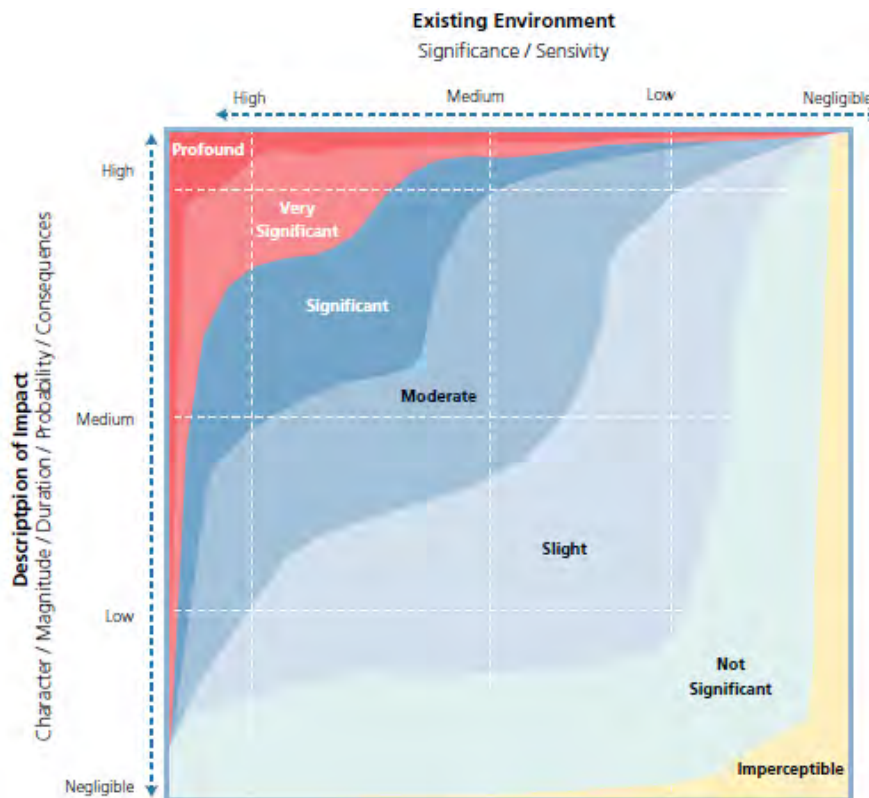
2.3 Significance of Landscape/Townscape Effects

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
	Medium	Very Significant to Significant	Significant	Moderate	Slight	Not Significant
	Low	Moderate	Moderate to Slight	Slight	Not significant	Imperceptible
	Negligible	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.