

Richmond Road
SHD application for Mixed Use Scheme (Build to Rent) at
Richmond Road, Fairview, Dublin 3

Landscape and Visual Impact Assessment

For Birkey Limited
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LANDSCAPE & VISUAL IMPACT ASSESSMENT – PRELIMINARY REPORT

1. Introduction

Mitchell + Associates was engaged by Birkey Limited, in January 2021 to prepare a Landscape and Visual Impact Assessment (LVIA) for a proposed mixed-use development (comprising 183 No. Build-to-Rent apartments and 1 No. café/retail unit) at Richmond Road, Fairview, Dublin 3. This LVIA report forms part of the planning application to An Bord Pleanála and assesses the impact of the proposed development on the landscape character and visual amenity of the current site and on the contiguous area and the site environs. It considers these in the context of the site, within Dublin's north inner-city area. It describes the landscape character of the subject site and its hinterland, together with the visibility of the site from significant viewpoints in the locality. It includes an outline of the methodology utilised to assess the impacts and descriptions of the receiving environment (baseline) and of the potential impacts of the development. Mitigation measures introduced to ameliorate or offset impacts are considered and the resultant predicted (residual) impacts outlined. This report should be read with reference to the photomontages, which are contained in a separate A3 report prepared by 3D Design Bureau.



Figure 1: Site location and context (Source: Bing maps with overlay by Mitchell + Associates)

2. Methodology

2.1 Introduction

This assessment was carried out between March and December 2021. Landscape and Visual Impact Assessment (LVIA) includes consideration of two main aspects:

- Landscape Character Impact – the assessment of effects on the character of the landscape arising from the insertion of the proposed development into the existing landscape context. The ‘landscape’ aspect of assessment is relatively subjective and can be described broadly as the human, social and cultural experience of one’s surroundings. These combined impacts will elicit responses whose significance will be partially dependent on how people perceive a particular landscape and how much the changes will matter in relation to other senses as experienced and valued by those concerned. Despite the extremely large part played by our visual experience in forming our views on landscape, one’s perception and indeed memory also play an important part if the changes brought about in landscape character are to be fully understood. It is clear therefore that different people doing different things will experience the surrounding landscape in different ways. Such sensitivities and variations in response, including where and when they are likely to occur, are taken into consideration in the assessment.
- Visual Impact – the assessment of effects of the proposed development on the visual environment and visual amenity as evidenced by the comparison of baseline (existing) images and photomontages illustrating the proposed development in context. This second aspect is somewhat less subjective in that direct ‘before and after’ comparisons can be made. Visual impact occurs by means of visual intrusion and/or visual obstruction and the distance between subject and viewpoint has a bearing on the scale of such impact.

It is appropriate that aspects of architectural context and design approach are addressed when assessing impact of proposed development on the urban landscape. In this regard, aspects of the architectural design rationale and the specific architectural responses to the site and context, are referred to within this report.

The standard evaluation methodology used in the preparation of the Landscape and Visual Impact Assessment (LVIA) for Environmental Impact Assessment Reports (EIAR) is utilised. The evaluation methodology is therefore based on the following:

- ‘Guidelines on the information to be contained in Environmental Impact Statements’ - Environmental Protection Agency (EPA) 2002.
- ‘Advice Notes on Current Practice in the preparation of Environmental Impact Statements’ - Environmental Protection Agency (EPA), September 2003.
- ‘Guidelines for Landscape and Visual Impact Assessment’, prepared by the Landscape Institute and the Institute of Environmental Assessment, published by Routledge, 3rd Edition 2013.
- Reference is also made to the DRAFT ‘Revised guidelines on the information to be contained in Environmental Impact Statements’ - Environmental Protection Agency (EPA), September 2015
- The DRAFT ‘Guidelines on the information to be contained in Environmental Impact Assessment Reports’ - Environmental Protection Agency (EPA), August 2017.

This preliminary Landscape and Visual Impact Assessment involved:

- Visiting the area in March, June and December 2021 and preparing a photographic record of the main landscape features;
- Undertaking a desk study of the subject site and its immediate environs in relation to its local and broader significance using the information gathered from site visits, studying aerial photography, historic and Ordnance Survey mapping;
- Establishing and describing the receiving environment in terms of the existing landscape, its visual amenity and its significance;
- Assessing the nature, scale and quality of the proposed development through examination of the design team's outline drawings, illustrations and descriptions of the proposed scheme;
- Assessing potential viewpoints, choosing and agreeing those which could be considered most important and most representative in terms of visual impact; and
- Assessing the landscape and visual impacts of the proposed development through consideration and interpretation of the prepared photomontages.

2.2 Photomontage Methodology

The primary method adopted for Visual Impact Assessment relies largely on a comparative visual technique whereby accurate photomontages incorporating the proposed development are compared to the existing corresponding baseline photograph so that an assessment of impact can be made. These 'before' and 'after' images are prepared for a number of selected viewpoints. The general methodology for the preparation of photomontages, including site photography, 3D computer modelling and rendering of views, is outlined in Appendix A.

2.3 Selection of Views

In recognition of the sensitivities of this location and to enable a full and detailed assessment of the proposal, a total of 19 views were selected for photomontage preparation. Figures 2a and 2b below, illustrate the viewpoint locations (indicated in red) of the photomontages submitted as part of the planning application.

In accordance with the guidelines, views from the public domain were given priority, particularly those from main thoroughfares and public places. The Guidelines also require that the proposed development is considered in context and that photomontages illustrate the proposed development with sufficient context for proper assessment. The views submitted are considered to be the most important and representative, having regard to the requirement to examine the likely significant impacts.

The views were selected to represent the greatest likely visual impact from a variety of directions around the site, and in all cases bar one (View 15), allowing sufficient distance to see the proposed development within its landscape context, as per the guidelines. For View 15, the viewpoint is too close to the proposed development to allow proper assessment in context, however it is retained, for convenience, within the 'Assessment of views' in section 8.2. Views 12, 13 and 16 are taken from within, or close to, the Holy Cross site and illustrate the potential visual impact of the subject scheme on the existing landscape from these viewpoints. The recent permission granted for significant development on the Holy Cross site

will lead ultimately to a changed context for these views and may also impact significantly on the future visibility of the subject scheme from these locations.



Figure 2a: Selected viewpoints (longer range): photomontages for these viewpoints are included with the planning application.



Figure 2b: Selected viewpoints (shorter range): photomontages for these viewpoints are included with the planning application.

The initial photomontages prepared were used to assess the design and to inform the design team of any advisable amendments – this is an iterative process and offers an opportunity for the design team to adjust the design or for the location of viewpoints to be adjusted to be sure of illustrating maximum impact. A location map of the selected viewpoints is also included with the photomontages in the separate A3 document prepared by 3D Design Bureau.

2.4 Methodology for Rating of Impacts

The significance of predicted effects is assessed by setting the magnitude (or nature) of landscape and visual impacts against the sensitivity (or nature) of the landscape and visual receptors. The predicted effects are further assessed and ascribed a value for quality and duration of effect.

The quality of impact can be assessed as 'positive' or 'negative' depending on whether the change is considered to improve or reduce the quality of the landscape character or visual environment. The quality of impact may also be assessed as 'neutral' if the quality of the environment is unchanged. The assessment of quality needs to consider and weigh-up a range of issues and potentially conflicting standpoints. The nature of the proposed change, its context, appropriateness, quality of design and the sensitivities of the viewers are all important considerations for this aspect of assessment.

The duration of impact is a third aspect of assessment to be considered and may range from temporary to permanent. In this case, the proposed development is likely to be long term, however the effectiveness of existing and proposed planting in assimilating the scheme into the existing landscape context or in totally screening it will presumably develop and mature over time. The temporary/short term impacts during the construction of the proposed development are also considered.

The assessment of landscape effects is based on the scheme design and the impact it will potentially make on the existing landscape and the elements that contribute to it. The assessment of visual effects is primarily based on the photomontages provided which compare the existing (baseline) views before development, with the 'proposed' views illustrating the proposed development placed into the existing context. For each view, the scale/magnitude of impact is related to the simple quantum of change within the field of view and to the nature and sensitivity of such change in respect of the respective receptors, in the context of the existing (receiving) environment. Therefore, whilst the significance of effects may range from 'imperceptible' to 'profound' and these may in part be related to distance and proximity, it should be remembered that the nature of the change and the sensitivities of the viewers also play a part in this aspect of assessment for each view.

This latter issue of sensitivity can however create emotive responses which often have little or no regard for the appropriateness and/or design of the proposal and the assessment needs to be considered in that context. For example, in this case of a residential development proposed for this mixed commercial and residential area, the interests or concerns (sensitivities) of say, a business owner in the area may differ greatly to those of an existing local resident or potential house-buyer. The full reconciliation of such sensitivities may be considered unlikely, in which case, issues of appropriateness and design quality become more influential in the assessment. The quantum, scale and proximity of proposed development are important aspects to be considered in terms of the carrying capacity of any sensitive landscape. The scheme design of the whole development (buildings, roads, planting etc) and the subtleties of detail

design in such circumstances are important in mitigating potentially negative impacts and ultimately, in determining appropriateness.

The significance criteria used for landscape and visual assessment are based on those given in the EPA 'Guidelines on the information to be contained in Environmental Impact Statements', 2002, (Section 5 Glossary of Impacts) and the DRAFT 'Guidelines on the information to be contained in Environmental Impact Assessment Reports' - Environmental Protection Agency (EPA), August 2017 (Section 3, pp 50-52). The criteria used are outlined in Appendix B.

3. Description of Receiving Environment

3.1 Site Location and Landscape Context

The proposed development occupies a site of approx. 0.61 ha along the Tolka River, between the river and Richmond Road, which run roughly parallel. The site lies midway between Drumcondra Road to the west and Luke Kelly Bridge at Ballybough, to the east. The area is a diverse mix of residential developments (of varying scales and heights), warehousing units and commercial outlets (including motor factors and repair shops, petrol stations, small scale retail and professional services). Green open land is slotted into the tight mix of building development and includes sports facilities and pitches such as at Tolka Park (currently home to Shelbourne FC), the parkland associated with the healthcare facilities grouped around St. Vincent's Hospital, and the open green spaces and sports facilities of Holy Cross College across the river. These buildings and open spaces are inserted, somewhat haphazardly, into and around a rather broken spine of older, mostly terraced houses lining the road, which is itself a rather ragged and unkempt piece of public infrastructure, varying in width and quality along its length. A veneer of disparate signage and advertising paraphernalia adds further to a generally discordant urban landscape which nevertheless exudes an underlying sense of inner-city activity and vibrancy. The only significant vegetation in the area are the trees lining each side of the river. The topography is generally quite flat but falling, as one might expect, towards the river from the slightly higher ground north of Richmond Road. The area immediately adjacent to the river has a history of flooding, which has been taken into account within the design criteria for the proposed development.

Currently occupying the subject site are a number of commercial/industrial units and associated yard, which are accessed from Richmond Road together with a three-storey red brick building with hipped dormer roof, containing two residential units. These buildings are screened and separated from the river to the south, by existing trees and vegetation alongside the existing riverbank wall. There are a number of developments of significant height in the general area, including the adjacent residential schemes recently completed to the east and west of the site, which are also slotted between Richmond Road and the river. The scheme to the east is a mix of residential and office accommodation within the restored/converted Distillery Lofts building which dates back to the late 19th Century.

Several Sites of Archaeological Interest are located close to the site, to either side of the river. None of these would appear to be likely to be directly affected by the proposed development. The potential Archaeological, Architectural and Cultural impacts of the proposed development are assessed in the report by Rubicon Heritage and the potential Architectural Heritage impacts are further assessed in the Historic Building Consultants' report, both of which accompany the planning application.

4. Characteristics of the Proposed Development

4.1 Introduction

A comprehensive description of the design for the proposed development is contained in the Architect's Design Statement prepared by RKD Architects. This includes urban analysis; building height and massing strategy/rationale; consideration of the relationships with neighbouring developments, the river and with Richmond Road; the façade design and detail, including variety in tone and colouring and; residential use and amenity. Please refer also to the design layout drawings and sections included with the submission.

Birkey Limited intend to apply to An Bord Pleanála for permission for a strategic housing development at this c. 0.61 hectare (c. 6,067 sq m) site at No. 146A and Nos. 148-148A Richmond Road, Dublin 3 (Eircodes D03 W2H1, D03 T6P0, D03 Y8R9, D03 PX27, D03 K6F7, D03 E447 and D03 HR27). The site is bounded to the north-east by Richmond Road and the Leyden's Wholesalers & Distributor Site, to the north-west by an apartment development (Deakin Court), to the south-west by the Tolka River and to the south-east by a residential and commercial development (Distillery Lofts). Improvement works to Richmond Road are also proposed including carriageway widening and a new signal controlled pedestrian crossing facility on an area of c. 0.08 hectares (c. 762 sq m). The development site area and road works area will provide a total application site area of c. 0.69 hectares (c. 6,829 sq m).

The proposed development will principally consist of: the demolition of all existing structures on site (c. 2,346 sq m) including warehouses and 2 No. dwellings; and the construction of a part 6 No. to part 10 No. storey over basement development (with roof level telecommunications infrastructure over), comprising 1 No. café/retail unit (157 sq m) at ground floor level and 183 No. Build-to-Rent apartments (104 No. one bedroom units and 79 No. two bedroom units). The proposed development has a gross floor area of c. 16,366 sq m over a basement of c. 2,729 sq m. The proposed development has a gross floor space of c. 15,689 sq m.

The development also includes the construction of a new c. 126 No. metre long section of flood wall to the River Tolka along the site's southern boundary. The new flood wall is positioned at the top of the existing river bank and will connect to existing constructed sections of flood wall upstream and downstream of the site. The top of the wall will be set at the required flood defence level resulting in typical wall heights of c. 1.2 to 2 metres above existing ground levels. The development will also include the repair and maintenance of the existing river wall on site adjacent to the River Tolka.

The development also provides ancillary residential amenities and facilities; 71 No. car parking spaces including 8 No. electric vehicle spaces, 4 No. mobility impaired spaces and 1 No. car share space; 5 No. motorcycle parking spaces; bicycle parking; electric scooter storage; a drop off space; the decommissioning of the existing telecommunications mast at ground level and provision of new telecommunications infrastructure at roof level including shrouds, antennas and microwave link dishes;

balconies facing all directions; public and communal open space; a pedestrian/bicycle connection along the north-western boundary of the site from Richmond Road to the proposed pedestrian/bicycle route to the south-west of the site adjoining the River Tolka; roof gardens; hard and soft landscaping; boundary treatments; green roofs; ESB Substation; switchroom; comms rooms; generator; lift overruns; stores; plant; and all associated works above and below ground.



Figure 4: Aerial sketch of proposed scheme, from north (Source: RKD Architects)

4.2 Context and broad design characteristics

The proposed development comprises a residential building ranging from 6 to 10 storeys above street level which incorporates a variation in form as well as height and which steps back from its outer edges to a taller central spine, dropping to 8 storeys over the main entrances and residential lobby. The proposed 6-storey element is located at the Richmond Road frontage, adjacent to the recently completed residential scheme to the west. The architectural design approach includes a mix of integrated contemporary building forms and façade materials which seeks to evoke aspects of the existing industrial character of the area.

The building is set back from the river to allow the provision of open space at ground level on the south side of the building which includes the planned cycle and walking route along the Tolka River. Direct public connection to this is provided from Richmond Road along the north-western edge of the site. Shared open space is also provided for residents on roof terraces at the 8th floor level.

The scheme incorporates residential amenity and support facilities including, amenity spaces; bike storage; refuse storage; plant; services, etc. at ground floor level. There is a layby drop-off facility and 1 no. accessible car parking space at the front of the building just off Richmond Road and parking for cars and motorbikes is provided in the basement.

Whilst issues of scale present visual contrasts between the existing local landscape and the proposed scheme, the designed scheme seeks to harmonise and integrate the development within the existing urban landscape – this includes the integration of social functions at ground level.

5. Potential Impacts of the Proposed Development

A development such as this proposal has the potential to impact significantly upon the landscape and visual aspects of the existing environment in a number of ways, at both construction and operational stages. Effects can be short or long term; temporary or permanent. The purpose of this section of the report is to describe the potential effects of such proposed development; upon the visual and landscape aspects of the immediate area, and further afield, where relevant.

5.1 Construction Phase

Potential visual impacts during the construction phase are related to temporary works, site activity, and vehicular movement within and around the subject site. Vehicular movement may increase in the immediate area, and temporary vertical elements such as cranes, scaffolding, site fencing, gates, plant and machinery etc., will be required and put in place. All construction impacts will be temporary, and may include the following:

- Site preparation works and operations (including tree protection measures)
- Site excavations and earthworks
- Site infrastructure and vehicular access
- Construction traffic, dust and other emissions
- Temporary fencing/hoardings, site lighting and site buildings (including office accommodation)
- Cranes and scaffolding

5.2 Operational Phase

The proposed development will consist of the insertion of a new residential building, public realm, site infrastructure and associated ancillary elements onto the subject site and will replace the existing commercial/industrial units including yard, plus residential use, which currently cover the site. The proposed scheme at up to 10 storeys is of significant height in the existing context. Despite several high buildings been recently constructed in this area, the proposal is some 4 stories higher than these and the nearest existing building of comparable height is the Croke Park stadium some 400m to the south. The recent permission granted for development on the Holy Cross site across the Tolka River includes tall buildings of 13 and 18 stories in height. The design rationale and architectural approach to the design of the proposed building and the details employed, seek to respond to such issues and to mitigate negative

effects on the landscape character and visual amenity of the area – these are outlined in more detail in Section 6.2 Mitigation – Operational Phase.

5.3 The 'Do Nothing' Approach

If the proposed development were not to proceed, the site would presumably (in terms of its landscape impact), remain in its present form for a period. In such circumstances the current land uses would also presumably continue. All existing boundary hedgerows and trees would presumably continue to grow and mature, subject to their maintenance and management by the site occupiers and adjoining landowners.

6. Mitigation (remedial/reductive measures)

6.1 Construction Phase

The building site including a site compound with site offices, site security fencing, scaffolding and temporary works will be visible during the construction phase, particularly from a range of viewpoints along Richmond Road. Such elements are generally viewed as temporary and unavoidable features of construction in any setting. The site hoarding will screen from view much of the construction activity and materials at ground level. Other mitigation measures proposed during this delivery stage of the development, revolve primarily around the implementation of appropriate site management procedures during the construction works – such as the control of lighting, storage of materials, placement of site offices and compounds, control of vehicular access, and effective dust and dirt control measures, etc. Such mitigation will be set out in the Construction and Environmental Management Plan prepared for the scheme. This will be a working document which will be continually reviewed and amended to ensure effective mitigation throughout the construction period. The planning application includes a Preliminary Construction and Environmental Management Plan, prepared by DBFL, which specifically references construction phase mitigation measures as relevant to the assessment of Landscape and Visual impact.

6.2 Operational Phase

The design rationale and details employed seek to mitigate negative effects on the landscape character and upon visual amenity of the area by:

- incorporating the smaller scaled block elements nearer the existing residential development west of the site and by stepping back from 8 storeys along the Richmond Road and Tolka River facades to the 10 storey elements along the central spine of the scheme;
- employing variation of tone, colour and texture across the facades, particularly where the building can be seen from a greater distance, in order to reduce the apparent scale and massing;
- an emphasis on the architectural expression of verticality and slenderness of individual parts of the building;
- the use of appropriate and harmonising colour, tones and materials (largely brick finishes) throughout the development;

- rationalisation of all services elements and any other potential visual clutter and its incorporation internally within building envelopes (as far as practically possible);
- adopting an integrated design approach to the relocation of the telecommunications infrastructure (antennae and dishes) on the roof, including separation and architectural shrouds;
- the incorporation of a well-considered landscape design for the public realm, shared and private spaces which takes into account the broader planning aspirations in and around the site;
- retaining existing vegetation where possible and introducing appropriate planting to further screen and integrate the buildings over time;
- the provision, maintenance and management of a sensitively considered soft landscape design for the development, which assists in the integration and screening of the buildings within the existing landscape, particularly at the lower levels and improves the amenity for residents and the broader area.

7. **Predicted Landscape Character Impact of the Proposed Development**

In assessing the landscape character impacts specifically, there are three main inter-related aspects to be addressed in considering the development proposals, namely:

- The perceived character of the existing inner-city landscape – how it is impacted by the proposal;
- Impacts of the proposed development on social and cultural amenity and;
- The proposed views of the development, relative to the existing site (outlined in Section 8.2, below) and the associated impact on visual amenity.

The duration of such impacts is determined by the design life of the proposed development as tempered by the mitigating effect of the maturing designed landscape proposed as an integral part of the development. In this case the development has an expected life of up to 60 years. Impacts on landscape character are therefore deemed to be of long-term duration in this instance.

This part of inner-city Dublin, whilst originally composed largely of low level and rather tight-knit residential communities, living side-by-side with their industrial employers, has been undergoing a planned character change over recent decades, whereby new denser residential development is encouraged. This has resulted in several such schemes of a taller scale having been approved and constructed in recent years, particularly within this strip of land between Richmond Road and the river, where industrial and commercial outlets had formerly developed in a rather haphazard and piecemeal manner. This proposed residential development follows in similar fashion and will impact on the urban landscape to varying degrees in terms of its perceived nature and scale. These impacts are tempered and conditioned by sensitivities associated with the receptor however the adjacent and surrounding land uses are also generally residential in character so adverse sensitivity, based on the nature of the development, would not be expected. The broader context within which the proposed development would sit has also changed further more recently, with the granting of planning permission for significant residential development at the Holy Cross site across the Tolka River, which includes buildings of significant scale including one at 13 storeys and one at 18 storeys in height. The scale, height and massing of the

proposed buildings on the subject site may be of some concern, primarily to adjacent residents, however as outlined in 6.2 above, the architectural design seeks to reduce any effects of the building over-dominating, by stepping down in height adjacent to existing residential areas and the taller parts of the building are arranged in a central spine. Based on the prepared photomontages, the proposed scheme would appear largely to achieve that for the selected viewpoints.

7.1 Construction Phase

Initially the erection of site hoarding will be completed, site access points established, and site accommodation units placed. Early in the construction period, excavations for building foundations will commence. Removal and/or storage of excavated materials from site and the delivery of construction materials will generate increased heavier traffic to and from the site.

As construction progresses over the construction period, visual impacts will vary, with the on-going business of construction – the delivery and storage of materials, the erection of the buildings, etc. Mitigation measures have been proposed as per Section 6.1 (Mitigation) to minimise the impact of the construction works on the site environs.

People living in the existing housing around the site will be impacted negatively to a slight extent by the construction of the proposed development. Impacts are likely to vary from slight and neutral to moderate and negative, depending on the stage of construction, and the intensity of site activity. The construction impacts will be of short-term duration.

7.2 Operational Phase

Impact on the perceived character of the area

Whilst the term 'landscape character' is generally held to involve more than simply appearances, there is little doubt that a place's visual qualities contribute most to its character. Generally speaking, this is particularly so for say visitors, whose experience is often relatively fleeting. In the context of the proposed development, impacts will typically be felt by people who live nearby, who may no longer enjoy a prospect of the industrial/commercial units beside them or the wall that surrounds them (not that these could be considered positive), and instead will now have a view of a higher rise housing scheme, which for many may appear similar in some respects to that in which they themselves live. However, the additional openness and connectivity designed into the proposed development, whereby the public will have greater access to the river, the planned cycle route and walkway, its residential amenities and public open space, will be perceived as a positive benefit of the scheme. The proposed development will therefore be perceived as a change, that is, one of a series of changes planned for this part of the city, but by no means one that is inevitably viewed as negative. The existing industrial/commercial site with limited access into it, offers nothing by way of an amenity resource for the local population and is not particularly attractive in itself. The proposed development will provide open space amenities and access to other planned amenities which do not currently exist locally. It is also appropriately considered and well-designed in respect of its visual appeal.

8. Predicted Visual Impact of the Proposed Development

8.1 Introduction

The assessment of visual impact is determined through the comparison of 'before' and 'after' photomontages – it is therefore, perhaps, a little less subjective than an assessment of landscape character. It too is inevitably influenced to some extent by the standpoint of the viewer (the receptor). The assessment of visual impacts created by the proposed development includes a consideration of the visual impacts on the visual environment likely to be impacted. A total of 19 viewpoints has been selected for which photomontages (verified views) have been prepared - these are included in the planning application and they illustrate the visual impact of the proposed development on the surrounding landscape. The photomontages are contained in a separate A3 report submitted with this planning application for the proposed development. In that photomontage report the existing view from each viewpoint is shown together with the proposed development as seen from the same viewpoint.

Because the expected life of the proposed development is up to 60 years, the duration of predicted visual impacts is assessed as long term, as is the case for predicted landscape character impacts (as outlined in Section 7.2, above).

The assessment of visual impacts, using comparative photomontages serves to identify impacts upon the visual environment. The photomontages are important in illustrating the impact of the proposed scheme from the more sensitive viewpoints. In this instance, they also serve to support and illustrate an aspect of the assessment of impact on landscape character.

It is important to remember that whilst photomontages are a useful tool in illustrating comparative visual impact, they are recognised as having their limitations and potential dangers. The guidelines for their use in assessment clearly advocate their use in the context of a site visit to the viewpoint locations and point out that photomontages alone should not be expected to capture or reflect the complexity underlying the full visual experience (refer to the GLVIA, 3rd Edition).

8.2 Assessment of views

Photomontages have been prepared for the 19 selected viewpoints. An assessment of the visual impact of the proposed development from these viewpoints is provided at this stage, as follows:

View 1

This is a view from the recently completed Grace Park Wood residential development situated some 320 metres north of the subject site looking southwards across the Ierne Sports and Social Club to the residential apartments on Waterfall Avenue, just north of the subject site. The view conveys a sense of being within a relatively green residential area. Glimpses of the roof of Croke Park Stadium and of the Dublin Mountains in the distance are only marginal and not readily discerned.

In the 'proposed' view, the upper levels of the development are visible, marking the location of Richmond Road. Whilst the proposed development is clearly taller than the adjacent buildings, it is not overtly so and does not significantly impact on this view. The variation, colouring and detail of the façades successfully mitigates the potential massing effect of this single building on the horizon and it relates well to the existing apartment block in front of it. The shrouded telecoms infrastructure on top of the building introduces a minor additional element on the roofline but it is an acceptably harmonious one.

The visual impact from this viewpoint is **slight and neutral**.

View 2

This is a view south-eastwards from the eastern end of Clonturk Park, looking across the existing football pitch towards the terrace of single storey cottages at the lower end of Grace Park Road, at its junction with Richmond Road.

A part of the proposed development becomes visible beyond the cottages, however the development is sufficiently distant to limit its visual impact, particularly in the context of the very small cottages. The new development, whilst clearly visible, is in no way dominating. It appears to be a logical extension of the built forms in this area and is of appropriate scale in this view.

The visual impact from this viewpoint is **slight and neutral**.

View 3

This is a view looking south-eastwards along Richmond Road from a location close to the Grace Park Avenue junction. The planted front gardens of the older residences along the northern side of the road sit in contrast to the existing taller and rather fractured mix of residential and industrial/commercial development on the southern side. The road itself is rather narrow with ill-defined edges giving a somewhat unkempt appearance in places.

A part of the proposed development is visible just beyond its neighbouring recently constructed four-storey apartment building in the centre of view, for which it provides an appropriate bookend. The removal of the existing three-storey red brick, hipped-roof building with dormers at the front of the subject site, together with the new relationship of the proposed building to the road, assists in providing improved visual continuity along the road. The scale and massing of the proposed building with set-backs together with the proposed materials, colouring and detail, is entirely appropriate in this view.

The visual impact from this viewpoint is **moderate and positive**.

View 4

This is a view looking south from a point on Richmond Road, opposite the recently completed Deakin Court apartment building. It is from a point closer to the subject site than View 3 and is from a similar view angle.

Similar comments apply as for View 3, however being from a closer viewpoint, the proposed development and its impacts occupy a greater proportion of the field of view. The proposed development provides an appropriately proportioned bookend to the existing recently completed apartment block in the foreground. The angling of the façade to the larger part of the proposed block, beyond the six-storey element to the front, limits the apparent scale of the building in this view. The higher elements set back beyond make little impact in the view.

Again, the removal of the somewhat anachronistic three-storey red brick building with the dormer roof containing 2 no. residential units (left of centre in the existing view), creates the opportunity to provide a much more considered interface between the building and the road with the open space entrance area, drop-off facility and garden, offering a welcoming interval along the road frontage which provides a connection with the river to the rear and positively invites movement in that direction.

The visual impact from this viewpoint is **significant and positive**.

View 5

This is a view from the northern end of Waterfall Avenue, looking southwards towards Richmond Road and the subject site beyond. The predominant land use is residential development of mixed styles and scales (up to four storeys) in a range of materials and colouring. To the left is the entrance to the Dublin Port Stadium with perpendicular car parking for virtually the full length of the avenue.

In the 'proposed' view, the development is clearly visible at the end of the Avenue, the alignment of which focusses one's attention upon it. The scale of the proposal is clearly taller than the general building heights in the area, however it is not overly dominant. Rather, it provides a complimentary backdrop to the existing view and the composition of the new building with the existing buildings works well, particularly in respect of the massing of the new building, which is arranged into several sub-blocks – this is achieved by way of stepping back and stepping down of the building, coupled with subtle variations in colouring and an emphasis on verticality in the fenestration in the facades. The angled face of the building relative to Richmond Road is also apparent and with the retained tree in the foreground creates an inviting dynamic which is much less severe than could have been the case had the building been aligned parallel with Richmond Road. Again, the shrouded telecoms infrastructure on top of the building introduces a series of minor elements to the roofline, but being regular and rhythmic in form, this is an acceptably harmonious aspect of the design.

The visual impact from this viewpoint is **significant and neutral**.

View 6

This is a view from the entrance to the Crannog Day Hospital (allied to St. Vincent's Hospital, Fairview) on Richmond Road, looking westwards. The view is dominated by the blue profiled metal cladding of Leyden's Cash and Carry warehouse, which lies behind the graffiti-strewn concrete block boundary wall. Coupled with a rather poorly finished public road in the foreground, this does not present a particularly pleasant prospect for the properties on the northern edge of the road.

In the 'proposed' view, the proposed development is visible beyond and above the existing warehouse building and whilst quite substantial in scale cannot be said to be dominating. Whilst the proposed development does at least insert an element of visual interest of some quality, it is in itself unable to offset the poor-quality view of the remaining wall and warehouse building in the foreground.

The visual impact from this viewpoint is **moderate and neutral**.

View 7

This is a view from Richmond Road at Riverview Apartments, looking westwards. This local area is largely residential in character with new apartment buildings to the left and older residential properties to the right, along Richmond Road. The two-storey stone-faced shell in the centre of view is a protected structure forming a secure boundary to the predominant industrial and commercial premises behind. The recently converted Distillery Lofts building is also just visible above the protected structure.

A very small upper part of the proposed development (ie, part of the top floor) becomes just visible over the protected structure, however it makes very little impact in this view, which is in any case of generally poor quality.

The visual impact from this viewpoint is **slight and neutral**.

View 8

This is a view looking north-westwards from the Luke Kelly Bridge over the Tolka River at Ballybough.

A very small part of the proposed development becomes visible from this viewpoint; however it makes little impact in the overall view.

The visual impact from this viewpoint is **slight and neutral**.

View 9

This is a view from the existing housing estate at Tolka Road (near its junction with Orchard Road), looking north-westwards. The existing residences are early-mid 20th Century, two-storey terraced dwellings in a range of finishes and colouring, with front gardens and a mix of on-street and in-curtilage car parking.

The alignment of the road in this view focusses on the part of the proposed development which now becomes visible in the distance. The proposed building is seen end on and is therefore a relatively slender insertion beyond the existing housing which is not significantly impacted. The shrouded rooftop telecoms infrastructure adds an acceptably 'chimney-like' quality to the building.

The visual impact from this viewpoint is **slight and neutral**.

View 10

This is a view from the private access bridge over the Tolka River at the northern end of Distillery Road, looking north-westwards towards the subject site. Despite the initial visual appeal of the flowing watercourse and the bankside vegetation, the existing residential developments either side of the river, appear to squeeze in upon the river channel and together with the channel/flood wall lining its northern edge, tend to accentuate the river's narrowness. The existing commercial buildings on the subject site are just visible in the centre of view.

The proposed development is viewed end-on from this location and the building appears as a slender vertical insertion which is emphasised by the alignment of the river. The proposed building presents a positive and attractive feature of landmark quality in the view.

The visual impact from this viewpoint is **significant and positive**.

View 11

This is a view from Distillery Road near its junction with Tolka Road, looking northwards. To the right of the road lies the low-rise housing area of Tolka Road and Clonliffe Gardens. On the left of view is the old Distillery building converted to apartments and offices, with the Distillery Lofts building on the right of view in the distance, accessed from Distillery Road via the private bridge. In the centre of view is the more recent Clonliffe Square apartment building. The entrance gates to the Belvedere rugby ground are left of centre just beyond the Distillery apartment building.

The proposed development sits behind the Clonliffe Square apartment building, and a small part of it will be visible above the roof line. The proposed building will come more into view as one moves around the Clonliffe Square building and it may read as just another, though more removed new addition to this local collection. Though taller than the nearer apartment buildings, its height is offset by its distance from the viewpoint and it appears to be of similar scale – this effect is accentuated by the apparent slenderness of the building from this angle.

The visual impact from this viewpoint is **slight and neutral**.

View 12

This is a view from Clonliffe Road, near the Jones' Road junction looking north across the Holy Cross College lands and boundary wall.

The proposed development, some 400 metres distant is screened by the boundary wall and the intervening trees within the Holy Cross site. It is not visible from this viewpoint.

The visual impact from this viewpoint is **imperceptible**.

View 13

This is a view from within the Holy Cross lands, looking eastwards across the open fields towards Belvedere Rugby Ground. To the left of view, beyond the riverside vegetation, the four-storey apartment development just to the west of the subject site can be seen. To the right of view, the Distillery Lofts building and the Clonliffe Square apartment block can also be seen. Whilst this view is from private lands, not public realm, it represents the only views available from this quarter and indeed from lands which should soon become publicly accessible through their future proposed development.

The subject proposed development will be clearly visible in this view. Being nearly square-on to the viewpoint and without intervening buildings, its full height and scale is apparent. However, the set-backs and step downs employed within the building design, together with the subtle variation in the façade colouring and detail, work well to reduce the apparent mass of the building and provide a well-considered and balanced composition. The proposed building in itself, provides a positive insertion to the view which relates well to the adjacent buildings either side of it. The shrouded telecoms infrastructure on top of the building introduces a series of minor additional elements on the roofline but these are also acceptably harmonious. The existing riverside vegetation to the foreground is a continuous ribbon across the view which assists in anchoring the building and integrating it into the overall view.

Being from a private site and therefore of limited potential impact, this view does not strictly qualify for assessment within the guidelines. However, at the very least, it is useful to illustrate by way of contrast

with the other illustrated views, the effect and significant role other buildings in the landscape have in limiting clear views of individual buildings in an urban context.

The visual impact from this viewpoint is **significant and neutral**.

Cumulative effects: This view from the Holy Cross grounds is certainly atypical of views of the proposed building, but it is an interesting illustration of its greatest impact at this point in time. It represents however, a view from an open, green site which will, in due course be supplanted by residential development which has recently been granted planning permission¹. The cumulative effect of the permitted Holy Cross development will be significant, particularly to this view. The existing view from this viewpoint will change significantly; it may be totally or partially blocked by the permitted development and even if the subject scheme remains visible, the context from which it is being viewed will significantly alter, from green open space to residential development.

View 14

This is a view from the junction of Grace Park Road and Richmond Road. This is a location further out along Richmond Road (to the north-west) than View 3. As such, the angle of view is similar but the subject site is further from the viewpoint. The broader context of Richmond Road with its varied and eclectic mix of building styles, scales, finishes and colouring is evident in the foreground.

In the proposed view, the upper part of the proposed development is visible just beyond the existing tree and existing buildings lining the southern side of the road. The scale and massing of the proposed building with set-backs, together with the proposed materials, colouring and detail, is entirely appropriate in this view.

The visual impact from this viewpoint is **slight** and **neutral**.

View 15

This is a view looking south from a location opposite the subject site, immediately across Richmond Road, at the junction with Waterfall Avenue. The viewpoint is so close to the subject site that not all of the site can be incorporated within the view.

Clearly from this viewpoint, at this proximity to the proposed development, the new building creates a profound difference to the local landscape and the social and visual amenity of the area. The proposed view, however, illustrates most of the proposed scheme which almost totally occupies the field of view.

¹ An application was lodged in July 2021 and was granted permission in November 2021, for a significant Build-to-Rent residential scheme which includes buildings of two to eighteen storeys in height (ABP Ref: 310860-21).

As such, the view cannot illustrate the proposed development in its landscape context as required and is therefore ineligible for inclusion in this assessment.

View 16

This is a view from the south-west corner of the car park (former tennis grounds) to the front of the Church at the Holy Cross College site. The parkland landscape of trees and grass, beyond the car park, provides a pleasant, soft and green backdrop in the view.

In the proposed view, a very small part of the proposed development just appears in the distance, above the trees. Whilst it is discernible, the building does not make a significant impact from this viewpoint and is effectively 'distanced' by the intervening trees.

The visual impact from this viewpoint is **slight** and **neutral**.

Cumulative effects: As for View 13, this is a view from what is currently an open, green site which has recently received planning permission for substantial residential development. The limited view of the subject scheme from this viewpoint will be further obscured by the permitted development, once constructed and the context from which the subject scheme will be viewed will also have changed significantly.

View 17

This is a view from Tolka Road, near the junction with Distillery Road, looking northwards.

The proposed development, the profile of which is indicated by the red line in the proposed view, is not visible from this viewpoint.

The visual impact of the proposed development from this viewpoint is **imperceptible**.

View 18

This is a view from Susanville Road, near its junction with Clonliffe Road, looking northwards.

The proposed development, the profile of which is indicated by the red line in the proposed view, is not visible from this viewpoint.

The visual impact of the proposed development from this viewpoint is **imperceptible**.

View 19

This is a view from Grace Park Gardens, near the junction with Grace Park Road, looking south through the railings and trees on the boundary of the Ierne Social and Sports Club and across club's bowling green. A glimpsed view through the trees towards the subject site is possible.

The proposed development, is partially visible in the distance, however being a glimpsed view, which is by no means general from this secluded residential street, it is not particularly significant, in that the demeanour of the street is not really affected.

The visual impact from this viewpoint is **slight and neutral**.

8.3 Conclusions

The proposed development represents a significant change in the nature and a clear increase in the scale, height and quantum of the buildings occupying the existing site. However, the predicted effects on the local landscape are assessed as being of some positive benefit in improving links from Richmond Road to the walkway/cycleway proposed along the Tolka River, in how the proposed development relates socially with adjacent developments and in how it addresses the Richmond Road frontage.

A summary of the assessment of views indicates that of the 19 selected views, 18 are valid for assessment (Viewpoint 15 is simply too close to the proposed development to see it in context). Of these 18 views, from three the proposed development is imperceptible. Of the remaining 15 views, the impacts in twelve are neutral and in three are positive. Therefore, the proposed development, whilst a significant change to the existing site, generally makes a neutral impact from surrounding public viewpoints and from several of the selected viewpoints it makes a positive impact. This reflects the high quality of the proposed design and the mitigation measures incorporated within it, in delivering a significantly increased scale of development in the existing context. Due to the orientation of the proposed building, its modelling and the finishes and details employed, the proposed development's full scale is really only discernible from within the Holy Cross College lands to the south-west. As already noted, this is a privately owned site, which having recently received planning permission for substantial residential development, should itself see significant residential development upon it in the near future.

9. Monitoring

The retention of existing trees where possible and proposed, coupled with the effective use of new planting to screen and integrate the built elements of the proposal into the existing landscape, are important aspects of the proposed scheme design. The success of the proposed scheme is dependent on both operations being properly executed. Effective tree protection measures must be established in advance of construction work commencing and an approved system of monitoring the on-going health and vigour of both existing and proposed planting will be necessary. The timely planting and the maintenance and management required to successfully establish new planting with the projected rates of

growth and general performance required, needs a significant and effective input from professionals with the necessary expertise to ensure it is effectively delivered. The monitoring of the planting performance and suitably appropriate responses to ensure same will be essential to the success of the development as proposed.

10. Cumulative Impacts

10.1 Introduction

Current guidelines suggest that a determination should be made as to whether cumulative effects are likely to occur – these are outlined in the current GLVIA guidelines (3rd edition) as *'additional effects caused by the proposed development when considered in conjunction with other proposed developments of the same or different types'*. Such determination needs to be made in respect of any permitted development of a similar nature which will have a bearing on the assessment of the proposed development - this is subject to the assessor's judgement in the matter.

10.2 Cumulative Impacts related to the proposed development

The Local Authority's planning strategy for this area includes for further residential development on other sites nearby. Therefore, cumulative effects are likely to occur on an ongoing basis. Other future schemes potentially include developments which are currently in design development and/or within the planning system. Whilst one can say with some certainty that such developments will have a bearing on the views assessed within this report, it can also be concluded that they are just as likely to diminish the direct visual impacts of the subject proposal upon some of the views assessed, rather than increase them.

The permitted development (ABP Ref: 310860-21) within the Holy Cross lands will significantly alter the landscape context of the broader area, and particularly so for the subject site which lies only some 140 metres distant, in clear sight across open space fringing the permitted development and the Tolka River beyond. The permitted development will ultimately be visible from a number of the illustrated views illustrating the subject site and will also obscure (or partially obscure) the subject scheme from two of the views (Views 13 and 16) which are illustrated, from within the Holy Cross lands.

11. References

1. Guidelines on the information to be contained in Environmental Impact Statements prepared by the Environmental Protection Agency (EPA) 2002.
2. Revised guidelines on the information to be contained in Environmental Impact Statements - Environmental Protection Agency (EPA), DRAFT, September 2015.
3. DRAFT 'Guidelines on the information to be contained in Environmental Impact Assessment Reports' - Environmental Protection Agency (EPA), August 2017.
4. Advice Notes on Current Practice in the preparation of Environmental Impact Statements - Environmental Protection Agency (EPA), September 2003.

5. Guidelines for Landscape and Visual Impact Assessment, prepared by the Landscape Institute and the Institute of Environmental Assessment, published by Routledge , 3rd Edition 2013.
6. Visual Representation of Development Proposals: Technical Guidance Note 06/19, Landscape Institute UK (LI) September 2019.
7. Dublin City Development Plan 2016-2022.

Appendix A: General methodology for the production of photomontages

Photography of Site

1. Photographs are taken from locations as advised by client with a professional SLR digital camera. The photographs are taken horizontally with a survey level attached to the camera. The photographic positions are marked (for later surveying), the height of the camera and the focal length of the image recorded.
2. In each photograph, a minimum of 2No visible fixed points are marked for surveying. These are control points for model alignment within the photograph.
3. The photographic positions and the control points are geographically surveyed and these positions are plotted on the site survey drawing as supplied by the Architect.

3D Computer Model, Rendered Views and Photomontage Preparation

4. The buildings are accurately modeled and materials applied according to plans, elevations and finished supplied by the Architect and aligned to the survey drawing with the camera positions.
5. Within the 3d software virtual 3d cameras are positioned according to the survey co-ordinates. The focal length of the photograph is input. Pitch and rotation are adjusted using the survey control points to align the virtual camera to the photograph.
6. The proposed development is output from the 3D software using this camera and the image is then blended with the original photograph to give an accurate image of what the proposed development will look like in its proposed setting. A highly accurate 3D-computer model of the proposed development was created with photo-realistic materials, finishes and colours. Rendered views of the proposed
7. In the event of the development not being visible, the roof line of the development will be outlined in red if requested.
8. A document is produced with the following information:
 - a) Site location map with view locations plotted.
 - b) Photo-montage sheet showing:
 - Existing and proposed conditions
 - View with surveyed control alignment points
 - Reference information including field of view/focal length, range to site/development
 - Date of photograph.
9. All surveying is carried out by a qualified topographical surveyor. Where GPS devices are used they are Survey grade.

Appendix B: Criteria for the Rating of Impacts

(Based on the EPA 'Guidelines on the information to be contained in Environmental Impact Statements' 2002, Section 5 Glossary of Impacts) and the DRAFT 'Guidelines on the information to be contained in Environmental Impact Assessment Reports' - Environmental Protection Agency (EPA), August 2017 (Section 3, pp 50-52). For this LVIA they are further described as follows:

Degree or magnitude of effects (significance)

Imperceptible / Not Significant: The development proposal is either distant or screened by existing landform, vegetation or built environment.

Slight Effects: The development proposal forms only a small element in the overall panorama / field of view, or there is substantial intervening screening by the existing landform, topography and/or vegetation. The view or character of the landscape is noticeably changed but without affecting its sensitivities.

Moderate Effects: An appreciable segment of the existing view is affected by the proposed development or the development creates visual intrusion in the foreground. The view or the character of the landscape is altered but in a manner that is consistent with existing and emerging baseline trends.

Significant Effects: Effects which, by their character, magnitude, duration or intensity alter a sensitive aspect of the landscape/ view.

Very Significant Effects: Effects which, by their character, magnitude, duration or intensity alter most of a sensitive aspect of the landscape/view.

Profound Effects: Effects which obliterate sensitive characteristics of the landscape and/or view.

Quality of effects

The quality of potential visual and landscape effects are assessed according to EPA guidelines as follows:

Positive Effects: Changes which improve the quality of the landscape/view.

Neutral Effects: Changes which do not affect the quality of the landscape/view.

Negative Effects: Changes which adversely affect the character of the landscape or reduce the quality of the visual environment.

Duration of effects

Potential effects arising from the proposed development may also be considered in terms of duration as described in the EPA Guidelines:

Temporary: Effects lasting less than one year

Short-term: Effects lasting one to seven years

Medium-term: Effects lasting seven to fifteen years

Long-term: Effects lasting fifteen to sixty years

Permanent: Effects lasting over sixty years

