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TOWNSCAPE & VISUAL IMPACT ASSESSMENT

Site at the Parkmore Long Mile Road,
Ballymount, Dublin 12.

Prepared by Macro Works Ltd

February 2028



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This TVIA should be read in conjunction with Photomontages produced by Digital Dimensions.

1 INTRODUCTION

- 1.1.1 This Townscape and Visual Impact Assessment (TVIA) is written in relation to a proposed residential development on lands at Parkmore Industrial Estate, Long Mile road, Robinhood, Dublin 12. Its purpose is to identify and determine the likely impacts of the scheme on the receiving environment, in terms of both townscape character and visual amenity.
- 1.1.2 The TVIA should be read in conjunction with the verified photomontages which illustrate how the proposed development would appear from a variety of locations in the surrounding townscape.

1.2 Description of the proposed development

- 1.2.1 The development will comprise a Large-Scale Residential Development (LRD) on a site at Parkmore Industrial Estate, Long Mile Rd, Robinhood, Dublin, 12. The proposed development will comprise the demolition of existing industrial units, and construction of a mixed use, residential-led development within 4 no. blocks ranging in height from 06 to 10 storeys over semi-basement. The development will comprise the following: 436 no. apartments (studios; 1 beds; 2 beds and 3 beds) with commercial/employment units, creche, café and library. Provision of car, cycle and motorbike parking. Vehicular accesses from Parkmore Estate Road and additional pedestrian/cyclist accesses from the Long Mile Road and Robinhood Road. Upgrade works to the estate road and surrounding road network. All associated site development works and services provision, open spaces, ESB substations, plant areas, waste management areas, landscaping and boundary treatments.
- 1.2.2 Full details of the proposals can be found in several supporting documents submitted with the application, including the Architectural Design Statement.



Figure 1 Existing Site context and location

1.3 Guidance documents

- 1.3.1 The methodology for this TVIA is based on the primary best practice document, the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3) (LI/IEMA, 2013). In accordance with this

published guidance, townscape and visual impacts are assessed separately, although the procedure for assessing each of these is closely linked. A clear distinction has been drawn between townscape and visual impacts as described below:

- Townscape impacts relate to the influence of the proposals on the physical and perceptual characteristics of the townscape and its resulting character and quality;
- Visual impacts relate to the influence of the proposals on specific views experienced by visual receptors and on visual amenity more generally.

1.3.2 In addition to GLVIA3, in the production of the TVIA, due regard has also been made to the following guidance and policy documents:

- South Dublin City Development Plan 2022-2028
- Dublin City Development Plan 2022 – 2028;
- Environmental Protection Agency (EPA) publication ‘Guidelines on the Information to be contained in Environmental Impact Statements (2022);
- Urban Development and Building Heights Guidelines for Planning Authorities by Department of Housing, Planning and Local Government (DHPLG) (2018);
- Technical Information Note 05/17 - Townscape Character Assessment (2017);
- Technical Information Note 01/21 – GLVIA webinar Q&As;
- Technical Guidance Note 1/20 - Reviewing Landscape and Visual Impact Assessments (LVIA) and Landscape and Visual Appraisals (LVAs);
- Technical Guidance Note GLVIA3 Statement of Clarification 1/13, 2/13, 1/14, and 2/14.
- City Edge Project – Strategic Framework, 2022

1.4 Statement of authority

This TVIA was prepared by Richard Barker (MLA MILI), Director at Macro Works Ltd of Cherrywood Business Park, Loughlinstown, Dublin 18; a consultancy firm specialising in Townscape and Visual Assessment and associated maps and graphics. Macro Works’ relevant experience includes a broad range of infrastructural, industrial and commercial projects since 1999, including numerous urban, residential, and mixed-use development projects.

2 METHODOLOGY

2.1.1 This document uses methodology as prescribed in the previously mentioned GLVIA3. Given the site’s context, this is principally a ‘townscape’ assessment, albeit the assessment utilises the same outline methodology as would be employed for the more familiar Landscape and Visual Impact Assessment (LVIA) of developments in rural settings.

2.1.2 GLVIA3 follows the European Landscape Convention (ELC) definition of landscape:

‘Landscape is an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors’ (Council of Europe, 2000). Thus, GLVIA-2013 covers all landscapes from “high mountains and wild countryside to urban and fringe farmland (rural landscapes), marine and coastal landscapes (seascapes) and the landscapes of villages towns and cities (townscapes)” - whether protected or degraded.

2.1.3 Townscape is defined in GLVIA3 in the following manner (section 2.7):

‘Townscape’ refers to areas where the built environment is dominant. Villages, towns and cities often make important contributions as elements in wider-open landscapes but townscape means

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. There are important relationships with historic dimensions of landscape and townscape, since evidence of the way the villages, towns and cities change and develop over time contributes to their current form and character.

- 2.1.4 In the context of ‘townscape’ it is recognised that there is a strong interrelationship between the ‘townscape’ and ‘cultural heritage’ assessments. As stated in section 5.11 of GLVIA;

“the sharing of relevant baseline information should not be confused with the need for separate cultural heritage appraisals such as historic landscape characterisation and assessment of historic townscape appraisal, or there will be a danger of both double handling and inappropriate judgements by non-experts. It is particularly important that responsibilities are clear in considering any effects on the settings and views for historic buildings, conservation areas and other heritage assets.”

- 2.1.5 The identification of heritage assets in this assessment is made to indicate the value and quality of the wider townscape character as well as provide an indication of areas from which views are potentially more sensitive to change.

2.2 Scope of the assessment

- 2.2.1 GLVIA3 establishes guidelines and not a specific methodology. The preface recognises that:

‘This edition concentrates on principles and processes. It does not provide a detailed or formulaic ‘recipe’ that can be followed in every situation – it remains the responsibility of the professional to ensure that the approach and methodology adopted are appropriate to the task in hand.’

- 2.2.2 The methodology for this assessment has therefore been developed specifically for this assessment to ensure that it is appropriate and fit for purpose.

2.3 Study Area

- 2.3.1 Whilst the site’s wider townscape and visual context have been reviewed, due to the combined influence of natural topography, and screening elements in the site’s wider urban context, the site is not readily visible from many locations beyond the immediate locality.
- 2.3.2 With this in mind, and considering the general diminishment of effects over distance, a proportionate focus is placed on the townscape within approximately 1km of the development. This study area contains locations from where the development will be most visible, and beyond this distance, the proposed development is not likely to give rise to significant townscape or visual impacts. The study area is illustrated in Figure 3.

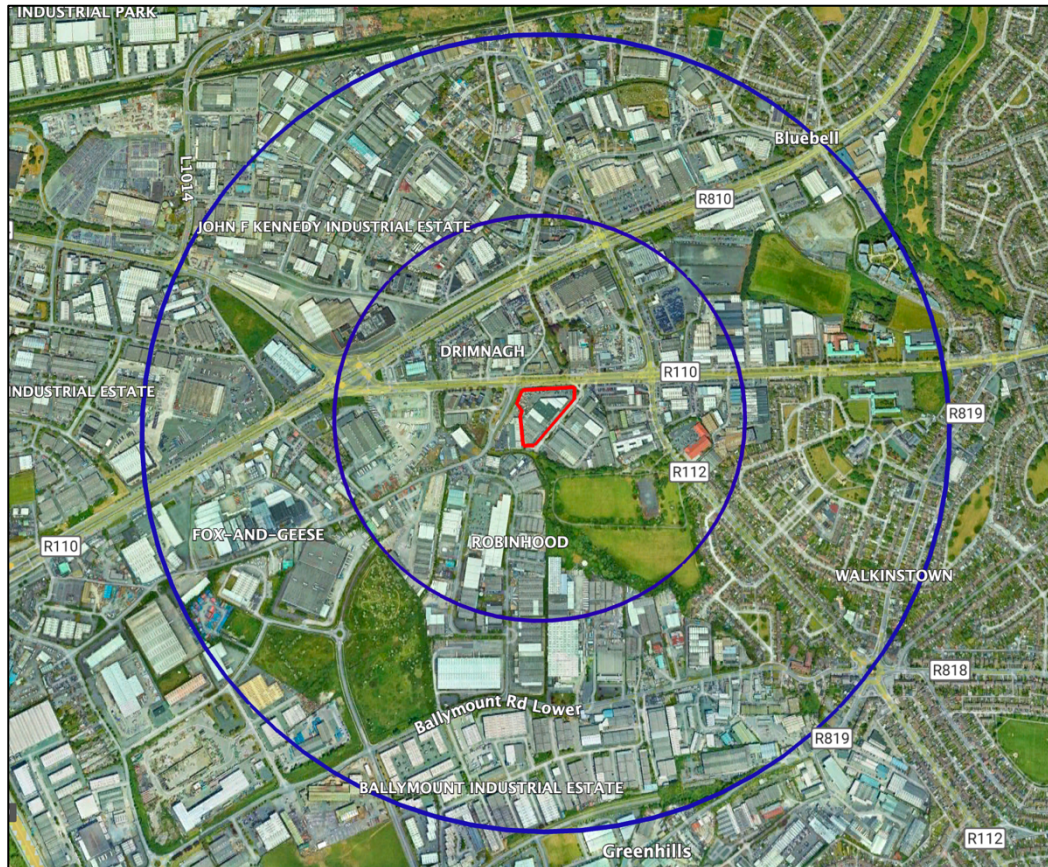


Figure 2 Site and 1km study area (500m buffer also shown)

2.4 Townscape Impact Assessment

- 2.4.1 This part of the TVIA provides an assessment of how the introduction of the proposed development will affect the physical features and fabric of the townscape, and then how the proposals influence townscape character with reference to published descriptions of character and an understanding of the contemporary character of the townscape as informed through desktop and site studies.
- 2.4.2 When assessing the potential townscape effects of the development, the value and sensitivity of the townscape receptor are weighed against the magnitude of the townscape impact to determine the significance of the townscape effect. The criteria outlined are used to guide these judgements.

Townscape Sensitivity

- 2.4.3 The sensitivity of the townscape to change is the degree to which a particular setting can accommodate changes or new elements without unacceptable detrimental effects on its essential characteristics. The judgement reflects such factors as its quality, value, contribution to the urban character and the degree to which the particular element or characteristic can be replaced or substituted. Townscape Sensitivity is classified using the following criteria set out in Table 1.

Table 1 – Townscape Sensitivity

Sensitivity	Description
Very High	Areas where the townscape character exhibits a very low capacity for change in the form of development. Examples of which are high value townscapes, protected at an international or national level (e.g. World Heritage Site), where the principal management objectives are likely to be protection of the existing character.
High	Areas where the townscape character exhibits a low capacity for change in the form of development. Examples of which are high value townscapes, protected at a national or regional level, where the principal management objectives are likely to be considered conservation of the existing character.
Medium	Areas where the townscape character exhibits some capacity and scope for development. Examples of which are townscapes, which have a designation of protection at a county level or at non-designated local level where there is evidence of local value and use.
Low	Areas where the townscape character exhibits a higher capacity for change from development. Typically, this would include lower value, non-designated townscapes that may also have some elements or features of recognisable quality, where management objectives include, enhancement, repair and restoration.
Negligible	Areas of townscape character that include derelict sites and degradation where there would be a reasonable capacity to embrace change or the capacity to include the development proposals. Management objectives in such areas could be focused on change, creation of townscape improvements and/or restoration.

Magnitude of change - Townscape

- 2.4.4 The magnitude of change is a product of the scale, extent or degree of change that is likely to be experienced as a result of the proposed development. The magnitude takes into account whether there is a direct physical impact resulting from the loss of townscape components and/or a change that extends beyond the immediate setting that may affect the townscape character. Table 2 outlines the criteria used to inform this judgement.

Table 2 - Magnitude of Change - Townscape

Criteria	Description
Very High	Change that would be large in extent and scale with the loss of critically important townscape elements and features, that may also involve the introduction of new uncharacteristic elements or features that contribute to an extensive change of the townscape in terms of character, value and quality.
High	Change that would be more limited in extent and scale with the loss of important landscape elements and features, that may also involve the introduction of new uncharacteristic elements or features that contribute to a considerable change of the townscape in terms of character, value and quality.
Medium	Changes that are modest in extent and scale involving the loss of landscape characteristics or elements that may also involve the introduction of new uncharacteristic elements or features that would lead to noticeable changes in townscape character, and quality.
Low	Changes affecting small areas of landscape character and quality, together with the loss of some less characteristic landscape elements or the addition of new features or elements that would lead to discernible changes in townscape character, and quality.
Negligible	Changes affecting small or very restricted areas of townscape character. This may include the limited loss of some elements or the addition of some new features or elements that are characteristic of the existing townscape or are hardly perceivable leading to no material change to townscape character, and quality.

2.5 Visual Impact Assessment

2.5.1 This part of the TVIA provides an assessment of how the introduction of the proposed development will affect views within the townscape. It therefore needs to consider:

- Direct impacts of the proposed development upon views through intrusion or obstruction;
- The reaction of viewers who may be affected, e.g. residents, walkers, road users; and
- The overall impact on visual amenity.

2.5.2 It has been deemed appropriate to structure the assessment around a series of representative viewpoint locations. All viewpoints are located within the public domain and are representative of views available from main thoroughfares and pedestrian areas within the vicinity of the proposed development. The selected viewpoints are considered to be comprehensive in communicating the variable nature of the visual effects.

2.5.3 When assessing the potential visual effects of the development, the sensitivity of the visual receptor is weighed against the magnitude of the visual impact to determine the significance of the visual effect. The criteria outlined below are used to guide these judgements.

Sensitivity of Visual Receptors

2.5.4 As with townscape sensitivity, the sensitivity of a visual receptor is categorised as Very High, High, Medium, Low, and Negligible. However, unlike townscape sensitivity, the sensitivity of visual receptors has an anthropocentric (human) basis. It considers factors such as the perceived quality and values associated with the view, the townscape context of the viewer, the likely activity the viewer is engaged in and whether this heightens their awareness of the surrounding environment.

2.5.5 A list of the factors considered by the assessor in estimating the level of sensitivity for a particular visual receptor is outlined below to establish visual receptor sensitivity at each viewpoint location.

Susceptibility of Visual Receptors to change

2.5.6 In accordance with GLVIA3, visual receptors most susceptible to changes in views and visual amenity are:

- “Residents at home;
- People, whether residents or visitors, who are engaged in outdoor recreation, including use of public rights of way, whose attention or interest is likely to be focussed on the landscape and on particular views;
- Visitors to heritage assets, or to other attractions, where views of the surroundings are an important contributor to the experience;
- Communities where views contribute to the landscape setting enjoyed by residents in the area;
- Travellers on road rail or other transport routes where such travel involves recognised scenic routes and awareness of views is likely to be heightened”.

Visual receptors that are less susceptible to changes in views and visual amenity include;

- People engaged in outdoor sport or recreation, which does not involve or depend upon appreciation of views of the landscape;
- People at their place of work whose attention may be focussed on their work or activity, not their surroundings and where the setting is not important to the quality of working life”.

Value attached to Views

2.5.7 The value attached to a view is determined by considering the following:

- Recognised scenic value of the view (County Development Plan designations, guidebooks, touring maps, postcards etc). These represent a consensus in terms of which scenic views and routes within an area are strongly valued by the population because in the case of County Development Plans, for example, a public consultation process is required;
- Views from within highly sensitive townscape areas. These are likely to be in the form of Architectural Conservation Areas, which are incorporated within the Development Plan and therefore subject to the public consultation process. Viewers within such areas are likely to be highly attuned to the townscape around them;
- Primary views from residential receptors. Even within a dynamic city context, views from residential properties are an important consideration in respect of residential amenity;
- Intensity of use, popularity. This relates to the number of viewers likely to experience a view on a regular basis and whether this is significant at a national or regional scale;
- Viewer connection with the townscape. This considers whether or not receptors are likely to be highly attuned to views of the townscape i.e. commuters hurriedly driving on busy roads versus tourists focussed on the character and detail of the townscape;
- Provision of vast, elevated panoramic views. This relates to the extent of the view on offer and the tendency for receptors to become more attuned to the surrounding landscape at locations that afford broad vistas;
- Sense of remoteness and/or tranquillity. Receptors taking in a remote and tranquil scene, which is likely to be fairly static, are likely to be more receptive to changes in the view than those taking in the view of a busy street scene, for example;
- Degree of perceived naturalness. Where a view is valued for the sense of naturalness of the surrounding landscape it is likely to be highly sensitive to visual intrusion by distinctly manmade features;
- Presence of striking or noteworthy features. A view might be strongly valued because it contains a distinctive and memorable townscape feature such as a cathedral or castle;
- Historical, cultural and/or spiritual significance. Such attributes may be evident or sensed by receptors at certain viewing locations, which may attract visitors for the purposes of contemplation or reflection heightening the sense of their surroundings;
- Rarity or uniqueness of the view. This might include the noteworthy representativeness of a certain townscape type and considers whether the receptor could take in similar views anywhere in the broader region or the country;
- The integrity of the townscape character. This looks at the condition and intactness of the townscape in view and whether the townscape pattern is a regular one of a few strongly related components or an irregular one containing a variety of disparate components;
- Sense of place. This considers whether there is a special sense of wholeness and harmony at the viewing location;
- Sense of awe. This considers whether the view inspires an overwhelming sense of scale or the power of nature.

2.5.8 Those locations which are deemed to satisfy many of the above criteria are likely to be of higher sensitivity, and no relative importance is inferred by the order of listing.

2.5.9 It is recognised that a viewer's interpretation and experience of the townscape can have preferential and subjective components. Where relevant, judgements are made on those elements of the townscape that are considered to contribute more prominently and positively to the visual townscape resource as well

as those elements that contribute negatively. Overall sensitivity may be a result of a number of these factors or, alternatively, a strong association with one or two in particular.

Magnitude of Change - Visual

- 2.5.10 The magnitude of change is again a product of the scale, extent, or degree of change that is likely to be experienced as a result of the proposed development. This is directly influenced by its 'visual presence/prominence', as experienced by visual receptors. These terms are somewhat qualitative and essentially relate to how noticeable or 'dominant' the proposal is within a particular view. Aside from the obvious influence of scale and distance, a development's visual presence is influenced by the extent and complexity of the view, contextual movement in the landscape/townscape, the nature of the backdrop, and its relationship with other features within the view. It is often, though not always, expressed using one of the following terms: Minimal; Sub-dominant; Co-dominant; Dominant; or Highly dominant.
- 2.5.11 Criteria used to inform judgements are provided in Table 3.

Table 3 - Magnitude of Change - Visual

Criteria	Description
Very High	Complete or very substantial change in view, dominant, involving complete or very substantial obstruction of existing view or complete change in character and composition of baseline, e.g., through removal of key elements.
High	A major change in the view that is highly prominent and has a strong influence on the overall view. This may involve the substantial obstruction of existing views or a complete change in character and composition of baseline, e.g. through removal of key elements or the introduction of new features that would heavily influence key elements.
Medium	Moderate change in view: which may involve partial obstruction of existing view or partial change in character and composition of baseline, i.e., pre-development view through the introduction of new elements or removal of existing elements. Change may be prominent but would not substantially alter scale and character of the surroundings and the wider setting. View character may be partially changed through the introduction of features which, though uncharacteristic, may not necessarily be visually discordant.
Low	Minor change in baseline, i.e. pre-development view - change would be distinguishable from the surroundings whilst composition and character would be similar to the pre change circumstances.
Negligible	Very slight change in baseline, i.e. pre-development view - change would be barely discernible. Composition and character of view substantially unaltered.

2.6 Significance of Effects

- 2.6.1 The significance of a townscape or visual effect is based on a balance between the sensitivity of the receptor and the magnitude of change and is categorised as Profound, Substantial, Moderate, Slight, or Imperceptible. Intermediate judgements are also provided to enable an effect to be more accurately described where relevant. 'No Effect' may also be recorded as appropriate where the effect is so negligible it is not noteworthy.
- 2.6.2 The significance category judgement is arrived at using the Significance Matrix in Table 4 as a guide. This applies the principle of significance being a function of magnitude weighed against sensitivity, but employs slightly different terminology that avoids the potentially confusing use of the term 'significant' (as recommended by GLVIA3 Statement of Clarification 1/13 (Landscape Institute, 10th June 2013)).

2.6.3 Indicative criteria descriptions used in relation to the significance of effect category are presented in Table 5.

Table 4 - Significance Matrix

	Sensitivity of Receptor				
Magnitude	Very High	High	Medium	Low	Negligible
Very High	Profound	Profound-substantial	Substantial	Moderate	Slight
High	Profound-substantial	Substantial	Substantial-moderate	Moderate-slight	Slight-imperceptible
Medium	Substantial	Substantial-moderate	Moderate	Slight	Imperceptible
Low	Moderate	Moderate-slight	Slight	Slight-imperceptible	Imperceptible
Negligible	Slight	Slight-imperceptible	Imperceptible	Imperceptible	Imperceptible

Table 5 - Indicative significance of effect criteria descriptions

	Landscape	Visual
Profound	There are notable changes in landscape characteristics over an extensive area or a very intensive change over a more limited area.	The view is entirely altered, obscured or affected.
Substantial	An effect which, by its character, magnitude, duration or intensity alters a sensitive aspect of the landscape. There are notable changes in landscape characteristics over a substantial area or an intensive change over a more limited area.	An effect which, by its character, magnitude, duration or intensity alters a sensitive aspect of the visual environment. The proposal affects a large proportion of the overall visual composition, or views are so affected that they form a new element in the physical landscape.
Moderate	An effect that alters the character of the environment in a manner that is consistent with existing and emerging baseline trends. There are minor changes over some of the area or moderate changes in a localised area.	An effect that alters the character of the visual environment in a manner that is consistent with existing and emerging trends. The proposal affects an appreciable segment of the overall visual composition, or there is an intrusion in the foreground of a view.
Slight	An effect which causes noticeable changes in the character of the landscape without affecting its sensitivities. There are minor changes over a small proportion of the area or moderate changes in a localised area or changes that are reparable over time.	An effect which causes noticeable changes in the character of the visual environment without affecting its sensitivities. The affected view forms only a small element in the overall visual composition or changes the view in a marginal manner.
Imperceptible	An effect capable of measurement but without noticeable consequences. There are no noticeable changes to landscape context, character or features.	An effect capable of measurement but without noticeable consequences. Although the development may be visible, it would be difficult to discern resulting in minimal change to views.

2.6.4 The likely effects of the proposals must be transparently assessed and understood so that the determining authority can bring a balanced, well-informed judgement to bear when making a planning decision. As such, whilst the Significance Matrix and criteria provide a useful guide, the significance of an

effect is ultimately determined by the landscape specialist using professional judgement, and also in the context of occasionally using hybrid judgements to account for nuance.

- 2.6.5 Effects assessed as ‘Substantial’ or greater (shaded cells) are considered to be the most notable in townscape and visual terms and may be regarded as ‘Significant’, albeit it is important to note that this is not a reflection on their acceptability in planning terms.

2.7 Quality of Effects

- 2.7.1 In addition to assessing the significance of townscape and visual effects, the quality of the effects is also determined. Whereas, the introduction of new built elements into countryside areas often results in negative landscape and visual effects, in urban and urban edge settings, new built form through its architectural design and public realm treatment, can contribute positively to a townscape/streetscape, and generate a combination of positive and negative effects.
- 2.7.2 It is therefore noted that urban development projects can give rise to a broad spectrum of opinions ranging from strongly negative to strongly positive, with a wide range of opinions lying somewhere between these two positions. Whilst some impacts are quantifiable, other impacts (such as the influence of architecture), are more qualitative in nature, where professional judgement is required.
- 2.7.3 In determining the quality of effects in this assessment, it is noted that the authors of this TVIA are Chartered members of the Landscape Institute, experienced in large-scale public realm and urban design and regeneration projects and the production of landscape/townscape and visual impact assessments.
- 2.7.4 Within this TVIA, effects are described as negative/adverse, neutral, or positive/beneficial, and the following criteria have been used to guide these judgements.
- Positive/beneficial - A change which improves the quality of the environment, enhancing the existing view/townscape;
 - Neutral - No effects or effects that are imperceptible, within normal bounds of variation e.g. will neither detract from nor enhance the existing view/townscape, or alternatively, a balance of minor positive and Negative effects;
 - Negative/adverse - A change which reduces the quality of the environment, detracting from the existing view/townscape.
- 2.7.5 The judgment of the quality of the effects is made in combination with the significance judgement for both townscape and visual impacts e.g. Moderate / Positive, Moderate / Neutral, or Moderate / Negative.

3 TOWNSCAPE & VISUAL BASELINE

- 3.1.1 This section of the TVIA presents the existing townscape and visual context against which any changes brought about by the proposed development are assessed.
- 3.1.2 The Townscape baseline is described in relation to the features and characteristics of the site and its wider urban context, and presented within published descriptions of character, and understood from site visits. The visual baseline is presented in relation to visual receptors to whom the development is likely to be visible.

3.2 Townscape Context

- 3.2.1 The proposed development will sit on 1.9 Hectares of industrial estate lands. The site is located near the junction of Walkinstown Avenue and Long Mile Road, approximately 200m to the east. It is currently

occupied by a truck sales and servicing depot incorporating low-rise sales and warehouse type buildings, with associated overspill car parking and sales yard. The immediately surrounding context is similar to the site with other car sales yards lining the Long Mile Road along with retail warehousing and light industry within extensive low rise buildings of low architectural merit and low generally constructed of quality materials. Commercial signage is also a key feature of the street frontage of the Long Mile Road.

- 3.2.2 The wider study area has the same key attributes as the immediate site context, but at a broader scale. The northern, southern and western half, is almost entirely industrial / retail warehousing in terms of form and function with car dealerships commonly lining the Long Mile and Ballymount Road. The development pattern is sporadic and generally low-rise (2-3 storeys) with little in the way of established building lines and frequent vacant and disused areas. There is a high degree of commercial signage, which does at least draw attention from the dated and utilitarian appearance of most of the industrial and commercial buildings. The site is located reasonably centrally within the wider Industrial area, close to a variety of retail establishments, and food and beverage providers. It is well located amongst several large employers, retail and public services, medical functions and commercial uses, as well as established residential areas.
- 3.2.3 The east-southeast of the study area is almost wholly residential, albeit interspersed with occasional neighbourhood open space amenity areas and a local commercial centre at the Walkinstown roundabout (approximately 950m southeast) at the root of each of the roads that diverge from it. Thus, the site represents a microcosm of the broader interface between industrial and residential land use for the suburbs of Ballymount and Walkinstown.
- 3.2.4 An aerial photograph of the site and its wider context is illustrated in Figure 4.



Figure 3 Aerial view of the site in relation to the adjacent townscape (c/o Google Earth)

Landform and Drainage

- 3.2.5 Parkmore Industrial Estate in Dublin is situated on relatively flat land, typical of the greater Dublin area. It doesn't have any significant natural landmarks or distinctive landforms. The topography is generally gentle, with slight undulations in some areas, but no prominent hills or valleys. The area is characterised by urban development, with landform and drainage having been historically altered. The River Liffey is located c.2.4km to the north, while the Grand Canal corridor is located just at the border of the 1km study area. At the study area level, there are no natural watercourses visible. Overall, Parkmore Industrial Estate is defined more by its built environment and urban fabric than by any particular topographical features.

Land use and land cover

- 3.2.6 The land uses and land cover of Parkmore Industrial Estate are primarily urban in nature. Industrial/Retail and commercial areas dominate the study area to the north, west and south. The outer eastern half of the site is predominantly surrounded by residential dwellings and buildings. These residential areas are mainly mid-century terraced houses, along with some newer housing developments and apartment schemes. There are a number of parks and amenity areas within the central and wider study area. The closest is Walkinstown Avenue Park, adjoining the southern boundary of the proposed development.
- 3.2.7 These residential areas are interspersed with light commercial premises which include shops, pubs, restaurants, and other local amenities. There are also areas designated for institutional and community purposes, such as schools, churches, and community centres.
- 3.2.8 At a very localised level, not many archaeological and architectural features are present. One of heritage buildings located within the wider study area, including the Drimnagh Medieval Castle, located approximately 760m to the northeast, and Mercedes Benz factory, approximately 280m north of the proposed site. These buildings make an important contribution to the streetscape at a localised level.

Transport Routes

- 3.2.9 The site is very well connected to public transport corridors, with access to Bus routes that serve the area and connect it to Dublin city centre, and the Luas Red line which passes to the north approximately 250m and provides access to Main Line trains in addition.
- 3.2.10 The area is well-connected by roads, with Long Mile Rd (R112) being a central thoroughfare running north to south. Other important roads include R110 Walkinstown Avenue, which runs to the east approximately 190m from the junction M50 motorway is located approximately 1.5km west of the proposed site. There are also designated cycling routes in and around the study area, facilitating bicycle commuting and leisure cycling for residents, and Grand Canal passes close to the border of the study area.

Public Amenities and Facilities.

- 3.2.11 There are a number of areas of public greenspace within the locality. These include Walkinstown Avenue park, Childrens Playground at Church of the Assumption of the Blessed Virgin Mary approximately 590m east, greenspace at Drimnagh Medieval Castle approximately 490m northeast, greenspace at the Ballymount Industrial Estate approximately 680m southwest. The Grand Canal walkway is accessible to the north, this waterway providing recreational value.

Historical Context of Study Area

- 3.2.12 The area of Parkmore industrial Estate is shown in historic mapping In the late-19th century the site was used as a gravel pit within a largely rural townland. The OSI map of 1837-1842 shows the field boundaries around the site and it is clear the primary context points of the site today can be identified on the map with the Long Mile Road laid out to the north and the watercourse to the south. Development and growth in the townland came during the 1960's when the larger Naas Rd Environs was zoned for Industrial Development. As industry moved to purpose built industrial estates in the area, the locality developed quickly as an industrial and employment centre. The area is characterised by its industrial history today with wide estate roads and simple, functional warehouses setback from the street edge.
- 3.2.13 The Long Mile Road can be seen dating back to older OSI maps (6 inch). The historical stream still exists today although now is hemmed in by industrial development. The Parkmore development acknowledges the stream as an important historical and natural feature abutting the site and aims to enhance its potential through the development of the Parkmore site.
- 3.2.14 The most significant protected structure in the area is the Mercedes Benz factory building which is located across the road from Parkmore. This building is constructed from red brick with white ceramic pilasters and window frames accenting the brick. Otherwise, the materiality of the area is largely stucco render and metal. Its location close to the Grand Canal supported the distribution of bricks across Ireland, and this mapping also illustrates the extensive industry and development present in the area, with a variety of factories present.

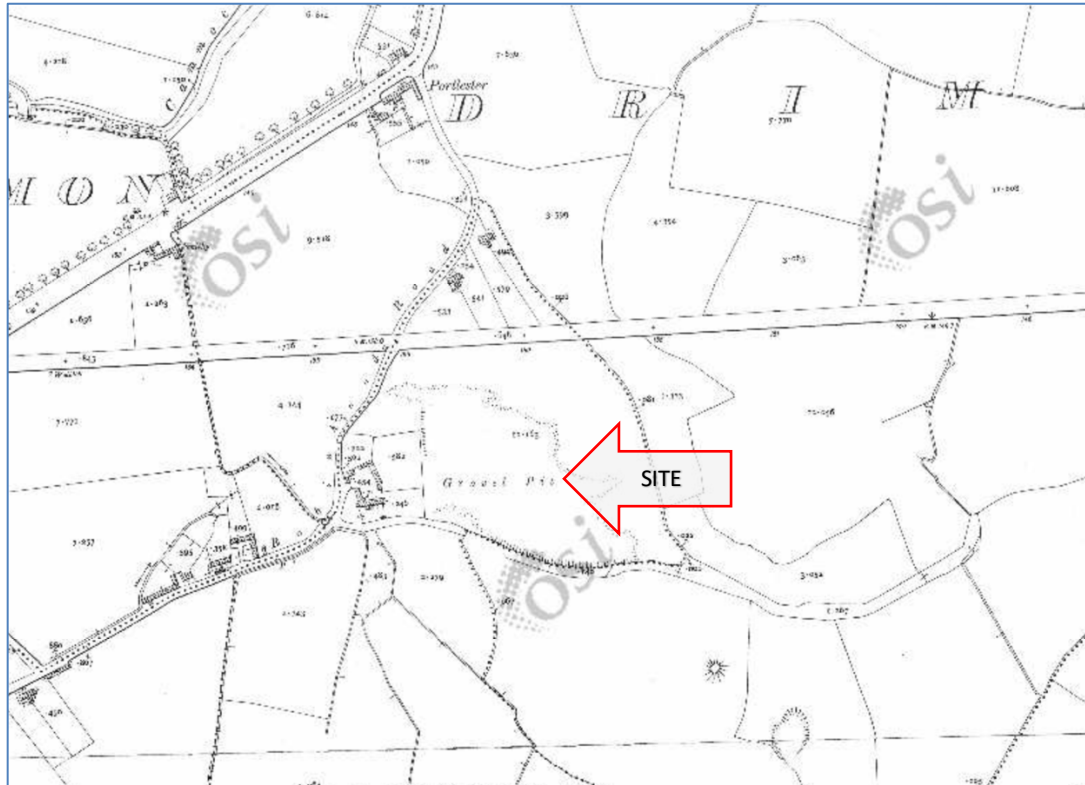


Figure 4 Historic 25-inch mapping (c/o Heritagemaps.ie)

3.3 Planning context

- 3.3.1 The site is located within the administrative boundaries of South Dublin City Council and is therefore subject to the land use policies and objectives of the South Dublin City Development Plan 2022-2028.

South Dublin City Development Plan (CDP) 2022-2028

- 3.3.2 In terms of land use zoning (Map 5 of the South Dublin CDP 2022-2028) the proposed development is contained within an area of 'Regeneration'. The South Dublin County Development Plan 2022-2028 assigns Zoning Objectives to all lands within its jurisdiction. The objective for Regeneration zone as contained in South Dublin CDP 2022-2028 is '*To facilitate enterprise and / or residential led regeneration subject to a development framework or plan for the area incorporating phasing and infrastructure delivery*'.

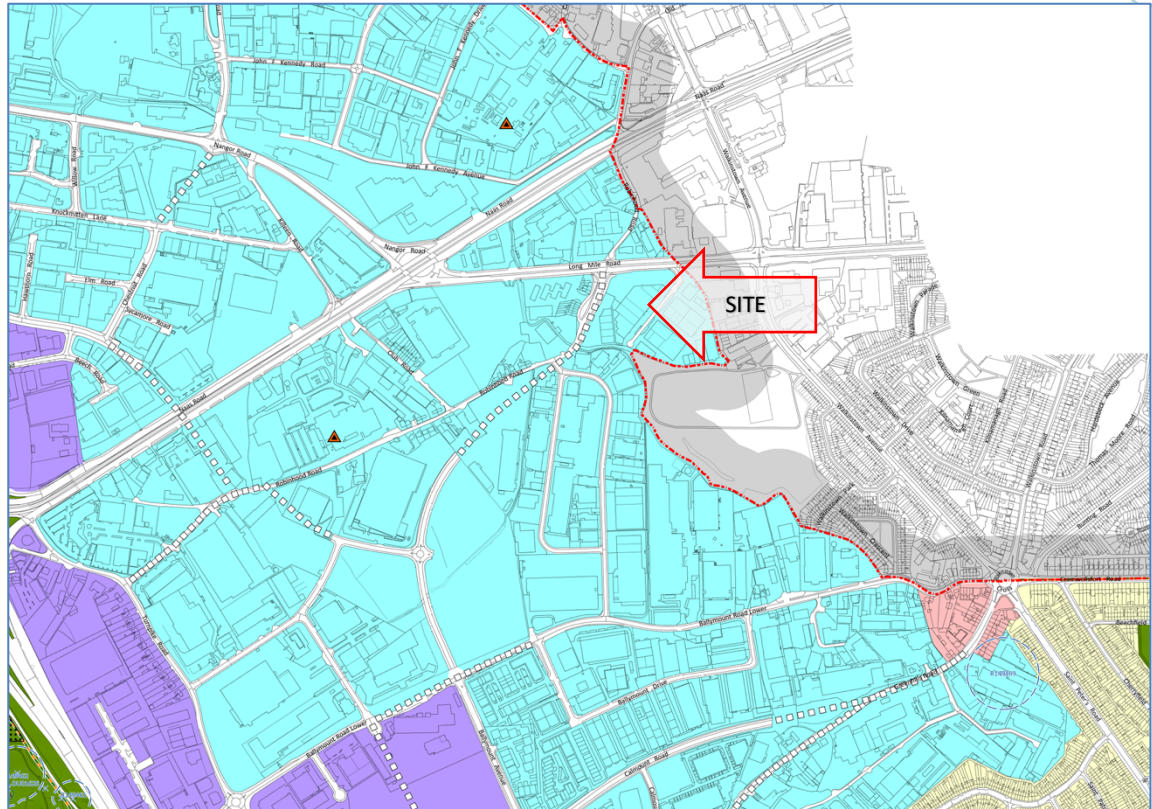


Figure 5 Land Use Zoning Map (Source: South Dublin CDP 2022-2028)|

3.3.3 The most relevant Core Strategy Objective relating to the 'Regen' zoning includes;

- CS1 Objective 1: To ensure a sustainable and plan led allocation of housing and employment growth within the strategic development areas of South Dublin County in line with the provisions of the MASP.
- CS2 Objective 1: To prepare a Local Area Plan or other appropriate mechanism for the zoned Regeneration (REGEN) lands and other lands at Naas Road / Ballymount as defined by the City Edge Project boundary. The LAP or equivalent will commence in 2022 and provide a framework for the sequential and phased development of the lands, integrating sustainable transport, land use and blue and green infrastructure. The City Edge Strategic Framework will inform this Statutory Plan.
- CS2 Objective 2: To facilitate a co-ordinated approach and vision to any future sustainable development of the City Edge area in collaboration with Dublin City Council and all relevant stakeholders, including the local community and existing businesses having regard to their operational needs, and ensure that the needs of the existing and new community will be met, and the provision of necessary community and physical infrastructure is delivered in tandem with any new development.
- CS4 Objective 2: To promote the delivery of residential development through active land management measures and a co-ordinated planned approach to developing appropriately zoned lands at key locations, including regeneration areas, vacant sites and under-utilised areas.
- CS7 Objective 2: To promote and support the regeneration of underutilised industrial areas designated with the regeneration Zoning Objective 'REGEN' ('to facilitate enterprise and / or residential led regeneration subject to a development framework or plan for the area incorporating phasing and infrastructure delivery).

- QDP8 Objective 2: In accordance with NPO35, SPPR1 and SPPR3, to proactively consider increased building heights on lands zoned Regeneration (Regen), Major Retail Centre (MRC), District Centre (DC), Local Centre (LC), Town Centre (TC) and New Residential (Res-N) and on sites demonstrated as having the capacity to accommodate increased densities in line with the locational criteria of Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2020) and the Urban Design Manual – Best Practice Guidelines (2009), where it is clearly demonstrated by means of an urban design analysis carried out in accordance with the provisions of South Dublin County's Building Height and Density Guide that it is contextually appropriate to do so.
- EDE3 Objective 7: To promote the provision of workspace as part of any mixed-use development on REGEN zoned land.

3.3.4 In section 12.9 of South Dublin. CDP 2022-2028, Under the regeneration zone it is set out that 'Development in Regeneration Zones will be assessed against the relevant criteria within the Urban Design Manual, the Design Manual for Urban Roads and Streets and / or the Retail Design Manual as appropriate. A Design Statement (see Section 12.5.2 Design Statements) accompanying development proposals in Regeneration (REGEN) zones should also address the following criteria:

- Demonstrate a clear transition towards a more urban form of development and a traditional street network;
- Address connectivity and linkages in the area and demonstrate that the development of the site would not give rise to isolated piecemeal pockets of residential development that are disconnected from shops, amenities and / or other residences;
- Residential development should not be introduced at ground floor level adjacent to busy roads, and / or roads that are subject to significant movements by Heavy Goods Vehicles (HGVs);
- Given the transitional nature of Regeneration Zones, precautions will be taken to ensure that the potential for noise pollution, air pollution or other nuisance from established industrial uses will not exceed acceptable environmental standards. The Planning Authority may seek a report from a suitably qualified person to identify and quantify sources of noise pollution, air pollution, or nuisance, assess the potential impacts on the proposed development and provide a series of recommendations to mitigate the impacts of any pollutants insofar as possible (for instance, orientation and layout of dwellings, positioning of openings and insulation);
- It may be necessary to consider improvements to the surrounding road and street network in conjunction with the Planning Authority, to calm traffic and improve pedestrian and cyclist access.

3.3.5 Designated Scenic Views and Prospects

In terms of visual and scenic amenity, the South County Dublin Development Plan contains designated scenic routes, but none are relevant to the proposed study area.

3.3.6 Dublin City Development Plan (CDP 2022-2028)

3.3.7 The eastern portion of the study area is contained within the jurisdiction of Dublin City Council with the nearest aspects being within 100m of the site. Therefore, the Dublin CDP is also relevant in this instance. In terms of land use zoning (Map G of the Dublin CDP), the proposed development is situated adjacent to 'Zone Z6,' which encompasses the area to the east near the junction of Long Mile Road and Walkinstown Avenue, and 'Zone Z9,' which covers the area to the south, mainly Walkinstown Avenue Park.



Figure 6 Excerpt from land use Zoning Map from Dublin CDP (2022-2028)

- 3.3.8 Contained within Chapter 4 is a map illustrating key views and prospects for protection, an excerpt from which is presented in Figure 6. Views and prospects are referenced specifically in Policy GI20 which aims to “protect and enhance views and prospects which contribute to the appreciation of landscape and natural heritage.” None of the views and prospects shown on the plan orientate towards the proposed site.
- 3.3.9 None of the views and prospects shown on the plan are within the study area or are orientated towards the proposed site.

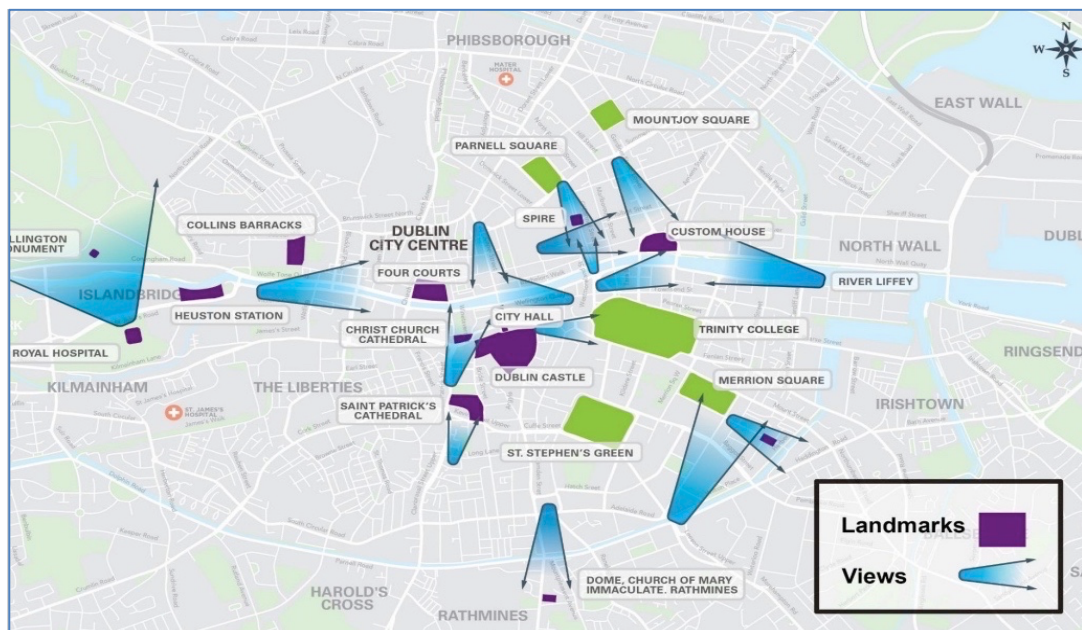


Figure 7 Key Views and Prospects (Figure 4-1, Chapter 4 of the Dublin City Development Plan)

City Edge Project – Strategic Framework, 2022

- 3.3.10 As part of a national strategy to rejuvenate the cities and large towns, whilst concentrating new housing and employment in existing urban areas, South Dublin County Council (SDCC) and Dublin City Council (DCC) have come together in a joint urban regeneration effort in form of City Edge Strategic Framework. The proposed site is included within the City Edge project.

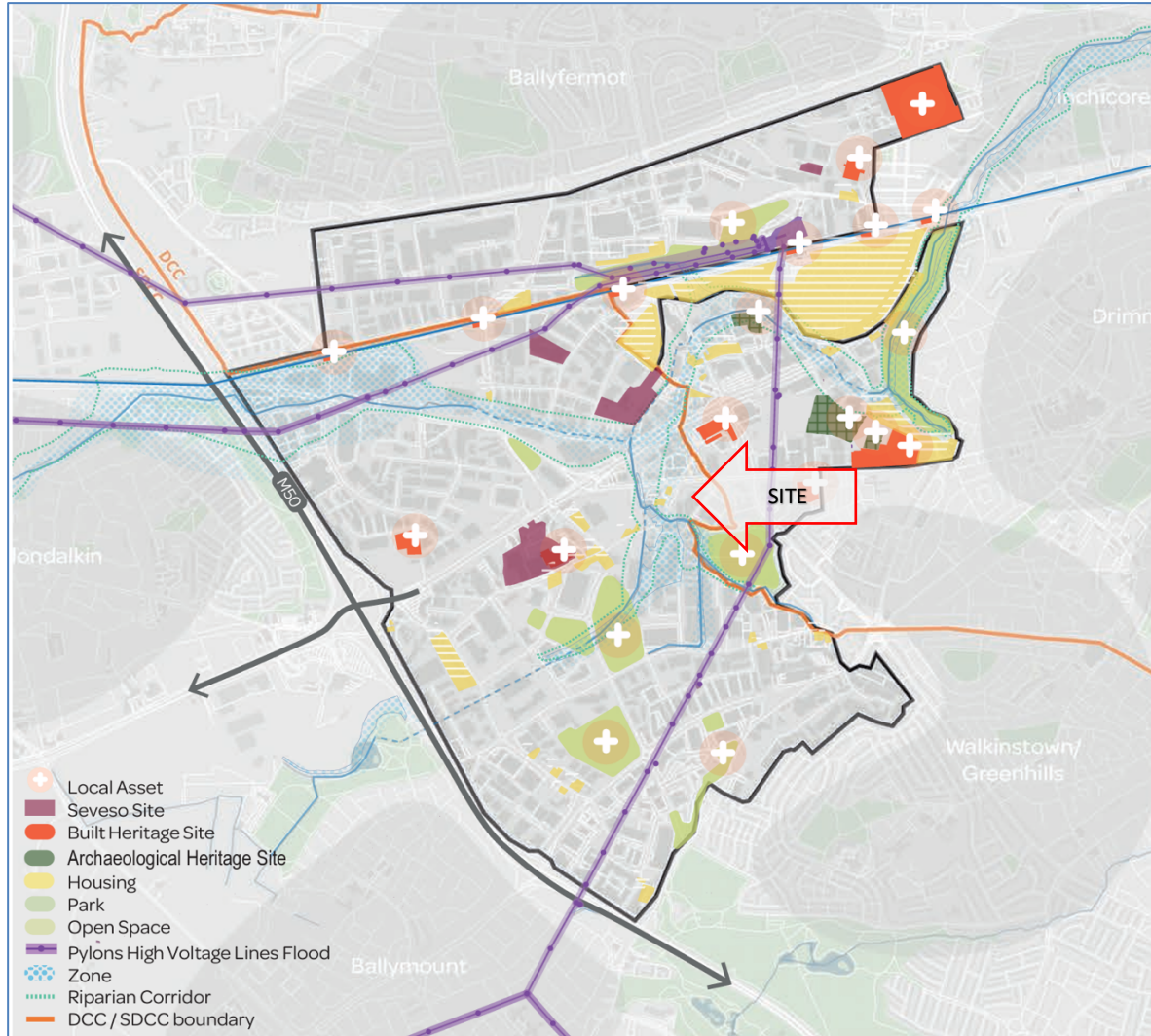


Figure 8 Extract from City Edge Strategic Framework

- 3.3.11 The City Edge Project is a transformative initiative, re-imagining the Naas Road, Ballymount and Park West areas at the western edge of Dublin City. Creating a new urban quarter, it has the potential for 40,000 new homes and 75,000 jobs, making it one of the largest regeneration schemes in Europe.
- 3.3.12 The strategic objectives mentioned in City Edge Strategic Framework which aligns with the proposed development includes:
- Housing: Accommodate a mixed and balanced community of between 75,000 and 85,000 new people with a choice of different housing types, tenures and sizes.
 - Movement: Ensure Transport Oriented Development by focussing new mixed-use and compact urban development on enhanced active travel and public transport corridors.

3.3.12.1 Density

The critical minimum residential densities required across City Edge to support sustainable neighbourhoods are as follows:

Minimum: 70 dwellings per hectare (gross) is considered to be a minimum requirement for Residential Led Mixed-use areas outside of Transport Corridors and Centres. Reduced densities below this minimum may be required on sites proximate to existing low-density residential neighbourhoods. Transport corridors and centres: Minimum densities of 100-120 dwellings per hectare (gross) on lands identified as:

- Residential Led Mixed-Use areas along the Naas Road, the two planned BusConnects routes, the Red Luas Line, the planned Luas Line F to Lucan and the two orbital transport corridors proposed under this Strategic Framework;
- Local High Street and High Street areas; and
- Mixed Use Employment and Residential areas.

In relation to the proposed development as it is in excess of 150 dwellings the documents states '*As a performance measure, all development with densities above 150 dwellings per hectare (net) should be scrutinised very carefully in the context that such developments can pose challenges in relation to fostering connected and diverse residential communities. Such developments would need to provide a relatively high proportion of family units while incorporating significant elements of planning gain in the form of generous contributions to the public realm such as parks, greenways, blueways or community facilities in addition to the standard public, semi-private / communal and private open space requirements. Development proposals above this density on sites within close proximity to existing low density residential communities would also need to be considered in a manner that seeks to avoid abrupt transition in density.*'

3.3.12.2 Height

Three height categories were outlined in the City Edge project:

Emerging Height Limits – As City Edge is predominantly low rise at present, a series of banded height ranges has been identified, which form the maximum allowable heights in any given area. They are maximum heights, not targets, and are only allowable based on performance based criteria. Locally Higher Buildings – These are buildings which are higher than the local context and allow for placeshaping and orientation at a local level. These buildings must score highly in the assessment against both the Performance based criteria and the upward modifiers which allow for cases to be made for buildings that are above the emerging height limits. These buildings are also allowable where a public good is served, e.g. a landbank must facilitate a public park being created in order to incentivise the successful delivery of City Edge. They must be of the absolute highest architectural quality in terms of form, elevation, slenderness ratio, materials, uses, public realm and mix.

Landmark / City Scale Tall Buildings – These are buildings which are typically a significant intervention on the cityscape and skyline and typically in excess of 50m and located in areas which have been identified as points of interest on a city scale to help to orientate and wayfind. They must be of the absolute highest architectural quality in terms of form, elevation, slenderness ratio, materials, uses, public realm and mix. They should be of the benchmarked when assessing any application by the planning authority against internationally recognised exemplars of high quality tall buildings that have lasted and endured the test on time. They will be Important city landmarks and landmarks internationally of Dublin and should be designed at that level of quality.

The height of Parkmore at max 35m is in line with the Height diagrams noted on the City Edge Framework document.

3.3.13 The framework highlights the Performance based criteria and objectives and states *‘Only if a site meets all or in exceptional cases where the merits of the overall scheme warrant it, some of the performance based criteria it would be deemed acceptable to grant applications at the limit of the maximum height at statutory plan stage’.*

3.3.14 The objectives that relate to the proposed development are as follows:

- Skylines should be varied including varying block heights, roof lines, roof embellishments in order to create a dynamic and interesting skyline
- Promote mix of use and diversity of activities:
- Promote the delivery of mixed use development including housing, commercial and employment development as well as social and community infrastructure
- Contribute positively to the formation of a ‘sustainable urban neighbourhood’
- Include a mix of building and dwelling typologies in the neighbourhood
- Provide for residential development, with a range of housing typologies suited to different stages of the life cycle

Urban Development and Building Heights Guidelines for Planning Authorities (2018)

3.3.15 The UDBH Guidelines were adopted in December 2018 by the Minister for Housing, Planning and Local Government “to secure better and more compact forms of future development.”

3.3.16 Policies stated within the guidelines that may be relevant include:

- SPPR1: In accordance with Government policy to support increased building height in locations with good public transport accessibility, particularly town/ city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.
- SPPR 2: In driving general increases in building heights, planning authorities shall also ensure appropriate mixtures of uses, such as housing and commercial or employment development, are provided for in statutory plan policy. Mechanisms such as block delivery sequencing in statutory plans² could be utilised to link the provision of new office and residential accommodation, thereby enabling urban redevelopment to proceed in a way that comprehensively meets contemporary economic and social needs, such as for housing, offices, social and community infrastructure, including leisure facilities.

3.3.17 Section 3.2 of the guidelines lists the following development management criteria, that need to be satisfied as part of the application process.

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 while being in line with the requirements of “The Planning System and Flood Risk Management – Guidelines for Planning Authorities” (2009).
- 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.

At the scale of the site/building

- The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.
- Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment’s ‘Site Layout Planning for Daylight and Sunlight’ (2nd edition) or BS 8206-2: 2008 – ‘Lighting for Buildings – Part 2: Code of Practice for Daylighting’.
- Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.

3.3.18 Policy SPPR 3 within the guidelines makes explicit reference to these criteria where it states (inter alia):

- SPPR 3: It is a specific planning policy requirement that where;
- (A) 1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and
- 2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines;
- then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.

- 3.3.19 The development management criteria advocate the involvement of a Chartered Landscape Architect and the production of a landscape/townscape and visual assessment. Correspondingly, this TVIA presents information that is of relevance to the guidelines.

3.4 Visual Context

- 3.4.1 Given the concentration of built development in the townscape surrounding the site, views towards the site are restricted from many locations in the wider area of the townscape. Views of the site are generally contained within the immediate streetscape of Industrial Estate and Walkinstown Avenue within approximately 500m of the site boundary.
- 3.4.2 In acknowledgement that the proposals involve a building that is taller than the prevailing commercial premises and expansive multi-storey terraced residential context, it is recognised that there are likely to be locations where the development is visible where the site currently is not, and that visual receptors including motorists and cyclists on the road network, patrons and employees of the surrounding commercial/industrial premises, and residential receptors in properties in the surrounding townscape, have the potential to obtain views.
- 3.4.3 Whilst the study area placed a proportionate focus on the townscape within approximately 1km of the site, it is likely that the proposed development would be most visible and influential on views within around 500m of the site given the presence of other built form, vehicular movement, activity associated with the surrounding residential landcover, and other characteristics of the townscape. Beyond this distance, views of the development would be partial and unlikely to be readily discernible in the context of wider views containing other more prominent features.

SDCDP Prospects to be Preserved and Protected

- 3.4.4 A review was undertaken of the designated “Prospects to be Preserved and protected” (as per Section 9.2.1 in the South Dublin County Development Plan). None of those identified in the SDCDP are close to the site or likely to be impacted in any material way by activity or land use on the application site. Where the site and proposed development may be visible from any of these locations, it would be at a notable distance, and set in the context of the wider urban expanse, such that it would not have any discernible influence on the protected view.

4 REPRESENTATIVE ASSESSMENT VIEWPOINTS

- 4.1.1 It is not warranted to include every location that provides a view towards the proposed development as this would result in an unwieldy report and make it extremely difficult to draw out the key impacts arising from the proposed development. Instead, the assessment of visual impacts is structured around a series of representative assessment viewpoint locations.
- 4.1.2 Representative assessment viewpoints seek to reflect a range of different receptor types, distances and orientations, to help to inform the conclusions being made. Where views are precluded by built form and vegetation, they seek to demonstrate the absence of visibility. Viewpoints are detailed in Table 6 and illustrated in Figure 7.
- 4.1.3 For each of the representative viewpoints, an existing (baseline) view is presented, together with a Photomontage that superimposes the proposed development within the view. Photomontages provide a ‘photo-real’ depiction of the scheme within the view utilising a rendered three-dimensional model of the development, which has been geo-referenced to allow accurate placement and scale.

- 4.1.4 Where there is no visibility of the proposed development, an outline view has been produced to illustrate where the proposed development lies relative to intervening screening.

Table 6 - Outline description of representative Viewpoints

VP	Location	Representative of	View direction
1	View looking east from jct. Naas Rd & Long Mile Road	Road users, workers in the area and residents	E-SE
2	View looking Sth East from Naas Rd opposite Evra motors	Road users, workers in the area, and residents	SE
3	Looking Sth West from jctn Naas Rd & Walkinstown Avenue	Road users, workers in the area, and residents	S-SW
4	View from Slievebloom Park/Lansdowne Gate looking west	Road users, gym visitors, park visitors, and residents	SW
5	View looking Sth East from Long Mile Rd / Robinhood Rd	Road users, workers in the area, and residents	S-SE
6	View looking West from Walkinstown Green.	Park and church visitors, and residents	W-NW
7	View looking Nth West Walkinstown Ave. & Walkinstown Grn.	Road users and residents	NW
8	View looking Nth West from Walkinstown Avenue Park	Park visitors, and residents	NW
9	View looking Nth from Walkinstown Avenue Park	Park visitors, and residents	N-NW
10	View looking Nth East from Robinhood Road	Road users, workers in the area, and residents	NE
11	View looking East from Long Mile Road	Road users, workers in the area, and residents	E-SE
12	View looking West from Long Mile Road / Walkinstown Ave	Road users, workers in the area, and residents	W-SW
13	View looking East from Robinhood Road	Road Users, workers and visitors	SW
14	View looking South West on Parkmore Estate Road	Road Users, workers and visitors	N

Figure 7 - Viewpoint Location Map



5 THE DESIGN PROPOSALS AND EMBEDDED MITIGATION

- 5.1.1 Full details of the proposed development, and its architectural design, can be found in the supporting Architectural Design Statement produced by Reddy Architecture + Urbanism. The design of the proposals has been subject to an iterative design approach, with contextual analysis underpinning the proposals ensuring that careful consideration has been given to the receiving townscape.
- 5.1.2 The proposals have sought to deliver a high-quality, contemporary, residential development in line with the ambitions for this urban area, and capitalise on the development potential of this site for social and affordable accommodation.
- 5.1.3 The architectural design of the buildings, has also sought to respond positively to the urban characteristics of the surrounding area, referencing the architecture and built heritage of the area. The quality of design is considered to offer a sensitive balance in enhancing the mix and distinctiveness of this urban district.
- 5.1.4 Height and the transition in height with adjoining built form have been a key consideration. The scale of the buildings and their setting in the site has been carefully considered so that the taller buildings are located along The Long Mile Road where the street width requires it. To the South at Walkinstown Park, a lower height is proposed to be more in line with a residential neighbourhood. The building heights step down towards the park with the highest buildings clustered around the urban boulevard and commercial fulcrum of the site.
- 5.1.5 In terms of architectural character, reference has been made to landmark Mercedes Building which is important to the character of this part of Dublin. This building became a point of intrigue and formed the basis for building a material palette for Parkmore. The proposals have sought to create a built form that has a modern appearance, with material choices that are robust and durable, that will contribute to its character and influence in the long term.

- 5.1.6 Building layouts and heights have been optimized to ensure good daylight access for apartments, minimizing overshadowing and loss of light.
- 5.1.7 The design emphasizes active frontages with ground-level commercial spaces and wide footpaths. The Long Mile Road features a strong street edge with commercial uses, while Parkmore Road and the new East-West route support residential and communal functions.

5.2 Proposed Landscape and Visual Mitigation Measures

- 5.2.1 It is not considered that there are any additional mitigation measures required to reduce the anticipated construction phase townscape/visual effects over those that would be considered standard best practice construction management measures. It is anticipated that this may include aspects such as the timing of construction activities, which will be restricted per local authority guidance, and will likely be consistent with those enforced on nearby sites. A site hoarding will also screen ground level clutter and activity from view.
- 5.2.2 Landscape and urban design measures are integral to the development and will help to soften and assimilate the built form within its surrounding context in a general sense whilst adding to the quality of the development. However, it is not a case where the consideration of landscape and visual impacts before and after landscape planting establishment would result in a materially different impact judgements.
- 5.2.3 Other than those features and characteristics of the development proposals that have been embedded into the design of the scheme, there are no specific townscape and visual mitigation measures considered necessary in this instance.

6 TOWNSCAPE IMPACT ASSESSMENT

6.1 Townscape sensitivity

- 6.1.1 In accordance with Section 5.5 of the GLVIA-2013, a townscape character assessment requires a particular understanding of, among other criteria, “the context or setting of the urban area and its relationship to the wider landscape.”
- 6.1.2 The site is currently contained in low rise warehouse and showroom buildings with external truck sales / parking. . Whilst this is typical of the surrounding townscape setting, it has no particular townscape or visual amenity value other than being commercially utilised and carries no environment, amenity, heritage, visual amenity or landscape designations.
- 6.1.3 In terms of the wider area of townscape, it comprises a broad mix of building types, heights, and characteristics. Whilst residential areas are present, this is interspersed by a more dominant matrix of industrial/commercial properties, hospital buildings and buildings with other functions, typical of a mixed urban area. Its condition and character is variable, and in places is in a poor/degraded condition. The site and local townscape is dominated by the busy road network, the audible and visual influence of which is notable at a local level.
- 6.1.4 The townscape of Parkmore Industrial Estate contains some elements of a recognisable quality and is considered to have local value, given community buildings and the cultural value associated with the former industries that were present in this area. However, it is not designated for any particular townscape value or importance, and in places has a compromised condition.

- 6.1.5 It is an extensively urban area that is influenced by a variety of building types and uses and therefore exhibits a higher capacity and scope for development. However, despite this variety, the prevalence of two-storey properties generates a level of sensitivity to taller built form in the wider area.
- 6.1.6 Given the reasons presented, the townscape sensitivity of the site and its immediate surrounds is deemed to be Low.

6.2 Construction Phase landscape effects

- 6.2.1 During the construction stage construction-related activity within and around the site, and nearby approach roads is anticipated. This will include, but is not limited to:
- Site preparation works and groundwork operations;
 - Intrusive foundation work including the installation of foundations and services;
 - HGVs transporting materials to and from the site;
 - Movement of heavy machinery on-site;
 - Temporary storage of demolition debris/construction materials on-site;
 - Security fencing/hoarding and site lighting.
- 6.2.2 Construction phase effects will be at their greatest when the main structure emerges above the surrounding existing buildings but remains veiled in the temporary clutter of scaffolding and dust/debris sheets. Construction work on sites throughout this wider urban area is a constant feature as the townscape fabric evolves and is rejuvenated over time.
- 6.2.3 In terms of townscape character, construction activities tend to go largely unnoticed because it is temporary/short term and transient (relates to different sites at different times). Notwithstanding, during the construction period the partially completed and scaffolded development will detract from the character of the townscape.
- 6.2.4 There will be impacts on the character of the townscape as a result of the intensity of movement and clutter of temporary structures associated with the construction works. However, these are likely to be of a familiar scale and nature of an evolving townscape setting such as this and should be considered in the context of existing vehicular movements associated with the extensive road network locally.
- 6.2.5 Construction stage impacts on landscape/townscape character will be 'short-term' (i.e. lasting 1-7 years), in accordance with the EPA definitions of impact duration.
- 6.2.6 Based on the reasons outlined above, the magnitude of change is deemed to be no greater than Medium, which when combined with the Low sensitivity of the receiving townscape, results in a Moderate-slight / Negative level of effect.

6.3 Operational Phase landscape effects

- 6.3.1 Following the completion of the proposed works, townscape impacts will relate entirely to the development's impact on the character of the receiving townscape and whether this is positive or negative. The most notable impact in this regard will result from the permanent presence of the new residential building, together with public realm enhancements in the area surrounding it.
- 6.3.2 In line with the underlying zoning objectives for the area, the proposed development is of a high-quality design and finish, that enhances the character of the street frontage and building curtilage. It has a simple, elegant character, with architectural treatments employed to reduce its perceived massing. It is distinctive, whilst of a character that complements the adjoining and wider built context, and materials

have sought to reinforce the association with the distinctive red bricks, of relevance to the cultural value of the townscape.

- 6.3.3 The proposed development will generate the most notable influence on the immediate area of townscape, as experienced within approximately 500m. In these locations, the development will be most visible, and the prominence of the development will be most notable. Beyond approximately 500m, although visible, the influence of the development reduces and it is perceived as part of the wider townscape, where other prominent features are also influential on the character of the townscape. The development is something of a departure from the low-rise commercial and industrial land uses / built form that occupies this part of the long Mile road where residential development is not currently prevalent. In this regard the taller and more intensive form of the development stands in modest contrast to its surroundings and will alter the townscape character. However, this contribution, aside from being of generally greater intensity and scale, is of a higher quality of design and material finish. Being clearly residential in function, there is also a sense that it will breath vibrance and life back into a utilitarian commercial / industrial area along one of the main arterial routes into the city centre. There will also be a stronger sense of utility for this marginal and underutilised portion of the city.
- 6.3.4 Although the development is new, and of a scale that is higher than the adjoining site context, its scale has been considered alongside that of the adjoining land uses, both existing and future in the context of its 'Regen' zoning in the South Dublin CDP and its inclusion in the heart of the City Edge Strategy, which seeks precisely this form of development. The scale and function of the proposed development is considered to be relevant to the prominence of its corner location close to the intersection of Long Mile RD and Walkinstown Ave.
- 6.3.5 Based on the reasons outlined above, the magnitude of change is deemed to be Medium. When combined with the Low sensitivity of the receiving townscape, the overall significance of effect is considered to be **Moderate-slight** within the immediate surrounds of the site, but reducing with distance as the development becomes a smaller and less distinctive component of the wider townscape fabric. The quality of the effect is deemed to be **Positive** on the basis that the development enhances the quality and utility of this slightly tired urban area..
- 6.3.6 The proposals are considered to represent a nature and scale of development that is sympathetic to its adjoining built context, and of a form and character that is appropriate to this area of townscape.

7 VISUAL IMPACT ASSESSMENT

- 7.1.1 The assessment of visual impacts at each of the selected viewpoints is aided by photomontages of the proposed development (included elsewhere within the application). Photomontages are a 'photo-real' depiction of the scheme within the view, utilising a rendered three-dimensional model of the development, which has been geo-referenced to allow accurate placement and scale. For each viewpoint, the existing view is presented, alongside a version that contains the proposed development.

7.2 Visual Receptor Sensitivity

- 7.2.1 All of the viewpoints are located within a relatively contained urban area, with a key differential in visual receptor sensitivity relating to whether or not the viewpoint represents residential receptors or people travelling along residential streets or located within other parts of the surrounding townscape.
- 7.2.2 In terms of visual receptor sensitivity, it is noted that the site is located in an extensively urban context where visual receptors are influenced by a mix of built forms of various heights and architectural characteristics, including residential terraces, extensive low-rise commercial/industrial premises. This

urban context is also set within a busy road network, the audible and visual influence of which is notable at a local level.

- 7.2.3 There are not considered to be any particularly notable or important panoramic views present, and the townscape does not appear to be valued for its scenic qualities. In this regard, taller buildings in the wider townscape, and large cranes visible reflect a townscape that is dynamic and changing, where visual change is common and expected.
- 7.2.4 Owing to the proximity at which views would be experienced, visual sensitivity is considered to be no greater than Medium-low tending to low for non-residential receptors.

7.3 Construction Phase Visual effects

- 7.3.1 Effects during construction will be highly variable depending on the activity taking place, the angle of the view, and the degree to which the activity would be visible. Visual effects will arise as a result of the highly visible construction-related plant, views of fencing/hoarding, site lighting and temporary structures, and movement associated with the intensity of activity at the site. They will also relate to the emergence of the partially completed structures draped in dust sheets and scaffolding and surrounded by tower cranes.
- 7.3.2 Construction phase visual effects are an inevitable consequence of the development proposal being brought forward, and there are a range of standard best practice construction management measures able to moderate these during construction. Many views from the townscape surrounding the site are not immune to the influence of comparable construction activity given the works undertaken elsewhere in the area.
- 7.3.3 Construction stage visual effects will be most noticeable in the immediate landscape/townscape setting of the site, and key approach roads where increased construction traffic volumes may also be noticeable. The highest magnitude of construction stage visual impacts will occur when the site is at its peak of construction activity and the main structures have emerged but are incomplete and draped / surrounded by construction related paraphernalia and temporary structures. The scale and intensity of these construction stage effects will have a detrimental effect on townscape character, but this is only a short-term impact (1-5 years).
- 7.3.4 Based on the reasons outlined above, the magnitude of change is deemed to be no greater than Medium. When combined with the Low sensitivity of the visual receptor, the overall significance of effect is considered to be no greater than Moderate-slight / Negative.
- 7.3.5 Given the 'short term' duration and variable nature of the construction phase effects, a proportionate emphasis is made on the permanent effects of the development.

7.4 Operational Phase Visual Effects

- 7.4.1 The assessment of visual impacts at each of the selected viewpoints is aided by photomontages of the proposed development. Photomontages are a 'photo-real' depiction of the scheme within the view, utilising a rendered three-dimensional model of the development, which has been geo-referenced to allow accurate placement and scale.
- 7.4.2 For each viewpoint, the existing view is presented alongside the view of the development once established. Table 7 presents the judgements made with regard to the operational phase visual effects from the viewpoint locations.

- 7.4.3 Whilst the visual effects of the development will inherently vary from location to location, from many locations in the wider townscape, the built form is either not visible or only forms a minor component in the overall view. The most notable visual influence relates to views experienced from the immediate area of townscape.



Table 7 – Operational Phase Visual Effects

	Existing view	Sensitivity	Description and Magnitude of Visual impact	Significance
VP1	<p>View looking east from jct. Naas Rd & Long Mile Road</p> <p>The existing view includes the R314 and a pedestrian walkway in the foreground. Woodies large retail warehouse is situated to the rear of the viewer, with other structures, including retail outlets and industrial facilities, visible in the distance in the depicted view. A Maxol petrol station can be seen in the middle distance. Further into the landscape, utility poles, overhead wires, and streetlights line the roads. The roadsides are marked with roadside vegetation. This view is afforded to the residents, workers, and people commuting through the area.</p>	Low	<p>The proposed apartment buildings rise prominently above the skyline features and foreground context of this view. The vertical scale, massing and height of the proposed development stands in contrast to the land uses and buildings in this otherwise predominately low-rise and horizontal scene. There is also a scale transition from the tallest brick façade structures that front the Long Mile road down to lower apartment buildings further to the southeast.</p> <p>The architectural quality of the design and finishes of the proposed development also stand in contrast to the utilitarian structures that surround the site. Consequently, there is a balance between the scale and intensity of the development and its contribution to townscape quality and integrity.</p> <p>On balance, the magnitude of visual impact is deemed to be Medium-low and of a positive quality.</p> <p>No seasonal variation in impact.</p>	Slight/ Positive / Permanent



Table 7 – Operational Phase Visual Effects

	Existing view	Sensitivity	Description and Magnitude of Visual impact	Significance
VP2	<p>View looking Sth East from Naas Rd opposite Evra motors</p> <p>The busy Naas Road corridor dominates the foreground with overhead, utility poles and wires traversing the scene. A dense hedge lines the roadside, along with small trees, providing a natural barrier between the road and adjacent properties. Beyond and between the trees can be seen signage and low rise industrial and retail buildings. This view is afforded by the residents, workers, and people commuting through the area.</p>	- Low	<p>The proposed apartment buildings rise prominently above the skyline features and foreground context of this view generating a marginally increased sense of enclosure to the scene. The scale, massing and height of the proposed development contrasts with the land uses and buildings in this otherwise predominately low-rise and horizontal scene. There is some sense of scale transition from the tallest brick buildings that front the Naas Road down to lower apartment buildings to the back of the site.</p> <p>The architectural quality of the design and finishes of the proposed development also stand in contrast to the utilitarian structures in the foreground. Consequently, there is a balance between the scale and intensity of the development and its contribution to townscape quality and integrity.</p> <p>On balance, the magnitude of visual impact is deemed to be Medium-low and of a positive quality.</p> <p>No seasonal variation in impact.</p>	Slight/ Positive / Permanent



Table 7 – Operational Phase Visual Effects

	Existing view	Sensitivity	Description and Magnitude of Visual impact	Significance
VP3	<p>Looking Sth West from jctn Naas Rd & Walkinstown Avenue</p> <p>This broad and busy road junction with multiple lanes forms the focal point of the view. A mix of commercial and residential buildings can be seen beyond, including the distinctive brown-brick tower from the Mercedes Benz Factory rising above intervening vegetation. The view is dominated by the utility poles, overhead wires, streetlights, and pedestrian crossings. Trees and hedgerows adds to the backdrop and provide screening to the buildings in the background.</p> <p>The view is representative of those experienced by motorists and pedestrians, workers in the area, as well as residents within properties.</p> <p>In the winter view there is marginally greater visibility towards the site due to the loss of leaves from mature broadleaf trees across the intersection. However, two large conifers remain as key screening elements.</p>	Low	<p>The proposed development is barely discernible from here revealing only the uppermost corner of one of the buildings between sections of intervening vegetation. There will be not material impact on visual amenity so the magnitude of impact is deemed to be Negligible and of a Neutral quality.</p> <p>During winter months the partial roof profile of the development will come into view, albeit still heavily veiled by winter branches and coniferous planting. It will be marginally more discernible from here but still without consequence for visual amenity. No material change in impact.</p>	Imperceptible/ Neutral/ Permanent
VP4	<p>View from Slievebloom Park/Lansdowne Gate looking west</p> <p>This is a view across a small neighbourhood Park towards the site of Drimnagh Mediaeval Castle, which lies beyond a dense coniferous tree belt. To the left of the trees is a Drimnagh Castle Primary School and together these elements truncate the view at a short distance. This view is afforded local residents and users of the park.</p> <p>During winter months there is a more open view between the conifer treeline and the school buildings that reveals a relatively large pitched roof structure in the middle distance.</p>	Medium-low	<p>The proposed development is not readily discernible from here due to intervening screening so the magnitude of impact is deemed to be Negligible and of a Neutral quality.</p> <p>Although the roofline profile will just be discernible above and beyond the middle distance building revealed by winter vegetation, the impact will not increase.</p>	Imperceptible/ Neutral/ Permanent



Table 7 – Operational Phase Visual Effects

	Existing view	Sensitivity	Description and Magnitude of Visual impact	Significance
VP5	<p>View looking Sth East from Long Mile Rd / Robinhood Rd</p> <p>This is a view across the busy Long Mile Road intersection with Robinhood Road in the direction of the proposal site, which is currently occupied by a Renault Track sales and servicing business. The view is framed by roadside trees and contains an array of streetlights and signs that serve as the only counterpoints to the generally low-rise horizontal nature of the scene.</p> <p>The view is representative of those experienced by motorists and pedestrians, workers in the area.</p>	Low	<p>The proposed apartment development transforms and contains the scene at a short distance to the southeast. It provides a much higher degree of containment and enclosure to this portion of the street scene and a consolidated lively edge to the Long Mile Road. Though there is substantial massing along the main road alignment, the design incorporates macro level punctuation between blocks and rich fenestration with commercial uses that open welcomingly onto the street level.</p> <p>In terms of form, function, architectural and material quality this is a considerable departure from the surrounding urban fabric and it will appear slightly ambiguous in this context. However, it is also clear that this is a more modern development than its surrounding counterparts that is a vanguard of regeneration for this area that will bring lively residential use into this otherwise industrial / commercial area. While it will stand as something of an isolated sentinel in the 'Regen' zoned area in the short to medium term, further consolidation will occur over time in accordance with the considered master planning of the City Edge area.</p> <p>On balance of the factors outlined above, the magnitude of visual impact is deemed to be High, but of a Positive quality.</p> <p>No seasonal variation in impact.</p>	Moderate/ Positive/ Permanent
VP6	<p>View looking West from Walkinstown Green</p> <p>The existing view includes a neighbourhood park in the foreground lined by trees. A row of white, two-story houses lines the street beyond with their façades partially screened by the intervening trees.</p> <p>This view is afforded by the local residents in the area and those using the park and attending the Church.</p>	Medium-low	<p>The proposed development is not discernible from here due to intervening screening so the magnitude of impact is deemed to be Negligible and of a Neutral quality.</p> <p>No seasonal variation in impact.</p>	Imperceptible/ Neutral/ Permanent



Table 7 – Operational Phase Visual Effects

	Existing view	Sensitivity	Description and Magnitude of Visual impact	Significance
VP7	<p>View looking Nth West Walkinstown Ave. & Walkinstown Grn</p> <p>The existing view depicts a residential street where two-story houses line both sides of the busy arterial road. Their façades are partially screened by roadside vegetation in this contained setting. This view is afforded by the residents in the area and people commuting through it.</p>	Low	<p>The proposed development is not discernible from here due to intervening screening so the magnitude of impact is deemed to be Negligible and of a Neutral quality.</p> <p>During winter months, there may be a hint of increased built volume beyond middle distance screening, however, it is such a subtle difference there will not be an increase in visual impact.</p>	Imperceptible/ Neutral/ Permanent
VP8	<p>View looking Nth West from Walkinstown Avenue Park</p> <p>This view is from the south-eastern corner of the park and takes in a foreground of open greenspace. A line of dense parkland trees rises in the background and contains the view at a modest distance. Overhead, utility poles and wires cross the view in the foreground. This view is afforded by the visitors to the park.</p>	Medium-low	<p>The proposed development is not discernible from here due to intervening vegetation screening and even in winter there will be a dense veil of overlapping branches. Consequently, the magnitude of impact is deemed to be Negligible and of a Neutral quality.</p> <p>During winter months the proposed development will be discernible through a dense veil of winter branches on the opposite side of the park. The volume of the structures is apparent which will increase the intensity and scale of built development within the view, but without unduly drawing from visual amenity. The impact is considered to be Low-negligible and Neutral during winter.</p>	<p>Imperceptible/ Neutral/ Permanent (Summer)</p> <p>Slight-imperceptible/ Neutral/ Permanent (Winter)</p>



Table 7 – Operational Phase Visual Effects

	Existing view	Sensitivity	Description and Magnitude of Visual impact	Significance
VP9	<p>View looking Nth from Walkinstown Avenue Park</p> <p>This view is similar to VP8, which represents Walkinstown Avenue Park, extending across the foreground. A line of dense parkland trees borders the field to the north, with a building partially visible through the gaps between the trees.</p> <p>This view is afforded by the visitors to the park.</p>	Medium-low	<p>The proposed apartment development will be partially and intermittently visible above and between sections of park perimeter vegetation. It will contribute to a minor degree of increased enclosure to the setting. In a context with the underlying and surrounding urban fabric of the Long Mile road commercial and industrial area is not readily apparent, the apartment blocks do not appear ambiguous of out of place. Albeit reasonably distant, the view the apartment block windows contributes to a desirably increased sense of passive surveillance to the park without a strong sense of overlooking.</p> <p>On balance of the factors outlined above the magnitude of visual impact is deemed to be Low and the quality of that effect trending towards positive – Neutral to Positive.</p> <p>During winter months the proposed development will be more openly visible, albeit through a veil of winter branches. The volume of the structures is more apparent which will increase the intensity and scale of built development within the view, but without unduly drawing from visual amenity. The impact is considered to be Medium-low and Neutral during winter.</p>	<p>Slight/ Neutral Positive/ Permanent</p> <p>–</p> <p>Moderate-slight / Neutral/ Permanent (Winter)</p>



Table 7 – Operational Phase Visual Effects

	Existing view	Sensitivity	Description and Magnitude of Visual impact	Significance
VP10	<p>View looking Nth East from Robinhood Road</p> <p>This is a contained view along Robinhood Road as it passes through the Robinhood industrial estate. Commercial and industrial premises sporadically line the lefthand side of the road while a derelict and overgrown residential property is visible to the right. The view is representative of those experienced by motorists, pedestrians and workers in the area.</p>	Low	<p>The proposed apartment development will be partially visible in the middle distance rising above low-rise industrial units. It will introduce a slightly greater intensity and scale of development within the scene and also diversity of land use being clearly residential in nature. At this distance and in this complex and unconsolidated context the development does not contribute to a greater sense of integrity to the urban setting – it is just another built element. However, it does not detract from visual amenity either.</p> <p>Overall, the magnitude of visual impact is deemed to be Low and the quality of effect, Neutral.</p> <p>During winter months, there may be a hint of increased built volume beyond middle distance screening, however, it is such a subtle difference there will not be an increase in visual impact.</p>	Slight-imperceptible/ Neutral Permanent



Table 7 – Operational Phase Visual Effects

	Existing view	Sensitivity	Description and Magnitude of Visual impact	Significance
VP11	<p>View looking East from Long Mile Road</p> <p>The long Mile Road dual carriageway dominates the scene in the foreground. Streetlights, utility poles, and overhead wires are dispersed throughout the streetscape. The surrounding area features a mix of commercial and industrial buildings. Trees and hedgerows line the roadside, primarily on the opposite side of the road.</p> <p>The view is representative of those experienced by motorists and pedestrians and workers in the area.</p>	Low	<p>The proposed apartment development will rise prominently above roadside buildings and vegetation to the right of the road alignment in the middle distance. It will be one of the few bulky vertical forms in this predominantly low-rise horizontal setting. The architectural quality and material finish of the proposed development will also stand in contrast to the slightly tired and underutilised urban fabric that surrounds it. The development presents its tallest blocks confidently to the street frontage of the Long Mile road in an appropriate manner and then terraces down to the south and east in transition to the lower built form that surrounds the site in these directions.</p> <p>While it will stand in slight contrast to its surroundings in terms of form and function and will be something of an isolated sentinel in this 'Regen' zoned area in the short to medium term, further consolidation will occur over time in accordance with the considered master planning of the City Edge area.</p> <p>On balance of the factors outlined above, the magnitude of visual impact is deemed to be Medium, but of a Positive quality.</p> <p>No seasonal variation in impact.</p>	Slight/ Positive/ Permanent



Table 7 – Operational Phase Visual Effects

	Existing view	Sensitivity	Description and Magnitude of Visual impact	Significance
VP12	<p>View looking West from Long Mile Road / Walkinstown Ave</p> <p>This is essentially the reverse view to VP11 back along the Long Mile Road to the west at a similar distance from the proposed development site. The main difference is that being closer to the city, the foreground setting is more intensively developed and although still low-rise, has a stronger sense of consolidation and integrity. Both sides of the road are flanked by a range of commercial and industrial facilities. Utility poles and overhead wires are present throughout the view.</p> <p>The view is representative of those experienced by motorists and pedestrians and workers in the area.</p>	Low	<p>The proposed apartment development will rise prominently above roadside buildings and vegetation to the left of the road alignment in the middle distance. It will be one of the few bulky vertical forms in this predominantly low-rise urban setting. The architectural quality and material finish of the proposed development will also stand in contrast to the underlying and surrounding urban fabric. The development presents its tallest blocks confidently to the street frontage of the Long Mile road and terraces down slightly to the south and east in transition to the lower built form that surrounds the site in these directions.</p> <p>While it will be a departure from its surroundings in term of form and function in the short to medium term, further consolidation in the Regen Zone will occur over time in accordance with the considered master planning of the City Edge area.</p> <p>On balance of the factors outlined above, the magnitude of visual impact is deemed to be Medium and of a Positive quality.</p> <p>No seasonal variation in impact.</p>	Slight/ Positive/ Permanent



Table 7 – Operational Phase Visual Effects

	Existing view	Sensitivity	Description and Magnitude of Visual impact	Significance
VP13	<p>View looking East from Robinhood Road</p> <p>This is a view from the winding Robinhood Road as it approaches the Long Mile Road intersection. Both roads are characterised by industrial and commercial development. The view to the north is occupied by a low rise commercial warehouse with carparking to the fore and enclosed by an industrial Palisade fence.</p>	Low	<p>There is a marked change to this view as the proposed apartment blocks rise just beyond the retail warehouse site in the foreground and appear to wrap around it in an arc. There is a much greater sense of enclosure and intensity and scale of built development as a result. There is some sense of ambiguity between the existing foreground built form and proposed apartments and also a sense that it is the private side of the apartments (facing south) with a more homogenous finish that the street facing facades. Whilst there is a strong sense of increased utility and rejuvenation for the site the architectural and finish is not as striking as for the street facing aspects.</p> <p>While it will be a distinct departure from its surroundings in term of form and function in the short to medium term, further consolidation in the Regen Zone will occur over time in accordance with the considered master planning of the City Edge area.</p> <p>On balance of the factors outlined above, the magnitude of visual impact is deemed to be High-medium and of a Neutral quality.</p> <p>No seasonal variation in impact.</p>	Moderate-slight/ Neutral/ Permanent



Table 7 – Operational Phase Visual Effects

	Existing view	Sensitivity	Description and Magnitude of Visual impact	Significance
VP14	<p>View looking South West on Parkmore Estate Road</p> <p>This is a relatively enclosed view of low rise industrial units within and surrounding the site. An apron of car parking is found to the front of each premises and occasional mature Steet trees. There is a glimpse of the Dublin Mountains along the access road alignment.</p>	Low	<p>There is a dramatic change to this view as the proposed apartment blocks rise directly across the street from the viewer replacing the low rise industrial units within the site. There is a much greater sense of enclosure and intensity and scale of built development. However, it is a more consolidated form of development that starkly increases the utility of the site with high architectural design quality and finishes. It represents both a repurposing and rejuvenation of the site.</p> <p>While it will be a distinct departure from its surroundings in term of form and function in the short to medium term, further consolidation in the Regen Zone will occur over time in accordance with the considered master planning of the City Edge area.</p> <p>On balance of the factors outlined above, the magnitude of visual impact is deemed to be High and of a Positive quality.</p> <p>No seasonal variation in impact.</p>	Moderate/ Positive/ Permanent

8 POTENTIAL CUMULATIVE EFFECTS

- 8.1.1 Within a cumulative assessment, the baseline against which landscape and visual effects are assessed is extended to consider other relevant schemes that are not currently present but that are subject to a valid planning application (or have been permitted) as being operational. Cumulative effects therefore represent any increased effects that may be generated by the development in a scenario where other relevant schemes in the locality are operational.
- 8.1.2 In accordance with GLVIA3, schemes that are at feasibility and pre-planning are not generally considered to be appropriate in the context of a cumulative assessment due to a lack of certainty that they will come forward and because of an absence of detail that enable any meaningful judgements to be made. In this instance, however, there are two scenarios worthy of consideration. The first is the normal consideration of other permitted and under construction (recently constructed) projects. The second is the consideration of the future realisation of the City Edge strategic plan and how the proposed development would sit within that context. Each scenario will be considered below.
- 8.1.3 As is typical of any evolving urban environment, it is acknowledged that there are numerous development projects (and projects of scale) underway and planned in the wider urban area. In this instance there is a distinct concentration of recently constructed and permitted residential mixed use developments of considerable height contained within the study area and the same 'City Edge' development area as the proposed development, albeit the Dublin City Council portion of it. This concentration is centred on the Naas Road to the east (city) side of the R112 in the north-eastern quadrant of the study area. These include developments 1, 2, 3 and 4 in the list of relevant cumulative impacts provided below:

1. Plan Ref: 3228/20 – Mixed Use Development: Nissan Site (Commencing construction)
2. Plan Ref: 4238/19 – Mixed Use Development: Royal Liver Insurance Retail Park (Approved)
3. Plan Ref: ABP-304383-19 – Mixed Use: Concord (Constructed)
4. Plan Ref: 2203/18 – Carriglea Residential Development (Constructed)
5. Plan Ref: ABP-304686-19 – Residential Development: Elanora Court (Constructed)



Figure 9 Consented Planning Applications in the vicinity

- 8.1.4 The critical cumulative scenario in this instance is not so much to do with whether the proposed development, in combination with other similar scale developments, is contributing to an excessive accumulation of built development intensity and scale. It relates to whether the combination of recently constructed and approved high intensity residential mixed use development is successfully transforming

this low-rise urban hinterland area of commercial warehousing and industry into a more vibrant and liveable precinct of the city with a coherent and consistent urban fabric i.e. in line with the zoning and planning policies of this City Edge area.

- 8.1.5 Based on the standalone assessment of the proposed development against the existing baseline of the study area, it still feels somewhat isolated and out of place relative to its immediate low-rise and underutilised setting of sporadic commercial and industrial. This is on the basis that the nearest of the newly constructed / in-construction developments are around 300m away to the northeast and more closely connected the higher intensity parts of the central city. However, the development trend sought by the prevailing policy environment is beginning to emerge as an overt change in the urban fabric of the study area. Thus, the physical and visual isolation of the proposed development is a temporal issue that will be resolved with time. It is merely an early precedent in a likely evolution of this part of the city following the underlying 'Regen' policy context.
- 8.1.6 In order to understand how the proposed development would present within a future scenario of the City Edge plan being fully implemented, basic mass modelling of the intended building heights and plot ratios of the surrounding area was undertaken from a subset of the representative viewpoints used for the main visual impact assessment (VP1, VP2 VP11 and VP12).
- 8.1.7 From VP1 and VP2 the proposed development would be fully screened from view by future surrounding development. From VP11 and VP12, which look along the long-mile road, the streetscape would be completely transformed generating a much more enclosed urban setting. Within that setting, the proposed development presents with a consistent building height and consolidated form to the street frontage. This provides a more appropriate context for the proposed development, which is imply a forerunner to future planning objectives, wherein it appears slightly out of place at present, but will become more consolidated with similar development over the coming years.



Figure 10 Future context of 'City Edge' Plan realisation from VP11

- 8.1.8 For the reasons outlined above, it is not considered that the proposed development contributes to any significant and negative cumulative effects. Instead, it can be considered that it contributes positively to the desired evolution of this part of the city into a vibrant living quarter.

8.2 Urban Design and Building Height Guidelines

- 8.2.1 The proposed development has been designed in conjunction with the principles outlined in the City Edge design policies, and from a townscape and visual perspective are considered to respond positively to them. It is consistent with heights emerging in the surrounding townscape and consented through planning particularly within the north-eastern quadrant of the study area.
- 8.2.2 Material and architectural treatments set a desired new standard for an area currently characterised by low quality low-rise built development.
- 8.2.3 At the scale of the relevant city/town, the following is noted:
- The development is considered to make a positive contribution to the streetscape of Long mile Rd. and Walkinstown Ave, incorporating a vibrant, active relationship with the built form and internal spaces;
 - Built form has employed a variety of architectural treatments, material applications, set-backs, and height stepping, to generate variety and visual interest, and ensure the built form has a sensitive relationship with adjacent built form and streetscape.
- 8.2.4 At the scale of district/neighbourhood/street, the following is noted:
- Through a contextually sensitive design, the proposed built form responds to its urban environment and makes a positive contribution to the streetscape
 - The proposal has incorporated architectural treatments that break up the massing of the building and generate a scale that is consistent with underlying zoning objectives. In no instance does the built form have uninterrupted facades;
 - The proposal has considered in detail the opportunities to enhance the public realm and streetscape surrounding the building and significantly enhance the pedestrian experience.
- 8.2.5 At the scale of the site/building the following is noted:
- In terms of townscape and visual impacts, detailed consideration has been given to the form, massing and height of the building so that it sensitively integrates with the surrounding built context and underlying zoning objectives, and does not adversely influence streetscape views.

9 CONCLUSIONS

9.1 Townscape effects

- 9.1.1 Effects on townscape character will naturally occur as a result of the change to the site's character, current condition and use, and due to the intensity of built development on the site. Although the proposed development will result in a short-term **Moderate-slight / Negative** level of effect during the construction stage, the permanent operational phase level of effect is considered to be **Moderate-slight / Positive**.

9.2 Visual effects

- 9.2.1 With regard to proximate locations and visual receptors (represented by VP5, VP11, VP12, VP13 and VP14) which all fall within 300m of the site, the proposed development would naturally have a strong visual presence relative to the low-rise industrial development and two-storey residential context that

pervades the wider townscape. However, architectural treatments will help to reduce the perceived mass and prominence of the built form and integrate the building with its adjacent context. At these proximate locations, the level of effect is considered to range from **Moderate / positive at VP5 and VP13 to -Slight / Positive** at VP11 and VP12. At VP14, which is essentially a view into the more private sides of the development above a foreground of retail warehousing, the balance of factors results in a **Moderate-slight / Neutral effect**. In these instances the proposed development is seen as a distinct departure from the low-rise commercial and industrial uses that surround it, but a welcome departure that brings a higher quality of architectural design and materials as well as a more consolidated and contained streetscape. Importantly, it is perceived as the beginning of a transformative townscape evolution rather than an isolated and out of place development.

- 9.2.2 With regard to more distant locations and visual receptors, views of the development become more partial, and the proposed development influences the visual environment more marginally. At these more distant locations, the overall level of effect is considered to be **Slight or Imperceptible**, with a mix of effects being **Positive and Neutral** depending on whether the contribution to the visible townscape is legible or not. Seasonal variation in impact was considered through the production of photomontages in both summer and winter. At two of the views the increased winter visibility of structures through winter branches was deemed to increase the visual impact by one category of magnitude but without changing the quality of effect. At the remaining views, there was no material variation in seasonal effects.

9.3 Summary

- 9.3.1 The proposed development is not considered to give rise to any significant and negative townscape or visual impacts. Instead it is perceived as an early precedent in the zoned evolution of this low integrity / quality portion of the city where such development is to be welcomed. The only negative effects are considered to occur during construction and thereafter effects are deemed to be of either a positive or neutral quality and the overall significance largely determined by proximity and the degree of intervening visual screening.