

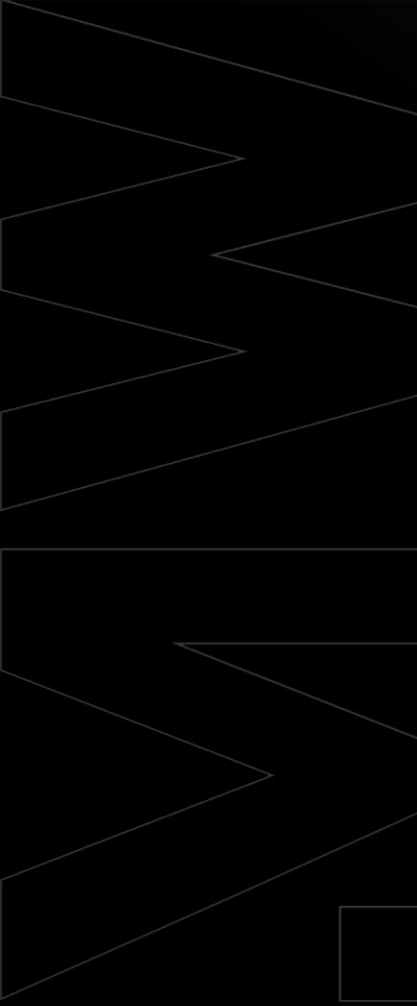
Townscape and Visual Impact Assessment

Proposed Blackpitts Student Housing Large-scale Residential Development

Prepared by Model Works Ltd for

Blackpitts Residence ULC

June 2025



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1.0 Introduction

This report assesses the potential townscape and visual impacts of a proposed student accommodation development on a site at Blackpitts and Donovan Lane, Dublin 6.

The report should be read in conjunction with the book of verified photomontages prepared by Horan Rainsford Architects, provided under separate cover.

1.1 Development Description

Planning permission is sought for a Large-Scale Residential Development delivering 217 student bed spaces (209 single rooms and 4 twin rooms, 213no. rooms in total), within one block. The blocks ranges in height up to 6 storeys with a basement below. All associated internal and external amenity space, including the provision of restaurant/café, on street carparking, cycle parking, landscaping, bin stores, service provision and all other associated site development works.

1.2 Townscape and Visual Impact Assessment Methodology

The assessment was carried out with reference to the Landscape Institute *Guidelines for Landscape and Visual Impact Assessment* 2013 (GLVIA), the Institute's Information Note *Townscape Character Assessment* 2017, and the EPA *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports* 2022. The assessment methodology, including definition of the terms and classifications, is provided in Appendix 1.

The European Landscape Convention defines landscape as “an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors”. The word ‘townscape’ is used to describe the landscape in urban areas. The GLVIA defines townscape as “the landscape within the built-up area, including the buildings, the relationships between them, the different types of urban spaces, including green spaces and the relationship between buildings and open spaces”. Since the subject site is within the urban area the word townscape is used in this report.

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

- Visual impact assessment is concerned with changes that arise in the composition of available views, the response of people to those changes and the overall effects on the area's visual amenity. The effects on 17 no. representative viewpoints in the receiving environment are assessed in Section 5, informed by verified photomontages (provided under separate cover).
- Townscape impact assessment is concerned with the effects of a proposed development on the *character and value* of the townscape as an environmental, cultural and economic resource. The potential effects on the townscape are assessed in Chapter 6.

1.2.1 Author Credentials

This report was prepared by Richard Butler (Bachelor of Landscape Architecture 1995, MSc Spatial Planning, 2007, Member of the Irish Landscape Institute, Member of the Irish Planning Institute) of Model Works Ltd. The author has over 25 years' experience in development and environmental planning, specialising in landscape/townscape and visual impact assessment (LVIA/TVIA). In the last number of years, he has prepared LVIA/TVIA reports and EIAR chapters for the following projects among others:

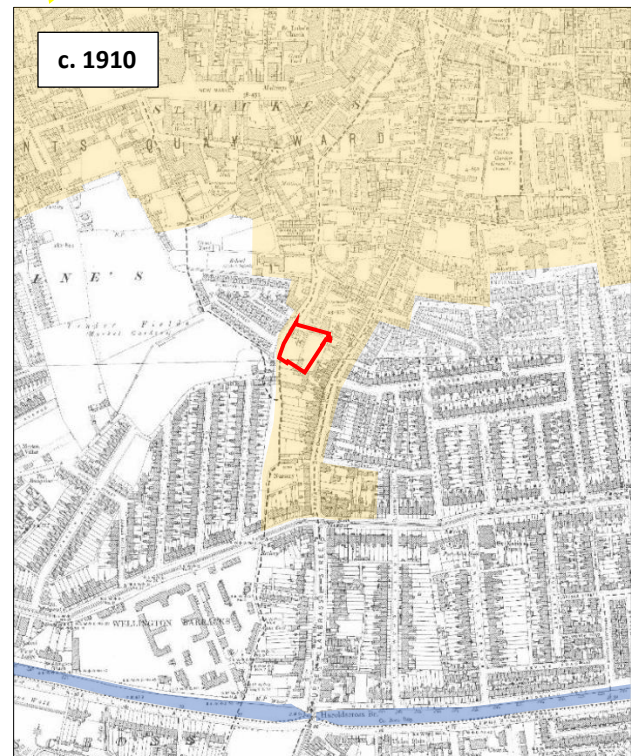
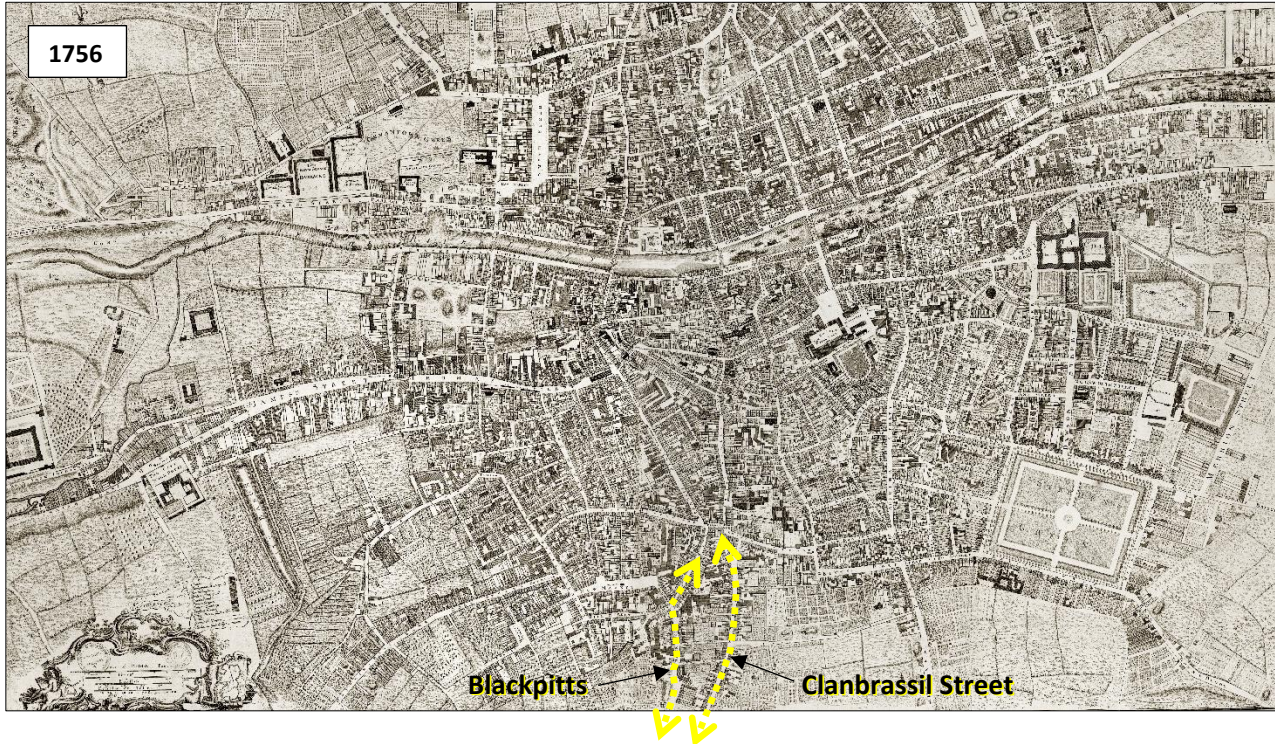
- Project Montrose LRD, former RTE lands, Donnybrook, Dublin;
- Prussia Street LRD, Stoneybatter, Dublin (student accommodation);
- Gowan House LRD, Naas Road, Dublin (student accommodation);
- Sandford Road LRD, Dublin;
- St Vincent's Hospital and Residential Development, Fairview, Dublin;
- Guinness Quarter, James's Street, the Liberties, Dublin;
- O'Devaney Gardens SHD, Dublin;
- Emmet Road SHD, Inchicore, Dublin;
- St Joseph's House and Adjoining Properties SHD, Brewery Road and Leopardstown Road;
- Newtownpark Avenue SHD, Blackrock, Co. Dublin;
- Pembroke Quarter (Irish Glass Bottle and Fabrizia sites) Phases 1, 1B, 2, A, Poolbeg West SDZ, Dublin;
- Dublin Arch (Connolly Quarter);
- Augustine Hill (Ceannt Station), Galway.

2.0 The Receiving Environment

2.1 Townscape Character

The site is located between Clanbrassil Street and Blackpitts at the southern edge of the Liberties area in Dublin. Clanbrassil Street is one of the original thoroughfares giving access to the city from the south. There has thus been - since medieval times - a strip of dense urban development on Clanbrassil Street, specifically on the west side of the street, while Blackpitts, parallel one block to the west, formed the urban edge.

Figure 1a-c: Rocques map (1756) and OS 6 inch and 25 inch maps (mid 19th and early 20th centuries) showing the strip of urban development on the west side of Clanbrassil Street, with Blackpitts forming the urban edge



The OS 25 inch map (surveyed 1897-1913 - Figure 1c, bottom right above) shows the significant change that occurred during the Victorian period as the former agricultural lands outside of the built-up area began to be developed into fine-grained residential neighbourhoods, often adjacent to industrial lands. This resulted in the distinctive mixed character of the Liberties townscape, with juxtapositions in land use, urban grain, building typologies, scale and architecture. Blackpitts is one of the places where this occurred, with distinctly 'urban' development (coarse grained, large-scale, mixed use) on the east side of the street, and fine-grained residential development on the west side. The site lies on the east side of Blackpitts and forms part of the area of urban character.

Approaching the turn of the 21st century, many of the former industrial premises in the area went out of use, leading to dereliction but also opportunities for redevelopment. A new phase in the evolution of the townscape began, encouraged by DCC's Liberties Local Area Plan 2009. The large former industrial plots with precedent for large buildings, coupled with the area's central location in the city, provided opportunities for meaningful densification through increased height.

This ongoing change has amplified the mixed townscape character of the Liberties area. There are now numerous examples of contemporary high density development located alongside fine-grained, smaller scale neighbourhoods. Such diversity creates capacity to accommodate further change, as (a) there is no norm with which new development can or should conform, and (b) the area is already characterised by juxtapositions.

Figure 2: Aerial photo showing the area of distinctly 'urban', mixed use, mixed-to-high density, modern development extending south from the Liberties between Clanbrassil Street and Blackpitts



Photos 1, 2: Examples of juxtapositions in development era, typology, scale and architecture in the Liberties area



Photos 3, 4: A seven storey development on Blackpitts to the north of the site



2.2 The Site

The site has frontage of approximately 42m to Blackpitts to the west, and 45m to Donovan Lane to the north. It is currently occupied by a modern (late 20th century) warehouse and office building set back from Blackpitts behind a service yard, with a security fence on the boundary. Along Donovan Lane the building fronts the street. The building is equivalent to three storeys in height and clad in red brick. The architecture is utilitarian.

The building, service yard and boundary fence are unsightly. They detract from the character and quality of the surrounding streets and townscape, and from visual amenity locally. The site frontage to both streets is dead (lacking active uses and entrances), and the development makes no contribution to passive surveillance of the public realm.

Figure 3: The site and immediate environs



Photo 5: The existing building behind the security fence and service yard on Blackpitts



Photo 6: The frontage to Donovan Lane



Photo 7: Blackpitts outside the site, showing (a) the existing development's negative contribution to the streetscape and visual amenity, and (b) the mixed character of the area – particularly the pronounced difference between the east and west sides of the street



2.3 Potential Receptors of Townscape and Visual Change

The key elements and character areas surrounding the site – i.e. the main potential receptors of change – are as follows:

- Clanbrassil Street
- Portobello neighbourhood east of Clanbrassil Street
- Donovan Lane
- Blackpitts
- The Victorian residential neighbourhood west of Blackpitts

Figure 4: Key elements and character areas in the receiving environment



2.3.1 Clanbrassil Street Corridor

Clanbrassil Street is a key thoroughfare providing access to the city centre from the south. The street is wide, with two traffic lanes in each direction, a central median, and cycle lanes and wide footpaths on both sides. On its west side the street is enclosed by modern, mixed use buildings up to five storeys tall (one of these buildings lies between Clanbrassil Street and the site). On its east side the buildings are older and smaller, but also mixed use. As a potential receptor of townscape/visual change, Clanbrassil Street is not sensitive. Its character is mixed, so there is capacity to accommodate change, and visual amenity is limited.

Photos 8, 9: Clanbrassil Street in the vicinity of the site



2.3.2 Portobello East of Clanbrassil Street

To the east of Clanbrassil Street is Portobello. This is a Victorian neighbourhood characterised by a fine urban grain and small, terraced, red brick houses. Due to its uniformity Portobello has a strong townscape character. It is thus sensitive to change within, but, due to its central position in the city, it is tolerant of change in the surrounding townscape. It is not unusual to see large, modern buildings from the streets of Portobello, and this does not detract from its character. Although well removed from the subject site and buffered from it by Clanbrassil Street, some of the streets (e.g. Lombard Street West) are aligned with the site. Tall development on the site could thus be visible from the area.

Photos 10, 11: Views along the streets of Portobello, showing the strong character of the neighbourhood, but visibility of different development typologies in the surrounding townscape



2.3.3 Donovan Lane

Donovan Lane is a narrow street connecting Clanbrassil Street and Blackpitts. The street is enclosed on its south side by the existing building on the site and a neighbouring four storey apartment building. This street elevation is unsightly. On the north side of the street is another four storey modern apartment building, but also the repurposed St Kevin's national school (converted apartments) and a recent townhouse development of three storeys. These buildings on the north side lend some quality and visual interest to the street. The diversity of development on Donovan Lane creates capacity to accommodate change, and the street could benefit from redevelopment of its main detractor, the site in its current use/condition.

Photos 12, 13: Views west and east along Donovan Lane showing the unsightly, dead-fronted southern elevation, and the higher quality northern elevation



2.3.4 Blackpitts

Blackpitts has a winding alignment and as a result the street corridor is of varying width. There are variations in level across the street in places, notably opposite the site, where there is a retaining wall on the west side (the level rising up to Hammond Street and St John's Street). The variety of uses along the street (historically and currently) has resulted in diverse plot and building typologies, scale and architecture. All these factors combined generate a particularly complex, urban townscape in the Blackpitts corridor, with diversity and juxtapositions the main characteristics. This translates into capacity for change, as there are no norms with which new development can or should conform.

Photos 14, 15: Views along the southern stretch of Blackpitts in the vicinity of the site

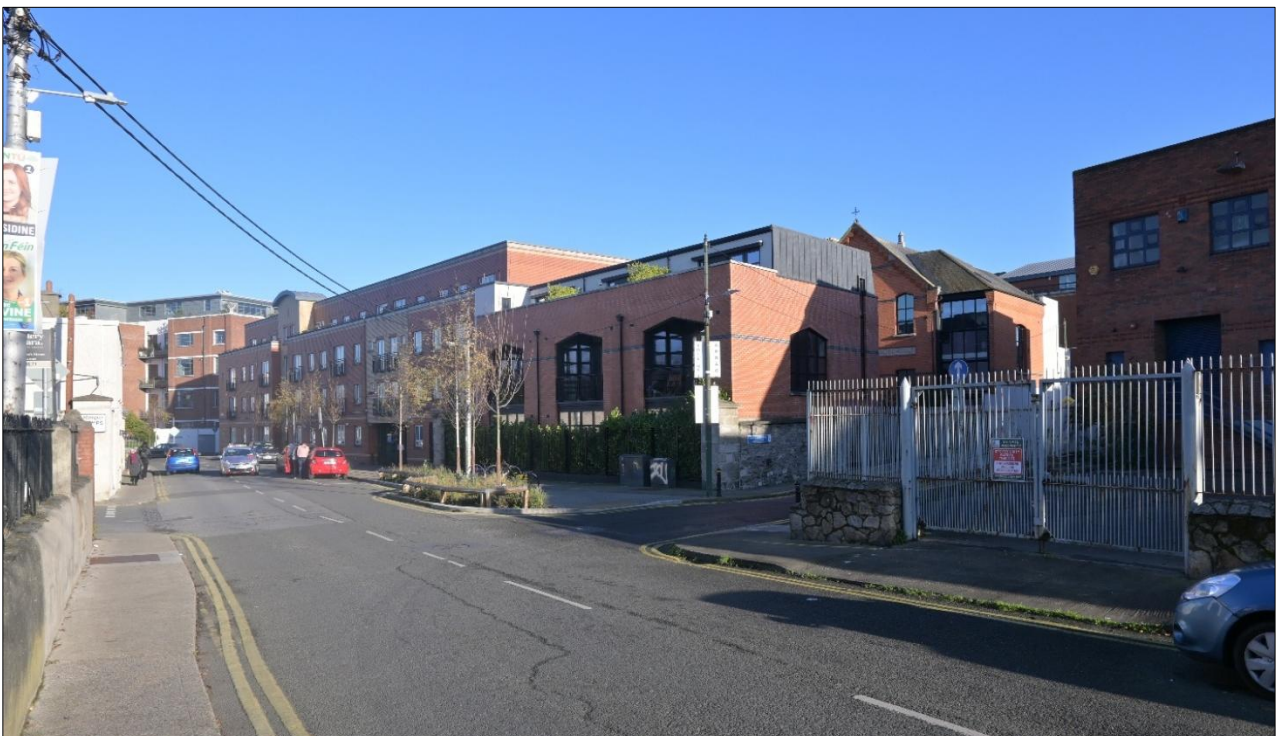


Photo 16: A view along the middle stretch of Blackpitts just north of the site



Photo 17: A view south along Blackpitts, towards the site, showing the street's winding alignment and the characteristic mix of development typologies, scale and architecture



2.3.5 Victorian Neighbourhood West of Blackpitts

The change in character between the east and west sides of Blackpitts is pronounced. To the west is a Victorian neighbourhood of similar character to Portobello, with a fine urban grain, narrow streets, and terraced houses of one and two storeys, mostly of red brick. Directly across Blackpitts from the site are Greenville Parade, St John's Street and Hammond Street. These streets all have direct, unobstructed views of the site and are the key receptors of potential change in the receiving environment. Streets further to the south west, e.g. Clarence Mangan Road, Greenville Avenue, Raymond Street and St Alban's Road, are not directly visually exposed, but taller development on the site may be visible from these streets.

Photos 18, 19: Views towards the site, across Blackpitts, from St John's Street



Photos 20, 21: A view from the elevated western end of Hammond Street, and from Greenville Terrace directly across Blackpitts from the site



Like Portobello, this area west of Blackpitts has a strong townscape character due to the uniformity of development typology and architecture. However, it is a city centre neighbourhood and therefore it interfaces with a variety of development types around its boundaries. This is most pronounced along the Blackpitts boundary. There is thus capacity for change with no loss of valued character along this edge.

The assessment of visual and townscape and impacts in Sections 5 and 6 of this report focuses on the elements and areas described in 2.3.1-2.3.5 above.

3.0 Relevant Policy

3.1 National Policy

3.1.1 National Planning Framework

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

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

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

3.1.2 Urban Development & Building Height Guidelines

The Guidelines state: *"Implementation of the National Planning Framework requires increased density, scale and height of development in our town and city cores...*

"to meet the needs of a growing population without growing our urban areas outwards requires more focus in planning policy and implementation terms on reusing previously developed 'brownfield' land, building up urban infill sites... and either reusing or redeveloping existing sites and buildings that may not be in the optimal usage or format taking into account contemporary and future requirements..."

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

At the scale of the relevant city/town:

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

At the scale of district/neighbourhood/street:

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

It is noteworthy that the Height Guidelines allow for taller development even within 'architecturally sensitive areas', subject to the development responding appropriately to its context.

The national policy above is quoted as it has implications for the composition and appearance of our urban areas. The policy *encourages* taller buildings than heretofore in the city core, especially on brownfield sites not in 'optimal usage or format'. National policy puts a responsibility on all parties - including the land owner and planning authorities - to seek to optimise the land use yield from such sites in the interest of sustainable development.

3.2 Dublin City Development Plan 2022-2028

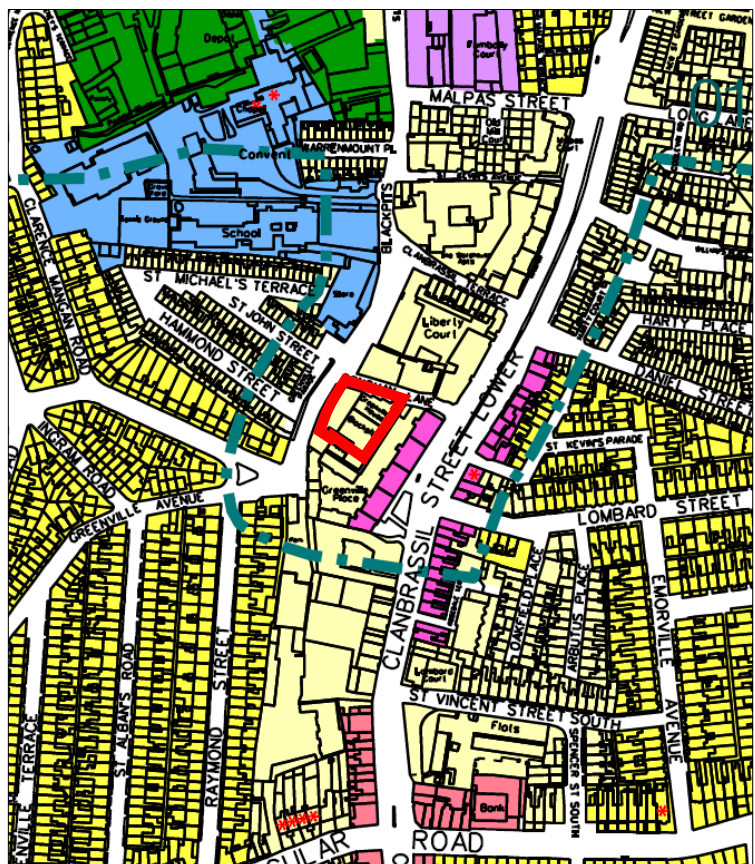
3.2.1 Land Use Zoning

The Dublin City Development Plan 2022-2028 (DCDP) zones the site Z1 'Sustainable Residential Neighbourhoods', with the objective: "To protect, provide and improve residential amenities".

The DCDP states: "The vision for residential development in the city is one where a wide range of high quality accommodation is available within sustainable communities, where residents are within easy reach of open space and amenities as well as facilities such as shops, education, leisure and community services. The objective is to ensure that adequate public transport, in conjunction with enhanced pedestrian and cycling infrastructure, provides such residential communities good access to employment, the city centre and the key urban villages in order to align with the principles of the 15-minute city." [emphasis added]

Also of note on the zoning map are the following:

Figure 5: Dublin City Development Plan 2022-2028 land use zoning



- The Z4 Key Urban Villages/Urban Villages zoning adjacent to the east of the site, on Clanbrassil Street;
- The Z3 Neighbourhood Centre zoning just to the south around the South Circular Road junction;
- The Z2 Residential Neighbourhoods (Conservation Areas) zoning of Portobello to the east of Clanbrassil Street, and an extensive area to the south west of the site;
- The Z1 Sustainable Residential Neighbourhoods (not Conservation Areas) zoning of the streets immediately west of the site across Blackpitts. This is the residential area most visually exposed to the site.
- Large areas of Z6 Employment/Enterprise and Z10 Inner City Sustainable Mixed Uses zoning on Blackpitts to the north of the site.
- There are extensive Z15 Community and Social Infrastructure zoned areas in close proximity to the site, most notably Griffith College, which is less than 500m (5 minutes) walk from the site.

The site is thus well located with respect to local retail and services, employment, education, public transport and access to the city. It is also only minutes' walk from the Grand Canal and St Stephen's Green for access to green infrastructure. These are drivers for sustainable residential use of the site.

3.2.2 Urban Consolidation and Density

Section 4.5.3 of the DCDP states: *"The NPF recognises that there is a need to increase densities on underutilised lands within core urban areas in order to promote consolidation and compact growth, prevent further sprawl and address the challenges of climate change..."*

"The RSES and Dublin MASP also promotes greater densification and more intensive forms of development particularly on infill, brownfield and underutilized lands along key strategic public transport corridors...

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

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

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

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

[emphasis added]

3.2.3 Urban Design and Architecture

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

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

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

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

3.2.4 Conservation Areas

There are no red-lined Conservation Areas (CAs) or Architectural Conservation Areas (ACAs) in the vicinity of the site. The nearest such area is Newmarket Square (CA) beyond the northern end of Blackpitts. The proposed development could have no impact on that area. There are however Z2 Residential Conservation Areas in the vicinity of the site, which could be affected by the proposed development.

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

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

Enhancement opportunities may include:

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

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

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

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

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

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

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

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

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

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

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

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

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

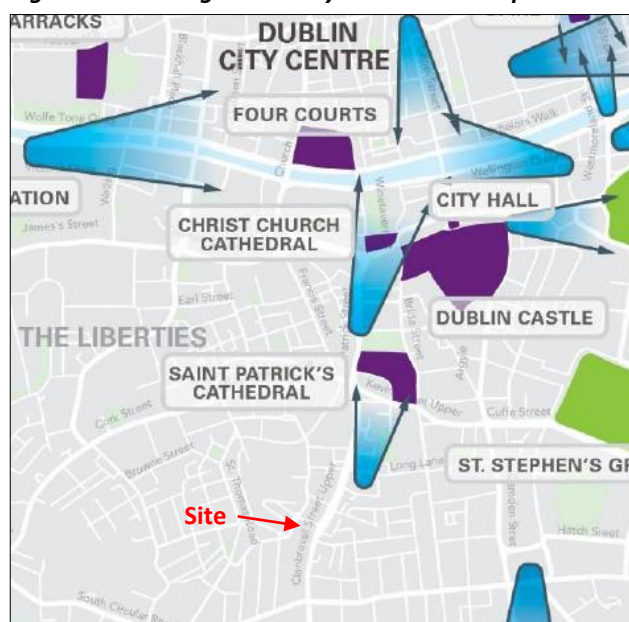
3.2.6 Overlooking and Overbearance

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

3.2.7 Key Views and Prospects

Figure 4-1 of the DCDP identifies the Key Views and Prospects in the city. There are no views and prospects identified in the vicinity of the site or potentially affected by the proposed development.

Figure 6: DCDP Figure 4-1 Key Views and Prospects



The above policy has informed the analysis and sensitivity classification of the receiving environment, the selection of viewpoints for visual impact assessment, the analysis of the proposed design, and the assessment of significance of the potential visual and townscape impacts in Sections 5 and 6 of this report.

4.0 Proposed Development

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

4.1 Layout and Built Form – Response to Context

- The proposed development comprises a single building of up to six storeys + rooftop plant.
- The building takes the form of a perimeter block, adopting the shape of the site (including a crank in the west elevation reflecting the winding alignment of Blackpitts).
- The building therefore has frontage to Blackpitts to the west (unlike the existing warehouse/office building, which is set back behind a service yard) and Donovan Lane to the north, with an internal courtyard positioned against the east boundary.
- Along the Blackpitts frontage the building is four storeys tall at the street-front, with two further floors set back behind the shoulder. The four storey street-front height responds to the neighbouring three storey apartment building to the south (to avoid an excessively pronounced step in height in the street elevation).
- Along Donovan Lane the building is five storeys at the street-front, with one additional floor set back behind the shoulder. The five storey street-front height responds to the neighbouring four/five storey apartment building to the north. (The fall in street level alongside the neighbouring building adds approximately one floor to its height.)
- At the corner of Blackpitts and Donovan Lane there is an accent volume of six storeys – to mark the junction and the building’s main entrance. The entrance recessed beneath the overhanging accent volume. This geometry adds visual interest to the built form.

Figure 7: The west elevation fronting Blackpitts (top) and the north elevation fronting Donovan Lane (bottom)

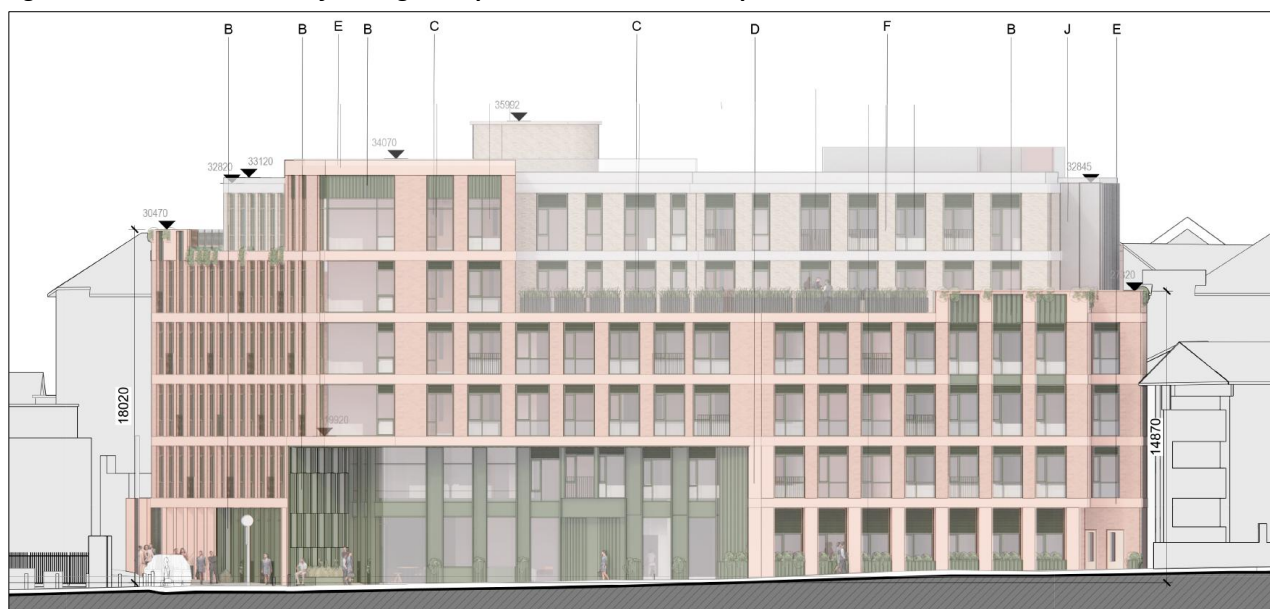


4.2 Façade Treatment

- The predominant facade material is light red brick, with the floor plates expressed in bands of terracotta/sandstone tile.
- Above the street-front shoulder, the upper floors are of light grey brick with concrete bands. The intention of the lighter colouring is to complement the setback of the upper floors to minimise their visual presence.
- The walls are punctured by grids of large (floor to ceiling height) window opes, with the aluminium framed windows deeply recessed, giving the facades a three-dimensional quality.
- The main entrance to the building is at the corner of Blackpitts and Donovan Lane, recessed beneath the cantilevered six storey accent volume. The ground and first floor façade around the entrance, wrapping around the corner, is clad in green faience. This is a glazed ceramic material. The combination of the recessed glossy green façade beneath the cantilevered red brick accent volume is intended to highlight the entrance in the building – and the building in the street elevation and wider townscape (for legibility).
- The faience material is used for detailing elsewhere in the facades.
- Aside from the entrance/corner detail, the ground floor is differentiated from the upper floors by terracotta/sandstone tiling and variations in fenestration design. These variations reflect the different uses in the ground floor, for example the restaurant/café, the reception and common area, the library/study, etc.

In summary, the proposed building is characterised by (a) a strong form, which responds to its place in the townscape and variations of scale in its context, (b) highly articulated facades, with variations in design and materials complementing the disaggregated form, and (c) a high quality materials palette (brick, stone tile, faience, metal). The design is a highly refined, bespoke response to the site opportunity and the townscape context, and results in a building of singular architectural character.

Figure 8: The west elevation fronting Blackpitts, and the materials palette

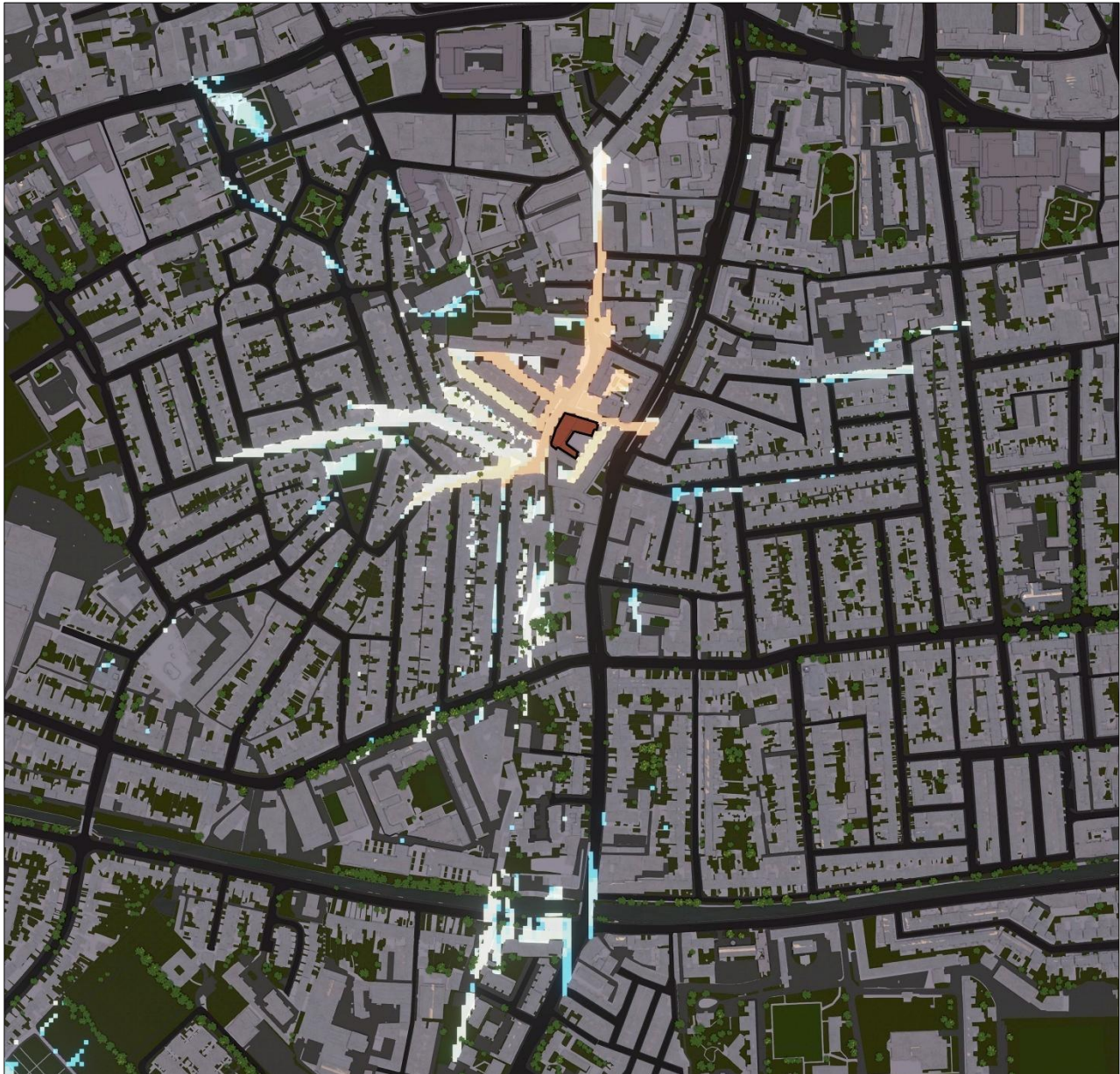


| | | | |
|---|----------------------------------------------------------------------------|---|---------------------------------------------------------|
| A | Proposed Double/Triple Glazed Windows with Aluminium Cills to selected RAL | G | Proposed Cast Concrete Banding / Capping |
| B | Proposed Green Faience Facade | H | Proposed Metal Balustrade, RAL to match Faience |
| C | Proposed Light Red Brick to be selected | I | Proposed Glass Balustrade |
| D | Proposed Terracotta / Sandstone tile facade | J | Proposed Dark Grey Zinc Façade, RAL to be selected |
| E | Proposed Terracotta / Sandstone Banding/Capping | K | Proposed Green Metalwork Planters, RAL to match Faience |
| F | Proposed Light Grey / Buff Brick to be selected | | |

5.0 Visual Impact Assessment

To inform the identification of viewpoints for visual impact assessment, a Zone of Theoretical Visibility (ZTV) map was produced for the proposed development. A ZTV shows the area from which a proposed building would be visible, taking account of the topography and existing built form around the site.

Figure 9: Zone of Theoretical Visibility map for the proposed development



The map shows that the ZTV is relatively limited in extent due to the site being hidden behind the buildings fronting Clanbrassil Street to the east and south. However, in the immediate environs to the west and north of the site, it would cause a high magnitude of visual change. Its impacts would be concentrated on the adjacent streets, Blackpitts and Donovan Lane, and the residential area directly to the west, including Greenville Parade, St John's Street, Hammond Street, Clarence Mangan Road and Greenville Avenue.

Taking account of the ZTV and the analysis of the receiving environment (Section 2.3 above), 17 no. viewpoints were selected for visual impact assessment informed by verified photomontages (see Figure 10 below). The viewpoints were also selected so that the photomontages would provide visualisations of the proposal from a range of directions and distance from the site.

Table 1: Viewpoints for visual impact assessment


| Townscape/Visual Receptors | Viewpoints |
|------------------------------------------------------------|------------------------|
| Clanbrassil Street | 1, 2, 3, 4 |
| Portobello neighbourhood east of Clanbrassil Street | 5, 6 |
| Donovan Lane | 7 |
| Blackpitts | 8, 9, 10, 11 |
| The Victorian residential neighbourhood west of Blackpitts | 12, 13, 14, 15, 16, 17 |


Figure 10: Viewpoints for visual impact assessment




The effects on the viewpoints are assessed in Table 2 below. For the methodology, terms and criteria used in the assessment refer to Appendix 1. The assessment should be read in conjunction with the verified photomontages produced by Horan Rainsford Architects, provided under separate cover.


Table 2: Visual effects assessment

| No | Viewpoint Location | Existing View | Sensitivity | Proposed View | Magnitude of Change | Significance of Effects |
|--------|-------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|-------------------------|
| 01 | Clanbrassil Street travelling south from the city centre | <ul style="list-style-type: none"> Clanbrassil Street is enclosed on its west side by mostly modern, multi-storey (4-5 storey), residential and mixed use buildings. The large buildings, modern architecture, mix of uses and the width of the street give Clanbrassil Street a 'modern city-centre thoroughfare' character. This townscape, and views along the street, have a high capacity to accommodate change. | Low | <ul style="list-style-type: none"> The proposed development would not be visible over the street-front roofline. Significance of effect: No effect. | None | No effect |
| 02 | Clanbrassil Street at Donovan Lane junction | <ul style="list-style-type: none"> This is the only view from Clanbrassil Street at which the proposed development would be visible. The narrow entrance to Donovan Lane is flanked by two modern apartment buildings of four storeys, both clad in red brick. Ground level falls rapidly from Clanbrassil Street along Donovan Lane, so that the building on the left side of the lane (between the site and Clanbrassil Street) is effectively five storeys tall, with a blank façade at street level. <u>The existing building on the site can be seen towards the bottom end of the lane. The building is low (equivalent to three storeys) and lacks articulation of form and facades. It also has no windows or entrances at street level, so that it combines with the neighbouring apartment building to give the south side of Donovan Lane a dead frontage.</u> <u>The existing building on the site, the street elevation, and the streetscape of O'Donovan Lane are all unsightly and could benefit from change.</u> | Low | <ul style="list-style-type: none"> The proposed development replaces the unsightly industrial premises towards the far end of the lane. With the drop in level along the lane, the building (five storeys at the street-front) is approximately the same height as the neighbouring apartment building. The six storey accent volume can be seen at the far corner, marking the Blackpitts junction where the main entrance is located. The set-back sixth storey is visible above the street-front shoulder. This volume is lighter in colour to reduce its visual presence. In addition to disaggregated form, the facades are articulated by a grid of strongly expressed floor plates and recessed windows – giving the building a three-dimensional quality and reducing the perceived massing. In keeping with the surroundings, the predominant material is red brick, but the pale colour sets the building apart from the neighbouring buildings and softens its presence. The ground floor is differentiated by a variation in material (terracotta/sandstone tiles).  <ul style="list-style-type: none"> Seen at an acute angle between the Clanbrassil Street buildings, the magnitude of change is medium. Significance of effect: Slight positive. <ul style="list-style-type: none"> The development would replace the main detractor in the view (the existing building) with a building of contemporary urban character and scale, and high quality architecture and materials. The building is appreciably responsive to its context in form, height, design and materials. The appearance of the site would be improved, as would the character and visual amenity of Donovan Lane as a whole. | Medium | Slight positive |
| 03, 04 | Clanbrassil Street travelling north towards the city centre | <ul style="list-style-type: none"> Clanbrassil Street is enclosed on its west side by mostly modern, multi-storey (4-5 storey), residential and mixed use buildings. The large buildings, modern architecture, mix of uses and the width of the street give Clanbrassil Street a 'modern city-centre thoroughfare' character. This townscape, and views along the street, have a high capacity to accommodate change. | Low | <ul style="list-style-type: none"> The proposed development would not be visible over the street-front roofline. Significance of effect: No effect. | None | No effect |

| No | Viewpoint Location | Existing View | Sensitivity | Proposed View | Magnitude of Change | Significance of Effects |
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| 05 | Lombard Street West, Portobello | <ul style="list-style-type: none"> Towards its western end a dogleg in the alignment of Lombard Street West opens the view towards the site (which is in the distance beyond the building fronting Clanbrassil Street). The view is framed by the distinctive terraced Portobello cottages in the foreground, and in the middle distance is the four storey mixed use building that stands between Clanbrassil Street and the site. The view shows (a) the strength of character of Portobello internally (illustrating the reason for its Z2 Residential Conservation Area zoning), and (b) the abrupt change of character that occurs around its edges. These existing juxtapositions create capacity to accommodate further change <u>outside of</u> the historic residential neighbourhood. Hence the medium sensitivity classification of the view. | Medium | <ul style="list-style-type: none"> The top of the proposed building protrudes very marginally above the roofline of the modern, four storey mixed use building on the far side of Clanbrassil Street. This constitutes a negligible magnitude of change. Significance of effect: Not significant neutral. <ul style="list-style-type: none"> Located well outside of the sensitive Portobello area in the foreground, and intruding very marginally in the view, the development would cause no significant change to the character or quality of the view. | Negligible | Not significant neutral |
| 06 | St Kevin's Parade, Portobello | <ul style="list-style-type: none"> St Kevin's Parade is aligned precisely with the site and is the area in Portobello that would experience the greatest visual impact (see ZTV map, Figure X above). The view is framed by terraced two storey houses in the foreground. At the end of the street is a terrace of cottages, and the four storey mixed use building on Clanbrassil Street rises behind the cottages. The view shows (a) the strength of character of Portobello internally, and (b) the change of character that occurs around its edges. These existing juxtapositions create capacity to accommodate further change <u>outside of</u> the historic residential neighbourhood.  | Medium | <ul style="list-style-type: none"> The top of the proposed building protrudes marginally above the roofline of the modern, four storey mixed use building on the far side of Clanbrassil Street. The upper levels of the proposed building are light grey in colour to minimise its visual presence, and the view shows this to be effective. The change (a) occurs outside of the sensitive Portobello area in the foreground, (b) affects a modern element of the view, not a valued or sensitive part of the composition, and (c) is a minor intrusion. Significance of effect: Not significant neutral. <ul style="list-style-type: none"> Located well outside of the sensitive Portobello area in the foreground, and intruding only marginally in the view, the development would cause no significant change to the character or quality of the view. | Negligible | Not significant neutral |
| 07 | Donovan Lane | <ul style="list-style-type: none"> Donovan Lane is a narrow street lined by a variety of buildings: <ul style="list-style-type: none"> On the south side is a four storey apartment building (foreground left in the view), which due to the drop in level along the street is effectively five storeys tall, with a blank concrete façade at street level. Beyond that is the site, occupied by an unsightly industrial/warehouse building approximately three storeys tall. There are no entrances to either building, so the elevation to the street is a dead frontage. On the north side is a modern 4/5 storey apartment building, a handsome repurposed historic school building (see Photo 13) and a recent townhouse development which presents its courtyard parking area to the street. The site is the main detractor to visual amenity and the main contributor to Donovan Lane's poor suboptimal performance as a streetscape and a part of the public realm. <u>The existing building, the southern street elevation, and the streetscape of O'Donovan Lane are unsightly and could benefit from change.</u> | Low | <ul style="list-style-type: none"> The proposed development replaces the unsightly industrial premises occupying the western stretch of the street. The building is five storeys at the street-front, with a set-back four storey volume facing the neighbouring apartments, stepping down the scale and articulating the form. The six storey accent volume can be seen at the far corner, marking the Blackpitts junction. This is where the main entrance is located beneath a corner overhang. The set-back lighter coloured sixth storey can just be seen over the five storey shoulder (and would not be visible from across the street). This element has very little visual presence, showing the effectiveness of the setback. In keeping with the surroundings, the predominant material is red brick, but the pale colour sets the building apart from its neighbours and softens its presence. The ground floor is differentiated by a variation in material (terracotta/sandstone tiles). The magnitude of change is high. Significance of effect: Moderate positive. <ul style="list-style-type: none"> The development would replace the main detractor in the view (the existing building) with a building of contemporary urban character and scale, and high quality architecture and materials. The building reads as five storeys tall (similar in height to the two apartment buildings in the foreground). It does not appear excessively tall for its context and there is no sense of excessive enclosure of the street. Streets of such enclosure are not unusual, nor undesirable in the 21st century city centre. The appearance of the site would be dramatically improved, and the character and visual amenity of Donovan Lane as a whole would be enhanced. | High | Moderate positive |

| No | Viewpoint Location | Existing View | Sensitivity | Proposed View | Magnitude of Change | Significance of Effects | |
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| 08 | Blackpitts junction with Clarence Mangan Road | <ul style="list-style-type: none">The view is taken from the southern end of Blackpitts at its junction with Clarence Mangan Road and Greenville Avenue.To the left across the street is a two storey house at the bottom end of Clarence Mangan Road. This is the eastern edge of the residential neighbourhood that extends to the west of Blackpitts.The view shows the winding alignment of Blackpitts, which results in a street characterised by built enclosure (as the bends in the street close the vista).To the right is a late 20th century three storey apartment building, which hides the existing building on the site from view. Due to the setback of the building behind the service yard, only the boundary fence along the site frontage can be seen. Beyond the site are a series of modern high density residential buildings ranging from three to five storeys and of varying architectural styles (but all featuring red brick).A buildings on the street frame a church spire in the distance.<u>This view illustrates the split character of Blackpitts, with an inner city period residential neighbourhood to the west and a modern, high density neighbourhood to the east. The townscape to the east has considerable capacity to accommodate change. The area to the west, while sensitive to internal change, already interfaces with a townscape of very different character and scale. There is thus some tolerance for change.</u> | Medium | <ul style="list-style-type: none">The site is occupied by a new building of contemporary urban typology, scale and architecture.The building is four storeys at the Blackpitts streetfront, with two further storeys set back behind the shoulder. Steps in the building line of the south elevation disaggregate the form.The main body of the building is of pale red brick and the upper volume light grey, combining with its setback to reduce its visual presence. Part of the south elevation to the right is clad in metal.The streetfront facade is articulated by a grid of recessed windows and strongly expressed floor plates. The design gives the façade a three-dimensional quality and reduces the perceived massing.There is an increase in built/visual enclosure of the street, but the degree of enclosure is not unusual for the city centre. The building bears similarities (in height, form and materials) to the building visible in the middle distance along Blackpitts.The church spire remains as the focal point of the view along the street.Significance of effect: Moderate positive.<ul style="list-style-type: none">While the building would be a prominent addition to the view, it would take its place comfortably in the modern, high density neighbourhood on the east side of the street, and cause no significant change in townscape character.The quality of architecture and materials are superior to the earlier modern buildings in this area (including the apartments in the foreground). Therefore, there would be a net improvement in the built environment.(It is only due to the fact that the existing building can’t be seen in this view that the impact is not classified positive.)While taller than the neighbouring buildings, when seen in the context of the street elevation the step in height is not overly pronounced. Such variation is not unusual in this part of the city; it derives from the area’s particular history (see Section 2.1 above) and it is the realisation of compact growth policy. | Medium-High | Moderate neutral | |
| 09 | Blackpitts approaching site from south | <ul style="list-style-type: none">This view is taken a short distance to the north of View 08, on Blackpitts, approaching the site’s south west corner.The three storey apartments are in the foreground to the right, and to the left is the gable wall of a house across the road from the site. This illustrates an important aspect of the receiving environment. The only houses presenting their front or rear facades (i.e. their principal views) towards the site are the houses of Greenville Parade, which are 22m+ from the site, separated from it by two roads (Blackpitts and Greenville Parade itself). The other nearby houses, on Blackpitts, Hammond Street, St John’s Street and Donovan Lane, do not have direct views of the site from their front or rear windows.For a city centre street, the development typology is unfortunate (and unsustainable), and the site’s contribution to the streetscape is negative. |  | Medium | <ul style="list-style-type: none">The site is occupied by a new building of contemporary urban typology, scale and architecture.<u>The building is four storeys at the streetfront, with two further storeys set back behind the shoulder. This makes the building read as approximately five storeys tall. An accent volume at the far corner rises to six storeys, marking the main entrance at the Donovan Lane junction.</u><u>The increase in height on the site combined with the building’s street-front position (typical for an urban street) causes a significant increase in built/visual enclosure on this stretch of the street. Such a degree of enclosure is not unusual for the city centre.</u> The building appears similar in typology and scale to the building visible in the middle distance along Blackpitts.<u>The crank in the west elevation (reflecting the distinctive winding alignment of Blackpitts), the setback above the four storey shoulder, the pop-up volume at the Donovan Lane corner, and the cantilever over the entrance disaggregate the massing and add visual interest to the building.</u>The grid of recessed windows and expressed floor plates give the façade a three-dimensional quality, further reducing the perceived massing.Significance of effect: Moderate positive.<ul style="list-style-type: none">The building would be a prominent addition to the streetscape, reinforcing the character of the area east of Blackpitts, and the variation that occurs between the east and west sides of the street.While there would be an increase in built/visual enclosure, (a) the degree of enclosure is not unusual or excessive for the city centre location, and (b) there are no houses (or other sensitive receptors) directly across the street.The quality of architecture and materials are such that the there would be a net improvement in the built environment and visual amenity. | Medium-High | Moderate positive |

| No | Viewpoint Location | Existing View | Sensitivity | Proposed View | Magnitude of Change | Significance of Effects |
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| 10 | Blackpitts approaching site from north | <ul style="list-style-type: none"> This view is taken a short distance to the north of the site, beside the junction of Blackpitts and St John's Street. In the foreground to the left is a terrace of three storey townhouses at the corner of Blackpitts and Donovan Lane. Beyond that junction is the site, with the warehouse/office building set back from the street behind a service yard, and security fencing on the boundary. <u>For a city centre street, the development typology is unfortunate (and unsustainable), and the site's contribution to the streetscape and visual amenity is negative.</u> Beyond the site is the gable wall of a modern, three storey apartment building. Greenville Parade can be seen running parallel to Blackpitts opposite the site, with a retaining wall between the two roads. The houses of Greenville Parade are out of view to the right. <u>This shows the separation distance between the site and the nearest houses that face the site.</u> This view again illustrates the split character of Blackpitts, with an inner city period residential neighbourhood to the west (right) and a modern, high density neighbourhood to the east (left). The townscape to the east – including the site - has considerable capacity to accommodate change. The area to the west, while sensitive to internal change, already interfaces with a townscape of very different character. There is thus some tolerance for change. | Medium | <ul style="list-style-type: none"> The site is occupied by a new building of contemporary urban typology, scale and architecture. <u>The six storey accent volume is at the near corner, rising above the recessed main entrance, marking the junction of Blackpitts and Donovan Lane. Further along Blackpitts the building is four storeys at the street-front (opposite Greenville Parade). From this angle the two set-back upper floors are not visible.</u> The façade features (a) a grid of large, recessed windows, (b) red brick walls with bands of terracotta/sandstone tile, (c) the same material used to differentiate the ground floor, and (d) the use of green faience (a glossy ceramic material) to detail the recessed ground and first floor façade at the corner. The highly articulated facades complement the stepped height to reduce the perceived massing of the building. The increase in height on the site combined with the building's street-front position (typical for an urban street) causes a significant increase in built/visual enclosure on this stretch of Blackpitts. <u>Such enclosure is not unusual for the city centre, and the separation distance from the nearest facing houses (on Greenville Parade) is sufficient to avoid overbearance.</u> Significance of effect: Moderate positive. <ul style="list-style-type: none"> The building would be a prominent addition to the streetscape, reinforcing the character of the contemporary urban townscape on the east side of Blackpitts - and the variation that occurs between the east and west sides of the street. While there would be an increase in built/visual enclosure, (a) the degree of enclosure is not unusual or excessive for the city centre, and (b) the building is sufficiently removed from the houses on Greenville Parade to avoid overbearance. The quality of architecture and materials are such that there would be a net improvement in the built environment and visual amenity. | High | Moderate positive |
| 11 | Blackpitts to the north of the site | <ul style="list-style-type: none"> This view is taken from Blackpitts 150m to the north of the site. The view again illustrates (a) the winding alignment of Blackpitts, and (b) the mix of building typologies, scale and architecture along the street. (The seven storey Uninest student housing development is just behind the viewer.) In the foreground is a complex composition of period and modern houses, and a five storey apartment building. Further along the street (on the east side) is another four storey apartment building, and the terrace of three storey townhouses at the Donovan Lane junction. The diversity of development eras, building typologies, scale and architecture generate a distinctly 'urban' townscape character and give the view a high capacity to accommodate change (there is no norm with which new development could or should confirm). | Low | <ul style="list-style-type: none"> The building's north elevation (fronting Donovan Lane) can be seen in the middle distance, framed by the diverse buildings lining Blackpitts in the intervening townscape. The building steps up from five to six storeys along Donovan Lane (towards the Blackpitts junction), and it sits comfortably alongside the neighbouring buildings. The step in height is in no way pronounced in the context. Significance of effect: Slight neutral. <ul style="list-style-type: none"> The building would take its place comfortably in the urban context, causing no significant change in either townscape character or visual amenity. | Low | Slight neutral |
| 12 & 13 | St John's Street | <ul style="list-style-type: none"> These views show the difference in townscape character that exists east and west of Blackpitts. On the west side is a city centre period neighbourhood comprised of narrow streets lined by terraced cottages and two storey houses positioned at the street-front (best illustrated by View 13). On the east side is a modern, higher density townscape characterised by a mix of uses and buildings of diverse typology, scale and architecture. View 12 shows that the site in its existing condition detracts from this townscape: The building, service yard and security fencing are unsightly; the entire site frontage to Blackpitts and Donovan Lane is dead frontage; the use and design contribute to a lack of passive surveillance of the public realm. <u>While the neighbourhood west of Blackpitts – i.e. the foreground of views 12 and 13 - is sensitive to change internally (due to the strong character generated by the area's uniformity), there is a high capacity for change on the far side of Blackpitts, owing to (a) the existing diversity in the area, and (b) the detracting effect of the site in its current condition.</u> | Medium | <ul style="list-style-type: none"> The site is occupied by a new building of contemporary urban typology, scale and architecture. The six storey accent volume is at the near corner, rising above the recessed main entrance, marking the junction of Blackpitts and Donovan Lane. To either side of the accent volume the upper levels are set back from a street-front shoulder – of four storeys on Blackpitts and five storeys on Donovan Lane. The façades feature (a) a grid of large, recessed windows, (b) red brick walls with bands of terracotta/sandstone tile, (c) the same material used to differentiate the ground floor, and (d) green faience (a glossy ceramic material) to detail the ground and first floor façade at the corner. The highly articulated facades complement the stepped height to reduce the perceived massing of the building. The increase in height on the site combined with the building's street-front position causes a significant increase in built/visual enclosure. <u>This is not unusual for the city centre, and View 13 shows the substantial separation distance (c. 22m) from the nearest houses (on Greenville Parade – see View 14).</u> Significance of effect: Moderate positive. <ul style="list-style-type: none"> The building would be a prominent addition to the views, reinforcing the character of the contemporary urban townscape on the east side of Blackpitts - <u>and the variation that occurs between the east and west sides of the street.</u> While there would be an increase in built/visual enclosure, (a) the degree of enclosure is not unusual or excessive for the city centre, and (b) the building is sufficiently removed | High | Moderate positive |

| No | Viewpoint Location | Existing View | Sensitivity | Proposed View | Magnitude of Change | Significance of Effects |
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| | | | | <p>from St John's Street and Greenville Parade to avoid overbearance.</p> <ul style="list-style-type: none"> - The quality of architecture and materials are such that there would be a significant improvement in the quality of the built environment, and visual amenity. | | |
| 14 | Greenville Parade | <ul style="list-style-type: none"> • This view represents the terrace of five houses that face the site across Greenville Parade and Blackpitts. • The view from the houses, and the street in front of the houses, is dominated by the site. The warehouse/office building is equivalent to three storeys tall, and is set back from the street behind a service yard enclosed by a security fence. The premises as a whole is unsightly. • The neighbouring three storey apartment building can be seen to the right, partly screened by a single tree in the foreground. • Further to the right, on the near (west) side of Blackpitts, are the houses at the end of Hammond Street. • <u>While the neighbourhood west of Blackpitts (including Greenville Parade) is sensitive to change internally, Blackpitts is already established – and has been for centuries – as a dividing line between character areas. The townscape on the east side of the street is not sensitive. Additionally, the site in its existing use and condition detracts from the townscape character and visual amenity experience on Greenville Parade. There is thus some capacity for change in the view.</u> | Medium | <ul style="list-style-type: none"> • The site is occupied by a new building of contemporary urban typology, scale and architecture. • The six storey accent volume is at the near corner (out of sight to the left in this view). <u>To the right, along Blackpitts, the building is four storeys at the street-front shoulder, with an additional two storeys set back. As a result of the setback the building reads as five storeys tall from this vantage point.</u> • The façade features (a) a grid of large, recessed windows, (b) red brick walls with bands of terracotta/sandstone tile, (c) a lighter coloured brick at the set-back upper level, (d) terracotta/sandstone tile to differentiate the ground floor, and (e) green faience to detail the ground and first floor façade at the main entrance. The highly articulated facade complements the stepped height to reduce the perceived massing of the building. • The increase in height on the site combined with the building's street-front position causes a significant increase in built/visual enclosure. <u>This is not unusual for the city centre. There are examples of similarly pronounced changes in character and scale in the Liberties and other regeneration areas in Dublin (for example across Barrow Street in the Docklands – see below).</u>  <ul style="list-style-type: none"> • Significance of effect: Moderate positive. <ul style="list-style-type: none"> - The building would be a prominent addition to the views, reinforcing the character of the contemporary urban townscape on the east side of Blackpitts - <u>and the change that already occurs between the east and west sides of the street.</u> - While there would be an increase in built/visual enclosure, (a) the degree of enclosure is not unusual or excessive for the city centre, and (b) the c. 22m separation distance (the combined width of Greenville Parade and Blackpitts) is sufficient to avoid overbearance. - The quality of architecture and materials are such that there would be a significant improvement in the quality of the built environment, and visual amenity. | High | Moderate positive |

| No | Viewpoint Location | Existing View | Sensitivity | Proposed View | Magnitude of Change | Significance of Effects |
|---------|----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|-------------------------|
| 15 & 16 | Hammond Street | <ul style="list-style-type: none"> Similar to views 12 and 13, these views show the difference in townscape character that exists east and west of Blackpitts. On the west side (in the foreground of the views) is a neighbourhood of narrow streets lined by terraced cottages and two storey houses. On the far side of Blackpitts is a modern, higher density townscape characterised by a mix of uses and buildings of diverse typology, scale and architecture. The existing warehouse/office building on the site is framed in the views. The building is unsightly and detracts from the adjacent neighbourhood's visual amenity. A taller apartment building (fronting Clanbrassil Street to the east) protrudes above the roofline of the warehouse/office building. While the neighbourhood in the foreground of the views is sensitive to change internally, there is a high capacity for change on the far side of Blackpitts, owing to (a) the existing diversity in that area, and (b) the detracting effect of the site in its current condition. | Medium | <ul style="list-style-type: none"> The site is occupied by a new building of contemporary urban typology, scale and architecture. The building is framed in the views and the increase in height combined with the building's street-front position causes a significant increase in built/visual enclosure. This is not unusual for the city centre, and particularly around the edges of regeneration areas such as the Liberties. The six storey street-front accent volume at the corner of Blackpitts and Donovan Lane is to the left. To the right of this, opposite Hammond Street, the street-front shoulder drops to four storeys and the two upper floors are set back (with a change in colour/materials to further reduce their prominence). The façades feature (a) a grid of large windows with deep reveals (giving the façade a three dimensional quality), (b) red brick walls with bands of terracotta/sandstone tile, (c) a lighter brick to differentiate the upper floors above the shoulder, (d) terracotta/sandstone tile to differentiate the ground floor, and (e) green faience to detail the ground and first floor entrance/feature façade. The high degree of articulation of the facade complements the stepped height to reduce the perceived massing of the building. Significance of effect: Moderate positive. <ul style="list-style-type: none"> The building would be a prominent addition to the views, reinforcing the character of the contemporary urban townscape on the east side of Blackpitts - and the variation that occurs between the east and west sides of the street. While there would be an increase in built/visual enclosure, (a) the degree of enclosure is not unusual or excessive for the city centre, and (b) the building is sufficiently removed from Hammond Street to avoid overbearance. The quality of architecture and materials are such that there would be a significant improvement in the quality of the built environment, and visual amenity. | High | Moderate positive |
| 17 | Clarence Mangan Road | <ul style="list-style-type: none"> This view is taken from Clarence Mangan Road, one block to the south of Hammond Street. This street was built slightly later than Hammond Street and St John's Street, and has a different configuration. The houses are larger, and set back from the street behind front gardens. The street is also wider and features street trees, which provide visual screening. The difference in character that occurs between the areas east and west of Blackpitts is less pronounced in this view, although it is nonetheless evident – with a modern three storey apartment building (adjacent to the site) framed in the view, and a taller building (fronting Clanbrassil Street) rising behind it. While the neighbourhood in the foreground is sensitive to change internally, there is capacity for change on the far side of Blackpitts. | Medium | <ul style="list-style-type: none"> Part of the new building - of contemporary urban typology, scale and architecture – is visible in the middle distance, although partially screened/filtered by the street trees in the foreground. (In the spring and summer months the building would be largely screened from view). The large windows and varied materials break the massing into smaller visual units, combining with the screening effect of the foreground trees to reduce the building's visual presence. Significance of effect: Slight neutral. <ul style="list-style-type: none"> The building would be visible but not prominent, and would have no significant effect on the character or quality of the view. For the location (city centre within the canal ring, close to Clanbrassil Street, a key thoroughfare), the development typology and scale are not inappropriate. | Low-Medium | Slight neutral |

6.0 Townscape Impact Assessment and Conclusions

6.1 Townscape Sensitivity

The sensitivity¹ of the receiving environment can be classified ‘medium’ (definition: *Areas where the townscape has certain valued elements, features or characteristics but where the character is mixed or not particularly strong, or has evidence of alteration, degradation or erosion of elements and characteristics. The townscape character is such that there is some capacity for change. These areas may be recognised in landscape policy at local or county level and the principal management objective may be to consolidate townscape character or facilitate appropriate, necessary change*).

The medium sensitivity classification reflects the following:

- **The site is an underutilised brownfield land parcel in the city centre.**
- **The site is occupied by an unsightly 20th century warehouse/office building, which detracts from the character, quality and visual amenity of the adjacent streetscapes and the wider townscape.** The building is set back from Blackpitts behind a service yard enclosed by security fencing, and where the building fronts Donovan Lane it has no windows or entrances at street level. The entire site frontage to Blackpitts and Donovan Lane is dead frontage.
- **The site is zoned Z1 ‘Sustainable Residential Neighbourhoods’.** The DCDP vision for these lands is: “... where a wide range of high quality accommodation is available within sustainable communities, where residents are within easy reach of open space and amenities as well as facilities such as shops, education, leisure and community services. The objective is to ensure that adequate public transport, in conjunction with enhanced pedestrian and cycling infrastructure, provides such residential communities good access to employment, the city centre and the key urban villages in order to align with the principles of the 15-minute city”. The site represents an opportunity to realise this vision.
- **The townscape surrounding the site is characterised by diversity and juxtapositions in development era, land use, plot and building typologies, scale and architecture** (see Photos 1-4 above).
- **Blackpitts itself is the dividing line between two character areas:**
 - To the east, between Blackpitts and Clanbrassil Street, is a strip of mostly modern, high density mixed use development. The site is part of this area. (Residential use predominates, but there is an Urban Village adjacent on Clanbrassil Street and a Neighbourhood Centre just to the south at the South Circular Road junction.) In this area the buildings are up to five storeys, and a short distance to the north along Blackpitts there are student accommodation and aparthotel developments of seven and eight storeys respectively.
 - To the west of Blackpitts is a Victorian neighbourhood characterised by a fine urban grain and terraced houses of one and two storeys. While such smaller scale residential areas are generally sensitive to change, it must be recognised that (a) there is already considerable diversity - and juxtapositions scale and architecture – in the neighbourhood’s townscape context and views, and (b) the site in its current use and condition is the main detractor from townscape character and visual amenity in the area.

¹ The GLVIA states that townscape sensitivity should be classified with consideration of ‘the particular project or development that is being proposed’ and ‘the location in question’. Sensitivity is determined by two factors:

1. Susceptibility to change: “*This means the ability of the townscape receptor (whether it be the overall character or quality/condition of a particular landscape type or area...) to accommodate the proposed development without undue consequences for the maintenance of the baseline situation and/or the achievement of townscape policies or strategies*”;
2. Value of the townscape receptor: This can be indicated by designations or, where there are no designations, by the judgement of the assessor.

In summary, there is some capacity for change in the area, and the townscape could benefit from redevelopment of the site – providing the development is responsive to the context and of high design and material quality.

6.2 Magnitude of Townscape Change

The magnitude of change which would result from the proposed development can be classified ‘medium’ (definition: *Change that is moderate in extent, resulting in partial loss or alteration to key elements, features or characteristics of the townscape, and/or introduction of elements that may be prominent but not necessarily substantially uncharacteristic in the context. Such development results in change to the character of the townscape*).

The medium magnitude of change classification reflects the following:

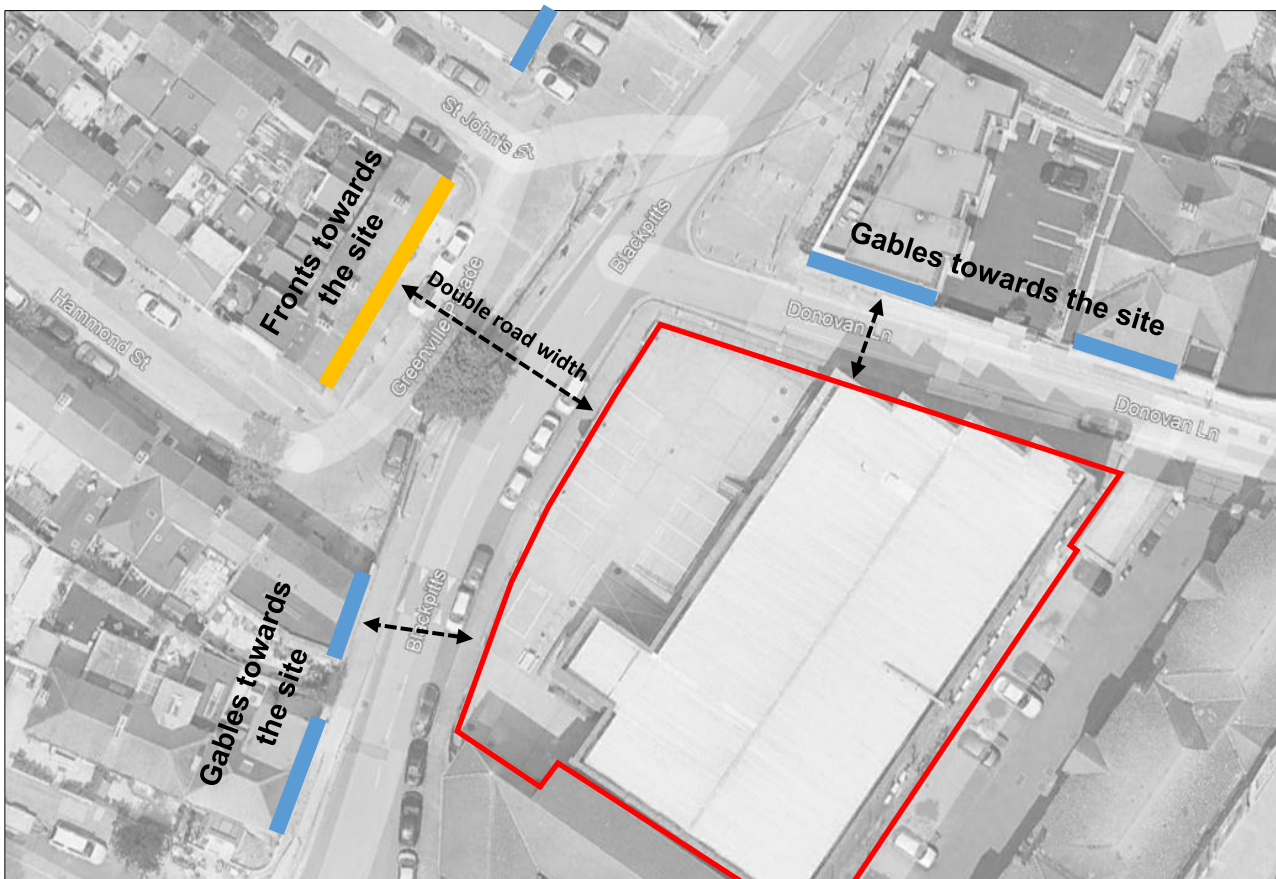
- **The site is of middling scale for the area between Clanbrassil Street and Blackpitts.** The coarse urban grain of this area dates from the 18th century, although the building stock is predominantly modern.
- **At six storeys (+ rooftop plant), the building is within the height parameters stated in the DCDP guidance for ‘City Centre within the Canal Ring’:** *“In general, and in accordance with the Guidelines, a default position of 6 storeys will be promoted in the city centre and within the canal ring subject to site specific characteristics, heritage/environmental considerations, and social considerations in respect of sustaining existing inner city residential communities. Where a development site abuts a lower density development, appropriate transition of scale and separation distances must be provided in order to protect existing amenities...”.*
 - The building steps down to a four storey street-front shoulder on Blackpitts, and a five storey shoulder on Donovan Lane. The setback of the upper floors means that the building will read as five storeys from the adjacent streets. A six storey accent volume marks the junction of Blackpitts and Donovan Lane, where the main entrance to the building is located.
- **The building would be taller than its neighbours in the area east of Blackpitts, but not dramatically so** (as shown in the elevations below). The older buildings in this area (those developed prior to the NPF and Building Height Guidelines) are three to five storeys, and a short distance to the north of the site along Blackpitts are two buildings of seven and eight storeys (developed more recently, in accordance with compact growth policy).



- The building would be substantially taller than the houses on the west side of Blackpitts (the houses nearest to the site are two storeys). While the step in height across Blackpitts would be pronounced, such juxtapositions are not unusual on Blackpitts or in the wider Liberties area (see photos below).



- An important factor is that the houses across Blackpitts and Donovan Lane from the site are either (a) aligned so that their principal views (from their front or rear windows) are away from the site, or (b) well removed from the site. **The only houses that face the site are the houses on Greenville Parade. These are separated from the site by the two parallel roads (Blackpitts and Greenville Parade), and a step in ground level (from the site and Blackpitts up to Greenville Parade and the houses).**



- Despite its height compared to the neighbouring developments, the building has a relatively limited zone of theoretical visibility. The ZTV map (Figure 9) shows that there would be very limited visibility to the east and south. The potential for significant visual impact is confined to:
 - Blackpitts (on which juxtapositions in typology and scale are already the norm);
 - Donovan Lane;
 - The residential area to the west, including Greenville Parade, St John's Street and Hammond Street.

- These areas would experience a high magnitude of change, with an adjacent 20th century warehouse/office building replaced by a residential building of contemporary urban scale (six storeys) and architecture. This is reflected in the results of the visual impact assessment, summarised below.

Table 3: Visual effects assessment summary

| No | ViewpointLocation | Sensitivity | Magnitude of Change | Significance of Effects |
|--------|-----------------------------------------------|-------------|---------------------|-------------------------|
| 01 | Clanbrassil Street travelling south | Low | None | No effect |
| 02 | Clanbrassil Street at Donovan Lane junction | Low | Medium | Slight positive |
| 03, 04 | Clanbrassil Street travelling | Low | None | No effect |
| 05 | Lombard Street West, Portobello | Medium | Negligible | Not significant neutral |
| 06 | St Kevin's Parade, Portobello | Medium | Negligible | Not significant neutral |
| 07 | Donovan Lane | Low | High | Moderate positive |
| 08 | Blackpitts junction with Clarence Mangan Road | Medium | Medium-High | Moderate neutral |
| 09 | Blackpitts approaching site from south | Medium | Medium-High | Moderate positive |
| 10 | Blackpitts approaching site from north | Medium | High | Moderate positive |
| 11 | Blackpitts to the north of the site | Low | Low | Slight neutral |
| 12, 13 | St John's Street | Medium | High | Moderate positive |
| 14 | Greenville Parade | Medium | High | Moderate positive |
| 15, 16 | Hammond Street | Medium | High | Moderate positive |
| 17 | Clarence Mangan Road | Medium | Low-Medium | Slight neutral |

- The assessment results show that the southern stretch of Blackpitts, Donovan Lane, and the residential streets immediately to the west across Blackpitts (Greenville Parade, St John's Street and Hammond Street) would experience medium-high to high magnitude of change in certain views. **The critical finding, however, is that (a) in its typology and scale the building would not be an inappropriate addition to the townscape/views, and (b) the quality of the architecture and materials are such that the building would be an attractive addition, enhancing the visual amenity of the surroundings.**

6.3 Significance and Quality of Townscape Impact

Measuring² the magnitude of change (medium) against the sensitivity of the receiving environment (medium), **the significance of the townscape impact is classified 'moderate'** (EPA definition of moderate significance: "An effect that alters the character of the environment in a manner that is consistent with existing and emerging baseline trends").

This assessment result is reasonable. The development would unquestionably alter the character of Donovan Lane and the southern stretch of Blackpitts, as well as *views from* the residential area to the west (while the character of the residential area itself would be unchanged) - but the nature and extent of the change would be consistent with the trend already established in this part of the city. The pertinent question is whether the change would be positive, neutral or negative. The assessment that the development would have positive effects. An unsightly warehouse building would be replaced by an attractive residential building of distinct identity, enhancing the quality of the built environment. While the building is considerably larger than some of the

² See Appendix 1, Section 2.3 and Table 3.

neighbouring buildings, design measures have been taken to reduce the perception of scale (setback of the upper floors, highly articulated facades, variations in material, etc.). Larger buildings positioned alongside or close to smaller buildings do not necessarily result in negative visual impact. There are numerous examples in the city – including in the vicinity of the site – of larger and smaller scale development coexisting *to the benefit of the townscape*. This would be the case with the proposed development. **The existing variation in character that occurs east to west across Blackpitts would be strengthened; the townscape east of Blackpitts would be directly enhanced, and the area to the west would be indirectly enhanced.**

In conclusion, the proposed development can be considered an appropriate intervention in the townscape. No negative townscape or visual impacts have been identified.

APPENDIX 1 LANDSCAPE/TOWNSCAPE & VISUAL IMPACT ASSESSMENT METHODOLOGY

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

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

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

1.0 Key Principles of the GLVIA

1.1 Use of the Term ‘Effect’ vs ‘Impact’

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

1.2 Assessment of Both Landscape/Townscape and Visual Effects

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

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

2.0 Townscape Effects Assessment

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

2.1 Landscape/Townscape Sensitivity

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

Table 1 Categories of Landscape/Townscape Sensitivity

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

2.2 Magnitude of Landscape/Townscape Change

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

Table 2 Categories of Landscape/Townscape Change

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

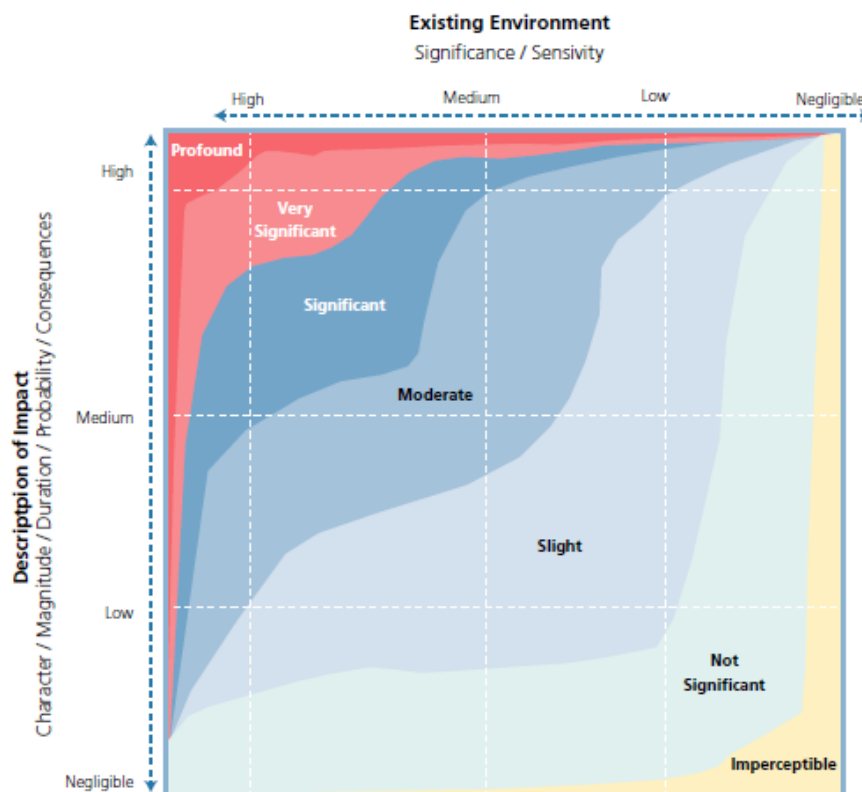
2.3 Significance of Landscape/Townscape Effects

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

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

| | | Sensitivity of the Landscape Resource/View | | | | |
|---------------------|------------|--------------------------------------------|------------------------------|---------------------------------|--------------------|---------------------------|
| | | Very High | High | Medium | Low | Negligible |
| Magnitude of Change | Very High | Profound | Profound to Very Significant | Very Significant to Significant | Moderate | Slight |
| | High | Profound to Very Significant | Very Significant | Significant | Moderate to Slight | Slight to Not Significant |
| | Medium | Very Significant to Significant | Significant | Moderate | Slight | Not Significant |
| | Low | Moderate | Moderate to Slight | Slight | Not significant | Imperceptible |
| | Negligible | Slight | Slight to Not Significant | Not significant | Imperceptible | Imperceptible |

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



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

Table 4 EPA definitions of environmental impact classifications

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

3.0 Visual Effects Assessment

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

3.1 Sensitivity of the Viewpoint/Visual Receptor

Viewpoint sensitivity is a function of two main considerations:

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

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

Table 5 Categories of Viewpoint Sensitivity

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

3.2 Magnitude of Change to the View

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

Table 6 Categories of Visual Change

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

3.3 Significance of Visual Effects

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

4.0 Quality of Effects

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

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

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