Planning Ref No.	Applicant Name	Summary of Development	Cumulative Impact Assessment	Construction Status
		consumption off the premises, (ii) New ground floor window and pay hatch to front elevation, (iii) Revisions to car parking layout, and (iv) all associated site, drainage and boundary development works.		
3047/21 **Decision: Grant Permission. Decision Date: 01 Oct 2021**	**The Board of Management of Greenlanes National School**	Planning permission for the construction of a single storey extension to the rear of the existing school at the northwestern side of the site and including all associated site works.	The Planning Authority (DCC) granted permission for the development subject to 8 no. condition(s). The conditions relate to working hours, noise control, public road cleaning, transport and parking. Conditions have been set by the Drainage Division regarding surface and foul water sewers and SuDS measures, which must be strictly adhered to. Therefore, there are no cumulative impacts anticipated with this development.	Construction status unknown. A desk-based study was completed, satellite imagery of the reviewed. Construction had not commenced by March 2022.
2998/20 **Decision: Grant Permission. Decision Date: 19 Oct 2020**	**St. Paul's College, Raheny**	The development will consist of the following: construction of (i) a pergola structure consisting of a timber frame with retractable awning system above; (ii) sand and cement rendered block walls (0.8 m in height) with precast concrete capping to surround the proposed pergola structure; (iii) raised planted bedding along the block walls; and (iv) all site works necessary to facilitate the development. The proposed structure is located	The Planning Authority (DCC) granted permission for the development subject to 6 no. condition(s). The conditions relate to working hours, noise control, public road cleaning, transport and drainage. Therefore, there are no cumulative impacts anticipated with this development.	Construction status unknown.

Planning Ref No.	Applicant Name	Summary of Development	Cumulative Impact Assessment	Construction Status
		within the internal courtyard area at St. Paul's College.		
3803/21 **Decision: Grant Permission.** **Decision Date: 17 Feb 2022**	**The Society of Jesus**	PROTECTED STRUCTURE: Permission for development at this site, which contains a Protected Structure known as Manresa House. The proposed development will consist of: 1) a new single storey, flat-roofed building located to the northeast of the protected structure, to provide for new reception, dining, cooking and associated ancillary spaces, with rooflights, solar panels and part sedum roof; 2) a new single-storey, flat-roofed open loggia structure forming a covered route from the existing Retreat Building to the proposed new building; 3) associated hard landscaping, including new terrace and external steps, 2no. disabled parking bays, and extensive planting works to the courtyard; 4) landscaping works, including the provision of 36 no. car-parking spaces, new planting to the west lawn and the formation of a new stormwater attenuation pond: and 5) the removal of an existing single-storey, pitched roof timber structure.	The Planning Authority (DCC) granted permission for the development subject to 12 no. condition(s). The conditions relate to working hours, noise control, public road cleaning, surface water drainage and SuDS, transport, parking and maintaining the integrity of the protected structure. Therefore, there are no cumulative impacts anticipated with this development.	Construction status unknown. A desk-based study was completed, satellite imagery of the reviewed. Construction had not commenced by March 2022.

Planning Ref No.	Applicant Name	Summary of Development	Cumulative Impact Assessment	Construction Status
2038/18 **Decision: Grant Permission. Decision Date: 08 Jan 2019**	**MKN Property Group**	PROTECTED STRUCTURE: Permission for a residential development of 72 no. units across 4 no. blocks with a single level basement, consisting of the change of use of the existing Verville Retreat building from nursing home use to residential use and the change of use of the existing former outbuilding to residential use. The overall development will comprise of the following: Block A: construction of a 4 storey building (3 storeys with a setback fourth storey) comprising 14 no. apartments (12 no. 2 bedroom units and 2 no. 3 bedroom units) with balconies/terraces to the north and south elevations; Block B: The change of use of the existing 4 storey Verville Retreat building from nursing home use to residential use comprising 9 no. apartments (3 no. 1 bedroom units and 6 no. 2 bedroom units). Demolition of later additions and extensions to the existing Verville Retreat building as well as associated modifications to elevations and internal modifications/reconfiguration of the refurbishments to the	The Planning Authority (DCC) granted Retention Permission under planning ref. no. 3081/20 on 28 Oct 2020. The development is subject to the conditions of the original planning grant, with additional conditions relating to drainage. Therefore, there are no cumulative impacts anticipated with this development.	A desk-based study was completed, satellite imagery of the reviewed. Construction commenced & ongoing as of March 2022.

Planning Ref No.	Applicant Name	Summary of Development	Cumulative Impact Assessment	Construction Status
		existing building in order to accommodate the provision of the new apartment units and the construction of a new external stair core at the buildings eastern elevation; Block C: Construction of a 4 storey building (3 storeys with a setback fourth storey) comprising 48 no. apartments (1 no. studio apartment, 20 no. 1 bedroom units, 21 no. 2 bedroom apartments and 6 no. 3 bedroom apartments) with balconies/terraces to all elevations and roof garden; Block D: The conversion of the existing single storey outbuilding into 1 no. single storey, 2 bedroom mews dwelling with associated internal and external modifications to accommodate the proposed change of use; A basement level comprising a total of 69 no car parking spaces, 80 no. bicycle parking spaces, ancillary plant room and refuse storage areas; Revisions and improvements to the existing vehicular entrance to Vernon Avenue; Demolition of the existing single storey block to the north of Verville Retreat; landscaping (including communal and private open space); Boundary treatment;		

Planning Ref No.	Applicant Name	Summary of Development	Cumulative Impact Assessment	Construction Status
		and, all associated engineering and site development works necessary to facilitate the development.		
4656/18 **Decision: Grant Permission. Decision Date: 27 Mar 2019**	**Clontarf Hospital**	Permission for development at Castle Avenue, Clontarf, Dublin 3. The development will consist of the removal of the existing maintenance portacabins and demolition of the existing hard standing area, removal of 4 young trees which will be replaced in the area to suit the development, removal of 3 car spaces and the construction of a single storey maintenance building including, workshop, office, store and bin store and associated site works adjacent to the existing services yard.	The Planning Authority (DCC) granted permission for the development subject to 12 no. condition(s). The conditions relate to working hours, noise control, public road cleaning, surface water drainage and SuDS, public infrastructure, public health and safety, amenity, ecology and sustainable development. Therefore, there are no cumulative impacts anticipated with this development.	Construction status unknown. A desk-based study was completed, satellite imagery of the reviewed. Construction had not commenced by March 2022.

In terms of the effects of noise and vibrations, the distance from the Proposed Development to the off-site developments, the EIARs, EIA Screening Reports, management plans and other assessment reports associated with the aforementioned off-site projects contain details of mitigation measures required to ensure no likely significant or adverse environmental impacts arise as a result of the associated developments and as a result of this, will ensure there will be no significant noise and vibration impacts as a result of the Proposed Development. Due to the implementation of good construction practices at the Site of the Proposed Development and these offsite permitted developments, it is not anticipated that significant cumulative impacts will occur.

9.6.5 "Do Nothing" Impact

A 'Do Nothing' scenario would result in the Site remaining as greenfield lands. Noise and vibration levels would remain unchanged onsite and at nearby sensitive receptors.

9.7 Avoidance, Remedial & Mitigation Measures

9.7.1 Construction Phase

In order to control likely noise impacts caused by the Proposed Development, best available technology will be employed by the appointed Main Contractor to minimise noise from the construction operations and will comply with the mitigation measures as set out in *BS 5228-1: A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise*:

- Selection of machinery/equipment with low inherent potential for generating noise.
- Siting of machinery/equipment as far away from sensitive receptors as permitted by site constraints.
- Avoid unnecessary revving of engines and switch off plant items when not required.
- Keep plant machinery and vehicles adequately maintained and serviced.
- Proper balancing of plant items with rotating parts.
- Keep internal routes well maintained and avoid steep gradients.
- Minimise drop heights for materials or ensure a resilient material underlies.
- Use of alternative reversing alarm systems on plant machinery.
- Where noise becomes a source of resonating body panels and cover plates, additional stiffening ribs or materials should be safely applied where appropriate.
- Limiting the hours during which site activities likely to create high levels of noise are permitted.
- Appointing a site representative responsible for matters relating to noise.
- Monitoring typical levels of noise during critical periods and at sensitive locations.

The Construction and Demolition Waste Management Plan (CDWMP) outlines the following proposed environmental noise mitigation measures:

General Considerations:

- All site staff will be briefed on noise mitigation measures and the application of best practicable means to be employed to control noise.
- Site hoarding should be erected to maximise the reduction in noise levels.

- The contact details of the Main Contractor and site manager will be displayed to the public, together with the permitted operating hours, including any special permissions given for out of hours work.
- In the event that the Main Contractor gets a complaint about noise from a neighbour immediate action will be taken to remedy the situation.
- The site entrance will be located to minimise disturbance to noise sensitive receptors.
- Internal haul routes will be maintained, and steep gradients will be avoided.
- Material and plant loading and unloading will only take place during normal working hours unless the requirement for extended hours is for traffic management (i.e. road closure) or health and reasons (written approval, must be obtained from the planning authority prior to this activity being undertaken).
- Use rubber linings in chutes, dumpers and hoppers to reduce impact noise.
- Minimise opening and shutting of gates through good coordination of deliveries and vehicle movements.

Plant:

- Ensure that each item of plant and equipment complies with the noise limits quoted in the relevant European Commission Directive 2000/14/EC.
- Fit all plant and equipment with appropriate mufflers or silencers of the type recommended by the manufacturer.
- Use all plant and equipment only for the tasks for which it has been designed.
- Shut down all plant and equipment in intermittent use in the intervening periods between work or throttle down to a minimum.
- Power plant items by mains electricity rather than diesel generators.
- Maximise screening from existing features or structures and employ the use of partial or full enclosures for fixed plant.
- Locate movable plant away from noise sensitive receptors.
- All plant operators to be qualified in their specific piece of plant.
- Compressors and generators will be sited in areas least likely to give rise to nuisance where practicable.

Vehicle activity:

- Ensure all vehicle movement (on site) occur within normal working hours. (other than where extension of work requiring such movements has been granted in cases of required road closures or for health and safety reasons).
- Plan deliveries and vehicle movements so that vehicles are not waiting or queuing on the public highway, if unavoidable engines should be turned off.
- Plan the site layout to ensure that reversing is kept to a minimum.
- Where reversing is required use broadband reverse sirens or where it is safe to do so disengage all sirens and use banksmen.
- Rubber/neoprene or similar non-metal lining material matting to line the inside of material transportation vehicles to avoid first drop high noise levels.
- Wheel washing of vehicles prior to exiting the site will take place to ensure that adjoining roads are kept clean of dirt and debris. Regular washing of adjoining streets should also take place as required by road sweepers.

Demolition Phase:

- Employ the use of acoustic screening; this can include planning the demolition sequence to utilise screening afforded by buildings to be demolished.
- If working out of hours for Health and Safety reasons (following approval by the competent authority) limit demolition activities to low level noise activity (unless absolutely unavoidable).
- Use low impact demolition methods such as non-percussive plant where practicable.
- Use rotary drills and 'bursters' activated by hydraulic or electrical power or chemically based expansion compounds to facilitate fragmentation and excavation of hard material.
- Avoid the transfer of noise and vibration from demolition activities to adjoining occupied buildings through cutting any vibration transmission path or by structural separation of buildings.
- Consider the removal of larger sections by lifting them out and breaking them down either in an area away from sensitive receptors or off site.

Ground Works and Piling Phase:

- The following hierarchy of groundwork/piling methods should be used if ground conditions, design and safety allows;
  - -Pressed in methods, e.g., hydraulic jacking
  - -Auger/bored piling
  - -Diaphragm walling
  - -Vibratory piling or vibro-replacement
  - -Driven Piling or dynamic consolidation
- The location and layout of the piling plant should be designed to minimise potential noise impact of generators and motors.
- Where impact piling is the only option utilise a non-metallic dolly between the hammer and driving helmet or enclose the hammer and helmet with an acoustic shroud.
- Consider concrete pour sizes and pump locations. Plan the start of concrete pours as early as possible to avoid overruns.
- Where obstructions are encountered, work should be stopped, and a review undertaken to ensure that work methods that minimise noise are used.
- When using an auger piling rig do not dislodge material from the auger by rotating it back and forth. Use alternate methods where safe to do so.
- Prepare pile caps using methods which minimise the use of breakers, e.g., use hydraulic splitters to crack the top of the pile.

Communication and Liaison:

- A Community Liaison Plan should be developed by the developer in consultation with local residents/businesses and a single point of contact nominated to engage with Dublin City Council and the residents/businesses and to handle complaints and communication of site information.
- All site staff should be briefed on the complaints procedure and mitigation requirements and their responsibilities to register and escalate complaints received.

The following control measures will also be implemented:

- The Site Manager will monitor a likelihood of prolonged exposure to excessive noise and commission noise surveying/monitoring programme where necessary.
- The Works Supervisor will assess risk arising from noise prior to each particular activity taking place and determine appropriate action. The aim will be to minimise the exposure to excessive noise levels.
  - If it is likely that the noise exposure exceeds Lower Action Value, then hearing protection must be made available.
  - If it is likely that the noise exposure exceeds Upper Action Value, then hearing protection is mandatory to be used. Work Supervisor will decide on the most suitable hearing protection to be used based on Exposure and worker's personal preference (earmuffs or earplugs).
- The Works Supervisor will ensure proposed measures are put in place and that their effectiveness and suitability is evaluated on regular bases.
- Site management will minimise noise at work by looking for alternative processes and/or working methods, which would make the work quieter and/or exposure times shorter.
- The Site Manager will liaise with all site contractors in order to effectively control noise exposure.
- The number of people working near source of the noise will be minimised.
- Plant and machinery will be compliant with current legislation and fitted with silencers as appropriate.
- Employees must use hearing protection where its use is made compulsory.
- Hearing protection zones will be identified where necessary.
- Spot checks on appropriate use of hearing protection will be carried out.
- Operators of rock breaking machines and workers nearby must wear adequate ear protection.

9.7.2 Operational Phase

During the Operational Phase of the Proposed Development, noise mitigation measures with respect to the outward impact of the Proposed Development are not deemed necessary.

9.7.3 "Worst Case" Scenario

The worst-case scenario would involve the failure of mitigation measures for the Proposed Development. In this scenario there is the potential for short-term, intermittent noise-related impacts.

9.8 Residual Impacts

Residual Impacts are defined *as 'effects that are predicted to remain after all assessments and mitigation measures'*. They are the remaining 'environmental costs' of a project and are the final or intended effects of a development after mitigation measures have been applied to avoid or reduce adverse impacts.

Once the mitigation measures as proposed are implemented, no residual significant noise or vibration impacts are expected to arise as a result of the construction and operation of the Proposed Development

9.9 Monitoring

During the construction phase, noise and vibration monitoring will be carried out by the contractor to ensure that the recommended threshold levels set out in the EIAR Chapter or any conditioned noise and vibration limits are not exceeded.

The following monitoring measures will be implemented during the Construction Phase of the Proposed Development:

- Carry out regular on-site observation monitoring and checks/audits to ensure that best management practices are being used at all times. Such checks will include:
  - Hours of work;
  - Presence of mitigation measures;
  - Number and type of plant;
  - Construction methods.
- In the event that the Main Contractor gets a complaint about noise from a neighbour, he will act immediately to remedy the situation.
- A sound level digital meter will be employed as necessary to monitor noise, with results being recorded to inform the contractor of noise level.
- Site reviews must be recorded and made available for inspection.
- Appraise and review working methods, processes and procedures on a regular basis to ensure continue development of best management practices.

9.10 Interactions

9.10.1 Population and Human Health

The impact assessment of noise and vibration has concluded that additional noise associated with the operation of on-site machinery will be intermittent and will not create any major negative impacts beyond the Site boundary. Mitigation and monitoring measures will be incorporated to further reduce the potential for noise generation from the Proposed Development.

It is noted that specific issues relating to Population and Human Health associated with the Proposed Development are set out in Chapter 4 of this EIAR.

9.10.2 Biodiversity

Interactions between noise and vibration and biodiversity have been considered as the Proposed Development has the potential to cause short-term impacts on biodiversity as a result of noise and vibration in the absence of mitigation measures. However, the mitigation measures employed at the Proposed Development will ensure that biodiversity will not be affected. An assessment of the potential impact of the Proposed Development on biodiversity is included in Chapter 5 of this EIAR.

9.10.3 Land and Soil

Soil excavation works will cause an increase in noise; however, it has been determined within Chapter 9 of this EIAR that this increase in noise will be intermittent and insignificant.

9.10.4 Traffic

There will be an increase in traffic as a result of the Proposed Development, however as per Section 9.5.3.1 of this chapter, associated noise impacts have been deemed as insignificant.

9.11 Difficulties Encountered When Compiling

No difficulties were encountered.

9.12 References

BS 5228-1:2009+A1:2014 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise.

Dept. of Housing, Planning and Local Government (DHPLG), 2018. Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment August 2018.

Design Manual for Roads and Bridges Volume 11 Section 3 Part 7 (HD 213/11 – Revision 1) (The Highways Agency et al., 2011).

Dublin Agglomeration Third Environmental Noise Action Plan December 2018-2023.

Environmental Protection Agency (2006) Environmental Management in the Extractive Industry (Non-Scheduled Materials).

Environmental Protection Agency (2016) Guidance Note for Noise (NG4): Licence Applications, Surveys and Assessments in Relation to Scheduled Activities.

European Communities (EC) (Environmental Noise) Regulations 2018 (S.I. No. 549/2018).

EC (Environmental Noise 2006 (S.I. No. 140/2006).

EC Noise Emission by Equipment for Use Outdoors (Amendment) Regulations (S.I. No. 241/2006).

Guidelines for the Treatment of Noise & Vibration in National Road Schemes, National Roads Authority, Revision 1, 25th October 2004.

Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (EPA May 2022).

ISO 1996-1:2016 Acoustics - Description, measurement and assessment of environmental noise. Part 1: Basic quantities and assessment procedures.

ISO 1996-2:2017 Acoustics - Description, measurement and assessment of environmental noise Part 2: Determination of sound pressure levels.

ISO 9613-1:1993 Acoustics - Attenuation of sound during propagation outdoors -- Part 1: Calculation of the absorption of sound by the atmosphere.

ISO 9613-2:1996 Acoustics - Attenuation of sound during propagation outdoors -- Part 2: General method of calculation.

10 LANDSCAPE/TOWNSCAPE AND VISUAL ASSESSMENT

10.1 Introduction

This Landscape / Townscape and Visual Impact Assessment chapter of the EIAR has been prepared on behalf on the applicant, Raheny 3 Limited Partnership, in respect of a development on lands east of St Paul's College, Sybil Hill Road, Raheny, Dublin 5. This chapter of the EIAR describes the landscape/townscape/visual context of the Proposed Development and assesses the likely impacts of the scheme on the receiving environment, in terms of both landscape character and visual amenity.

Landscape/townscape assessment relates to changes in the physical environment, brought about by a Proposed Development, which may alter its character. This requires a detailed analysis of the individual elements and characteristics of a landscape that go together to make up the overall character of that area. By understanding the aspects that contribute to this character it is possible to make judgements in relation to its quality (integrity) and to identify key sensitivities. This, in turn, provides a measure of the ability of the landscape in question to accommodate the type and scale of change associated with the Proposed Development, without causing unacceptable adverse changes to its character.

Visual Impact Assessment relates to changes in the composition of views as a result of changes to the landscape/landscape, how these are perceived and the effects on visual amenity. Such impacts are population-based, rather than resource-based, as in the case of landscape impacts.

10.1.1 Statement of Authority

This Landscape/Townscape and Visual Assessment chapter of the EIAR was prepared by Macro Works Ltd of Cherrywood Business Park, Loughlinstown, Dublin 18; a consultancy firm specialising in Landscape and Visual Assessment and associated maps and graphics. Relevant experience includes a vast range of infrastructural, industrial and commercial projects since 1999, including numerous residential mixed-used development projects.

The author of this EIAR chapter is Jamie Ball, a Senior Landscape Architect and team leader within Macro Works Ltd. He holds a BA LA Hons (University of Gloucestershire – 1998) and is a Corporate Member of Irish Landscape Institute (ILI). Within Macro Works, Jamie undertakes assessment for a range of development types across the consultancy firm's portfolio, including several residential mixed-used development projects. He has broad experience from several leading landscape consultancies, both domestic and international (i.e., US and Australia), and has been involved in a number of high-profile projects since 1999.

10.2 Study Methodology

Production of this Landscape/townscape and Visual Impact Assessment involved:

- A desktop study to establish an appropriate study area and relevant landscape and visual designations in the Dublin City Development Plan 2016-2022, as well as the draft Dublin City Development Plan 2022-2028;

- Fieldwork in the form of three site visits throughout 2021 to study the receiving environment;

- Assessment of the significance of the landscape impact of the Proposed Development as a function of landscape sensitivity weighed against the magnitude of the landscape impact;

- Assessment of the significance of the visual impact of the Proposed Development as a function of visual receptor sensitivity weighed against the magnitude of the visual impact.

This document uses methodology as prescribed in the Institute of Environmental Management and Assessment (IEMA) and landscape Institute (UK) 'Guidelines for Landscape and Visual Impact Assessment' (GLVIA-2013). It is important to note that the GLVIA-2013 follow the European Landscape Convention (ELC) definition of landscape: *'Landscape is an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors' (Council of Europe, 2000)*. Thus, GLVIA-2013 covers all landscapes from *"high mountains and wild countryside to urban and fringe farmland (rural landscapes), marine and coastal landscapes (seascapes) and the landscapes of villages towns and cities (townscapes)"* - whether protected or degraded.

Although this is principally a 'townscape' assessment, it utilises the same outline methodology as would be employed for the more familiar Landscape and Visual Impact Assessment (LVIA) of developments in rural settings. Indeed, the broader context of the study area is that of an urban setting or 'townscape' and this is defined in GLVIA-2013 in the following manner (Section 2.7):

> *"'Townscape' refers to areas where the built environment is dominant. Villages, towns and cities often make important contributions as elements in wider-open landscapes but townscape means the landscape within the built-up area, including the buildings, the relationships between them, the different types of urban spaces, including green spaces, and the relationship between buildings and open spaces. There are important relationships with historic dimensions of landscape and townscape, since evidence of the way the villages, towns and cities change and develop over time contributes to their current form and character."*

Please note, Digital Dimensions produced verified photomontages which are appended in Appendix Q of this EIAR. Based in Rathmines Dublin 6, Digital Dimensions is one of Ireland's leading architectural visualisation companies. Their verified photomontages were used to assess the likely visual impacts associated with the proposed development, as per Section 10.5.2 of this EIAR chapter.

10.2.1 Landscape/townscape Impact Assessment Criteria

When assessing the potential impacts on the townscape resulting from a Proposed Development, the following criteria are considered:

- Landscape/townscape character, value and sensitivity;

- Magnitude of likely impacts;
- Significance of landscape effects.

The sensitivity of the townscape to change is the degree to which a particular setting can accommodate changes or new elements without unacceptable detrimental effects to its essential characteristics. Landscape/townscape Value and Sensitivity is classified using the following criteria set out in Table 10-1.

Table 10-1: Landscape/Townscape Value and Sensitivity

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

The magnitude of a predicted landscape/townscape impact is a product of the scale, extent or degree of change that is likely to be experienced as a result of the proposed Development. The magnitude takes into account whether there is a direct physical impact resulting from the loss of landscape/townscape components and/or a change that extends beyond the immediate setting that may have an effect on the townscape character. See Table 10-2.

Table 10-2: Magnitude of Landscape/Townscape Impacts

Sensitivity	Description
Very High	Change that would be large in extent and scale with the loss of critically important landscape elements and features, that may also involve the introduction of new uncharacteristic elements or features that contribute to an overall change of the townscape in terms of character, value and quality.
High	Change that would be more limited in extent and scale with the loss of important townscape elements and features, that may also involve the introduction of new uncharacteristic elements or features that contribute to an overall change of the townscape in terms of character, value and quality.
Medium	Changes that are modest in extent and scale involving the loss of landscape characteristics or elements that may also involve the introduction of new uncharacteristic elements or features that would lead to changes in landscape character, and quality.
Low	Changes affecting small areas of landscape character and quality, together with the loss of some less characteristic landscape elements or the addition of new features or elements.
Negligible	Changes affecting small or very restricted areas of landscape character. This may include the limited loss of some elements or the addition of some new features or elements that are characteristic of the existing landscape or are hardly perceivable.

The significance of a landscape/townscape impact is based on a balance between the sensitivity of the landscape receptor and the magnitude of the impact. The significance of landscape impacts is arrived at using the following matrix set out in Table 10-3.

Table 10-3: Impact Significance Matrix

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

Note: The significance matrix provides an indicative framework from which the significance of impact is derived. The significance judgement is ultimately determined by the assessor using professional judgement. Due to nuances within the constituent sensitivity and magnitude judgements, this may be up to one category higher or lower than indicated by the matrix. Judgements indicated in orange are considered to be 'significant impacts' in EIA terms.

Please note that in relation 10-1 to 10-4 (above and below), the aforementioned draft EPA guidelines provide a general methodology and impact ratings for all environmental topics covered in an EIAR; the aforementioned GLVIA (2013) provides specific guidelines for landscape and visual impact assessment. Therefore, a combination of the draft EPA guidelines and the GLVIA has informed the methodology for the assessment. In respect of significance terminology and definitions, the EPA Guidance states:

> *"Significance is a concept that can have different meanings for different topics – in the absence of specific definitions for different topics the following definitions may be useful …".*

It then provides a table of seven categories from '*Profound*' to '*Imperceptible*'. By contrast, the GLVIA recommends the use of a *"word scale for degrees of significance"* and uses a four category example that does not use the term 'significant' within it, on the basis that *"problems can arise where separate topic assessments use the same or similar terminology in the evaluation of significance, but define these terms differently"*.

Instead, LVIA practitioners have flexibility to determine the scale terms they use, but must clearly indicate which categories are deemed to be 'Significant' impacts in EIA terms. In the case of the project LVIA, a clear indication of what categories are deemed to be significant was provided in respect of the identical significance matrices in the project LVIA i.e. '*Substantial*' and '*Profound-substantial*' as shown with mustard/yellow shading in Table 10.3, above.

10.2.2 Visual Impact Assessment Criteria

As with the landscape/townscape impact, the visual impact of the Proposed Development will be assessed as a function of sensitivity versus magnitude. In this instance the sensitivity of the visual receptor, weighed against the magnitude of the visual effect.

Sensitivity of Visual Receptors

Unlike landscape sensitivity, the sensitivity of visual receptors has an anthropocentric (human) basis. It considers factors such as the perceived quality and values associated with the view, the landscape/townscape context of the viewer, the likely activity they are engaged in and whether this heightens their awareness of the surrounding landscape. A list of the factors considered by the assessor in estimating the level of sensitivity for a particular visual receptor is outlined below to establish visual receptor sensitivity at each VRP:

Susceptibility of Receptors

In accordance with the Institute of Environmental Management and Assessment ("IEMA") Guidelines for Landscape and Visual Assessment (3rd edition 2013) visual receptors most susceptible to changes in views and visual amenity are:

- *"Residents at home;*
- *People, whether residents or visitors, who are engaged in outdoor recreation, including use of public rights of way, whose attention or interest is likely to be focussed on the landscape and on particular views;*

- *Visitors to heritage assets, or to other attractions, where views of the surroundings are an important contributor to the experience;*
- *Communities where views contribute to the landscape setting enjoyed by residents in the area;*
- *Travellers on road rail or other transport routes where such travel involves recognised scenic routes and awareness of views is likely to be heightened".*
- Visual receptors that are less susceptible to changes in views and visual amenity include:
- *"People engaged in outdoor sport or recreation, which does not involve or depend upon appreciation of views of the landscape;*
- *People at their place of work whose attention may be focussed on their work or activity, not their surroundings and where the setting is not important to the quality of working life".*

The visual sensitivity of receptors is determined in this Assessment by the following factors:

Recognised scenic value of the view

(County Development Plan designations, guidebooks, touring maps, postcards etc). These represent a consensus in terms of which scenic views and routes within an area are strongly valued by the population because in the case of County Developments Plans, for example, a public consultation process is required;

Views from within highly sensitive townscape areas

These are likely to be in the form of Architectural Conservation Areas, which are incorporated within the Development Plan and therefore subject to the public consultation process. Viewers within such areas are likely to be highly attuned to the townscape around them;

Primary views from residential receptors

Even within a dynamic city context views from residential properties are an important consideration in respect of residential amenity;

Intensity of use, popularity

This relates to the number of viewers likely to experience a view on a regular basis and whether this is significant at a national or regional scale;

Viewer connection with the townscape

This considers whether or not receptors are likely to be highly attuned to views of the townscape i.e., commuters hurriedly driving on busy roads versus tourists focussed on the character and detail of the townscape;

Provision of vast, elevated panoramic views

This relates to the extent of the view on offer and the tendency for receptors to become more attuned to the surrounding landscape at locations that afford broad vistas;

Sense of remoteness and/or tranquillity

Receptors taking in a remote and tranquil scene, which is likely to be fairly static, are likely to be more receptive to changes in the view than those taking in the view of a busy street scene, for example;

Degree of perceived naturalness

Where a view is valued for the sense of naturalness of the surrounding landscape it is likely to be highly sensitive to visual intrusion by distinctly manmade features;

Historical, cultural and / or spiritual significance

Such attributes may be evident or sensed by receptors at certain viewing locations, which may attract visitors for the purposes of contemplation or reflection heightening the sense of their surroundings;

Rarity or uniqueness of the view.

This might include the noteworthy representativeness of a certain townscape type and considers whether the receptor could take in similar views anywhere in the broader region or the country;

Integrity of the townscape character

This looks at the condition and intactness of the townscape in view and whether the townscape pattern is a regular one of few strongly related components or an irregular one containing a variety of disparate components;

Sense of place

This considers whether there is special sense of wholeness and harmony at the viewing location.

10.2.3 Visual Impact Magnitude

The visual impact magnitude relates to the scale and nature of the visual change brought about by the proposal and this is reflected in the criteria contained in Table 10-4.

Table 10-4: Magnitude of Visual Impacts

Criteria	Description
Very High	The proposal alters a large proportion or critical part of the available vista and is without question the most distinctive element. A high degree of visual clutter or disharmony is also generated, strongly reducing the visual amenity of the scene.
High	The proposal alters a significant proportion or important part of the available vista and is one of the most noticeable elements. A considerable degree of visual clutter or disharmony is also likely to be generated, appreciably reducing the visual amenity of the scene.
Medium	The proposal represents a moderate alteration to the available vista, is a readily noticeable element and/or it may generate a degree of visual clutter or disharmony, thereby reducing the visual amenity of the scene.
Low	The proposal alters the available vista to a minor extent and may not be noticed by a casual observer and/or the proposal would not have a marked effect on the visual amenity of the scene.
Negligible	The proposal would be barely discernible within the available vista and/or it would not detract from, and may even enhance, the visual amenity of the scene.

10.2.4 Visual Impact Significance

As stated above, the significance of visual impacts is a function of visual receptor sensitivity and visual impact magnitude. This relationship is expressed in the same significance matrix and applies the same EPA definitions of significance as used earlier in respect of townscape impacts (see Table 10-3).

10.2.5 Quality of Effects

In addition to assessing the significance of landscape/townscape effects and visual effects, EPA Guidance for EIAs requires that the quality of the effects is also determined. This could be negative/adverse, neutral, or positive/beneficial.

Whereas the introduction of new built elements into countryside areas more often results in negative landscape and visual effects, in urban and/or peri-urban settings, development proposals are often replacing one built feature with another. The consequence for the townscape character and visual amenity is often beneficial or may be a combination of positive effects and negative effects for different receptors. In the context of this assessment, the judgment of the quality of the effects is made in combination with the significance judgement for both landscape/townscape impacts and visual impacts (e.g., Moderate / Positive or Moderate / Negative).

10.2.6 Extent of Study Area

Owing to the scale of the built-up development in this locality, it is anticipated that the Proposed Development is not likely to give rise to significant landscape/townscape or visual impacts beyond approximately 1km. As a result, a 1km-radius study area is used in this instance.

Figure 10-1: Study area for the Proposed Development

The landscape/townscape baseline represents the existing context and is the scenario against which any changes to it, brought about by the Proposed Development, will be assessed. A description of the landscape/townscape context of the proposed site and wider study area is provided in Section 10.3.1. Although this description forms part of the landscape/ townscape baseline, many of the elements identified also relate to visual receptors i.e., places from which viewers can potentially see the Proposed Development. The visual resource will be described in greater detail in Section 10.5.2.

10.3 The Existing and Receiving Environment

The landscape/townscape baseline represents the existing context and is the scenario against which any changes to it, brought about by the Proposed Development, will be assessed. A description of the landscape/townscape context of the proposed site and wider study area is provided below in Section 10.3.1. Although this description forms part of the landscape/

townscape baseline, many of the elements identified also relate to visual receptors i.e., places from which viewers can potentially see the Proposed Development. The visual resource will be described in greater detail in Section 10.7.

10.3.1 Baseline Environment

10.3.1.1 Immediate Site Context

The 6.7 ha site is a relatively flat, low-lying, mostly greenfield site that is bound to the north, east and south by St Anne's Park; a popular and much-visited large urban park of c.110 ha situated between Raheny and Clontarf. The site is also a manmade, modified landscape, like that of its vicinity/hinterland. In 1948,12.5 ha of the park was purchased from Dublin Corporation for it to become St Paul's College (boy's secondary school) in 1950. The site, therefore, has been private property for over 70 years and not part of St. Anne's Park during that time. However, there is a tenable visual connection between the site and its park surrounds, as well as a broadly similar landscape fabric and character between it and the western end of the park.

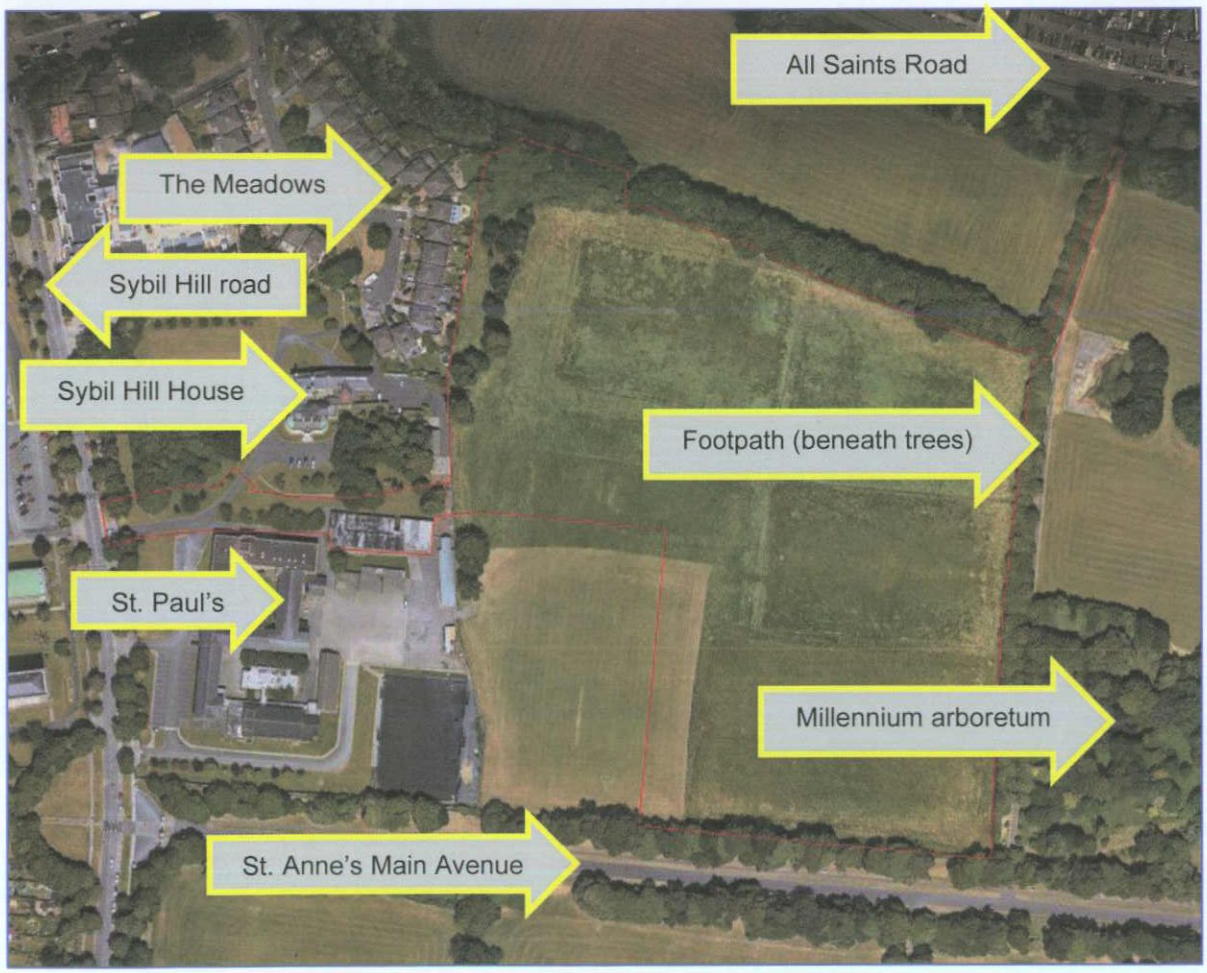

Figure 10-2: Site boundary overlaid onto Google Earth imagery (2018 capture)

Previously the site formed four of the playing pitches of St. Pauls. In that regard, it has served in recent decades as rather monocultural in character, with a vast blanket of unbroken amenity grass with some trees in the northwest corner of the site. However, there are mature treelines

immediately outside the site's northern, eastern and southern site boundaries, with public pathways aligned in close proximity to the site's eastern and southern boundary (i.e., outside the site boundaries). It is understood that the site has not been accessible to the public and/or park users for several decades, being surrounded by tall fences/walls. In the last approx. 3 years, following the purchase of the site from St. Paul's, the site has been cordoned off from the school, during which time it has been gradually reverting back to nature (i.e., recultivating through self-seeding and lack of maintenance), as per Figure 10-3.

The extended western 'arm' of the site, however, is more diverse and complex. It takes the form of a 17-33m wide, east-west corridor crossing over the grounds of St. Pauls school in areas that are currently occupied by either prefabs/low temporary building, internal campus access roads, lawns or trees, before emerging at an existing entrance onto Sybil Hill that currently serves Sybil Hill House. While a short thin corridor also emerges from the northeast corner of the site, beneath an existing pathway connecting to St. Assam's Road, this is of less relevance, as no overgrounds works are proposed for this area (i.e., only subsurface utilities).

Along with Sybil Hill House (protected structure) and the Meadows residential *cul de sac*, the grounds of St. Paul's are set to the site's immediate west. Within 100m north of the site are GAA (public) playing pitches and the small Naniken River. Further playing pitches and a (publicly-accessible) arboretum lie within 50m of the site's eastern boundary (i.e., the 'Millennium Arboretum'), while a pathway connecting St. Anne's Main Avenue to All Saints Road runs close to this entire eastern boundary, though mature vegetation tends to screen the site form most of this pathway. To the immediate south of the site is the tree-lined, 19th Century main Avenue of St. Anne's Park (see Figure 10-4), with tall, mature evergreens densely clumped to the immediate south of this boundary.

Figure 10-3: A dark green paladin fence aligns the eastern and southern site boundaries, and part of the northern boundary

In terms of site boundaries, a dark green paladin fence aligns the eastern and southern site boundaries (see Figure 10-3), and at least half of the northern boundary. Blue wooden hoarding currently demarcates the southwestern corner of the site, separating the site from the sole grass pitch that is in ownership of St. Paul's. A concrete wall with railings above it marks the north-western site boundary. A stone wall marks a smaller section of the northern site boundary, which is aligned by a dense thicket of mature trees (i.e., an ecological corridor) to its immediate north. The site, therefore, is not permeable. Neither is it accessible to the public, and has been private property for at least the last 70 years.

Figure 10-4: The site when viewed from its southern boundary.

Figure 10-5:To the immediate south of the site is the tree-lined, 19th Century main Avenue of St. Anne's Park.

10.3.1.2 Broader Townscape Context

St. Anne's Park is set between Raheny, to its north, and Clontarf, to its south and west, with Dublin Bay flanking the eastern edge of the park (i.e., outside the study area). It is c. 110 ha in size, making it the second largest municipal park in Dublin.

In the early 19th century, most of the park, as well as the site lands, were under agricultural production (see Figure 10-5), at a period in which Raheny and Clontarf would have been regarded as rural locations, distinctively removed from Dublin city (it was 1900 before Clontarf was formally incorporated into the City of Dublin). Indeed, the site was part of the townland at Maryville, whereas the eastern sections of the park are mostly in the Harmonstown, Charleville and Bettyville townlands. Maryville was a large house and estate, very close to Sybil Hill House, which was within the site lands but has long since been demolished.

Figure 10-6: Extract of Ordnance Survey 1829-1842 map, showing the agricultural nature of the site.

In 1837, Sir Benjamin Lee Guinness purchased the estate of Thornhill within the Harmonstown townland and only later added lands, to the west and north, of Bettyville, Charleville, Maryville (in which the site lands are located) and Sybil Hill, to form a 202 hectares (500 acres) estate. He then renamed the Thornville house and estate to St. Anne's, after a holy well located in the eastern end of the park. The most distinctive and well-recognised features of the park were laid out in the mid-late 19th Century, and with the exception of the Main Avenue, tend to be located in the eastern/coastal end of the site (i.e., more than 500m from the site that represent St. Anne's historic core. These include the Naniken riverside walk, the clock tower (and walled garden), the Red Stables, the Temple of Isis (and artificial duck pond), the Herculean Temple, the Chestnut Walk and the Annie Lee Tower Bridge, among other heritage estate features all within the historic core. This is reflective of the fact that the original large, Italianate-style, St. Anne's House that was commissioned in 1837 (gutted by fire in 1943 and demolished in 1968) was located more than 1km from the site, at the heart of the historic core.

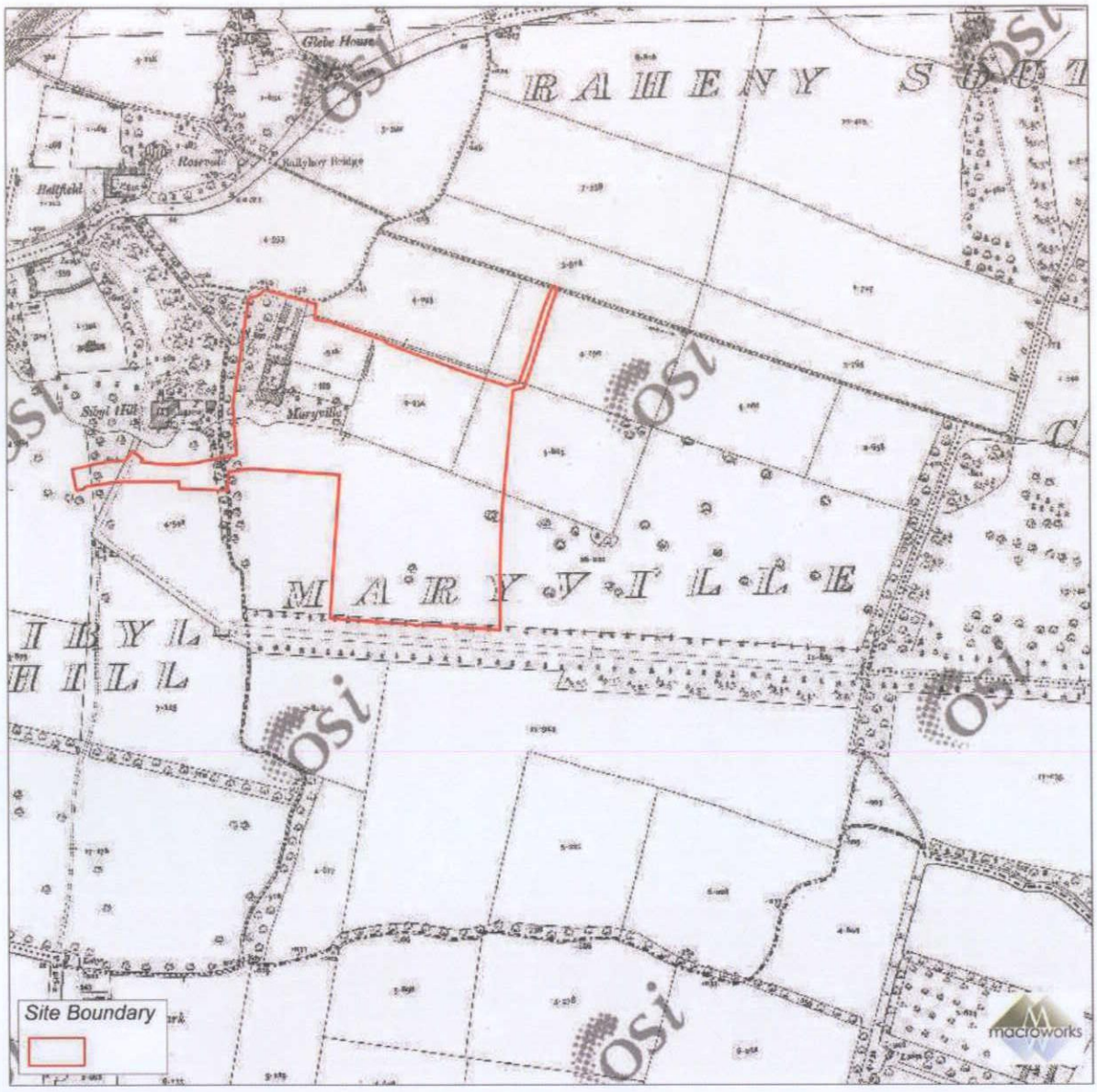

Figure 10-7: Extract of Ordnance Survey 1897-1913 map, showing site lands to be then a mix of agricultural lands (in its north half) and 'landscaped' parkland (in its southern half).

The sense of place within the historic core is infused with numerous serpentine paths, specimen trees and charming remnants of an intricate 19th Century private Demesne. Its aesthetic pleasure grounds, walled gardens, follies, intimate spaces and tree-dotted, parkland landscape generate a sense of romance, intrigue and serendipity in the park user who feels he/she is re-discovering the 'lost estate.' This is at stark odds to that of other areas of the park (including the site), that were only developed for recreational purposes within the last 70 years.

The perfectly straight, near 1.5km-long Main Avenue of the park once connected the formal park entrance to St. Anne's House and was planted in the late 19th Century with an alternating layout of Evergreen Oak and Scot's Pine. These large, densely-planted evergreen trees now align the southern boundary of the site (i.e., outside the site boundary) and are a distinctive feature of the park all year round, channelling views east/west, with limited visibility of features north or south of the avenue. The western end of the Main Avenue was later extended by a further approx. 150m west to meet the recently constructed Sybil Hill road, later in the 20th

Century, As referenced in Figure 10-6, by the late 19th century/early 20th Century, the site lands were a mix of agricultural lands (in its north half) and 'landscaped' parkland closer to the Main Avenue, representative of the esteemed estate it had become.

In 1939, approx. 180 ha (445 acres) of the original estate were sold to Dublin Corporation and by 1956, the entirety of the remaining land was owned by Dublin Corporation. In that regard, the only capacity for the site to ever have been part of St. Anne's Park could have been between 1939 and 1950 (when St. Paul's College opened, with the site as it's private playing pitches). In the following decade, approx. 81ha (200 acres) of the estate were developed for public housing. The only 'iconic' feature of the park to be added since that time is that of the Rose Garden, in 1975, located more than 450m from the site, in which a celebrated rose festival takes place each July. However, the overall landscape character and *genius loci* of the western side and north-eastern end of the park is not similar to that of the historic core of the park, with the Main Avenue serving as a verdant corridor between these distinct characters.

Figure 10-8: Playing pitches south of the Main Avenue and south of the site. Please note the density of tall, dense trees (aligning the Main Avenue) to the north (i.e., left) of this view.

For more than the last half century, the park's western half (i.e., broadly within 500m of the site) and north-eastern extreme continues to be characterised by extensive playing pitches among tall, mature treelines, with a mid-late 20th Century, sport-focused public park identity to it, with a relatively lower degree of visual amenity and visual sensitivity. This is also influenced by the partially-visible suburban boundaries of the park being more palpable at the western side, where intervisibility with surrounding modern residences, schools and roads is more common. There are over 30 playing pitches (mostly GAA and soccer) in the park, as well as a small, public par-3 golf course (located approx. 450m east of the site) and a public 18-court tennis club (approx. 400m northeast of the site). In recent years, prior to Covid, large (ticketed) 'big name' music concerts have been organised in the western end of the park in summer, across sporting pitches south of the Main Avenue. The park is heavily frequented, too, for Saturday morning park runs and farmers markets; the latter located by the Red Stables.

Within 200m north of the site is the dense, residential streets of Raheny and Harmonstown, some of which are on lands that formed part of the original St. Anne's estate. Within 500m west (Killester) and south (Clontarf) of the site is again an intensely residential locale, reflective of the inner suburb location of the site. Indeed, this is reflected in the high population within proximity to the park; localities that are more populous than most large Irish towns. These consist of Clontarf (over 32,000 residents); Raheny (over 18,000), Killester and Harmonstown (each approx. 5,000 residents). In that regard, there are approx. 60,000 residents within comfortable walking distance to St. Anne's. This helps contextualise it as a large European urban park with the centre of a European capital - Dublin City – located approximately 5km away.

East of St. Anne's Park and outside the study area is Dublin Bay, including the north Bull Island. This much-prized and protected coastal resource is at a considerable remove from the site lands, not just in distance but in geographical, geological, historical, social and cultural context to the western end of the park.

In terms of housing typologies in the broader area, while 2-storey, extensive housing is prevalent across Raheny, Clontarf, Harmonstown and Killester, primarily from the mid 20th Century onwards, there are multiple instances of higher-density apartment complexes of 3-5 storeys from more recent decades. Aligning Sybil Hill Road (R808) is the Ardilaun Court residential development, built in 2018 and being 4-5 storeys in height, approx. 100m west of the site. On the western side of Sybil Hill Road (R808) is the Sacred Heart nursing home, constructed in 1971 and also being five storeys in height. Within 200m south of the park is the 1960s Seapark development: 10 no. apartment blocks ranging from 3-4 storeys. Similarly, aligning the park's southern boundary is the more recent Belgrove Park, consisting of multiple 3-4 storey residential blocks. However, immediately abutting the western boundary of the site is St. Paul's College (a two-storey 1950s structure) and Sybil Hill House, which has been owned by St. Pauls College since the 1950s and is a two-storey protected structure from the 1750s, with a small section of its original ha-ha surviving to the south of the property.

10.3.2 Planning Policy Context

10.3.2.1 Dublin City Development Plan 2016-2022

In terms of land use zoning (Map B of the Dublin CDP) the Proposed Development is contained in 'Zone Z15', whose zoning objective is "to protect and provide for institutional and community uses" (see Figure 10-8). There are no additional zoning objectives relevant to the site (e.g., conservation area, Architectural Conservations Areas, Protected Structures, Sites/Zones of Archaeological Interest). According to Section 14.8.14 of the Dublin CDP, the 'Permissible Uses' for Zoning Objective Z15 entail:

> *"Buildings for the health, safety and welfare of the public; childcare facility, community facility, cultural/recreational building and uses, education, medical and related consultants, open space, place of public worship, public service installation, residential institution."*

Those uses that 'Open for Consideration' entail:

> *"Bed and breakfast, car park ancillary to main use, conference centre, funeral home, guest house, hostel, hotel, municipal golf course, residential, student accommodation, training centre."*

It is worth nothing that, unlike the site, St. Anne's Park is Zoned Z9, "*To preserve, provide and improve recreational amenity and open space and green networks*," with the added Specific Objective of being a 'Conservation Area.' A small section of the site of the Proposed Development is zoned Z9, as this includes lands within St. Anne's Park required to provide for the routing of a surface water discharge from the site via St. Anne's Park to the Naniken River, however, no residential development is proposed on the lands contained within the application boundary which are zoned Z9.

Figure 10-9: Extract of Map B of the Dublin Development Plan, showing how the site is contained within Zone Z15

Chapter 4 – 'Shape and Structure of the City' of the Dublin City Development Plan (2016-2022) contains relevant policies in respect of Dublin's inner suburbs and outer city. Section 4.4 pertains to the 'Strategic Approach,' for the city's development. It states:

> *"The vision for the urban form and structure of the city is to achieve a high quality, sustainable urban and natural environment, which is attractive to residents, workers and visitors."*

The key approaches to achieving this vision underpinning the development plan, which are relevant to the site and the Proposed Development, include:

- *"The creation of a more compact city, where residents can live close to their places of work or study, and can easily traverse the city, thereby reducing urban sprawl and unsustainable travel patterns.*
- *The creation and nurturing of sustainable neighbourhoods, which are designed to facilitate walking and cycling, close to public transport insofar as possible and a range of community infrastructure, in quality, more intensive mixed-use environments.*
- *The development of a well-designed and defined network of streets and quality urban spaces, together with the achievement of a good mix of uses to encourage vitality, in well-designed buildings which are appropriate to their context.*
- *The development of a green infrastructure strategy for recreation, amenity, biodiversity and climate change reasons.*
- *The integration of a cultural and social vision into place-making."*

Policies and objectives outlined within Chapter 4 of the development plan that are relevant to the site and/or Proposed Development include:

SC5: *To promote the urban design and architectural principles set out in Chapter 15, and in the Dublin City Public Realm Strategy 2012, in order to achieve a quality, compact, well-connected city.*

SC10*: To develop and support the hierarchy of the suburban centres, ranging from the top tier key district centres, to district centres/urban villages and neighbourhood centres, in order to support the sustainable consolidation of the city and provide for the essential economic and community support for local neighbourhoods, including post offices and banks, where feasible, and to promote and enhance the distinctive character and sense of place of these areas.*

SC11*: To promote employment and economic opportunities in the KDCs and in district centres/urban villages and in neighbourhood centres in the identified innovation corridors and clusters.*

SC12: *To ensure that development within or affecting Dublin's villages protects their character.*

SC13: *To promote sustainable densities, particularly in public transport corridors, which will enhance the urban form and spatial structure of the city, which are appropriate to their context, and which are supported by a full range of community infrastructure such as schools, shops and recreational areas, having regard to the safeguarding criteria set out in Chapter 16.*

SC14: *To promote a variety of housing and apartment types which will create a distinctive sense of place in particular areas and neighbourhoods, including coherent streets and open spaces.*

SC15: *To recognise and promote green infrastructure and landscape as an integral part of the form and structure of the city, including streets and public spaces.*

Objectives relevant to the site and/or Proposed Development:

> ***SC04:*** *To undertake a views and prospects study, with the aim of compiling a list of views and prospects for protection and/ or enhancement which will be integrated with and complement the urban form and structure of the city.*

Approach to Taller Buildings

Section 4.5.4.1 specifically deals with the 'Approach to Taller Buildings' and begins with the statement that:

> *"Dublin City Council acknowledges the intrinsic quality of Dublin as a low-rise city and considers that it should remain predominantly so. The vast majority of the city area is identified as not being suitable for mid-rise or taller buildings. The City Council remains committed to the need to protect conservation areas, architectural conservation areas and the historic core of the city. However, taller buildings can also play an important visual role and can make a positive contribution to the skyline of a city. Dublin City Council recognises the merit of taller buildings, including landmark buildings, in a very limited number of locations at a scale appropriate for Dublin."*

Relevant Policy in relation to building height includes:

> ***SC16:*** *To recognise that Dublin City is fundamentally a low-rise city and that the intrinsic quality associated with this feature is protected whilst also recognising the potential and need for taller buildings in a limited number of locations subject to the provisions of a relevant LAP, SDZ or within the designated strategic development regeneration area (SDRA).*
>
> ***SC18****: To promote a co-ordinated approach to the provision of tall buildings through local area plans, strategic development zones and the strategic development and regeneration areas principles, in order to prevent visual clutter or cumulative negative visual disruption of the skyline.*

Designated Scenic Views and Prospects

Also contained within Chapter 4 Dublin City Development Plan is a map illustrating views and prospects for protection. However, there are no designated views and prospects within the study area.

10.3.2.2 Draft *Dublin City Development Plan 2022-2028*

Chapter 4 – 'Shape and Structure of the City' of the draft Dublin City Development Plan 2022-2028 contains relevant policies in respect of Dublin's inner suburbs and outer city. Section 4.5 pertains to 'Policies and objectives,' those of which are relevant to the site and/or Proposed Development (in relation to the Inner Suburbs) include:

> ***SC8:*** *To support the development of the inner suburbs and outer city in accordance with the strategic development areas and corridors set out under the Dublin Metropolitan Area Strategic Plan and fully maximise opportunities for intensification of infill, brownfield and underutilised land where it aligns with existing and pipeline public transport infrastructure.*

SC9: *To develop and support the hierarchy of the suburban centres, including Key Urban Villages, Urban Villages and Neighbourhood Centres, in order to:*

- *support the sustainable consolidation of the city and align with the principles of the 15 minute city;*
- *provide for the essential economic and community support for local neighbourhoods;*
- *promote and enhance the distinctive character and sense of place of these areas by ensuring an appropriate mix of retail and retail services.*

Approach to Taller Buildings

Section 4.5.4 of the draft CDP pertains to 'Increased Height as part of the urban form and spatial structure of Dublin.'

SC14 Building Height Strategy: To ensure a strategic approach to building height in the city that accords with The Urban Development and Building Height Guidelines for Planning Authorities (2018) and in particular, SPPR 1 to 4.

SC15 Building Height Uses: To support the development of an adequate mix of uses in proposals for larger scale development which are increasing height or proposing a taller building in accordance with SPPR 2

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

The Urban Development and Building Guidelines were adopted in December 2018 by the Minister for Housing, Planning and Local Government *"to secure better and more compact forms of future development."*

Policies stated within the UDBH guidelines that may be relevant to the Proposed Development are included below:

SPPR1*: In accordance with Government policy to support increased building height in locations with good public transport accessibility, particularly town/city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.*

SPPR 2: *In driving general increases in building heights, planning authorities shall also ensure appropriate mixtures of uses, such as housing and commercial or employment development, are provided for in statutory plan policy. Mechanisms such as block delivery sequencing in statutory plans could be utilised to link the provision of new office and residential accommodation, thereby enabling urban redevelopment to proceed in a way that comprehensively meets contemporary economic and social needs, such as for housing, offices, social and community infrastructure, including leisure facilities.*

Section 3.2 of the UDBH guidelines also lists development management criteria from the city/town scale to the site/building scale in which *"the applicant shall demonstrate to the satisfaction of the Planning Authority/ An Bord Pleanála, the Proposed Development satisfies the following criteria…"* Those criteria deemed relevant to this visual impact assessment and the Proposed Development are included below.

At the scale of the relevant city/town:

- *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.*

10.3.2.4 National Parks & Wildlife Service (NPWS) designations

There are no Special Areas of Conservation, Special Protection Area, Natural Heritage Area or proposed Natural Heritage Area with the site or its vicinity, including St. Anne's Park. Be that as is may, it is worth repeating that according to Dublin City Development Plan 2016-2022 (see Section 10.3.3.1), the site is not a "Conservation Area" but the remaining areas of St. Anne's is.

10.4 Characteristics of the Proposed Development

10.4.1 Project Description

Raheny 3 Limited Partnership are applying for permission for development on lands east of St Paul's College, Sybil Hill Road, Raheny, Dublin 5. The site is bound to the north, east and south by St Anne's Park and to the west by residential development at The Meadows, Sybil Hill House (a Protected Structure) and St Paul's College. Vehicular access to the site is from Sybil Hill Road.

The Proposed Development consists of the construction of a residential and nursing home development set out in 7 no. blocks, ranging in height from 4-7 storeys to accommodate 580 no. apartments, residential tenant amenity spaces, a crèche and a 100-bed nursing home. The site will accommodate car parking spaces, bicycle parking spaces, storage, services and plant areas at both basement and podium level.

Landscaping will include extensive communal amenity areas, and a significant public open space provision on the east and south of the site. The proposed application includes all site landscaping works, green roofs, substations, boundary treatments, lighting, servicing, signage, surface water attenuation facilities and associated and ancillary works, including site

development works and services above and below ground. For a full description of the Proposed Development please refer to the Statutory Notices.

10.4.1.1 Additional Landscape & Visual Characteristics Associated with the Proposed Development

A comprehensive tree survey of the site was conducted in late 2021 by the consulting Arborists, The Tree File. It found that:

> *"While the broader Arboricultural review investigated 235no trees or tree groups, only 127no. of these are considered physiologically pertinent to the site and the proposed development … The proposed development will see the loss of only 36 individual trees and part of "Tree Line 2". Of these 36no. trees, 10no. have been categorised at "U" grade trees and have been recommended for removal regardless of development works."*

It is worth noting that of the trees lost as a result of the Proposed Development, the vast majority of these are also non-native species.

10.5 Potential Impact of the Proposed Development

10.5.1 Landscape Impacts of the Proposed Development

10.5.1.1 Landscape/townscape Value and Sensitivity

In accordance with Section 5.5 of the GLVIA-2013, a townscape character assessment requires a particular understanding of, among other criteria, "the context or setting of the urban area and its relationship to the wider landscape."

As was previously established in Section 10.3 of this chapter, although this is largely a greenfield site of an open verdant character, it is also a manmade, modified landscape, like that of its vicinity/hinterland. The site is not publicly accessible, nor does it provide any public open space, but is, instead, secured/cordoned off from the public, as it has been for over 70 years. Indeed, the only capacity of the site to ever have been part of the Park would have been between 1939 and 1950, at most. This is also reflected in its zoning, as set out in Section 10.3.2.1, which states that the Proposed Development is contained in 'Zone Z15', whose zoning objective is "*to protect and provide for institutional and community uses*"; a zoning that is compatible with that across the northern half of Sybil Hill (road), while being, understandably, at odds to all of St. Anne's Park. A small section of the site is zoned Z9 and will provide for the routing of a surface water discharge from the site via St. Anne's Park to the Naniken River. This Zoning Objective is "To preserve, provide and improve recreational amenity and open space and green networks." No residential development is proposed on the lands contained within the application boundary which are zoned Z9.

Furthermore, there are no additional zoning objectives relevant to the site, including conservation areas, Architectural Conservations Areas, Protected Structures or Sites/Zones of Archaeological Interest. Neither are there are any Special Areas of Conservation, Special Protection Areas, Natural Heritage Areas or proposed Natural Heritage Areas within the site

or its vicinity, including St. Anne's Park. Similarly, there are no scenic designations associated with the site, nor anywhere within the study area.

The landscape character and fabric of the site is distinctly that of mid-late 20th century sport-focused recreation, albeit not for the public but exclusively pupils of St. Paul's College. While the thick, verdant corridor of St. Anne's Main Avenue runs to the immediate south of the southern boundary, the historic core of St. Anne's Park remains almost 400m distance from the site, with the most 'iconic' features of the park mostly being more than 800m from the site. Indeed, the site's evolution through the 19th and 20th century is distinctly separate to that of the historic core, and one with a lower degree of visual amenity and visual sensitivity. Be that as it may, there is a broadly similar landscape fabric and character between the site and the western and north-eastern end of the park, as demonstrated in Figure 10-9. This is because these areas, too, principally evolved in the mid-late 20th century for sport-focused recreational use, while also being at a similar remove from the Park's historic core.

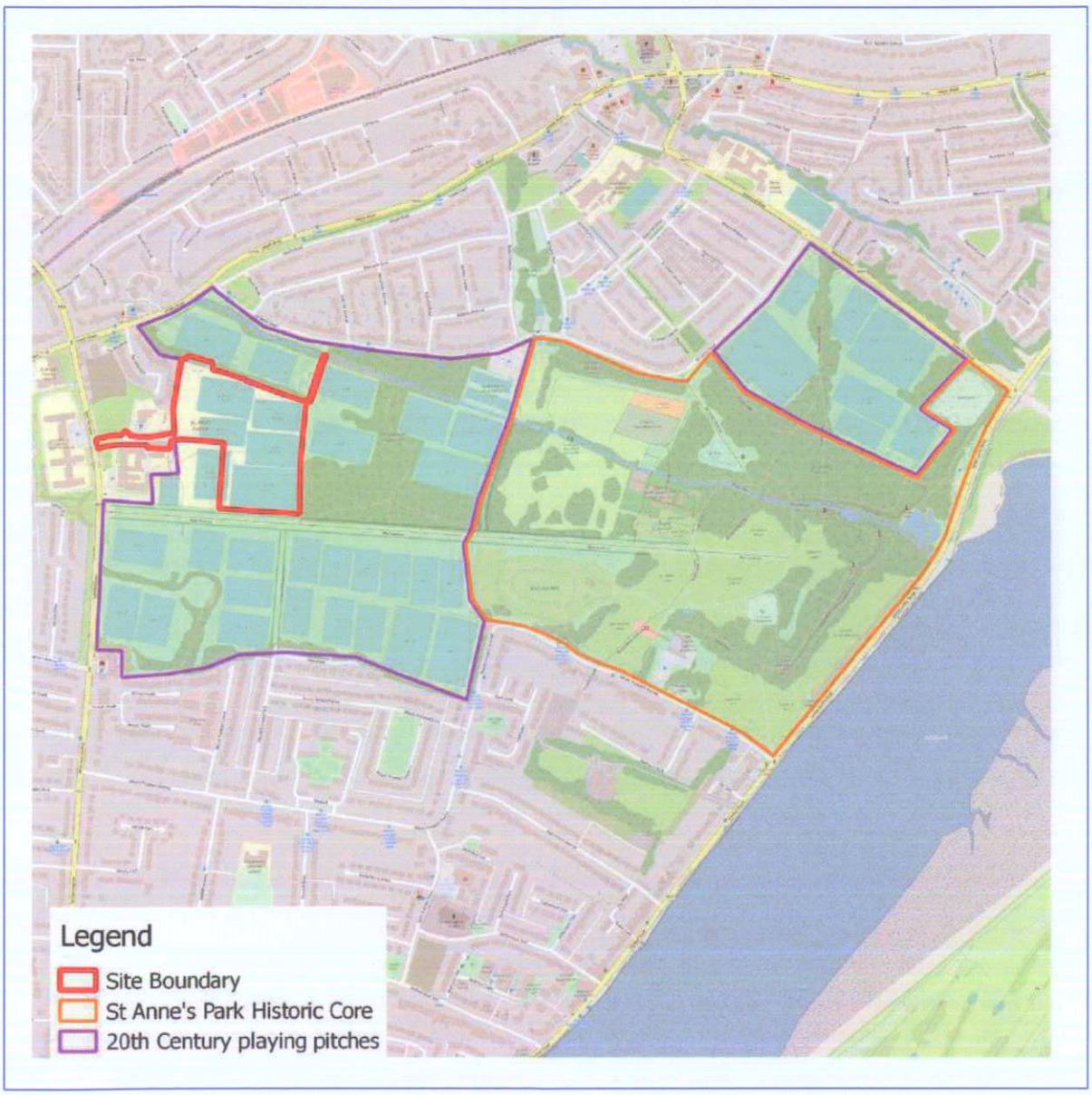

Figure 10-10: Landscape character and fabric within the site and St. Anne's Park.

Lastly, while the study area is notable for the high amount of public open space (mostly in the form of St. Anne's Park), residential development is by far the common form of land use, overall, with numerous multiple storey buildings within the study area, some of which adjoin the boundaries of the park, with others located within 200-300m of it.

On balance of the factors outlined above, the sensitivity of the receiving townscape setting is considered to be **Medium-low**.

10.5.1.2 Construction Phase landscape impacts

There will be permanent physical effects to the land cover of the site, which are not readily reversible. During the construction stage of the Proposed Development, which is estimated to take approx. 18 months, there will be intense construction-related activity within and around the site, including approach roads. This will include, but is not limited to:

- HGVs transporting materials to and from the site;
- Movement of heavy earth-moving machinery and the erection of several tall tower cranes on-site;
- Temporary storage of excavated materials and construction materials on-site;
- Gradual emergence of the proposed blocks, and associated works;
- Security fencing and site lighting.

Construction stage impacts on landscape/townscape character will be 'short-term' (i.e., lasting 1-7 years), in accordance with the EPA definitions of impact duration. Furthermore, the context of this construction activity is within a suburban, residential setting where the construction of multi-storey buildings has been long established. As it is mostly a greenfield site, there is a minimal degree of demolition associated with the site; namely, approx. 15m of concrete wall and railing, as well as a single-storey temporary building (i.e., prefabs).

According to the aforementioned Arboricultural Chapter of the EIAR accompanying this application (as per Section 10.4.1.1), a comprehensive tree survey of the site was conducted in late 2021 by the consulting Arborists, The Tree File. It found that:

> *"While the broader Arboricultural review investigated 235 no trees or tree groups, only 127 no. of these are considered physiologically pertinent to the site and the proposed development … The proposed development will see the loss of only 36 individual trees and part of "Tree Line 2". Of these 36 no. trees, 10 no. have been categorised at "U" grade trees and have been recommended for removal regardless of development works."*

It is worth noting that of the trees lost as a result of the Proposed Development, the vast majority of these are also non-native species.

On the basis of the reasons outlined above, the magnitude of construction stage landscape/townscape impacts is deemed to be Medium. When combined with the Medium-low sensitivity of the receiving landscape, the overall significance of construction stage landscape/townscape impacts is considered to be **Moderate**, in accordance with the criteria contained in Section 1.5. In addition, the quality of construction stage effects is deemed to be **Negative**.

10.5.1.3 Operational Phase landscape impacts

Following the completion of the proposed works, landscape/townscape impacts will relate entirely to the development's impact on the character of the receiving landscape/townscape.

The most notable landscape/townscape impacts of the application site will result from the permanent 7 no. blocks that mostly range in height from 4 to 7 storeys. While this will be a distinct vertical imprint into what had been mostly a grassy, greenfield site, it also represents a broader compatibility with the townscape fabric and character along the northern end of Sybil Hill (i.e., within 100m of the site), and residential nature of the wider study area.

To be more detailed: the wider locality is an intensely residential inner suburb of a European capital, with the site being approximately 5km from city centre. While the vast majority of residential development within the broader locality is extensive, two-storey housing, there are also multiple instances of higher-density apartment complexes of 3-5 storeys from more recent decades. These include: the 4-5 storey Ardilaun Court and the five-storey Sacred Heart nursing home, both within 100m of the site along Sybil Hill; Seapark is within 200m south of St. Anne's and is 10 no. apartment blocks ranging from 3-4 storeys; aligning the park's southern boundary is the more recent Belgrove Park, consisting of multiple 3-4 storey residential blocks.

In terms of the Proposed Development's likely impact on the character of the adjacent St. Anne's Park, while the proposal represents a distinct change of land use (i.e., from chiefly sporting pitches, like those in adjacent areas of the park, to chiefly residential, like those adjoining the park), the presence of existing tall mature treelines to all sides of the site adjoining the park will maintain the disconnect the Park has had from this cordoned off private property. These tall, mature treelines will have the effect of 'softening' the vertical scale of the development, helping to 'anchor' it into the surrounding townscape fabric and character, while also enriching it. Be that as it may, the completion of construction will mark an escalation and intensification of that fabric within the study area, while being attuned to and compatible with it. However, while the proposal will result in a distinct increase in the scale and intensity of development within the application site, and its immediate surrounds, such a development is to be expected in a residential, ever-evolving suburb as this, and will knit into the prevailing urban fabric rather than contrasting against it.

Yet the Proposed Development's impact on the character of the receiving landscape/townscape is not entirely centred upon the proposed 7 No. blocks, as it also includes a crèche and a 100-bed nursing home. The proposal will accommodate car parking spaces, bicycle parking spaces, storage, services and plant areas, but also vehicular/pedestrian/cyclist accesses to/from Sybil Hill and St. Anne's Park.

Crucially, the Proposed Development will provide for c.20,969.91sqm of public open space, or c.31.15% on this site area of c.6.7ha. The Proposed Development will also include high quality, Landscape Architect-designed open spaces, planting and boundary treatments. 714 no. new trees and extensive planting mixes (including multiple varieties of shrubs, grasses, bulbs, perennials, groundcovers and pond planting) will be densely planted throughout the site to further enrich its existing verdant character. A total of 33 no. existing trees will be removed. In summary, 33 no. existing tress will be removed and 714 no. new tress will be planted resulting in an overall net gain of tree cover.

Owing to the sizable net gain of not just proposed trees but other proposed planting, upon establishment the site will bear a considerably stronger sylvan character than it does at present.

For the reasons outlined above, the magnitude of operational stage landscape/townscape impacts is considered to be **Medium-Low.** In accordance with the Landscape/Visual significance matrix contained in Table 10-3, the combination of a 'Medium-low' townscape sensitivity judgement and a 'Medium-low' townscape impact magnitude judgment results in a **Moderate-slight** overall operational stage significance of townscape impact. On balance of the intensity and scale of new development against the quality of the architectural and landscape design the operational landscape effect is deemed to be marginally negative i.e., **Neutral-Negative**.

10.5.1.4 The "Do Nothing" Scenario

In the event that the Proposed Development does not proceed, the site is likely to remain a fallow/unmaintained greenfield site on private property, fenced off/secured from the public (e.g., park users in the adjacent St. Anne's Park) as well as pupils/staff of St. Paul's College.

10.5.2 Visual Impacts of the Proposed Development

10.5.2.1 Visual Receptor Sensitivity

Viewshed Reference Points (VRP's) are the locations used to study the visual impacts of the proposal in detail. It is not warranted to include each and every location that provides a view of this development as this would result in an unwieldy chapter of the EIAR and make it extremely difficult to draw out the key impacts arising from the project. Instead, the selected viewpoints are intended to reflect a range of different receptor types, distances and angles. The visual impact of a Proposed Development is assessed using up to 6 categories of receptor type as listed below:

- Key Views (from features of national or international importance);
- Designated Scenic Routes and Views;
- Local Community views;
- Centres of Population;
- Major Routes (e.g., from regional roads, upwards);
- Amenity and heritage features.

In the case of the study area for the Proposed Development, it is taken that all such receptors are within a 'Centre of Population;' it being Dublin City. In addition, there are no known designated scenic route or views, or even Key Views, within the study area.

In consideration of the visual receptor criteria set out in section 10.2.2, the main variation in the nature of views and those availing of those views, in this instance, relates to an overt sense of place. As previously set out in Section 10.3.1 the study area's character and sense of place is that of an intensely residential locality, within which is a very large municipal that borders the site. Thus, there is a very clear division between the visual sensitivity of receptors within the residential sector, compared to those within the recreational amenity of St. Anne's Park. However, there is a further distinction to be made between receptors from institutional settings

along the Sybil Hill, as well as those from major routes within the site study. Thus, in terms of visual sensitivity, the receptors will be categorised as those being:

- Chiefly residential in land use and character;
- Chiefly that of recreational/amenity use;
- Chiefly educational and/or institutional in land use and character;
- Chiefly that of a major route.

Those receptors that are chiefly residential in land use and character entail: VP1, VP5, VP7, VP11, VP12, VP13, VP14, VP18. Overall, views within this receptor base are deemed to be of 'Medium-low' visual sensitivity, on balance of a multitude of factors set out in Section 10.2.2.

Those receptors that are chiefly recreational/amenity in land use entail: VP10, VP11, VP15, VP16, VP17, VP19, VP20 and VP22. Overall, views within this receptor base are deemed to be of 'Medium' visual sensitivity, on balance of a multitude of factors set out in Section 10.2.2.

Those receptors that are chiefly educational and/or institutional in land use entail: VP8 and VP9. Overall, views within this receptor base are deemed to be of 'Medium-low' visual sensitivity, on balance of a multitude of factors set out in Section 10.2.2.

Those receptors that are chiefly that of a major route entail: VP2, VP3, VP4 & VP6. Overall, views within this receptor base are deemed to be of 'Medium-low' visual sensitivity, on balance of a multitude of factors set out in Section 10.2.2.

10.5.2.2 Magnitude of Visual Effect

10.5.2.2.1 Construction Phase:

In terms of Construction Phase visual impacts, these will be subject to continual and decisive visual change through the approx. 18-month construction period. Such short-term and continually evolving impacts cannot feasibly be supported by photomontages but will be similar to those described in the construction stage landscape impacts (in Section 10.5.1.2) and include, but is not limited to:

- HGVs transporting materials to and from the site;
- Movement of heavy earth-moving machinery and the erection of several tall tower cranes on-site;
- Temporary storage of excavated materials and construction materials on-site;
- Gradual emergence of the proposed blocks, and associated works;
- Security fencing and site lighting

Overall, such Construction Phase visual impacts will be short-term in duration and not likely to be generate any significant visual impacts.

Operational Phase:

The assessment of Operational Phase visual impacts at each of the selected viewpoints is aided by photomontages of the Proposed Development. Photomontages are a 'photo-real' depiction of the scheme within the view, utilising a rendered three-dimensional model of the development, which has been geo-referenced to allow accurate placement and scale. For each viewpoint, the following images have been produced:

1. Existing View
2. Montage View upon completion of all proposed works

Please note that that there are 22 photomontages assessed below, from 21 selected viewpoints. This is because VP10 and VP22 are from the one selected viewpoint, with VP10 more reflective of a tighter angle in its viewing arc, while VP22 is a panoramic reflecting a 180° viewing arc. This has been undertaken out of an abundance of caution, as the viewpoint location is from along the main Avenue of St. Anne's Park, at a location close to the site's southern boundary.

Also please note that for the below purposes, the 'site boundary' refers to the developable area in which the proposed blocks are located (i.e., as opposed to the access road 'arm' extending westwards to connect with Sybil Hill).

Viewshed Reference Point		Viewing distance to site boundary	Direction of View
VP1	Furry Park Road	500m	E/NE

Representative of:	• Local community views
Receptor Sensitivity	**Medium-low**
Existing View	By way of context, this location is from the heart of intensely residential streets to the west of Sybil Hill. The east-west axis of Furry Park road is laid out upon a similar axis to the Main Avenue of St. Anne's Park; an axis that has the most potential for views in the direction of the site.
Visual Impact of proposed development	Owing to intervening houses, no views of the Proposed Development will be attainable from this location. Consequently, the magnitude of visual impact is deemed to be **Negligible** and of a **Neutral** quality.

Summary

Based on the assessment criteria and matrices outlined at **Section 10.2** the significance of residual visual impact is summarised below.

	Visual Receptor Sensitivity	Visual Impact Magnitude	**Significance of Visual Impact**
Impact Significance	Medium-low	Negligible/neutral	**Imperceptible/ Neutral**

Viewshed Reference Point		**Viewing distance to site boundary**	**Direction of View**
VP2	Sybil Hill at entrance to Sacred Heart Nursing Home	178m	E/NE

Representative of:

- Local community views
- Major route (i.e., R808/Sybil Hill)

Receptor Sensitivity

Medium-low

Existing View

By way of context, this location is from the western side of the northern end of Sybil Hill, at the entrance to the five-storey Sacred Heart Nursing Home, which runs for north-south for over 150m. Across the road is the entrance to Sybil Hill House, a protected structure owned by St. Pauls College in which some members of the Vincentian Order live. Behind a low brick wall and railing, a school ground replete with multiple mature trees is apparent. From this distance, the grounds appear planted/re-planted in the mid-20th Century, owing to the prominence of certain conifer non-natives. Little else can be discerned beyond these trees, which stretch with lawn areas for approx. 170m eastwards from Sybil Hill.

Visual Impact of proposed development

The existing, single lane private entrance will be considerably widened to accommodate a two-way traffic public road with footpaths to either side, connecting the development to Sybil Hill; the only vehicular entrance that will access the Proposed Development. Aside from footpaths and cycle lanes, street planting to either side of this new access road will be apparent. Approx. 200m away, a four/five storey residential block will be largely screened by intervening vegetation. In the context of an inner suburb of a European capital city, as well as the

northern end of Sybil Hill, the proposed block will be highly unlikely to draw attention to itself and even if observed, will not markedly detract from the visual amenity of the scene. However, the increase of intensity of built environment will be a readily-noticeable element made more manifest by the proximity and presence of the new access road/footpath/cycle path in the foreground.

Consequently, the magnitude of visual impact is deemed to be **Medium-low** and of a **Negative** quality.

Summary

Based on the assessment criteria and matrices outlined at **Section 10.2** the significance of residual visual impact is summarised below.

	Visual Receptor Sensitivity	Visual Impact Magnitude	**Significance of Visual Impact**
Impact Significance	Medium-low	Medium-low/negative	**Slight/ Negative**

Viewshed Reference Point		**Viewing distance to site boundary**	**Direction of View**
VP3	Entrance to St. Paul's College	206m	East

Representative of:

- Local community views
- Major route (i.e., R808/Sybil Hill)

Receptor Sensitivity

Medium-low

Existing View

By way of context, this location along Sybil Hill is located approx. 40m north of the entrance to the Main Avenue of St. Anne's Park. On the eastern side of the road, one of two entrance into St. Paul's College is clearly visible, framed between roadside trees to either side. Although relatively largely in area, the school's red brick, two-storey 1950s buildings tie in with the foreground wall and piers. Beyond the school buildings, little can be discerned.

Visual Impact of proposed development

Owing to the aforementioned school buildings, the only elements of the proposal that will be capable of being discerned is the modest roof outline of one of the proposed blocks, more than 200m away. However, even if noticed, the proposal would not detract from the suburban visual amenity of the scene, especially in light of there being the five-storey Sacred Heart Nursing Home aligning the western side of this road (i.e., across the road from St. Paul's College).

Consequently, the magnitude of visual impact is deemed to be **Negligible** and of a **Neutral** quality.

Summary

Based on the assessment criteria and matrices outlined at **Section 10.2** the significance of residual visual impact is summarised below.

	Visual Receptor Sensitivity	Visual Impact Magnitude	**Significance of Visual Impact**
Impact Significance	Medium-low	Negligible/neutral	**Imperceptible/ Neutral**

Viewshed Reference Point		**Viewing distance to site boundary**	**Direction of View**
VP4	Sybil Hill at playing pitches of St. Anne's Park	283m	NE

Representative of:

- Local community views
- Major route (i.e., R808/Sybil Hill)

Receptor Sensitivity

Medium-low

Existing View

Sybil Hill extends for approx. 700m, from Vernon Avenue in the south to the junction with Howth Road/R015 in the north. For over 300m of this road, St. Anne's Park aligns the eastern side. For almost all of that section, a 4-5-foot-high hedge aligns the park's western boundary, behind which a row of mature and semi-mature trees is set. It is only through this fragmented and narrow envelope of visibility - above the

hedge and beneath the branches of the trees - that allows for views into the park. From this and similar locations along this section of the park, all that be discerned of St. Anne's is extensive, ostensibly flat, playing pitches, bound by distant mature trees. In this instance, the tall, mature, evergreen trees on the far (i.e., north) side of the playing pitches are those aligning the southern side of the Main Avenue.

Visual Impact of proposed development

Owing to the aforementioned tall, mature, evergreen trees aligning the southern side of the Main Avenue, no views of the Proposed Development will be attainable from this location.

Consequently, the magnitude of visual impact is deemed to be **Negligible** and of a **Neutral** quality.

Summary

Based on the assessment criteria and matrices outlined at **Section 10.2** the significance of residual visual impact is summarised below.

	Visual Receptor Sensitivity	Visual Impact Magnitude	**Significance of Visual Impact**
Impact Significance	Medium-low	Negligible/neutral	**Imperceptible/Neutral**

Viewshed Reference Point		**Viewing distance to site boundary**	**Direction of View**
VP5	Ennafort Road, Harmonstown	296m	S/SE

Representative of:

- Local community views

Receptor Sensitivity

Medium-low

Existing View

Harmonstown is a densely residential locality within 200m north of the site. Less than 300m from the site and on marginally elevated terrain, a junction with Ennafort Road allows for the most potential of views in the direction of the site from Harmonstown. Two-storey residences align the

road, while beyond these, mature trees can be discerned, which align Howth Road/R015.

Visual Impact of proposed development

A distant, bare-discernible corner of one of the proposed blocks will be capable of being made out from this this location, although will be unlikely to be noticeable in a built-up suburban setting as this. Thus, even if observed, it will have no bearing upon the visual amenity of the setting. Owing to the aforementioned trees and houses, the overwhelming majority of views of the Proposed Development will not be attainable from this location.

Consequently, the magnitude of visual impact is deemed to be **Negligible** and of a **Neutral** quality.

Summary

Based on the assessment criteria and matrices outlined at **Section 10.2** the significance of residual visual impact is summarised below.

	Visual Receptor Sensitivity	Visual Impact Magnitude	**Significance of Visual Impact**
Impact Significance	Medium-low	Negligible/neutral	**Imperceptible/ Neutral**

Viewshed Reference Point		**Viewing distance to site boundary**	**Direction of View**
VP6	Howth Road/R105 at St. Anne's Park	105m	S/SE

Representative of:

- Local community views
- Major route (i.e. Howth Road/R105)

Receptor Sensitivity

Medium-low

Existing View

By way of context, Howth Road is a busy regional road that is one of the main throughfares between coastal north Dublin (e.g., Clontarf, Raheny, Kilbarrack, Baldoyle, Sutton, Howth) and the city centre.

Between Raheny and Killester, for approx. 200m the road aligns the north-western section of St. Anne's Park. Similar to Sybil Hill, a 4-5-foot-high hedge aligns the park's boundary, behind which a row of mature and semi-mature trees is set. It is only through this fragmented and narrow envelope of visibility - above the hedge and beneath the branches of the trees - that allows for views into the park. Where partial visibility does allow, a distant mature treeline can be discerned, which serves as the northern boundary of the site, over 100m away. The site is at an oblique angle to road and footpath users, while residents along the north side of the road do not have as much (partial) visibility in the direction of the site, owing to the foreground tree canopies.

Visual Impact of proposed development

More than 200m away and outside St. Anne's Park, the upper storey of a five/six storey proposed residential block is discernible above the mature treeline aligning the site's northern boundary. Of what can be discerned of the proposed block will read as a contemporary multi-storey apartment complex that can be regularly seen about this city, and the proposed building's scale, form, text or tone may not be noticed by a casual observer. The Proposed Development will represent an escalation in the height of all visible buildings in this scene, but will certainly not be visually dominant or overbearing. Even if observed, it will be in a residential, suburban context, and would not have a marked effect of the visual amenity of this setting.

Consequently, the magnitude of visual impact is deemed to be **Low** and of a **Negative** quality.

Summary

Based on the assessment criteria and matrices outlined at **Section 10.2** the significance of residual visual impact is summarised below.

	Visual Receptor Sensitivity	Visual Impact Magnitude	**Significance of Visual Impact**
Impact Significance	Medium-low	Low/negative	**Slight/ Negative**

Viewshed Reference Point		**Viewing distance to site boundary**	**Direction of View**
VP7/7a	The Meadows	53m	E/SE

Representative of:	• Local community views
Receptor Sensitivity	**Medium-low**
Existing View	Less than 200m in length, The Meadows is a *cul de sac* residential street off Howth Road, sections of which align the north-west site boundary. Detached, two-storey residences are dominant on this street. At the south-eastern side of the road, residences back onto the site boundary. In this scene, set within a small green near the terminus of the road, along the eastern side of the road numerous such residences are aligned. It is very much a standard, suburban residential scene, albeit with numerous notably tall tress to the rear of the properties; trees that are located within the site (i.e., outside St. Anne's Park). It is also worth noting that the recently constructed 4-5 storey Ardilaun Court is located to the rear of properties on the western side of this road.
Visual Impact of proposed development	In select, highly-localised glimpses between the gaps in the roofline of the foreground residences, a proposed residential block will be discerned behind the aforementioned tall trees, while outside St. Anne's Park. However, the vast majority of the proposed residential block, including its roofline, will not be visible from this location. Where partially visibility will allow, the Proposed Development will be evident as an appropriately scaled piece of contemporary multi-storey residential block that is routinely found within the ever-evolving suburbs of Dublin. The Proposed Development will represent an intensification in height of all visible buildings in this scene, but will not be visually dominant or overbearing. For the most part, the roofline of the foreground residences will remain more apparent, while the existing trees in the site will tower over both the proposed block and the foreground residences, helping maintain a semi-sylvan character to this vista. The proposal will alter the available vista to a minor extent and will not have a palpable effect on the visual amenity of the scene. In addition, it will partially counter the 4-5 storey Ardilaun Court that aligns the western side of The Meadows. However, it is worth noting that the degree of enclosure generated by the proposed blocks will be greater for those residences along The Meadows that back onto the site. Consequently, the likely impact upon the residential visual amenity of these residences will also be higher.

Consequently, the magnitude of visual impact is deemed to be **Low** and of a **Negative** quality.

Summary

Based on the assessment criteria and matrices outlined at **Section 10.2** the significance of residual visual impact is summarised below.

	Visual Receptor Sensitivity	Visual Impact Magnitude	**Significance of Visual Impact**
Impact Significance	Medium-low	Low/negative	**Slight/negative**

Viewshed Reference Point		**Viewing distance to site boundary**	**Direction of View**
VP8/8a	Sybil Hill House	106m	NE/E/SE

Representative of:

- Heritage & Amenity feature

Receptor Sensitivity

Medium-low

Existing View

By way of context, Sybil Hill House, which has been owned by St. Pauls College since the 1950s is a protected structure from the 1750s, with a small section of its original ha-ha surviving to the south of the property (i.e., partially visible in foreground). However, it is worth re-iterating that the House, like all else within the grounds of St. Pauls, is and always has been in private property and not accessible to the public; factors that also inform the visual sensitivity of the receptor. In that regard, this is a less typical LVIA/TVIA receptor, as this location is not in the public sphere. A thicket of mature trees is located to the southeast of the House, beyond which (i.e., further east) is the developable area of the site.

Immediately south of the House is the two-storey, mid-20th Century, red brick campus of St. Paul's college, with a row of non-native prunus trees visible to its north. A grassy corridor between the school building and the ha-ha is evident in the foreground, though little can be discerned beyond, owing to mature vegetation. This grassy corridor is

within the western 'arm' of the site and is hence cordoned off with temporary fencing.

Visual Impact of Proposed Development

To the northeast, north of the ha-ha, the proposed blocks will be challenging to discern, owing to the scale of existing mature trees in tandem with Sybil Hill House. However, a low brick wall with ornate black railing will run between the site and Sybil Hill House; fencing that will reflect and respect this protected, period property. To the east, owing to the clearance of some existing trees to facilitate the new access road into the site, partial views of the proposed blocks will open up. However, at this location, these moderately scaled, four/five storey residential blocks in the site will be more than 200m away.

Where visible, the Proposed Development will be evident as an appropriately scaled, suitably finished piece of contemporary multi-storey architecture. The proposal will add to the intensity and scale of built development within the scene, while suggesting a contemporary/21st Century architectural presence that was not previously as palpable. Furthermore, it's deep red, brick-like tones will appear compatible with the foreground St. Paul's College and its height and form will not attract attention to itself.

The foreground access road, however, will introduce a considerably more tenable and immediate visual change to this scene. The proposed clearance of some trees along this section of the site will be in order to facilitate the proposed access road; tempered by the proposed planting of a hedge along the southern side of the road, among other measures. In addition, such visual change is not tantamount to visual impact: such a road, footpath, cyclepath and attendant planting are routine sights across the study area and the city, and are integral elements of such highly functional residential suburbs as this. In addition, the scheme will present an array of high-end, contemporary landscape design that will generate a source of visual amenity in its own right.

On balance, the magnitude of visual impact is deemed to be **Medium-low** and of a **Negative** quality.

Summary

Based on the assessment criteria and matrices outlined at **Section 10.2** the significance of residual visual impact is summarised below.

Visual Receptor Sensitivity	Visual Impact Magnitude	**Significance of Visual Impact**