

## 11 Landscape & Visual Impact Assessment

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## 11.1 Introduction

This chapter assesses the landscape and visual impacts of the proposed strategic housing development [SHD] at 'St Teresa's', Temple Hill, Monkstown, Blackrock, County Dublin on the surrounding urban area and was prepared by ARC Architectural Consultants Limited.

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## 11.2 Study Methodology

Article 1 of the *European Landscape Convention* defines landscape as “an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors”. The purpose of this chapter is to assess how the existence of a proposed development might change how a surrounding area might be ‘perceived by people’ visually.

The preparation of this visual impact assessment has had regard to the *Environmental Impact Assessment of Projects Guidance on the preparation of the Environmental Impact Assessment Report* (European Commission, 2017) and draft *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports* (August 2017) prepared by the Environmental Protection Agency. It is noted that the EPA Guidelines, in categorising the extent of environmental impact, uses the term ‘effects’ in place of ‘impacts’.

As has been noted in the European Commission’s 2017 EIAR Guidance, the baseline, is not static but is something continuously evolving, and the assessment of the baseline should include all relevant considerations. An understanding of the history of the development of Blackrock is necessary in order to understand what natural and human factors acted to form Blackrock’s urban landscape. Historical, cultural, and social concerns are factors that inform the character of any landscape and need to be understood in assessing the effects on that landscape arising from the existence of proposed development. These factors are part of the baseline.

As has been noted in the European Commission’s 2017 EIAR Guidance, the perception of development by observers will be influenced by the context in which the development is seen. There are a number of quite different physical contexts from which proposed development on the St Teresa’s lands will be seen. When seen by observers travelling on the Blackrock Bypass, the proposed development is likely to be viewed as a development typical of many other developments seen along a major distributor road. From Rockfield Park, the development will be observed absorbed into a landscape context and seen behind trees across a large open green space. From nearby housing estates of single or two storey houses, the scale of the proposed development may appear jarring to some observers. Some observers are, therefore, likely to regard the existence of the proposed development as giving rise to significant landscape and visual effects, whereas others will not.

Awareness on the part of observers of other developments planned or under way in the local area is also an important factor in how observers will regard a proposed new development. There are extensive other developments taking place and approved in Blackrock, and awareness of these developments is likely to influence how observers will respond to the St Teresa’s development. Awareness of the fact that Blackrock has been subject to continuous development for the last 300 years and has been subject to major development for the last 50 years, is also central to how a new development will be regarded. Some observers may fall into the trap of believing that their surroundings are fixed and might, therefore, have a negative response to any new development. However, receiving environments are rarely fixed, and Blackrock in particular is a place that is subject to rapid and continuous change.

The purpose of a visual impact assessment is, taken together with the full range of other documents lodged as part of a planning application, to assist in informing the decision making process.

Assessment of visual effects, has three main parts:

1. Analysis of the likely extent of visibility of a proposed development
2. Description of the visual sensitivity of the receiving environment and its consequent capacity to absorb development
3. Assessment of the objective extent of change in the visual character of the receiving environment likely to arise from the existence of the proposed development, and of the likely response of observers to that change.

The EPA draft Guidelines require that visual impact assessment be carried out in a manner that is systematic, impartial, and objective and independent. It is not the purpose of assessment to promote or advocate for the development. It is an important principle of impact analysis that the analysis should be capable of being repeated independently, and that repeated analysis should lead to the same conclusion. To facilitate this, the steps taken in the analysis of impacts should be clearly set out in an assessment report.

#### **1. *Analysis of the likely extent of visibility of a proposed development***

The first task of a visual impact assessment is to assess the likely extent and nature of visibility of the proposed development. This includes determining from what locations the proposed development is likely to be visible and from what locations it will not be. It includes determining, where visible, how major or minor an element the proposed development will be in any view. The primary determining factors when assessing extent of visual impact are:

- (i) Whether a development will be visible or not;
- (ii) Where visible, how much of any view a development will occupy; and
- (iii) Whether or not a proposed development is the focus of a view.

Each of these factors affect the visual prominence of a proposed development.

The extent of visibility of a proposed development in any view tends to be directly related to the distance of the viewpoint from the development. However, intervening obstacles such as buildings or structures, trees and planting, and topography, can modify the extent of visibility of the proposed development. Where streets or urban spaces are aligned towards the site of a proposed development, and where the buildings or trees at the end of these alignments are relatively modest in height, there is a potential for taller developments to be visible above any lower intervening buildings or other obstacles. This potential increases with the length of the open foreground but reduces when the viewpoint is closer to any intervening obstacles. It follows, that for taller structures (e.g. taller than the prevailing height of the surrounding built environment or landscape elements) to be openly visible, they must be seen across an open foreground or at the end of a long vista or alignment. From viewpoints within dense urban, or even suburban, environments, very modest buildings in the foreground can conceal even very large or tall structures from view.

An initial survey of the potential visibility of the proposed development was carried out by ARC on several dates in June 2018, and further survey of potential visibility were carried out in July and September 2021. Before visiting the surrounding area, ARC carried out mapping analysis to identify locations surrounding the application site, which would be representative of the extent of visibility of the proposed development, including locations from which views of the proposed development were likely.

Photomontages were prepared by Model Works from these view locations and these photomontages are appended to this report. ARC had regard to those photomontages in the preparation of this Visual Impact Assessment.

## **2. Description of the visual sensitivity of the receiving environment and its consequent capacity to absorb development**

As has been discussed above, the visibility of proposed development is mediated by the physical geometry of the receiving environment, including the pattern and form of the existing built environment. These are among the factors that determine the visual capacity of a receiving environment to absorb development. Among other characteristics are the visual character and uniformity of the receiving environment and its historical or cultural value.

An intact and uniform Georgian square, which is a coherent and integrated visual setting, would usually be regarded as visually sensitive with a consequent low capacity to absorb new development that might dilute the existing visual character. The same might be true of certain suburban environments. On the other hand, a centre city environment or dockland settings where there are structures of a diverse character, and a wide range of scales are settings that are usually less sensitive and are likely to have a high visual capacity to absorb development. Locations that have a statutory designation as an architectural conservation area or locations where there are protected structures, because of such designations are usually regarded as having an increased visual sensitivity leading to a reduced visual capacity to absorb development. Other designations, such as special amenity area orders, designated views and prospects and designated high amenity zones, may also limit this absorption capacity. Capacity to absorb development, therefore, has a direct bearing on the extent of likely visual impacts / visual effects.

In areas that are very uniform in character the introduction of larger structures may change the visual character of the area. In established urban areas, the introduction of new large structures as part of a process of ; has the potential to give rise to substantial visual impacts / visual effects. The extent of this change will depend on the extent of difference in visual character between the new development and the existing surrounding visual environment. The extent of change is likely to be the main factor in determining the extent of visual impacts / visual effects.

## **3. Assessment of the objective extent of change in the visual character of the receiving environment likely to arise from the existence of the proposed development, and of the likely response of observers to that change**

The list of definitions given below is taken from *Table 3.3: Descriptions of Effects* contained in the draft EPA *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports*. Some comment is also given below on what these definitions might imply in the case of visual impact or landscape and visual impact. The definitions from the EPA document are in italics.

**Imperceptible:** *An effect capable of measurement but without significant consequences.* The definition implies that the development would be visible, capable of detection by the eye, but not noticeable to the casual observer. If the development were not visible, there could be no impact.

**Not Significant:** *An effect which causes noticeable<sup>2</sup> changes in the character of the environment but without significant consequences* (the footnote "2" to the word "noticeable" is: "for the purposes of planning consent procedures"). The definition implies that the development would be visible, capable of detection and of being noticed by an observer who is actively looking for the development with the purpose of assessing the extent of its visibility and visual effects.

**Slight:** An effect which causes noticeable changes in the character of the environment without affecting its sensitivities. For this definition to apply, a development would be both visible and noticeable, and would also bring about a change in the visual character of the environment. However, apart from the development itself, the visual sensitivity of the surrounding environment would remain unchanged.

**Moderate:** An effect that alters the character of the environment in a manner that is consistent with existing and emerging baseline trends. In this case, a development must bring about a change in the visual character of the environment; and this change must be consistent with a pattern of change that is already occurring or is likely to occur.

**Significant:** An effect which, by its character, magnitude, duration or intensity alters a sensitive aspect of the environment. The definition implies that the existence of the development would change an important characteristic of the visual environment in a manner that is not “consistent with existing and emerging baseline trends”. Whether an effect might or might not be significant can depend on the response of individual observers, since what one person might regard as a sensitive aspect of the visual environment, another might not. A conservative approach, classifying effects as significant even though many observers might not regard them as significant, is taken here.

**Very Significant:** An effect which, by its character, magnitude, duration or intensity significantly alters most of a sensitive aspect of the environment. The definition implies that the existence of the development would substantially change most of the visual characteristics of the environment in a manner that is not “consistent with existing and emerging baseline trends”.

**Profound:** An effect which obliterates sensitive characteristics. In visual terms, profound impacts are only likely to occur on a development site, in that it is only on the site that all previous visually sensitive characteristics could be obliterated. Outside the site, some visual characteristic of the original environment is likely to remain.

The range of possible effects listed above deal largely with the extent of impact; and the extent of the impact of a development is usually proportional to the extent to which that development is visible. The extent of impact will also, in part, depend on the sensitivity of the spaces from which the development is seen. This proportionality may be modified by the extent to which a development is regarded as culturally or socially acceptable. The character of the impact: positive, negative or neutral, will depend on how well a development is received by the public, and on the general contribution of the development to the built environment. The character of a visual impact, and even the duration of a visual impact, is very dependent on the attitude of the viewer. If a viewer is opposed to a new building for reasons other than visual, that viewer is likely to see the building in a negative light, no matter how beautiful the building might be. Although buildings are intended to be permanent, and will be permanently visible, the extent of visual impact associated with a building often diminishes with time as further development in the area takes place.

### Planning Policy Context

The *Dun Laoghaire-Rathdown Development Plan 2016-2022* and *Blackrock Local Area Plan 2015--2021* identify the application site for development as part of lands identified as ‘St Teresa’s and Dunardagh’. Map 12 of the *Blackrock Local Area Plan 2015--2021* provides for a benchmark height of four storeys, with three storey elements at its north-western and eastern boundaries. Map 12 also identifies the potential for five storeys along the frontage at Temple Hill / the Rock Road (the N31 National Primary Road), but notes that the area around the protected structure at St Teresa’s is a height sensitive area.

It should be noted that the application site is not located in an Architectural Conservation Area or a Candidate Architectural Conservation Area. However, there are three protected structures on the

development site, including St Teresa's House (formerly Craigmore). The application site includes Character Areas 5 and 6 indicated on Map 6 of the *Blackrock Local Area Plan 2015--2021*. The LAP states as follows in relation to these Character Areas:

**“Character Area 5**

*This area includes the original mid 19th century house, St Teresa's, and lands to the rear/north overlooking Temple Hill. Historic maps indicate that the rear elevation was not designed to have a formal relationship with Temple Hill. Rather the main views were to the south towards the Dublin Mountains.*

*The later buildings adjoining the Protected Structure encroach on its setting and visual amenity. In the event that these structures become obsolete/redundant, there may be an opportunity to create an improved setting for the Protected Structure in any redevelopment of this part of the site. The lands to the rear/north of St. Teresa's, overlooking Temple Hill, have the potential to accommodate taller structures provided that development proposals comply with the following objectives.*

Objectives: Character Area 5

D11

*It is an objective of the Council to ensure that development within Character Area 5 shall include the creation of an improved setting for St Teresa's Protected Structure.*

*The Council will retain The Gate Lodge to St. Teresa's and necessitate any extensions to ensure its continued use and viability in accordance with policies and objectives set out in Chapter 2 of this Plan.*

D12

*It is an objective of the Council to ensure that new development within Character Area 5 will be concentrated to the rear of the part of the site overlooking Temple Hill, be of a high standard of design and be sympathetic to the Protected Structure in terms of its siting, design and materials used.*

D13

*It is an objective of the Council to facilitate the relocation of the original entrance gates and piers to the proposed new entrance to Rockfield Park as part of any re-development of the lands in accordance with the Site Framework Strategy (Section 3.5) and Objective RP3 (Section 9.2).*

**Character Area 6**

*This encompasses lands to the south of St. Teresa's extending to the boundary with Rockfield Park. Historic maps show that this part of the site has never been developed. There is a County Development Plan objective to protect and preserve the Trees and Woodland on part of the site and where possible these shall be incorporated into any future development. It is important that any development at this location maintains the sense of open space the house has always enjoyed. The low lying topography renders this part of the site very sensitive to development. Any development proposals will be required to comply with the following objectives.*

Objectives: Character Area 6

D14

*It is an objective of the Council to ensure that development within Character Area 6 be appropriately sited having regard to views to and from the Protected Structure and retain the historic view to the south toward the Dublin Mountains.*

D15

*It is an objective of the Council to ensure that any development proposals for Character Area 6 shall include photomontages to demonstrate the visual impact to and from the Protected Structure.*

D16

*It is an objective of the Council to ensure that any development proposals for Character Area 6 shall provide additional screening consisting of native tree species in order to protect the setting and visual amenity of the Protected Structure.*

D17

*It is an objective of the Council to ensure that any development within Character Area 6 shall be sited so as to protect and provide an appropriate setting for the folly to the southwest of St. Teresa's."*

### **The Urban Development and Building Heights Guidelines for Planning Authorities**

In December 2018, the Department of Housing, Planning and Local Government published the *Urban Development and Building Heights Guidelines for Planning Authorities*, which sets out the following development management criteria:

*"In the event of making a planning application, the applicant shall demonstrate to the satisfaction of the Planning Authority/ An Bord Pleanála, that the proposed development satisfies the following criteria:*

*At the scale of the relevant city/town*

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

*At the scale of district/ neighbourhood/ street*

- The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape*
- The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.*
- The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of "The Planning System and Flood Risk Management – Guidelines for Planning Authorities" (2009).*
- The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.*

- *The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood."*

The *Urban Development and Building Heights Guidelines for Planning Authorities* are referenced here in the interests of completeness. However, for the avoidance of doubt these guidelines, nor, indeed, any other planning policy guidelines (save those related to environmental impact assessment), were considered when classifying the magnitude and extent of potential visual impacts of the proposed development on the built environment.



### 11.3 The Existing Receiving Environment (Baseline)

The site of the proposed development is bounded by Temple Road to the northeast, St Vincent's Park to the southeast, Rockfield Park to the southwest, and St Louise's Park, the Alzheimer Society of Ireland and Barclay Court to the northwest. The site of the proposed development also includes parts of the road junction between Temple Road, Temple Hill, Temple Park Avenue, Newtown Avenue and St Vincent's Park.

Temple Road to the northeast provides the main road frontage for the subject site. Temple Road was widened to become part of the Blackrock Bypass in 1988. Temple Road is now a 4 lane dual carriageway with a cycle lane and a public footpath either side and a planted central reservation. Prior to its inclusion as part of the Blackrock Bypass, Temple Road was a relatively modest single carriageway suburban road with terraced and semi-detached two storey houses along its northeast side. The outlook from the fronts of these houses changed substantially when the Bypass was created.

St Vincent's Park is a small estate of single storey terraced and semi-detached houses, modest in scale. They are separated from the main body of the subject site by the shared private road serving St Teresa's and the Daughters of Charity at Dunardagh. St Vincent's Park does not appear on the 1937 Ordnance map.

Rockfield Park is a large public park surrounded by suburban development, directly south of the lands of St Teresa's. It is an important public green space near the centre of Blackrock but is not visible from any of the main roads in the area. Many people travelling through or even living in Blackrock may not be aware of its existence. Rockfield Park was formerly part of demesne lands attached to a house called Rockfield that stood at the east side of the demesne. Part of the house is still standing near the north end of Newtown park Avenue. When St Teresa's was first constructed, then called Craigmore, the lands attached to Craigmore included an area that is now part of the north end of Rockfield Park.

St Louise's Park is a small development of single storey local authority housing immediately outside the southwest corner of the St Teresa's lands. The Alzheimer Society of Ireland National Office and Orchard Respite Centre occupies the former walled garden of St Teresa's at the centre of the western side of the St Teresa's lands. The land was donated to the Alzheimer Society of Ireland in 2005. Barclay Court is a modern development of over 80 two storey houses to the west of the St Teresa's lands. Despite its location close to the centre of Blackrock, Barclay Court has a surprisingly quiet suburban character.

The wider area to the east, south, west and northeast is overwhelmingly residential in character and is typified by estates of one and two storey houses of varying styles and types interspersed with higher density residential developments.

The present character of Blackrock is the result of a relatively continuous process of development over the last three centuries. In the 18<sup>th</sup> century, it was a seaside resort and enjoyed the patronage of the Fitzwilliam family who moved from Merrion Castle, near the present Merrion Gates, to a new house at Mount Merrion in around 1710, laying out Mount Merrion Avenue down to Blackrock. To the east of the bottom of Mount Merrion Avenue a large house was built in 1739 for the family of John Hely-Hutchinson a prominent lawyer, and statesman and the Provost of Trinity College Dublin. In the 1750s the house was bought by the FitzGerald's, the Dukes of Leinster, who enlarged it and named it Frescati, apparently a deliberate corruption of the name of the Italian resort Frascati. The involvement of the Fitzwilliam and Fitzgerald families made certain the popularity of Blackrock and the town developed and flourished in the latter half of the 18<sup>th</sup> century.

In the late 18<sup>th</sup> century and on through much of the 19<sup>th</sup> century, the area around Blackrock became dotted with the 'country seats' of the wealthy, large house on large grounds. Craigmore, built in 1862, was one of these. Many of the 'country seats' had fine sea views and views of the Dublin Mountains and the hills at Dalkey and Killiney. The opening of the Dublin and Kingstown Railway at the end of 1834, running along the coast at Blackrock and on to Kingstown, promoted the development of Blackrock and Kingstown as new commuter towns. New terraces of houses were built many around new squares and parks, many with fine sea views. These terraces interrupted the sea views from many of the earlier 'country seats'. As time passed, further terraces were built interrupting the sea views of some of the earlier terraces.

The process of development has been changing the urban landscape of Blackrock and its surroundings for the last 300 years and continues to do so. Each new development brings change. Development on the lands of St Teresa's is part of this continuous process.

Below are some historical notes on the development of Blackrock and the general area surround the subject site at St Teresa's. A more detailed and systematic history of the development is provided in 'an Historic Landscape Assessment of Teresa's/Craigmore and its Lands and Environs' prepared by Dr John Olley, which is submitted as part of the application documents for the current proposed development.

#### **The Historical Development of Blackrock**

The area of Blackrock, originally regarded as a fishing village, underwent a transition from fishery and agricultural pursuits during the middle of the 18th century, and became an area more devoted to the residential and recreational needs of the wealth of Dublin. Its name derives from the Black Rock, transliterated into Gaelic as An Carraig Dubh. Black Rock reflects the area's geological rock formation comprising limestone and granite. When wet, the rock's limestone calp takes on a black appearance. John D'Alton, in his 1838 publication, The History of the County of Dublin, notes the Black Rock's geological composition, as follows:

*'On the shore of Dublin bay, between this [Booterstown] and the Black Rock, a mass of compact limestone is visible within a few fathoms of the granite, but in the interval the rock is concealed.*

*...from Black-Rock to Dundrum, the limestone succeeds the granite, and consequently the whole series of primary strata are absent. The actual contact of the two rocks has not been observed; but at Black-Rock they are within a few yards of each other; and the limestone is extremely compact, consisting of angular fragments, as if it had been shattered into small pieces and subsequently reunited.'*

This landscape can be viewed below in a painting entitled 'A view of the Black Rock and the Mountains to the south side of the Harbour of Dublin' painted by William Jones in 1744 (see below).'

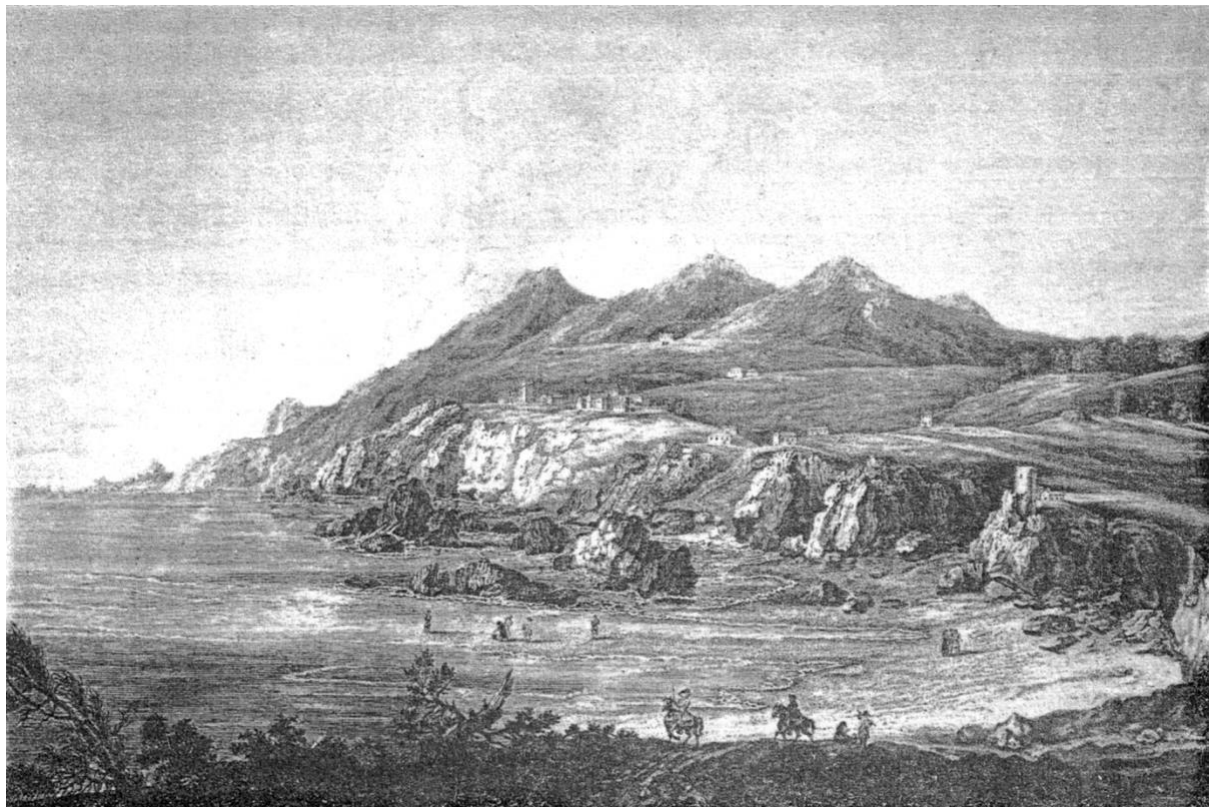


Figure 11.1: 'A view of the Black Rock and the Mountains to the south side of the Harbour of Dublin' painted by William Jones (1744)

Writing of Blackrock's origins in his 1903 publication, *A History of the County Dublin (Part II)*, Francis Ball describes its history briefly, as follows:

*'The town of Blackrock lies at the extremity of the franchises of the city of Dublin, and the cross, which stands in its main street, marks the termination of the ancient jurisdiction of the Dublin Corporation. The cross is generally thought to have been erected for that purpose, but it has recently been suggested that it is ecclesiastical in its origin. The place is one of the points mentioned in the accounts of the riding of the franchises, but, except in connection with that event, was little known until the middle of the eighteenth century. It then became, under the name of the Black Rock, the holiday outlet for the Dublin populace.'*

The Anglo Norman Fitzwilliam family held extensive lands along the coast at the south side of Dublin that included the village of Black Rock. The lands had been in the possession of the Fitzwilliam family since the 14th century. Their principal seat was at Merrion Castle, located near the present Merrion Gates, its grounds more recently occupied by the religious institution of St Mary's. Merrion Castle is shown on the First Edition Ordnance Map of 1840. By the end of the 17th century, Merrion Castle had largely fallen into decay, and so the Fitzwilliam family decided to build a new house on a low hill some distance to the southwest, a house they called Mount Merrion, which then gave its name to the area. The house was built by Richard, the fifth Viscount Fitzwilliam in around 1710, though he only lived there for a short time, living most of the time in England until his death in 1743. It would appear that in the middle of the 18th century, the sixth Viscount Fitzwilliam carried out landscaping works on the estate of Mount Merrion, laying out Mount Merrion Avenue down to Blackrock, as indicated in John Rocque's 1760 Map of the County of Dublin.

### **Seaside Resort**

By the mid 18th century, the area of Blackrock had become transformed into a seaside resort for the gentry, alluded to by Ball (1903):

*'The popularity of Blackrock led to the erection of many villas between Booterstown and that place. Amongst these was Willow Park, which at the time of the Union was the residence of Hugh Viscount Carleton, Lord Chief Justice of the Common Pleas... Williamstown, a small group of houses principally known through its occupation by the French College, assumed its present appearance about 1780 under the improving hand of Counsellor William Vavasour, whose name is still preserved in the Beggar's Bush district. '*

This proliferation of sea-bathing recreational pursuit was similarly attested by Samuel Lewis in his 1837 publication, A Topographical Dictionary of Ireland, when writing of Blackrock, as follows:

*'This place, which is situated on the southern shore of Dublin bay, consists of one principal street extending along the road from Dublin to the head of the village, and continued along the two roads which meet there from Kingstown, also of several minor streets and avenues, containing altogether 308 houses irregularly built, of which some are in pleasant and retired situations. The village itself possesses few pleasing features, but the country around it is beautifully diversified, and the immediate vicinity is embellished with numerous detached villas surrounded with pleasure grounds disposed with much taste. Maritimo, the marine villa of Lord Cloncurry, and Blackrock House, the residence of the Rev. Sir Harcourt Lees, Bart., are beautifully situated; the Dublin and Kingstown railway passes through the grounds of both these seats. Carysfort House, the villa of the Right Hon. W. Saurin, commands a fine view of the sea and of the mountains in the neighbourhood; Newtown House, belonging to W. Hodgens, Esq., is finely situated, and from the rear is a noble view of the bay of Dublin. The other principal seats are Montpelier House, that of J. Duckett, Esq., Mount Temple, of E. Brewster, Esq. ; Frescati Lodge, of H. Cole, Esq.; Field Villa, of H. C. Field, Esq. ; and Laurel Hill, of the Rev. Hugh White. Frescati, formerly the seat of the Fitzgerald family, a spacious mansion erected by the mother of Lord Thomas Fitzgerald, called "Silken Thomas," is now divided into four separate dwellings, and occupied by respectable families. The facilities for sea-bathing render this a place of great resort during the summer months; several respectable boarding-houses have been opened for the accommodation of visitors; and an excellent hotel, called Seapoint House, has been built and fitted up for the reception of families.'*

Many of these large houses boasted gardens that swept down to the sea. Once impressive Georgian terraces are still evident on Carysfort Avenue and, to a lesser extent, on Newtown Avenue.

### **Highway Robbery**

Whilst a popular seaside resort for members of the gentry, eighteenth century Black Rock was not without its shortcomings. The theme of plundering and highway robbery might also inform an understanding of this locale which, today, suggests a sense of comparative wellbeing, if not, affluence. Such unsavoury aspect to this seaside resort is sketched by an entry into the minutes of the Blackrock Association (founded in 1782), cited in Liam Mac Cóil's 1977 publication, The Book of Blackrock, as follows:

*'County of Dublin, Black Rock – Decr. 9th 1782*

*At a Numerous Meeting of the Noblemen and Gentlemen of the Neighbourhood this day assembled – William Ogilvie Esq. in the Chair – Mr. Ogilvie having laid before them the Plan of an Association for Apprehending, Prosecuting and Convicting all Persons guilty of Housebreaking, Highway Robbery, Felony or Trespass in or about Black-Rock, Booterstown, Merrion, Stillorgan [...] Killmacud, Newtown, Monkstown, Dunleary, Bullock, Dalkey, Kabinteely and the country adjoining, signed by a considerable Number of respectable Inhabitants; It was resolved to adopt the same under the Title of the Black Rock Association.*

*... nightly patrol.*

*The gentlemen of the Black Rock association have determined immediately to establish a nightly patrol from the Rock to Bagot-street and back, to secure passengers from any depredations on the road.*

The advent of the Dublin & Kingstown Railway in 1834 was to introduce a more structured approach to the business of travelling through Blackrock and its environs.

### **The Dublin & Kingstown Railway**

Designed by William Dargan, an engineer from County Laois, the advent of the Dublin & Kingstown railway line that ran through Blackrock served to further alter the exclusive character of this seaside resort. The railway station in Blackrock opened its doors on 17 December 1834. Of note is the locale's unique rock formation being utilised for the wall cappings between Williamstown and Blackrock, that today can be seen in the walls of Blackrock Dart Station. However, the construction of this line was to mar the untrammelled view of the sea from Blackrock's exclusive villas since the railway ran parallel to the coastline. Thus, the advantage of enjoying an unfettered view of Blackrock's seascape – albeit in motion – became the exclusive preserve of the travelling public.

Lewis, writing in 1837, waxed lyrical about the new railroad's impact on Blackrock and its surrounds, as follows:

*'Baths have been constructed by the Dublin and Kingstown Railway Company, on the side of the railway embankment, which passes along the sea-shore close to the village, and to these access is obtained by a handsome foot bridge from the high ground. An elegant bridge has been built over the railway, which passes close under Seapoint House, affording the inmates a facility of access to a boat pier on the opposite side. In the centre of the village is a large block of granite, on which are the remains of an ancient cross; to this spot, which is the southern extremity of the city of Dublin, the lord mayor, with the civic authorities, proceeds when perambulating the boundaries of his jurisdiction.'*

By 1872 the first horse tram had appeared in Terenure marking the origins of the bus service in Dublin. Further tram routes were electrified throughout the city and its environs between 1898 and 1900 that included the suburb of Blackrock. By 1918 buses had started to emerge as competition to the trams. Included in those routes were the 7 and 8 buses that ran through Blackrock, tracing their origins to tram routes of the same number (available from: <https://www.olddublintown.com/dublin-buses.html>); tram lines cutting through this coastal landscape of forgotten possibilities. When comparing the tram service to the present bus service, it should be noted that the No 8 tram left Nelson's Pillar on O'Connell Street every 8 minutes. The No 7 tram left every 4 minutes.

As is noted above Blackrock became popular as a place for sea bathing in the middle of the 18th century. John Rocque's map of the County of Dublin of 1760 notes 'Bath for Men' and 'Bath for Women' at the shoreline in Blackrock. There were numerous specially constructed baths along the shore. Late 19th century maps note 'Peafield Baths' at a location that now lies within Blackrock Park, and there were also baths on the Blackrock side of Seapoint. The most important baths were of course Blackrock Baths, the most impressive in the Dublin Bay. A blog 'builtublin' by Lisa Cassidy writes of the Blackrock Baths:

*The first baths were constructed in the 1830s, replaced in 1887 by a concrete structure designed by architect and engineer William Kaye-Parry – a men's pool and a ladies' pool, surrounded by a promenade. In 1928, significant upgrades included the addition of steel grandstands with timber seating accommodating 1150, with steel-framed wire mesh glazing on the risers allowing light*



*through the vertical surface of the steps. The steps were replaced since by reinforced concrete with the same gaps allowing lighting through.*

The baths constructed in 1830 were those constructed by the railway company, but there were earlier baths. Blackrock Baths hosted all kinds of swimming events including water polo, and there were regularly large crowds in attendance. Use of the baths began to decline in the last third of the 20th century and they slowly fell into disuse. They were finally demolished in 2013. There are some plans for redevelopment.

### **Ever Changing Blackrock**

To the present day Blackrock continues to thrive, flanked by Frascati and Blackrock shopping centres. Blackrock was bifurcated by the construction of the Blackrock Bypass, built in the late 1980s and officially opened on 24 March 1988. The new dual carriageway contributed to Blackrock having an air of importance but also giving sense of being Blackrock being severed or cut through.

Originally hailing as a simple fishing village, Blackrock, over the centuries, progressively became elevated to the status of town. In its more recent history, the town has morphed into a commercial re-branding as Blackrock Village.

The brief outline, above, is intended to provide some indication of the scale and extent of development and change that has taken place in and around Blackrock over time. New development is very visible in Blackrock today, a remaking of Blackrock, particularly along the Bypass.



Figure 11.2: Extract from John Rocque's Map of the County of Dublin, 1760. Baths for Men and Women are noted on the map; and the Black Rock is shown at a location close to the of the present railway station





Figure 11.3: Extract from Taylor's map of 1816. Mt Prospect School and Rockfield are both noted.

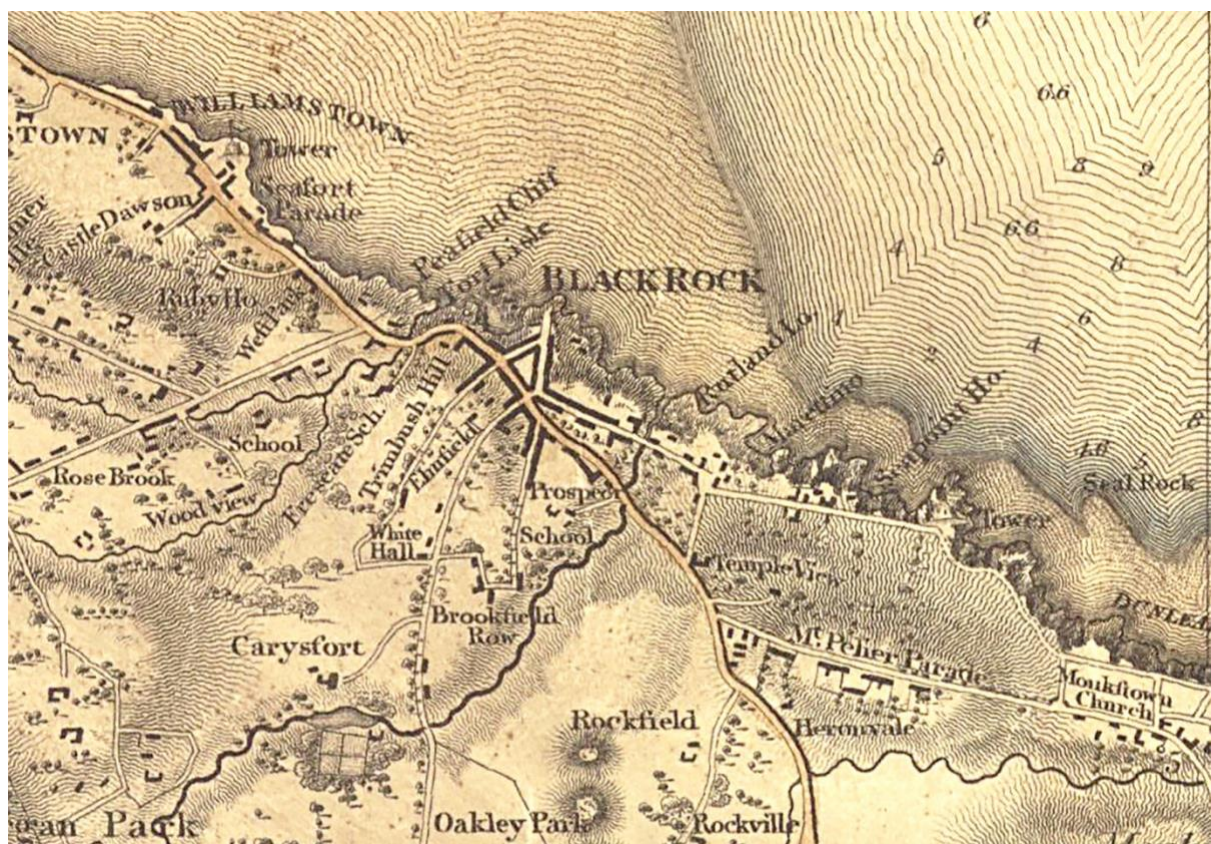


Figure 11.4: Extract from Duncan's map of 1821. . Mt Prospect School and Rockfield are again both noted





Figure 11.5: An extract from the First Edition Ordnance map of 1837. Prospect house is noted, presumably the location of Mt Prospect School. The St Teresa's lands are shown as an empty field east of Prospect House. (ARC OSI Licence No. CYAL50210860 © Ordnance Survey Ireland/Government of Ireland.)

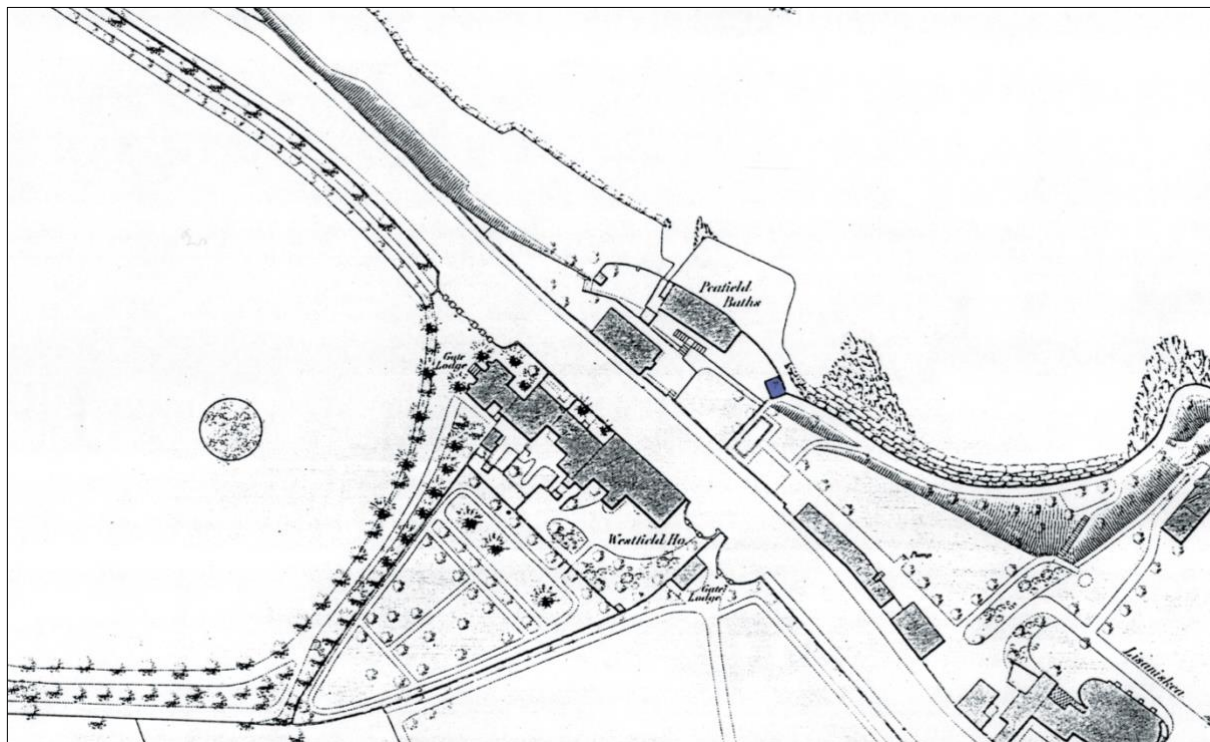


Figure 11.6: A detail from an Ordnance map of 1867. This shows Peafield Baths at a location in what is now Blackrock Park a little northwest of Lios an Uisce. (ARC OSI Licence No. CYAL50210860 © Ordnance Survey Ireland/Government of Ireland.)



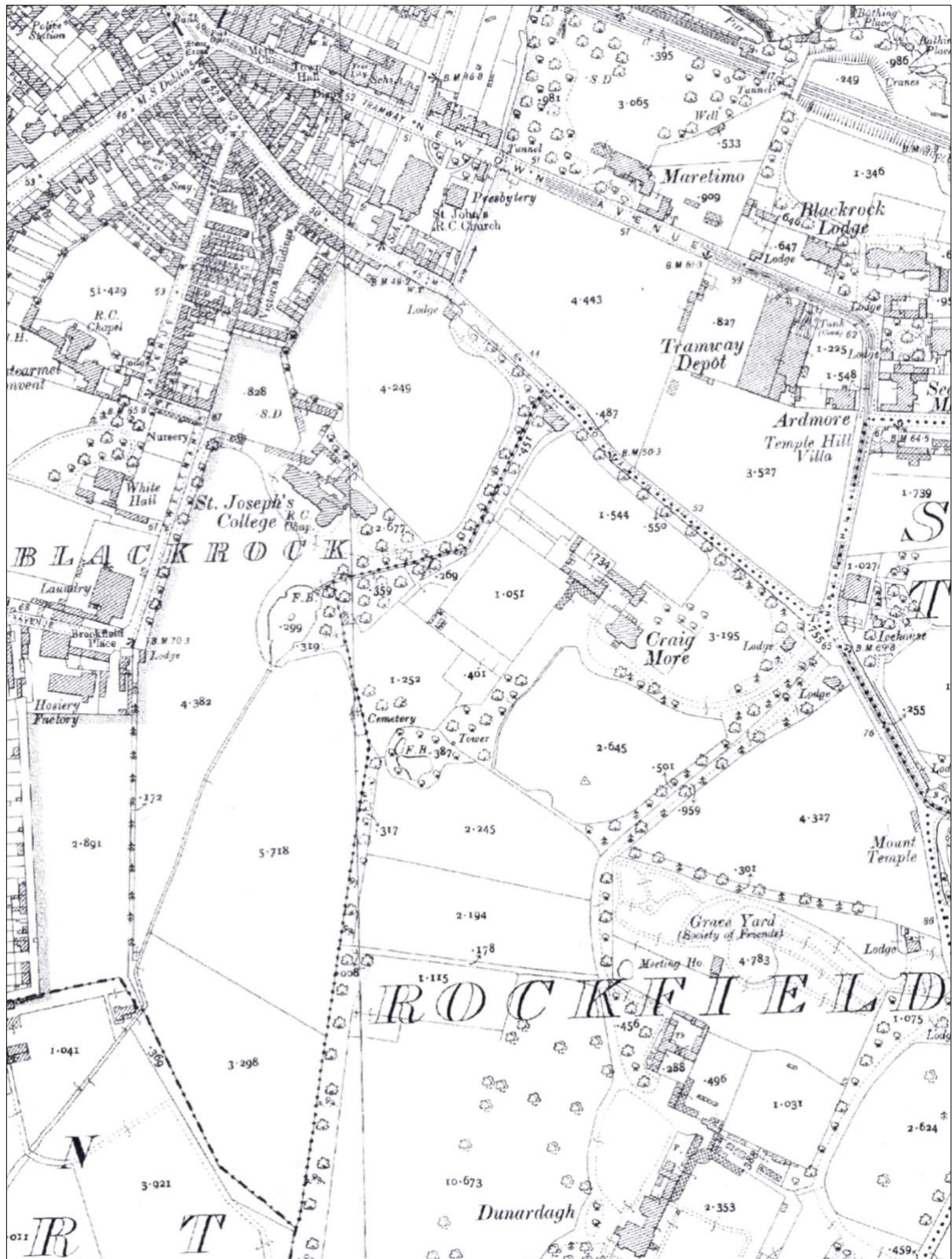


Figure 11.7: Extract from the Ordnance map of 1907. This shows the location of the present St Teresa's, then called Craig More  
(ARC OSI Licence No. CYAL50210860 © Ordnance Survey Ireland/Government of Ireland.)



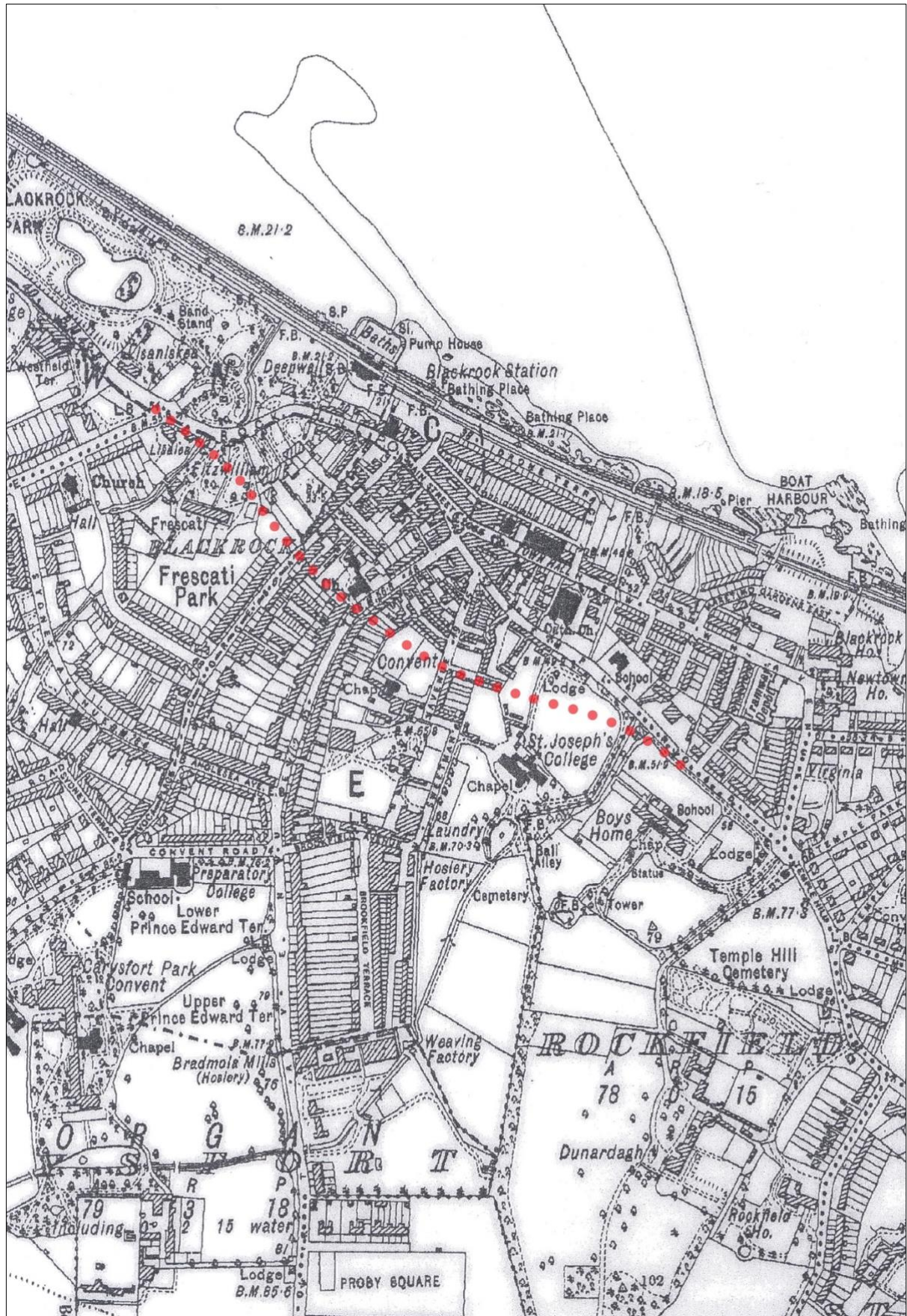


Figure 11.8: Extract from the Ordnance map of 1937. St Teresa's is noted as a school and boy's home. The red dotted line shows the approximate location of the 1988 Blackrock Bypass and indicates the extent to which the Bypass undermined the historic centre of the town. (ARC OSI Licence No. CYAL50210860 © Ordnance Survey Ireland/Government of Ireland.)

## 11.4 Characteristics of the Proposed Development

The development will consist of a new residential and mixed use scheme of 493 residential units and associated residential amenities, a childcare facility and café in the form of (a) a combination of new apartment buildings (A1-C2 and D1 – E2); (b) the subdivision, conversion and re-use of 'St. Teresa's House' (Block H); and (c) the dismantling, relocation and change of use from residential to café of 'St. Teresa's Lodge' (Block G) within the site development area. A detailed development description is now set out as follows:

The proposal provides for the demolition (total c. 207 sq m GFA) of (a) a single storey return (approx. 20 sq m) along the boundary with The Alzheimer's Society of Ireland; (b) the ground floor switch room (approx. 24.9sq.m.), (c) ground floor structures northwest of St. Teresa's House (26.8sq.m), (d) basement boiler room northwest of St. Teresa's House (17.0 sq.m), (e) ground floor structures northeast of St. Teresa's house (22.0sq.m.) (f) basement stores northeast of St. Teresa's house (67.8 sq.m.) and (g) a non - original ground floor rear extension (approx. 28.5 sq m) associated with the Gate Lodge.

The new development will provide for the construction of a new mixed use scheme of 487 no. apartment units in the form of 11 no. new residential development blocks (Blocks A1-C2 and D1 – E2) as follows:

- Block A1 (5 storeys) comprising 37 no. apartments (33 no. 1 bed units and 4 no. 2 bed units)
- Block B1 (10 storeys) comprising 55 no. apartments (37 no. 1 bed units, 10 no. 2 bed units, 8 no. 3 bed units)
- Block B2 (8 storeys) comprising 42 no. apartments (28 no. 1 bed units, 9 no. 2 bed units and 5 no. 3 bed units)
- Block B3 (8 storeys) comprising 42 no. apartments (28 no. 1 bed units, 9 no. 2 bed units and 5 no. 3 bed units)
- Block B4 (5 storeys) comprising 41 no. apartments (4 no. studio units, 4 no. 1 bed units, 27 no. 2 bed units and 6 no. 3 bed units)
- Block C1 (3 storeys) comprising 10 no. apartments (1 no. studio units, 3 no. 1 bed units and 6 no. 2 beds)
- Block C2 (3 storeys) comprising 6 no. apartments (2 no. 1 bed units and 4 no. 2 bed units) together with a creche facility of 392 sq m at ground floor level and outdoor play area space of 302 sq m.
- Block C3 (1 storey over basement level) comprising residential amenity space of 451 sq m.
- Block D1 (6 storeys) comprising 134 no. apartments (12 no. studio units, 22 no. 1 bed units, 90 no. 2 bed units and 10 no. 3 bed units).
- Block E1 (6 storeys) comprising 70 no. apartment units (34 no. 1 bed units, 26 no. 2 bed units and 10 no. 3 bed units).
- Block E2 (6 storeys) comprising 50 units (1 no. studio units, 29 no. 1 bed units, 18 no. 2 bed units and 2 no. 3 bed units).

Each new residential unit has associated private open space in the form of a terrace / balcony.

The development also provides for Block H, which relates to the subdivision and conversion of 'St. Teresa's House' (3 storeys) into 6 no. apartments (5 no. 2 bed units and 1 no. 3 bed unit) including the demolition of non-original additions and partitions, removal and relocation of existing doors, re-instatement of blocked up windows, replacement of windows, repair and refurbishment of joinery throughout and the upgrade of roof finishes and rainwater goods where appropriate.

It is also proposed to dismantle and relocate 'St. Teresa's Lodge' (1 storey) from its current location to a new location, 180 m south west within the development adjacent to Rockfield Park. St. Teresa's Lodge (Block G) will be deconstructed in its original location and reconstructed in a new location

using original roof timbers, decorative elements and rubble stonework, with original brickwork cleaned and re-used where appropriate.

It is also proposed to dismantle and relocate 'St. Teresa's Lodge' (1 storey - gross floor area 69.63sq m) from its current location to a new location, 180 m south west within the development adjacent to Rockfield Park. St. Teresa's Lodge (Block G) will be deconstructed in its original location and reconstructed in a new location using original roof timbers, decorative elements and rubble stonework, with original brickwork cleaned and re-used where appropriate. A non - original extension (approx. 28.5 sq m) is proposed for demolition. The current proposal seeks a new extension of this building (approx. 26.8 sq m) and a change of use from residential to café use to deliver a Part M compliant single storey building of approx. 67.4 sq m

Total Open space (approx. 15,099.7 sq m) is proposed as follows: (a) public open space (approx. 11,572.3 sq m) in the form of a central parkland, garden link, woodland parkland (incorporating an existing folly), a tree belt; and (b) residential communal open space (approx. 3,527.4 sq m) in the form of entrance gardens, plazas, terraces, gardens and roof terraces for Blocks B2 and B3. Provision is also made for new pedestrian connections to Rockfield Park on the southern site boundary and Temple Hill along the northern site boundary.

Basement areas are proposed below Blocks A1, B1 to B4 and D1 (c. 7,295 sq. m GFA). A total of 252 residential car parking spaces (161 at basement level and 91 at surface level); 1056 bicycle spaces (656 at basement level and 400 at surface level); and 20 motorcycle spaces at basement level are proposed. 8 no. car spaces for creche use are proposed at surface level.

The proposal also provides for further Bin Storage areas, Bike Storage areas, ESB substations and switch rooms with a combined floor area of 356.2 sq m at surface level.

The development also comprises works to the existing entrance to St. Teresa's; the adjoining property at 'Carmond'; and residential development at St. Vincent's Park from Temple Hill (N31/R113). Works include the realignment and upgrade of the existing signalised junction and associated footpaths to provide for improved and safer vehicular access/egress to the site and improved and safer access/egress for vehicular traffic to/from the property at 'Carmond' and the adjoining residential development at St Vincent's Park.

Emergency vehicular access and pedestrian/cyclist access is also proposed via a secondary long established existing access point along Temple Hill. There are no works proposed to the existing gates (Protected Structure) at this location.

The associated site and infrastructural works include provision for water services; foul and surface water drainage and connections; attenuation proposals; permeable paving; all landscaping works including tree protection; green roofs; boundary treatment; internal roads and footpaths; and electrical services including solar panels at roof level above Blocks A1, B1 - B4, C1-C3, D1, E1, E2.

## 11.5 Potential Impact of the Proposed Development

This section provides a description of the potential specific, direct and indirect impacts that the proposed development is likely to have on the visual environment. The description and the assessment of likely landscape and visual impact has had regard to the Objectives set out in the *Blackrock Local Area Plan 2015--2021*, *The Dún Laoghaire Rathdown Development Plan 2016-2022* and to a range of other statutory provisions

The extent of potential landscape and visual impact of the proposed from locations around the proposed development is discussed below. The view locations discussed below are representative of locations from which it was suggested by mapping analysis that development might be visible. Photomontages from 33 representative locations have been prepared by Model Works and are provided in a separate document. The 33 views are 18 initial representative views chosen by ARC and 15 additional views, including longer distance views, chosen in the summer of 2021 subsequent to pre-planning consultation. The character of the impact: positive, negative or neutral, will depend

on how well a development is received by the public, and on the general contribution of the development to the built environment.

### **Overview of Landscape and Visual Effects**

The proposed development is located on large former institutional lands immediately to the south of Temple Road, Blackrock.

Temple Road as it runs past the site of the proposed development is a dual carriageway and forms part of the Blackrock Bypass / Rock Road (N31). It is a wide transport corridor with two traffic lanes and a cycle lane in each direction, and with a wide central reservation planted with London plane trees providing generous separation between the application site existing residential development on the northern side of the N31. To the south the site is bounded by the extensive open lands of Rockfield Park. Immediately to the east lie lands belonging to the Daughters of Charity, and beyond these lands the small scale residential development of St Vincent's Park. Immediately to the west of the site are the lands of the Alzheimer Society of Ireland, then St Louise's Park and the residential developments of Barclay Court and Prospect Hill. The wider area to the east, south, west and northeast is overwhelmingly residential in character and is typified by estates of one and two storey houses of varying styles and types interspersed with higher density residential developments.

While much of the surrounding area is typified by low rise and low density housing, it is significant that the subject application site fronts on to the N31 National Primary Route, which serves as transport infrastructure of strategic national importance. A road corridor with this level of traffic is a very robust visual environment, and views of the proposed development from the N31 road corridor will be in this context. Blackrock and the N31 road corridor have undergone a process of considerable change and densification in recent years, a process of change which is continuing. Large scale commercial buildings ranging in height from two to five storeys have been developed to the northwest of the application site at Temple Road at the edges of Blackrock District Centre. Lands bounding the Rock Road from Blackrock have been developed with large high density buildings, such as the three to five storey apartment development at Les Buissonnets and the mixed use three to six storey Frascati Hall development. An additional three storeys of apartments are now under construction above the Frascati Shopping Centre (i.e. rising to a height roughly equivalent to eight residential storeys) (DLRCC Reg. Ref.: D17A/0950 & ABP Ref.: 300745-18). As part of the planning history of this site, it should be noted that An Bord Pleanála previously granted permission for a residential development on the application site, including, *inter alia*, 291 no. apartments in blocks ranging in height from two to eight storeys (ABP Ref. PL06D.303804), although the Inspector repeatedly asserted that *"the site could accommodate a greater height than that proposed, in particular, ... towards the southern end of the site overlooking the public park and also along the frontage with Temple Hill Road."* The opportunities for densification along the N31 Road Corridor are also mentioned a recent submission by the Office of the Planning Regulator (dated 28th February 2021) on the Issues Paper for the *Dun Laoghaire Rathdown County Development Plan 2022 – 2028*, which stated: *"It appears from figure 4 (population change) and figure 8 (units under construction) that residential construction activity is largely concentrated in four main areas while many areas in close proximity to the N11, N31 and DART public transport corridors .... have stagnated or suffered population decline. The Office considers that this will be a key issue to monitor and address in the next development plan especially in the context of current residential building trends and the opportunities that are beginning to manifest in relation to brownfield development along the corridors above."*

Therefore, while the application site is in an area which includes developments of modest scale at St Vincent's Park, Craigmole Gardens and Newtown Villas, the visual environment of Blackrock and



the N31 road corridor includes development of a variety of different scales, with many of the buildings in the area, both recent and historic, being quite substantial in scale. It is in the context of a surrounding built environment and open spaces of different scales that the likely visual impact of the proposed development needs to be assessed.

As described above, the *European Landscape Convention* defines landscape as “an area, as perceived by people”. The purpose of this report is to assess the impacts of the proposed St. Teresa’s SHD on the surrounding area and how such change might be ‘perceived by people’ visually. The *Guidelines for Landscape and Visual Impact Assessment* (third edition) published by the UK Landscape Institute and Institute of Environmental Management & Assessment states: “It is important to remember at the outset that visual receptors are all people... The visual receptors most susceptible to change are generally likely to include... residents at home... it will be important to recognise that residents may be particularly susceptible to changes in their visual amenity - residents at home, especially using rooms normally occupied in waking or daylight hours, are likely to experience views for longer than those briefly passing through an area. The combined effects on a number of residents in an area may also be considered, by aggregating properties within a settlement, as a way of assessing the effect on the community as a whole. Care must, however, be taken first to ensure that this really does represent the whole community and second to avoid any double counting of the effects.” There is no doubt that some observers, particularly in the residential estates adjoining the application site (such as those at St Louise’s Park, Barclay Court and St Vincent’s Park) would regard the visual effects of the proposed development as ‘significant’.

The existence of the proposed development will result in 'significant' changes in the visual character of the existing baseline receiving environment. However, given that:

- the lands of St Teresa's are zoned for residential development; and
- the new development will form part of a sequence of large scale modern development in existence, under construction and envisaged to extend along the N31 road corridor;

the landscape and visual impact of the proposed development of buildings rising to ten storeys along the N31 road corridor may be considered to be consistent with existing and emerging trends in the area. Given this, although the changes that will be brought about by the existence of the proposed will be significant, some observers may regard the landscape and visual impact of the proposed development from many locations in the area to be 'moderate' in extent.

View No	Location	Potential Visual Impact
1	Newtown Avenue near its junction with Temple Road (Blackrock Bypass)	Moderate to Significant
2	East end of Temple Road at Temple Hill	Moderate
3	Roundabout at the west end of St Vincent's Park	Moderate to Significant
4	Rockfield Park at the north end of Avondale Court	Moderate to Significant
5	Near the southwest corner of Rockfield Park.	Imperceptible to Slight
6	Rockfield Park immediately north of Carraig Lawn Tennis Club	Slight to Moderate
7	Entrance to Rockfield Park from Brookfield Court	Slight
8	Entrance to Rockfield Park from the south end of Barclay Court	Imperceptible to Slight
9	Junction at the south end of Barclay Court	Imperceptible to Slight
10	Residential road at the north end of Barclay Court	Moderate to Significant
11	Temple Road opposite Barclay Court	Moderate to Significant
12	Temple Road at the entrance to the public car park	Moderate
13	North end of Craigmole Gardens	Moderate to Significant
14	Newtown Avenue looking into Newtown Villas	Moderate to Significant
15	Within the Daughters of Charity lands	Imperceptible to Slight
16	Blackrock Bypass west of Barclay Court	Moderate
17	Temple Road (Blackrock Bypass) at its junction with Newtown Avenue	Moderate to Significant
18	St Louise's Park	Moderate to Significant
A	West Pier, Dún Laoghaire	Moderate
B	Newtownpark Avenue	None
C	Temple View (formerly lands of Temple Hill House)	Slight to Moderate
D	Monkstown Road at Shandon Park	Imperceptible to Slight

E	Montpelier Place	Moderate to Significant
F	Stradbroke Road	None
G	Castlebyrne Park	None
H	Convent Road	Imperceptible to Slight
I	Prospect Hill	Moderate to Significant
J	N31 at Carysfort Avenue	Slight
K	Blackrock Park	None
L	Southern Car Park at Sandymount Strand	Imperceptible to Slight
M	Cross Avenue	None
N	Quaker Cemetery	Slight to Moderate
O	Approach to Irish Alzheimer's Society	Moderate to Significant

Table 11.1: Table of Potential Impacts

**Construction Stage**

The extent of landscape and visual impact of the development during the construction phase is likely to be similar to that for the operational phase, as tabled above. The character of visual impacts during the construction phase is likely to be wholly negative at first, tending to become neutral to positive as work proceeds and the new buildings and structures become apparent.

**Operational Stage**

This table of landscape and visual effects above, and view descriptions below, refer to the operational phase of the development, when construction is complete, and the buildings are in use. The table above and the descriptions below includes 18 view locations chosen as part of an initial assessment and 15 additional views added in summer 2021. The initial set of views are titled 1 to 18 while the 15 additional views are titled A to O

***View 1: From Newtown Avenue near its junction with Temple Road (Blackrock Bypass)***

This view looks south towards the junction. In the existing view, the present gate lodge and wall of St Teresa's is seen to the right, behind which there is heavy existing tree planting. The existing entrance to St Teresa's and the lands of the Daughters of Charity is seen in the centre of the view. A private house and the roofs of houses at St Vincent's Park are seen to the right.

In the proposed view, the entrance to the St Teresa's lands is seen widened and changed substantially. The former gate lodge has been relocated further to the south within the St Teresa's lands and is no longer visible from this view location. Many of the trees to the right hand side of the view have been removed. One of the proposed new apartment blocks is seen prominently to the right of the view, with parts of other apartment blocks seen behind, all these set in new landscaping. The new development is seen openly in this view and occupies a substantial part of the view. Given that the lands of St Teresa's are zoned for development of the type proposed in the current application, since the new development will form part of a sequence of large scale modern development now extending along the Blackrock Bypass the proposed development is likely to be regarded by some observers as consistent with existing and emerging trends in the area. The



landscape and visual impact of the proposed development from this view location is assessed to be 'moderate' to 'significant' in extent.

***View 2: From the east end of Temple Road at Temple Hill***

This view looks west towards the junction of the Blackrock Bypass with Newtown Avenue, which is seen the right of the view. Beyond the junction, two storey houses are seen on the north side of the Bypass, Temple Road, and the Church of St John the Baptist Blackrock is seen in the distance. In the existing view, the present gate lodge to St Teresa's is seen in the centre of the view, behind which there is heavy existing tree planting. To the left of the view a line of trees is seen behind the stone boundary wall to St Vincent's Park.

In the proposed view, the entrance to the St Teresa's lands is seen widened and changed substantially. The former gate lodge is gone, as are many of the existing trees behind the gate lodge, though replaced by new tree planting. Parts of two of the new apartment blocks, set in new landscaping are seen behind the new entrance and behind trees at St Vincent's Park. It is likely that, in winter conditions, more of the proposed development will be visible from this view location through winter trees. The new development is seen openly in this view but is not a dominant element of the views. In the view, the width of the Blackrock Bypass provides considerable separation between the site of the proposed development and existing development to the north. The landscape and visual impact of the proposed development from this view location is assessed to be 'moderate' in extent.

***View 3: From a roundabout at the west end of St Vincent's Park***

This view looks west over the roundabout towards houses on the west side of St Vincent's Park. This view across open foreground of the road and roundabout to the single storey houses of St Vincent's Park affords a view of the upper storeys of the proposed development, with other elements of the proposed development obscured by dense mature tree planting. It is likely that, in winter conditions, more of the proposed development will be visible from this view location through winter trees. Due to existing planting, the proposed development is likely to be less visible from the rear of houses at St Vincent's Park than from the location of this viewpoint. While the proposed development is likely to result in a 'significant' change in views from this location, some observers may consider this view to be consistent with emerging trends for development in the area or 'moderate' in extent. The landscape and visual impact of the proposed development from this view location is assessed to be 'moderate' to 'significant' in extent.

***View 4: From Rockfield Park at the north end of Avondale Court***

This view looks North across the Stillorgan Rugby Football Club pitch at Rockfield Park from a location close to the end of Avondale Court. In the existing view, none of the existing buildings in the St Teresa's lands are visible because of trees along the southern boundary of the St Teresa's lands. In the view as proposed, some of these trees are gone and there is an open view into the St Teresa's lands. The original house on St Teresa's lands, Craig More, is seen centrally in the view, beyond apartment buildings seen to the right and left. The new development is seen openly in this view and occupies a substantial part of the view. Given that the lands of St Teresa's are zoned for residential development, and given the extent of continuing large scale development in the general area, the proposed development may be regarded by some observers as consistent with existing and emerging trends in the area. The landscape and visual impact of the proposed development from this view location is assessed to be 'moderate' to 'significant' in extent.

It is noted that under Objectives D14 in relation to Character Area 6 in the Blackrock LAP, it is an objective of the Council 'to ensure that development within Character Area 6 be appropriately sited having regard to views to and from the Protected Structure and retain the historic view to the south

toward the Dublin Mountains'. At present that view is obscured by trees between the protected structure and Rockfield Park. It is proposed, as part of the proposed development, to remove the obstructing trees and to site new buildings so that the view from St Teresa's House to the mountains is restored, and so that there will be an axial view of the house from Rockfield Park.

***View 5: From near the southwest corner of Rockfield Park.***

This view looks north across football pitches at the southwest end of Rockfield Park. The club house of Carraig Lawn Tennis Club is seen in the centre of the view, beyond which are trees in the park and on St Teresa's lands. The backs of houses of Avondale Court are seen to the right. In the proposed view, a very small part of the proposed development is just glimpsed in the centre of the view. The remainder of the development is hidden by trees and is represented by a red outline. It is likely that, in winter conditions, other parts of the proposed development will be visible through winter trees. The visual impact of the proposed development from this view location is assessed to range from 'imperceptible' to 'slight'.

***View 6: From Rockfield Park immediately north of Carraig Lawn Tennis Club***

This view looks north across part of Rockfield Park towards St Teresa's lands. Most of the view is occupied by trees in the park and on St Teresa's lands. In the proposed view, the white building is gone and its position in the view is now occupied by apartment buildings. The remainder of the development is hidden by trees and is represented by a red outline. It is likely that, in winter conditions, other parts of the proposed development will be visible through winter trees. The proposed development is a minor element in the view but will be much more visible in winter conditions. The landscape and visual impact of the proposed development from this view location is assessed as 'slight' to 'moderate'.

***View 7: From the entrance to Rockfield Park from Brookfield Court***

This view looks northeast across part of Rockfield Park towards Carraig Lawn Tennis Club, beyond which are trees in the park and on St Teresa's lands. The club house of Carraig Lawn Tennis Club is seen to the right of the existing view. In the proposed view, parts of the proposed development are seen in the middle distance through trees and the netting around tennis courts. The remainder of the development is hidden by trees and is represented by a red outline. In winter conditions, some other parts of the proposed development may be just visible through winter trees. The proposed development is a minor element in the view and the landscape and visual impact of the proposed development from this view location is assessed as to 'slight'.

***View 8: From the entrance to Rockfield Park from the south end of Barclay Court***

This view looks northeast across a turning circle in the foreground and then across part of Rockfield Park. Most of the view is taken up by trees and shrubs on open space that is part of Barclay Court, beyond which are trees in the park and on other lands between the park and St Teresa's. The proposed development is not visible in the view and is represented by a red outline. In winter conditions it is likely that some parts of the proposed development will be visible. The landscape and visual impact of the proposed development from this view location is assessed as 'imperceptible' to 'slight'.

***View 9: From a junction at the south end of Barclay Court***

This view looks east into a cul de sac at the south end of Barclay Court. Houses in Barclay Court are seen at the left and right of the view. The centre of the view is taken up by trees and shrubs. The proposed development is not visible in the view and is represented by a red outline. In winter conditions it is likely that some parts of the proposed development will be visible. The landscape and visual impact of the proposed development from this view location is assessed as 'imperceptible' to 'slight'.

***View 10: From a residential road at the north end of Barclay Court***

This view looks east along a residential road at the north end of Barclay Court. Houses within the Barclay Court development occupy most of the view. In the proposed view, upper floors of three of the blocks that form part of the proposed development are seen above houses at the east end Barclay Court at some distance from the viewpoint. The proposed 10 storey block is prominent in the centre of the view. The remainder of the proposed development is not visible in the view and is represented by a red outline. While the construction of the proposed development is likely to result in a 'significant' change in the visual environment from this location, given that the lands of St Teresa's are zoned for residential development, and since the new development will form part of a sequence of large scale modern development now extending along the Blackrock Bypass the proposed development may be considered by some observers to be consistent with existing and emerging trends in the area. Given this, the landscape and visual impact of the proposed development from this view location is assessed as 'moderate' to 'significant'. From the rear of a number of west facing houses at the north end of Barclay Court other parts of the proposed development are likely to be more openly visible, also resulting in 'moderate' to 'significant' visual impacts.

***View 11: From Temple Road opposite Barclay Court***

This view looks southeast along Temple Road towards the site of the proposed development. The entrance to Barclay Court is seen to the right. The site of the proposed development is seen in the centre of the view behind the large, recessed gateway that give access to St Louise's Park and the Alzheimer Society of Ireland. Houses along the north side of Temple Road (Blackrock Bypass) are seen to the left, and Temple Hill is seen in the distance. . On the site of the proposed development extensive stands of trees are visible in the centre of the view, with large trees behind a stone wall along the boundary with Temple Road.

In the view as proposed, the large trees on the site are gone and are replaced by three tall blocks of apartments seen behind a new railings and new tree planting along the boundary with Temple Road, and, nearer to the viewpoint, a lower block. This lower block is seen behind the piers and railings of the existing large, recessed gateway. The upper elements of another apartment block are visible above the roofs of houses at Barclay Court. The new development is seen openly in this view and occupies a substantial part of the view. In the view, the width of the Blackrock Bypass provides considerable separation between the site of the proposed development and existing development to the north. While the construction of the proposed development is likely to result in a 'significant' change to the visual environment, given that the lands of St Teresa's are zoned for development of the type proposed in the application for permission and since the new development will form part of a sequence of large scale modern development now extending along the Blackrock Bypass, the proposed development may be considered by some observers to be consistent with existing and emerging trends in the area. The visual impact of the proposed development from this view location is assessed to be 'moderate' to 'significant' in extent.

***View 12: From Temple Road at the entrance to the public car park***

This view looks southeast along Temple Road towards the site of the proposed development. The corner of an existing large commercial office development is seen to the right. Other modern office buildings are seen to the left. The site of the proposed development is seen in the middle distance in the centre of the view behind foreground trees. Temple Hill is seen in the distance. In the existing view, extensive stands of trees are seen on the site of the proposed development behind a traffic island and the 'Black Rock' sculpture.

In the view as proposed, the large trees on the site are gone and are replaced by three blocks of apartments seen behind a new railings and new tree planting along the boundary with Temple Road, and a fourth lower block, is partly visible on the left of the view. The remainder of the proposed development is not visible in the view and is represented by a red outline. The new development is seen in the middle distance in this view and occupies a relatively minor part of the view. Given that the lands of St Teresa's are zoned for development of the type proposed in the current application and since the new development will form part of a sequence of large scale modern development now extending along the Blackrock Bypass, some of which frame the view, the proposed development may be regarded by some observers consistent with existing and emerging trends in the area. The landscape and visual impact of the proposed development from this view location is assessed to be 'moderate' in extent.

It is noted that a line of London plane trees has been planted in the central reservation of the Blackrock Bypass, directly opposite the site of the proposed development. As these trees mature, they will considerably change the character of the Blackrock Bypass and will reduce the visibility of the proposed development particularly from locations to the north and northwest.

***View 13: From the north end of Craigmore Gardens***

This view looks south along Craigmore Gardens towards Temple Road (Blackrock Bypass) and the site of the proposed development. Houses on Craigmore Gardens are seen to the left and right in the view.

In the view as proposed, the several large trees along the north side of the site are gone and are replaced by blocks of apartments seen behind a new railings and new tree planting along the boundary with Temple Road. While the existence of the proposed development is likely to result in a 'significant' change to the visual environment, given that the lands of St Teresa's are zoned for development of the type proposed in the current application and since the new development will form part of a sequence of large scale modern development now extending along the Blackrock Bypass, the proposed development may be considered by some observers to be consistent with existing and emerging trends in the area. The landscape and visual impact of the proposed development from this view location is assessed to be 'moderate' to 'significant' in extent.

It is noted that a line of London plane trees has been planted in the central reservation of the Blackrock Bypass, directly opposite the site of the proposed development. Further London plane trees are proposed to be planted just inside the northern boundary of the proposed development along Temple Road. As these trees mature, they will considerably change the character of the Blackrock Bypass and will reduce the visibility of the proposed development from locations to the north and northwest. It is also noted that neither the front nor the rear of the houses on Craigmore Gardens face towards the proposed development.

***View 14: From Newtown Avenue looking into Newtown Villas***

This view looks south along Newtown Villas. Some of the trees on the site of the proposed development are seen in the middle distance in the centre of the view, behind a wall at the end of Newtown Villas and the roofs of houses in Craigmore Gardens. Newtown Villas is an Architectural Conservation Area.

In the view as proposed, the top four storeys of one of the proposed apartment buildings is seen in the centre of the view in the middle distance, with the top of another similar building seen to the left. The top three storeys of the proposed 10 storey apartment building are visible above the roofs of houses to the right. The proposed development occupies only a minor part of the view, but, nonetheless, is a central focus. It is also noted that a large residential development has been

approved on the former Europa Garage site which immediately adjoins Newtown Villas to the east, ABP Reference 303804-19. The existence of the approved Europa Garage development will give rise to far greater landscape and visual impacts on Newtown Villas than the development on the St Teresa's lands, which are over 100 metres distant from Newtown Villas. While the proposed development is likely to result in a 'significant' change in views from this location, given the existence of considerable large scale modern development in Blackrock, and the approval for a large development immediately next door to Newtown Villas on the Europa Garage site, the potential visual impact of the proposed development on views from this location may be considered by some observers to be consistent with emerging trends for development in the area. The landscape and visual impact of the proposed development from this view location is assessed to be 'moderate' to 'significant' in extent.

It is noted that a line of London plane trees has been planted in the central reservation of the Blackrock Bypass, directly opposite the site of the proposed development. Further London plane trees are proposed to be planted just inside the northern boundary of the proposed development along Temple Road. As these trees mature, they will considerably change the character of the Blackrock Bypass and will reduce the visibility of the proposed development from locations to the north and northwest.

***View 15: From within the Daughters of Charity lands***

This view looks northwest from a private road within the Daughters of Charity lands. The stone boundary wall to Rockfield Park runs across the view, behind which are trees in the park and on St Teresa's lands. The proposed development is not visible in the view and is represented by a red outline. In winter conditions parts the proposed development may become partly visible through trees in the foreground. The landscape and visual impact of the proposed development from this view location is assessed as 'imperceptible' to 'slight'.

***View 16: From the Blackrock Bypass west of Barclay Court***

This view looks east along the Blackrock Bypass. Trees at the back of houses in Barclay Court are seen on the right. Houses along Temple Road (Blackrock Bypass) are seen to the left, and Temple Hill is seen in the distance. In view as proposed, the top five storeys of the proposed 10 storey apartment block are seen in the centre of the view. Otherwise, the proposed development is almost entirely hidden by trees and buildings at Barclay Court and is represented by a red outline. The landscape and visual impact of the proposed development from this view location is assessed to be 'moderate' in extent.

***View 17: From Temple Road (Blackrock Bypass) at its junction with Newtown Avenue.***

This view looks northwest along Temple Road (Blackrock Bypass). In the existing view, the wall of St Teresa's is seen to the right, behind which there is heavy existing tree planting. To the right, two storey houses are seen on the north side of the Bypass, and the Church of St John the Baptist Blackrock is seen in the distance. Large office buildings are seen to the left of the church in the middle distance.

In the view as proposed, the large trees on the site are gone and are replaced by four blocks of apartments seen behind a new railings and tree planting along the boundary with Temple Road. The new development is seen openly in this view and occupies a substantial part of the view. In the view, the width of the Blackrock Bypass provides considerable separation between the site of the proposed development and existing development to the north. While the construction of the proposed development is likely to result in a 'significant' change to the visual environment, given that the lands of St Teresa's are zoned for development of the type proposed in the current application and since the new development will form part of a sequence of large scale modern

development now extending along the Blackrock Bypass, the proposed development may be considered by some observers to be consistent with existing and emerging trends in the area. The landscape and visual impact of the proposed development from this view location is assessed to be 'moderate' to 'significant' in extent.

It is noted that a line of London plane trees has been planted in the central reservation of the Blackrock Bypass, directly opposite the site of the proposed development. Further London plane trees are proposed to be planted just inside the northern boundary of the proposed development along Temple Road. As these trees mature, they will considerably change the character of the Blackrock Bypass and will reduce the visibility of the proposed development from locations to the north and northwest. It is also noted that the width of the Blackrock Bypass provides considerable separation between the site of the proposed development and existing development to the north.

***View 18: From St Louise's Park***

This view looks southeast from the centre of St Louise's Park towards the boundary of the St Teresa's lands. A single storey house is seen to the right. In the proposed view, the upper three storeys of proposed apartment blocks are visible, as is planting and trees proposed along the boundaries of the St Teresa's lands. From nearby locations in St Louise's Park, glimpses of the lower floors of these blocks will be intermittently visible through gaps in boundary planting and existing development at St Louise's Park. While the proposed development is likely to result in a 'significant' change in views from this location, given the extent of large new developments existing or approved in the area, some observers may consider this view to be consistent with emerging trends for development in the area. The visual impact of the proposed development from this view location is assessed to be 'moderate' to 'significant' in extent.

***View A: From the West Pier Dún Laoghaire***

This view looks southwest from the West Pier at a distance of some 2.0 kilometres from the site of the proposed development. The top levels of three of the higher elements of the proposed development are seen in the distance behind intervening trees and developments of various dates that form part of Monkstown. The proposed development is a small but noticeable element in the view. The landscape and visual impact of the proposed development from this view location is assessed to be 'moderate' in extent.

***View B: From Newtown Park Avenue***

This view looks north from the southern half of Newtown Park Avenue at a distance of some 1.35 kilometres from the site of the proposed development. The proposed development is not visible in the view, and the landscape and visual impact of the proposed development from this view location is assessed to be none.

***View C: From Temple View***

This view looks west from the lands of Temple View, a recently completed development in the formerly lands of Temple Hill House, a protected structure, seen to the right in the view. The original house survives and has been restored and converted into apartments. Parts of the proposed development are just visible in the view and are likely to be more visible in winter conditions when trees are not in leaf. The landscape and visual impact of the proposed development from this view location is assessed to be 'moderate' in extent.

***View D: From Monkstown Road at Shandon Park***

This view looks northwest along Monkstown Road from the junction with Shandon Park. The original house survives and has been restored and converted into apartments. The proposed development is not visible in the view, but parts of the proposed development may be visible from locations nearby. In winter conditions when trees are not in leaf there is a greater likelihood of elements of

the proposed development being visible from this location. The landscape and visual impact of the proposed development from this view location is assessed to be 'Imperceptible' to 'Slight' in extent.

***View E: From Montpelier Place***

This view looks northwest from the southeast corner of Montpelier Place. Montpelier Place is an Architectural Conservation Area and is the location of a number of fine late Georgian houses, seen to the right and left of the view. From the view location, parts of the upper floors of one of the apartment blocks in the proposed development are seen above and behind houses at St Vincent's Park and trees in the middle distance. The proposed development is a minor but significant element in the view. The proposed development is likely to be more visible from this view location in winter conditions when trees are not in leaf. The existence of the proposed development is likely to be regarded by some observers at this location as giving rise to significant landscape and visual effects. However, given the extent of new and emerging development in the immediate area, the development may be regarded by many as being consistent with existing and emerging trends and, therefore, giving rise to moderate landscape and visual effects. The landscape and visual impact of the proposed development from this view location is assessed 'moderate' to 'significant' in extent.

***View F: From Stradbroke Road***

This view looks northwest from Stradbroke Road some 30 metres southeast of its junction with Newtown Park Avenue. The proposed development is not visible in the view, and the landscape and visual impact of the proposed development from this view location is assessed to be none.

***View G: From Castlebyrne Park***

This view looks north from the southern end of Castlebyrne Park at a distance of some 0.75 kilometres from the site of the proposed development. The proposed development is not visible in the view, and the landscape and visual impact of the proposed development from this view location is assessed to be none.

***View H: From Convent Road***

This view looks east along Convent Road from a small roundabout at the centre of the junction between Convent Road, Avoca Avenue, Sydney Terrace and Avoca Place, at a distance of some 0.50 kilometres from the site of the proposed development. A small part of the proposed development is just visible in the distance in the centre of the view, seen above and behind intervening trees. The proposed development is a very minor element in the view. The development likely to be more visible in winter conditions when trees are not in leaf. The landscape and visual impact of the proposed development from this view location is assessed to be 'imperceptible' to 'slight' in extent.

***View I: From Prospect Hill***

This view looks east from a small recent residential development in the lands of Prospect House, a protected structure. Prospect House is seen to the left of the view. From this view location, the upper parts of several of the apartment blocks in the proposed development are seen in the centre of the view. The proposed development is prominent in the view. The proposed development is likely to be more visible from this view location in winter conditions when trees are not in leaf. The existence of the proposed development is likely to be regarded by some observers at this location as giving rise to significant landscape and visual effects. However, given the extent of new and emerging development in the immediate area, the development may be regarded by many as being consistent with existing and emerging trends and, therefore, giving rise to moderate landscape and visual effects. The landscape and visual impact of the proposed development from this view location is assessed 'moderate' to 'significant' in extent.

***View J: From the N31 at Carysfort Avenue***

This view looks east from the central reservation at the junction of the N31 with Carysfort Avenue. The dual carriageway of Frascati Road (the Blackrock Bypass) fills the centre of the view. Large modern developments are seen to the left and right. From this view location, upper parts of apartment blocks in the proposed development are seen in the distance in the centre of the view. Given the robust visual character of what is seen in the foreground and middle ground in the view, the proposed development is hardly noticeable. The landscape and visual impact of the proposed development from this view location is assessed to be 'slight' in extent.

***View K: From Blackrock Park***

This view looks southeast from an elevated location in Blackrock Park at a distance of some 1.00 kilometres from the site of the proposed development. The proposed development is not visible in the view, and the landscape and visual impact of the proposed development from this view location is assessed to be none.

***View L: From Southern Car Park at Sandymount Strand***

This view looks southeast from the south end of the Southern Car Park at Sandymount Strand at a distance of some 3.40 kilometres from the site of the proposed development. The top of the tallest building in the proposed development is just discernible in the distance in the centre of the view, seen behind other development in Blackrock. The landscape and visual impact of the proposed development from this view location is assessed as 'imperceptible' to 'slight'.

***View M: From Cross Avenue***

This view looks southeast the centre of Cross Avenue at a distance of some 1.20 kilometres from the site of the proposed development. The proposed development is not visible in the view, and the landscape and visual impact of the proposed development from this view location is assessed to be none.

***View N: From the Quaker Cemetery***

This view looks north from an area in the western part of the Quaker Cemetery. The Quaker Cemetery is a candidate Architectural Conservation Area. The Cemetery is densely planted with trees many of which are evergreen, and so views out from within most parts of the Cemetery are very restricted. From the view location, parts of the upper floors of one of the apartment blocks in the proposed development are seen behind trees in the foreground and middle ground. The proposed development is a minor but significant element in the view. The proposed development may be a little more visible from this view location in winter conditions when deciduous trees are not in leaf. However, almost all the intervening trees are evergreen or coniferous, and will restrict the visibility of the proposed development. The landscape and visual impact of the proposed development from this view location is assessed to be 'slight' to 'moderate' in extent.

***View O: From Approach to Irish Alzheimer's Society***

This view looks southeast across the car park of the Irish Alzheimer's Society, which forms the foreground of the view. Parts of the proposed development are seen prominently on each side of the view and in the centre. The existence of the proposed development is likely to be regarded by many observers at this location as giving rise to significant landscape and visual effects. However, given the extent of new and emerging development in the immediate area, the development may be regarded by many as being consistent with existing and emerging trends and, therefore, giving rise to moderate landscape and visual effects. The landscape and visual impact of the proposed development from this view location is assessed 'moderate' to 'significant' in extent.



## 11.6 Potential Cumulative Impacts

Cumulative landscape and visual impacts are likely to occur in circumstances where a proposed or approved development, yet to be constructed or completed, would be seen in the same view as elements of the proposed St Teresa's development. The approved development at the site of the former Europa Garage, ABP Reference 303804-19 has yet to start construction. There is also an approved development at the Frascati Shopping Centre, Blackrock, rising to a height roughly equivalent to eight residential storey, DLRCC Reg. Ref.: D17A/0950 & ABP Ref.: 300745-18. This second development is under construction.

The development in the Europa Garage site is likely to appear in a small number of views in which the development of the St Teresa's lands will also appear. These are Views 11, 14 and 16, and distant views from Sandymount and the West Pier. The development at the Frascati Shopping Centre is some 550 metres from the nearest point of the St Teresa's site, a little too far separated for the two developments to appear together. However, it is possible that upper parts of both developments might appear in distant views from Sandymount and the West Pier.

## 11.7 Do Nothing Scenario

In the Do Nothing scenario the St Teresa's lands will remain undeveloped; or the development approved on the site under ABP- 303804-19 may be built out. In the latter scenario the landscape and visual impacts are likely to range from none to 'moderate'.

## 11.8 Risks to Human Health

The Institute of Public Health in Ireland in *Health Impacts of the Built Environment: a review* highlights the implications of visual amenity and attractiveness within the built environment for human health as follows: *"Deteriorating physical features of urban environments, vandalism, graffiti and litter can harm health. Studies have highlighted how such environments can impact on both mental and physical health through reduction in physical activity, increased anxiety among residents and increased social disorder."* The document also notes that people are more like to exercise, *inter alia*, *"if the scenery is enjoyable"*. Whereas *Health Impacts of the Built Environment* notes that the visual environment plays a role in human health, it does not provide any recommendations with regard to the visual environment and human health

In this regard, it should be noted that the character of the impact of changes to the visual environment on human health (positive, negative or neutral) will depend on how well a development is received by the public, and on the general contribution of the development to the built environment. The character of a visual effects, and even the duration of a visual effect, is very dependent on the attitude of the viewer. If a viewer is opposed to a new building for reasons other than visual, that viewer is likely to see the building in a negative light, no matter how beautiful the building might be.

## 11.9 Mitigation Measures

### Construction Stage

### Operational Stage

No mitigation measures are proposed. However, it should be noted that, while the landscaping proposed as part of this application will, of itself, result in changes in the visual environment, many

would consider boundary and other hard and soft landscaping works to result in positive changes and to have a mitigating effect on the visual impact of new development.

## 11.10 Predicted Impacts of the Proposed Development

### Construction Stage

The extent of landscape and visual impact of the development during the construction phase is likely to be similar to that for the operational phase, as tabled above. The character of visual impacts during the construction phase is likely to be negative at first, tending to become neutral to positive as work proceeds and the new buildings and structures become apparent.

### Operational Stage

Since no mitigation measures are proposed, predicted residual visual impacts will be as described for potential impacts above. Visibility of the proposed development is likely to be largely restricted to locations relatively close to the application site, except for distant views of the proposed development from the coast. While the existence of the proposed development is likely to result in a significant change to the visual environment from some nearby viewpoints, having regard to the planning history of the site, to the pattern of residential and apartment development that has taken place on the sites of larger detached houses in the area and to nearby substantial development along the N31 and in the centre of Blackrock, proposed changes on the St Teresa's lands may be considered by some observers to be consistent with existing and emerging trends for development in the area.

## 11.11 Monitoring

Monitoring is not applicable to this chapter.

## 11.12 Reinstatement

Reinstatement is not applicable to this chapter.

## 11.13 Interactions

## 11.14 Difficulties Encountered

No difficulties were encountered in the preparation of this chapter.

## 11.15 References

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- Ordnance Survey maps (available from: <https://shop.osi.ie/shop/>)
- Old Dublin Town (available from <https://www.olddublintown.com/dublin-buses.html>)
- Rocque, John. (1760). *Map of the County of Dublin*.
- Lisa Cassidy blog: [builtdublin.com/blackrock-baths-blackrock-co-dublin/](http://builtdublin.com/blackrock-baths-blackrock-co-dublin/)

### **11.16 Legal Notice**

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