

Townscape and Visual Impact Assessment

**Proposed Independent House Student
Accommodation Development,
87-93 Middle Abbey Street, Dublin 1**

Prepared by Model Works Ltd for

Summix IHD Development Limited

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1.0 Introduction

This report assesses the potential townscape and visual effects of a proposed student accommodation development at Nos. 87-93 Middle Abbey Street, Dublin 1.

The report should be read in conjunction with the book of verified photomontages produced by 3D Design Bureau, provided under separate cover.

1.1 Development Description

Summix IHD Developments Limited intend to apply to Dublin City Council for a permission for a large-scale residential development principally comprising student accommodation at a c. 0.3 Ha site at Nos. 87-93 Middle Abbey Street, Dublin 1, D01 NH70 (known collectively as 'Independent House'). The site is generally bound by Prince's Street North to the north, William's Lane and Nos. 94-96 Middle Abbey Street to the west, Middle Abbey Street to the south, and Nos. 35-39 O'Connell Street Lower (known as 'Penneys') to the east. The site comprises 6 No. interconnecting, long-standing vacant structures as follows: (a) a principally part 5 No. to part 6 No. storey above basement level building fronting Middle Abbey Street, known as Independent House, with a single storey workshop building to the rear; (b) a 5 No. storey (above basement level) building at the corner of Middle Abbey Street and William's Lane, known as Emerald Chambers; (c) a triple height (at basement level) structure towards the centre of the site, known as the 'Printing Hall'; (d) a 2 No. storey (above basement level) warehouse and office fronting William's Lane; (e) a part 3 No. to part 4 No. storey (above basement level) loading bay and office fronting Prince's Street North; and (f) a 3 No. storey (above basement level) office in the eastern portion of the site, bounded by Penneys. The site includes 2 No. Protected Structures (RPS Ref. Nos. 18 & 8797).

The development's surface water and foul water drainage network shall discharge from the site into the existing combined sewer located along Prince's Street North to the north-west of the site. A new pedestrian crossing and upgrade works to the footpath and kerb along Prince's Street North are proposed. Public realm improvements are also proposed to William's Lane. The development site area, drainage works, road works and public realm improvements will provide a total application site area of c. 0.33 Ha.

The development will principally consist of: the retention and refurbishment of part of the building façade along Prince's Street North; the demolition of the 3 No. former warehouses and offices (c. 5,270 sq m) and the lowering of part of the basement level thereat; the demolition of part of the adjoining wall to the north-east of the site, bounding the Penneys loading bay; the partial demolition of the Printing Hall (c. 457 sq m) and the rear of Emerald Chambers (c. 150 sq m) and Independent House (c. 100 sq m); the removal of the existing concrete roof slab at Emerald Chambers to facilitate an increase in floor-to-ceiling height at fourth floor level; the lowering of part of the ground floor level in Independent House and Emerald Chambers for universal access; refurbishment works to the Protected Structures including general internal and external works for conservation repairs, maintenance, change of use and upgrading of the buildings; and the construction of a part 1 No. to part 9 No. storey over basement building connecting into the retained structures and principally comprising 316 No. Student Accommodation bedspaces (267 No. standard rooms, 5 No. accessible rooms, 2 No. twin studios (4 No. bedspaces), 10 No. accessible studios and 30 No. single studios) with associated facilities, which will be utilised for short-term let during student holiday periods. The 272 No. standard and accessible rooms are provided in 42 No. clusters ranging in size from 5 No. bedspaces to 8 No. bedspaces, and all clusters are served by a communal living/kitchen/dining room.

The development also provides: ancillary internal and external communal student amenity spaces and support facilities; cultural and community floor space (c. 644 sq m); 3 No. retail units (c. 216 sq m); a café/restaurant (c. 254 sq m); bicycle stores at basement and ground floor levels; visitor cycle parking

spaces; bin stores; ESB substation; hard and soft landscaping; green/blue roofs; new telecommunications infrastructure at roof level, together with all associated equipment; boundary treatments; PV panels; plant; lift overruns; and all associated works above and below ground.

The gross floor area of the development is c. 15,413 sq m comprising c. 12,751 sq m above basement level.

1.2 Design Changes and Update of the Townscape and Visual Impact Assessment in Response to DCC Opinion

Dublin City Council's Opinion on the LRD Stage 2 submission raised a number of issues relating to the proposal's potential townscape and visual impacts. In response to the Opinion, the proposal has been refined and the TVIA report (which was included with the Stage 2 submission) has been updated to (a) assess the impacts of the final proposal, and (b) address issues raised by DCC in the Opinion.

1.2.1 Key Design Changes in Response to DCC Opinion

A key item of the Opinion was DCC's concern over the visual impact of rooftop telecommunications equipment. In the Stage 2 iteration of the proposal, two clusters of antennae (outlined yellow below) were proposed at the southern edges of the two wings of the new building to the rear of Independent House and Emerald Chambers.

Figure 1a: Aerial view of the Stage 2 proposal showing the rooftop telecommunications infrastructure and a vertical extension to Emerald Chambers

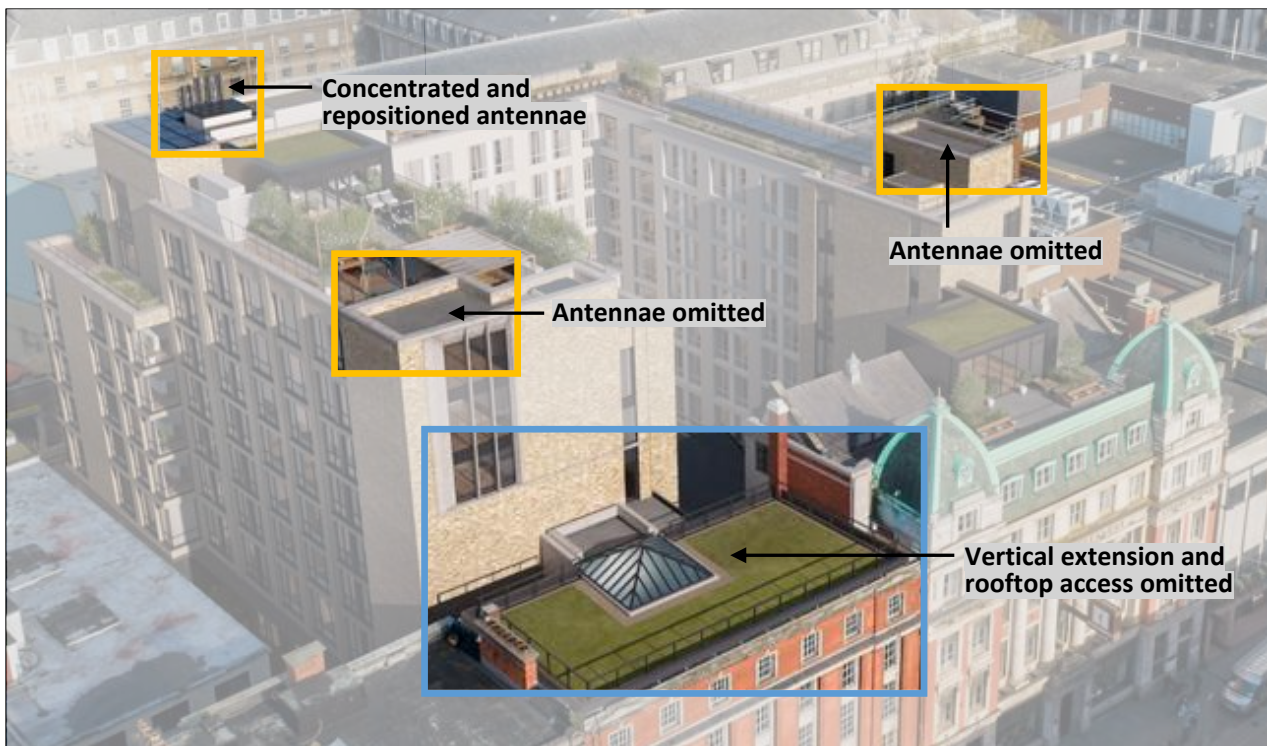


Item 1.b) of the Opinion stated: *"The Planning Authority has serious concerns regarding the provision and positioning of new telecommunications equipment on a highly visible location near the parapet edge of the protected structures. The submitted CGIs/photomontage demonstrate the negative visual impact of this equipment which will be visible some distance from the site (CGI 5 Temple Bar). The Applicant is requested to relocate the equipment to be out of sight / reduced or a less visible location where possible so that they are not visible from principle elevations / more sensitive parts of the streetscape".*

In the final proposal, the telecommunications equipment has been reduced to a single cluster of antennae, with this cluster positioned in the north west corner of the roof. **This (a) maximises the separation distance of the antennae from Independent House and Emerald Chambers, (b) ensures no visibility from Abbey Street over the roofline of the protected structures, and (c) substantially reduces the visual impact of the antennae in the views from the south (e.g. Viewpoints 2, 3, 5).**

Another significant design change at roof level is the omission of the previously proposed (Stage 2) vertical extension to Emerald Chambers. The vertical extension would have included two studio units and provision of access to amenity space on the flat roof of Emerald Chambers (see Figure 1a above). The vertical extension and roof access have been omitted from the final proposal.

Figure 1b: Aerial view of the final proposal showing the relocated telecommunications infrastructure and the omission of a vertical extension to Emerald Chambers



Another theme of the Opinion was DCC's concern over the overall height of the proposed development and its related visual impact, particularly on nearby cultural heritage sites such as the GPO and the National Monument on Moore Street (Nos. 14-17 Moore Street). Additional viewpoints have been added to the assessment (see 1.2.2 below) and verified photomontages produced to provide further assessment of the potential impact on these sensitive receptors.

Regarding the GPO, the only views in which the proposed development would be visible along with the GPO are views along Prince's Street North and from O'Connell Street at its junction with Prince's Street North. The four photomontages produced for views west along Prince's Street North (Viewpoints 11, 21, 12, 22) show that the nine storey elements of the new building would mostly not be visible in these views. The building would read as six storeys tall fronting Prince's Street North, stepping up to seven and eight storeys back from the street, away from the GPO (see Figure 2a, 2b below).

There is no requirement to reduce the height of any part of the proposed building to protect views of the GPO. The development would have only positive effects on the GPO, by enhancing an important part of its townscape setting, i.e. Prince's Street North, which currently is in poor condition and detracts from the setting of the GPO.

Figure 2a,b: Photomontages for Viewpoints 21 and 22, showing the proposed development in views west along Prince's Street North. The proposed building reads as six storeys tall at the street-front, stepping up to eight storeys away from the street and the GPO. The proposed nine storey volume would not be visible.



Regarding the National Monument on Moore Street, the photomontage for a new viewpoint outside No. 17 Moore Street (Viewpoint 20) shows that the proposed development would not be visible at that location. At the proposed height of up to nine storeys, the development would have no impact on the National Monument.

Informed by this evidence, and the fact that the proposed development has a very limited zone of theoretical visibility (see Figure 5 below) for a building of its size, there has been no reduction in height of the proposal in response to the Opinion.

1.2.2 Updates to the TVIA for the Stage 3 Submission

The changes and additions to the TVIA report for the final LRD application include the following:

- **Four new viewpoints have been added to the visual effects assessment, with verified photomontages produced to inform their assessment.**

- Two of these (Viewpoints 18 and 19) are on the south quays of the Liffey. This is in response to Item 1.a) of the Opinion, which states: *“The Applicant is requested to submit further CGIs / photomontages of the proposal viewed from the south Quays.”*

Viewpoint 18 is at Butt Bridge south east of the site. Viewpoint 19 is at Millennium Bridge to the south west. These viewpoints complement Viewpoints 1 and 4, so that in total four photomontages are provided for the south quays. The photomontages show that the proposed development would not be visible at either Viewpoint 18 or 19.

- An additional viewpoint (Viewpoint 20) has been included on Moore Street, outside the National Monument (Nos. 14-17 Moore Street). This is in response to Item 4.c) of the Opinion, which states: *“At nine stories in height the development could have a negative visual impact on the National Monument on Moore Street, associated with the Easter Rising of 1916. For this reason CGIs / photomontages of the proposed development viewed from the Moore Street National Monument are requested. This should be accompanied by an assessment of the visual impact.”*

The photomontage for Viewpoint 20 shows that the proposed development would not be visible from the National Monument.

- An additional viewpoint (Viewpoint 22) has been added on Prince’s Street North beside the GPO. This is in response to Item 5.h) of the Opinion, which states: *“There is concern regarding the height of the new structure and its impact on the wider receiving environment, in particular the GPO and GPO Buildings. The Applicant is requested to consider a reduction in height of one storey along the Princes Street elevation”.*

- Additionally, a winter photomontage (Viewpoint 21) has been provided for the view from the east side of O’Connell Street. This is the same location as Viewpoint 11 (a summer view in which foliage on street trees partially screens the proposed development in the photomontage).

There has been no reduction in the height of the proposed building in response to the Opinion. This decision was taken based on the evidence provided by the photomontages, which show that the proposal would cause no harm to the GPO.

Viewpoints 21 and 22 complement Viewpoints 11 and 12 in providing views of the proposed development along Prince’s Street North alongside the GPO. In all of these views the proposed nine storey element in the north west corner of the site would not be visible. The building would read as six storeys fronting Prince’s Street North, stepping up to seven and eight storeys back from the street (away from the GPO). The photomontages show that the height of the proposal would not cause any negative effect on the GPO (e.g. by screening, ‘crowding’ or distracting from it). In views of the GPO (Viewpoints 11, 21), the GPO would remain the defining feature of the composition, with the proposed development a secondary element. In views from *alongside* the GPO (Viewpoints 12, 22),

the proposed development's main effect would be to enhance the streetscape of Prince's Street North, and thereby enhance the townscape setting of the GPO to its benefit.

- **The zone of theoretical visibility (ZTV) map of the proposed development (Figure 5) has been updated to reflect the final proposal.** The 3D model used for production of the ZTV map includes the proposed rooftop telecommunications equipment, which has been reduced in extent and repositioned in response to the Opinion.

1.3 Townscape and Visual Impact Assessment Methodology

The assessment was carried out with reference to the Landscape Institute *Guidelines for Landscape and Visual Impact Assessment* 2013 (GLVIA) and the EPA *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports* 2022. The assessment methodology is explained in detail in Appendix 1.

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

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

- Visual impact assessment is concerned with changes that arise in the composition of available views, the response of people to those changes and the overall effects on the area's visual amenity. The effects on 22 no. representative viewpoints in the receiving environment are assessed in Section 5, informed by verified photomontages (produced by 3D Design Bureau and provided under separate cover).
- Townscape impact assessment is concerned with the effects of a proposed development on the *character and value* of the townscape as an environmental, cultural and economic resource. The potential effects on the townscape are assessed in Section 6.

The assessment process involved desktop study of the site and receiving environment, field survey and photographic recording, analysis of relevant planning policy from city to national to level, liaison with the design team, review of the proposed development drawings and design statements, production of verified photomontages, assessment and reporting. Vu.City (<https://www.vu.city/cities/dublin>) was used to identify the zone of theoretical visibility (ZTV) of the proposed development (see Figure 5) and to inform the selection of viewpoints for detailed visual effects assessment.

1.3.1 TVIA Author Credentials

The assessment was carried out by Richard Butler (BL Arch, MSc Spatial Planning, MILI MIPI) of Model Works Ltd. Richard has degrees in landscape architecture and town planning and is a member of the Irish Landscape Institute and Irish Planning Institute. He has over 25 years' experience in Landscape/Townscape and Visual Impact Assessment.

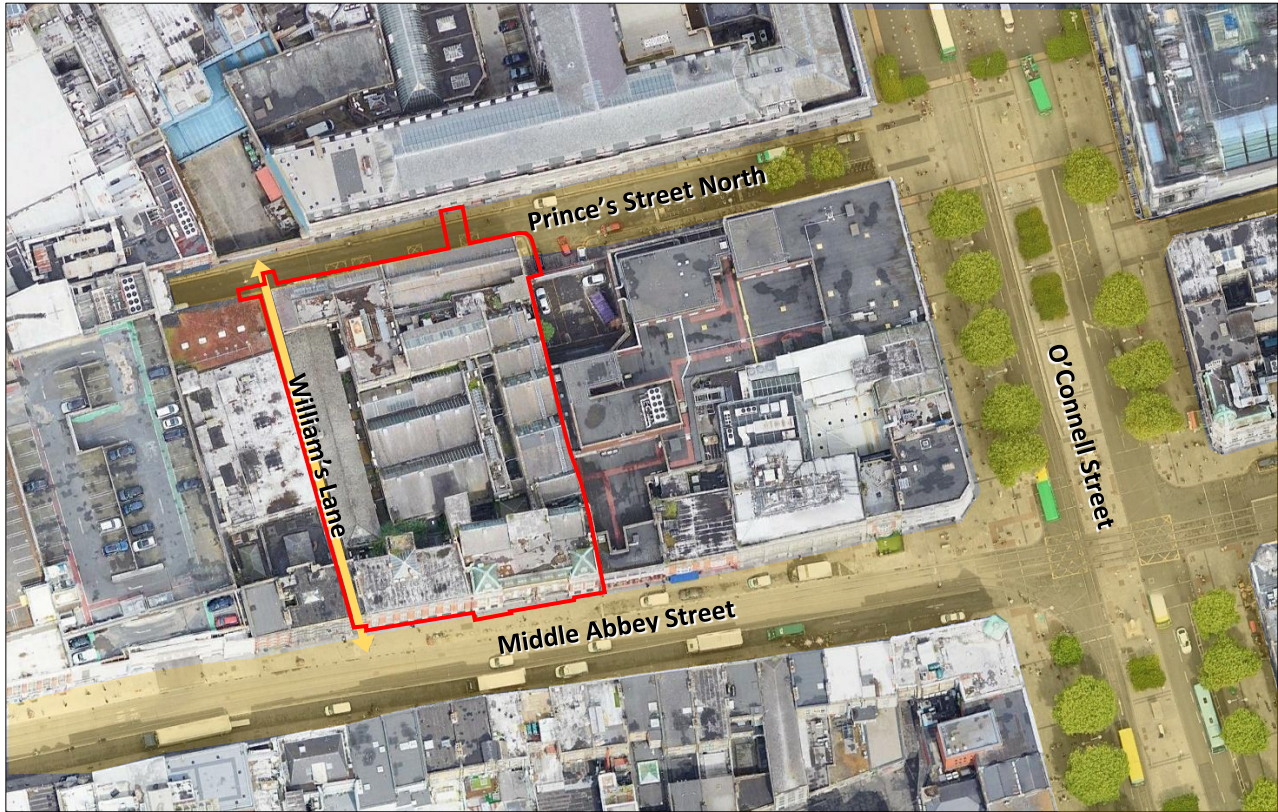
In the last number of years he has prepared TVIAs for projects including the 'Clink i Lár' hostel on Upper Abbey Street, the Guinness Quarter, St Stephen's Green Shopping Centre redevelopment, Jervis Street Shopping Centre redevelopment, St Vincent's Hospital and Residential Development (Fairview), O'Devaney Gardens, Phases 1, 1B, 2 and A of the Pembroke Quarter (Glass Bottle site), and the Connolly Quarter (Project Arc, Connolly Station) among others.

2.0 The Site and Receiving Environment

2.1 The Site

The site is the former Irish Independent Newspaper premises, a complex of buildings occupying part of the city block between Middle Abbey Street, Prince's Street North, O'Connell Street, and William's Lane.

Figure 3: The site's immediate environs (with public realm shaded yellow)



The complex of buildings on the site is made up of three main parts:

- **Independent House, Nos. 87-90 Middle Abbey Street.** This is a part five, part six storey, nine bay office building in neoclassical style, completed in 1924. The building is ornately designed and decorated, with horizontal and vertical variations in detailing and materials. The materials include granite, portland stone and red brick. The top floor is contained in a slate-covered mansard roof, with the two end bays topped by domical vaulted roofs. The dormer windows and ribs of the roof are copper. The combination of its complex form and copper colouring makes the roof particularly distinctive, although the entire elevation to Abbey Street catches to the eye due to its high level of articulation (see Photos 1 & 2). Another distinctive feature of the building is the bronze Art Deco clock that projects from the centre of the façade.

Photo 1: Independent House



Photo 2: A view east along Middle Abbey Street showing the elevations of Emerald Chambers and Independent House



- **Emerald Chambers, 91-93 Middle Abbey Street.** This is a five storey, seven bay office building adjoining Independent House to the west. It was completed in 1922, and was later acquired by Independent Newspapers. The ground floor is of cut stone (similar to Independent House), and the four floors above are red brick, with narrow, recessed stone bays. These give the façade a strong vertical emphasis. Unlike Independent House, the roof is flat. A safety railing projects above the parapet.

Both Independent House and Emerald Chambers are protected structures, and they are both handsome, eye-catching buildings in the street elevation. They make a strong, positive contribution to the character and quality of Middle Abbey Street. However, the buildings have been vacant since the early 2000s and have suffered some internal damage due to the lack of maintenance. Their vacancy also creates a stretch of dead frontage along the street, and this contributes to Middle Abbey Street not fulfilling its full potential as a streetscape.

- **Complex of warehouses, printing hall and offices fronting Prince's Street North and William's Lane.** To the rear of the Independent House and Emerald Chambers is an extensive complex of industrial style warehouse and office buildings.

The buildings are utilitarian in character, although the elevation to Prince's Street (see Photo 3) is of some architectural heritage value and visual interest due to features such as the glazed brick piers flanking the loading bays, and large, multi-pane windows at ground level (Photo 4).

The frontage to William's Lane is a mostly blank wall at ground level, variously of concrete render or brick. It is distinctly industrial in character, unsightly, and lacking in entrances and windows. This contributes - along with its narrow width and the lack of passive surveillance - to the lane's uninviting appearance and its failure as an element of the public realm and pedestrian network (see Photos 5-8).

Photo 3: A view west along the site frontage to Prince's Street North



Photo 4: The glazed brick piers and multi-frame windows which lend visual interest to the building fronting Prince's Street North



Photos 5-8: Views along William's Lane

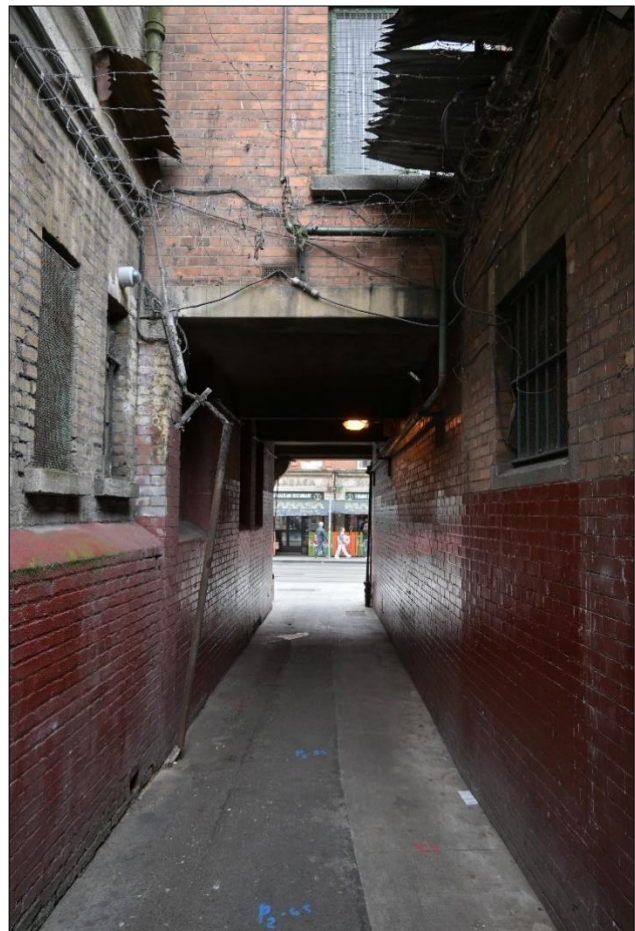


Photo 9: The entrance to William's Lane on Middle Abbey Street

William's Lane emerges on Middle Abbey Street through a decorative archway beneath the Abbey Chambers building, which adjoins Emerald Chambers to the west. The entrance is an attractive feature of the street elevation, but the poor quality of the lane counteracts the appearance of the entrance.

(The William's Lane entrance is far more attractive than the entrance to Dame Court on Dame Street. However, while Dame Court features in people's mental map of the city and is well used, William's Lane does not and is not. One of the main potential benefits of the site's redevelopment is the transformation of William's Lane into a successful element of the public realm and pedestrian network.)



2.2 Surrounding Townscape Character – Potentially Affected Areas

2.2.1 Zone of Theoretical Visibility

To scope the TVIA, a zone of theoretical visibility (ZTV) mapping exercise was carried out using Vu.City. ZTV mapping involves placing a 3D model of the proposed development into a model of the city (Figure 4) and using this to identify the areas from which the development would be visible - taking account of the existing built form in the surrounding townscape. The model used for the ZTV included the proposed telecommunications equipment on the roof.

Figure 4: 3D model of the proposed development (brown) placed into the Vu.City model of Dublin

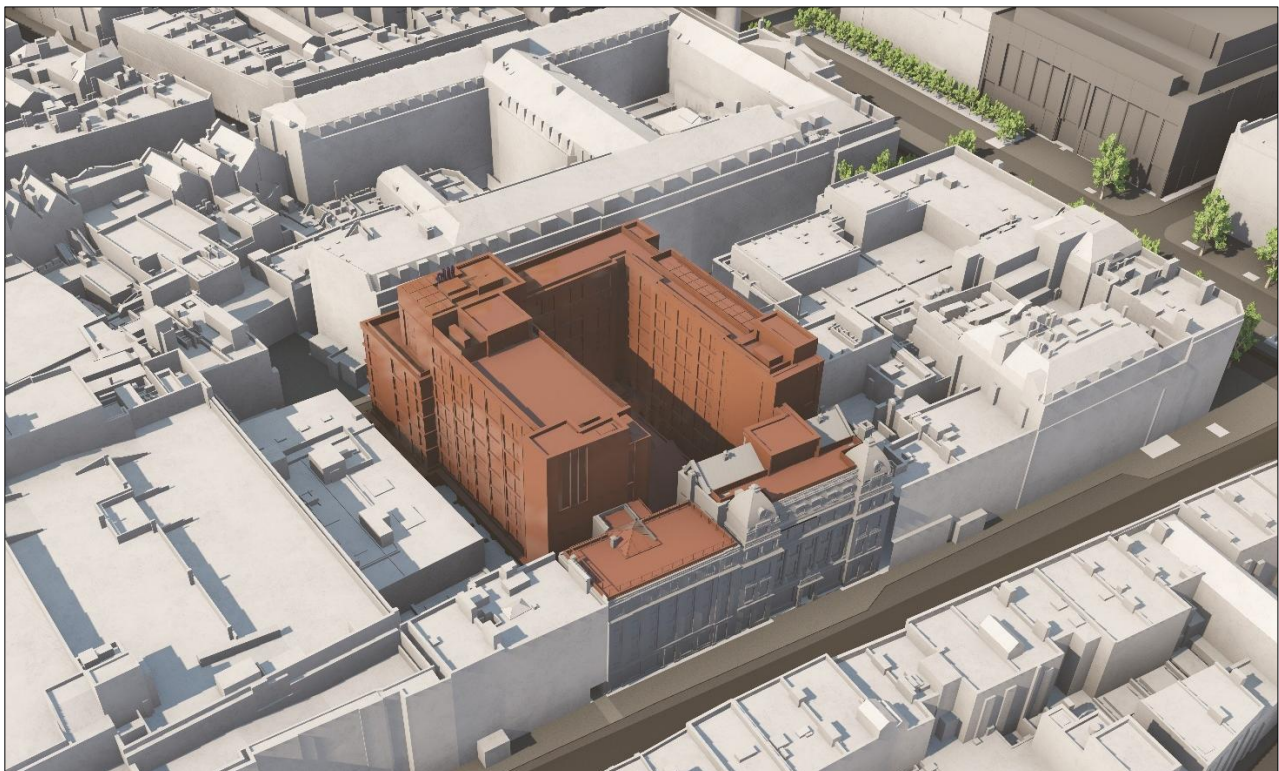
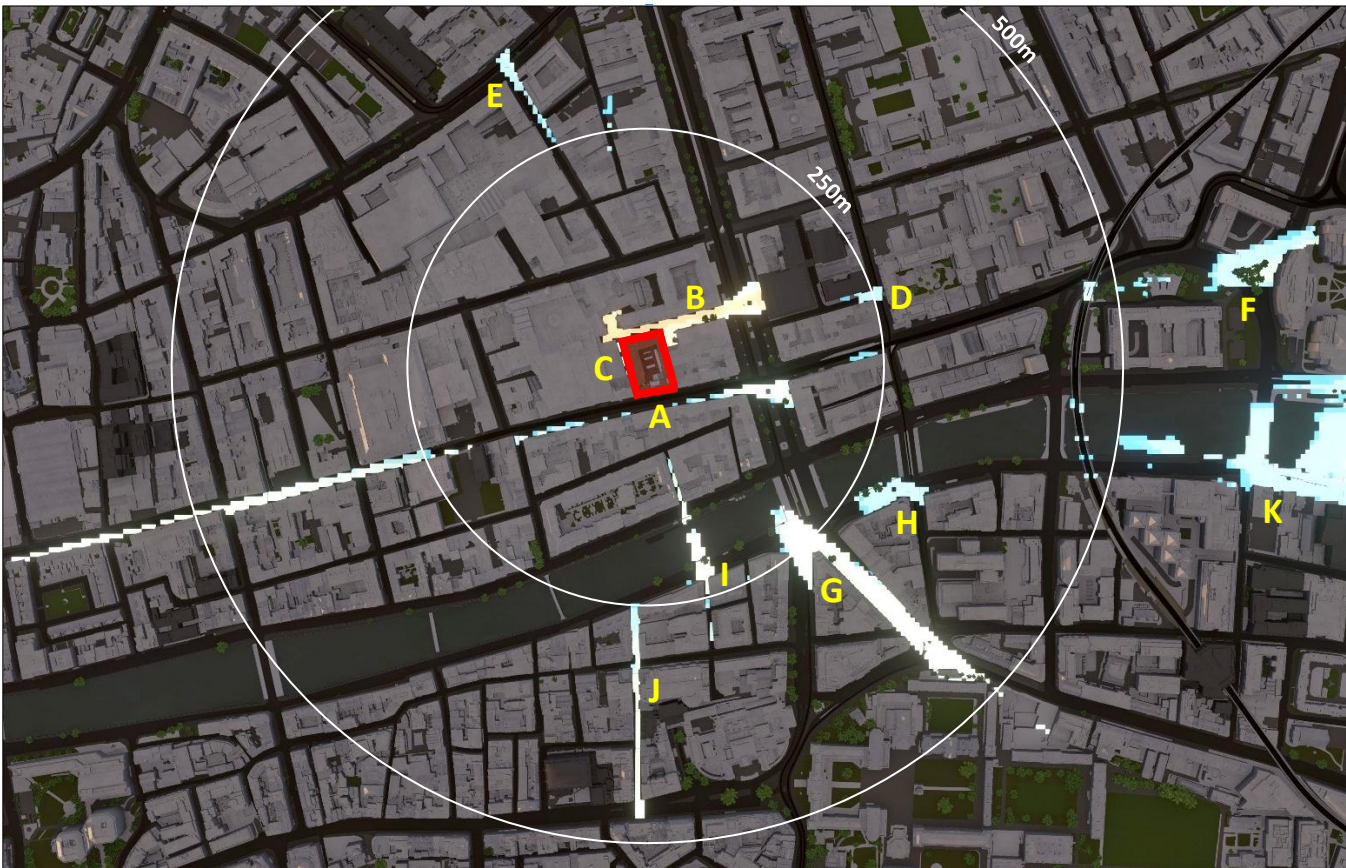


Figure 5: ZTV map of the proposed development



The ZTV map shows that due to (a) the density of built form around the site and (b) the concentration of the proposed built form/height away from Middle Abbey Street (behind Independent House and emerald Chambers), the area from which the proposed development would be visible is very limited. The building would be visible from the following areas:

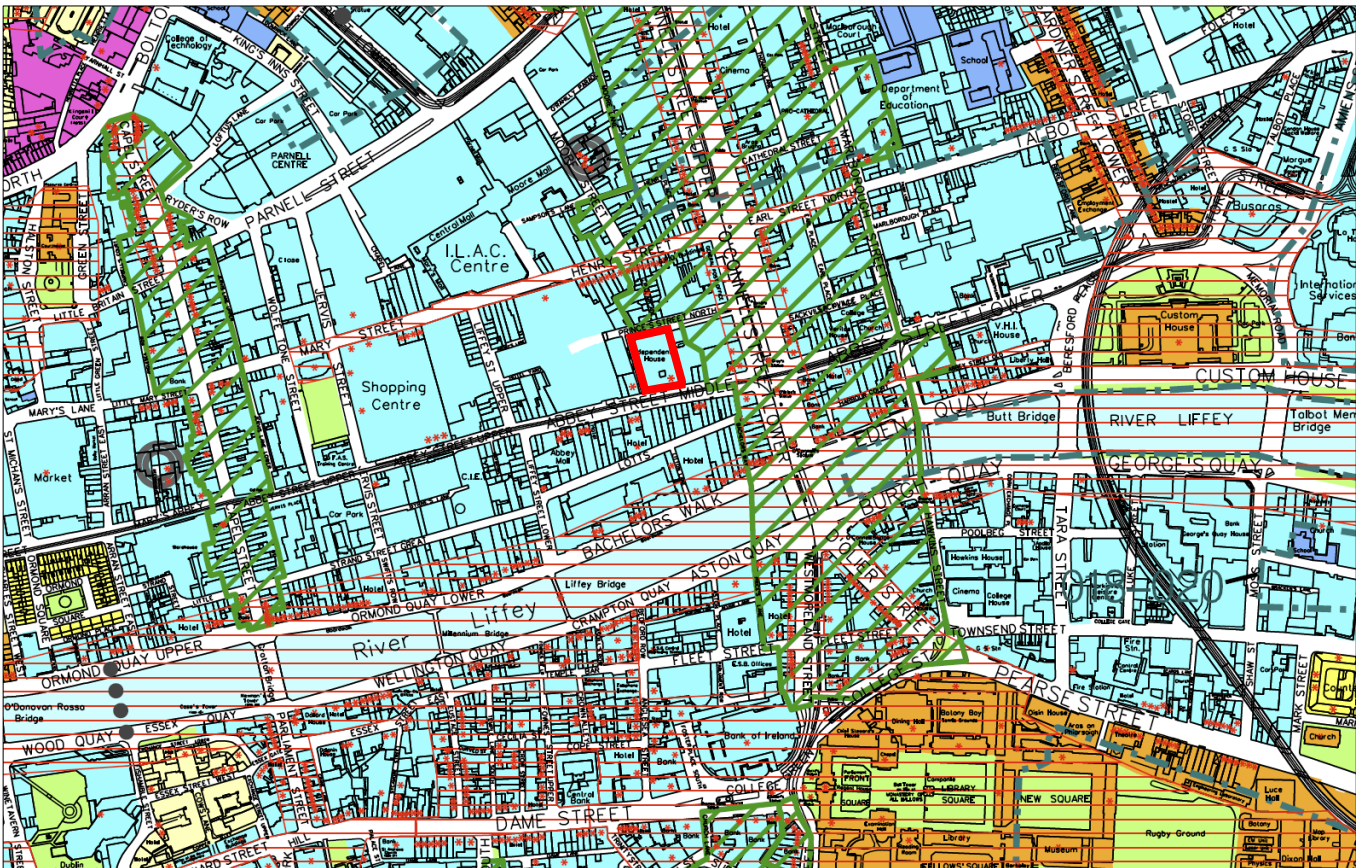
North of the Liffey River

- A. The south side of Middle Abbey Street, as far east as O'Connell Street, and in the distance to the west;
- B. Prince's Street North, including its junction with O'Connell Street;
- C. William's Lane;
- D. A small area towards the eastern end of Sackville Place;
- E. A small area towards the northern end of Moore Street (north of the National Monument, Nos. 14-17);
- F. The eastern part of Beresford Place, where it meets Amiens Street beside the IFSC. This area is well beyond 500m from the site. In the complex urban environment, the visibility of part of a building from this distance cannot constitute a significant visual or townscape impact – unless it is particularly tall or obscures or otherwise affects an important townscape feature. This does not apply in the case of the proposed development.

South of the Liffey River

- G. An area on the south quays just west of O'Connell Street Bridge and extending along D'Olier Street (and a short stretch of Westmorland Street);
- H. A part of Burgh Quay west of Rosie Hackett Bridge;
- I. A small part of Aston Place where it meets Aston Quay;
- J. Bedford Row and Anglesea Street, as far south as Dame Street/College Green;
- K. City Quay and the Talbot Memorial Bridge. This area is also well over 500m from the site.

Figure 6: Dublin City Development Plan 2022-2028 land use zoning map



The key findings of the ZTV mapping exercise are as follows:

- For a development of substantial height (up to nine storeys), the proposed building has a very limited ZTV.
- O'Connell Street would be largely unaffected. The development would be visible only from O'Connell Street's junctions with Abbey Street and Prince's Street North.
- The Liffey Quays would be largely unaffected, with the development only visible from several small parts of the south quays.

These findings are important as these areas - O'Connell Street and the Liffey corridor - are the most sensitive parts of the receiving environment. The O'Connell Street corridor is covered by Architectural Conservation Area (ACA) and 'red-lined' Conservation Area (CA) designation, and the Liffey corridor by CA designation.

The ZTV shows that the site is well suited for intensification of land use in the city centre through increased building height, as it has (a) limited potential to affect the area beyond its immediate environs, and (b) limited potential to affect the most sensitive areas in the receiving environment.

The assessment of townscape and visual effects in Sections 5 and 6 below focuses on the areas identified in the ZTV mapping exercise. The potentially most affected areas are briefly described below.

2.2.2 Middle Abbey Street

Middle, Upper and Lower Abbey Streets together are one of the main east-west thoroughfares in the north city centre. The Luas Red Line runs along the street, and it carries a large volume of pedestrian traffic. For its central location, the street includes a high proportion of modern (20th century) development. This is because large parts of the street, including the entire northern side of Middle Abbey Street, were destroyed by fire in the 1916 Rising. All the buildings on the north side of the street therefore date from c. 1920 or later – although there is strong variation in character between the eastern and western halves of the street. The site falls into the eastern part, which has a strong neoclassical character (Photo 10). The western stretch, from the former Adelphi Cinema (later incorporated into Arnotts), is more distinctly modern/20th century (Photo 11).

Photo 10: The view west along Middle Abbey Street from O'Connell Street



Photo 11: The view east along Middle Abbey Street towards O'Connell Street



2.2.3 Prince's Street North

Prince's Street North is a street of mixed character. At its junction with O'Connell Street, it is framed by the GPO - one of the city's most important buildings - on the north side, and by Penneys on the south side. Two street trees have a notable presence along the eastern stretch of the street. Towards its western end, the character and visual amenity of the street deteriorate as it approaches and passes the subject site before ending at the entrance to a car park in an unsightly elevation of the Arnotts department store (see Photo 3 above). The north side of the street, i.e. the GPO, falls into the O'Connell Street ACA. Although the site lies outside of the ACA, its redevelopment has the potential to significantly affect this part of the ACA.

Photo 12: The view west along Prince's Street North from O'Connell Street



The western half of Prince's Street North is of low environmental quality and visual amenity value (see Photos 3 and 4 above). In addition to the subject site's loading bays, there are service entrances to Penneys, the GPO Arcade and Arnotts, as well as the Arnotts car park entrance, which all contribute to an unsightly built frontage and an inactive and unwelcoming streetscape for pedestrians. The street does however have certain valuable characteristics. These include:

- Its pivotal position in the pedestrian network. Prince's Street North is connected to O'Connell Street to the east, Middle Abbey Street to the south (via William's Lane) and Henry Street to the north (via the GPO Arcade). It is a *potentially* important component of the pedestrian network in the city centre (and the connectivity already exists), but the lack of activating uses, poor streetscape condition and lack of surveillance result in its potential not being realised.
- The street's provision of views of the GPO and Clery's, two of the city's most important buildings. One (the GPO) has frontage to the street, and the other (Clery's) is framed in the view east along the street (see Photo 13). Figure 4-1 of the Dublin City Development Plan 2022-2028 (Figure 11 below) identifies this view as a 'Key View', i.e. requiring protection from inappropriate/adverse change.

The street thus has significant unrealised functional, aesthetic, and 'place' potential. If the western end of the street could be enhanced, along with William's Lane, then Prince's Street North could be transformed from a detractor to an asset in the public realm.

Photo 13: The view east along Prince's Street North showing the GPO Arcade entrance to the left (leading to Henry Street), the façade of the GPO, and in the distance across O'Connell Street the façade of the redeveloped Clery's - with modern vertical extension above the historic façade. This is identified in the Dublin City Development Plan as a 'Key View'



2.2.4 William's Lane

William's Lane is a narrow lane connecting Prince's Street North and Middle Abbey Street along the west boundary of the site. The lane is fronted on both sides by buildings of industrial character/appearance, with only service entrances and no active uses or passive surveillance (see Photos 5-8 above). Given its location, the lane could perform an important pedestrian function, but it feels unsafe and unwelcoming, and does not fulfil its potential.

2.2.5 O'Connell Street

O'Connell Street passes some 70m to the east of the site, and the site is visible from the street's junctions with Abbey Street and Prince's Street North. Dublin City Council's O'Connell Street ACA report describes the street as follows:

"In the Dublin context, the O'Connell Street area is of major architectural, historical, cultural, artistic and social importance. It constitutes a distinct quarter of the city that was formally planned, laid out and developed between the 1740's and the early 1800's. This architecturally distinguished area has a simple but elegant plan - terraced buildings lining the streets, usually four to five storeys in height, with the lines and rhythm of the facades lending an overall coherence. Occasionally, these terraces are interrupted by a landmark building that confers a special quality or image onto individual streets. In spite of the pressures of time, this area still remains relatively intact over two hundred years later, a testimony to the importance of the area."

The building of greatest architectural and cultural significance on the street is the GPO, which lies to the north of the site across Prince's Street North (see Photo 12 above). The ZTV (Figure 5) reveals that the proposed development would not be visible from O'Connell Street apart from at the junctions of Abbey Street and Prince's Street North. The only potential for the proposed development to appear in views of the GPO are in views along Prince's Street North (the view west from O'Connell Street and the view east towards O'Connell Street).

Photo 13: A view across O'Connell Street towards the GPO (and the site behind it). The proposed development would not appear in this view



2.2.6 Aston Quay and Burgh Quay

Aston Quay and Burgh Quay, on the south bank of the Liffey either side of O’Connell Bridge, are some of the busiest parts of Dublin’s public realm. This area provides iconic views up O’Connell Street to the north (Photo 14), along the Liffey corridor to east and west, and towards Trinity to the south.

Photo 14: The view north from Aston Quay at the junction of D'Olier Street, Westmorland Street and O'Connell Bridge



Photos 14-16 show the visual amenity provided by the Liffey corridor, but also the complexity of these city centre views, which include diverse architecture, extensive public realm, the river, trees, and traffic. In recognition of its townscape and visual amenity value, the Liffey corridor is designated CA.

Photo 15: The view across the Liffey River from Burgh Quay, towards the site



Photo 16: The view across the Liffey River from Aston Quay, towards the site



2.2.7 D'Olier Street

D'Olier Street is identified in the ZTV map (Figure 5) as one of the potentially most affected parts of the receiving environment. The alignment of the street provides framed views towards the site - albeit from some distance (the northern end of the street is c. 220m from the site and separated from it by the Liffey River and quays and a wide city block on the north side of the river). The photos below show the complex composition of views along D'Olier Street, with buildings from various eras, diverse architecture and materials, and a busy streetscape.

Photo 17: A view from the northern stretch of D'Olier Street towards the site



Photo 18: The view from the southern end of D'Olier Street, beside Trinity College



2.2.8 Bedford Row and Anglesea Street

Similar to D'Olier Street, the alignment of Bedford Row/Anglesea Street is such that it provides framed views towards the site, with no built form in the foreground to obstruct the view. Therefore, the ZTV identifies the street as a theoretical receptor of change. It should be noted again that this visibility is theoretical, and, at a distance of well over 200m, the visual effect may be limited.

Photo 19: The view north along Anglesea Street and Bedford Row towards the site, located well to the rear of the buildings visible on the far side of the Liffey



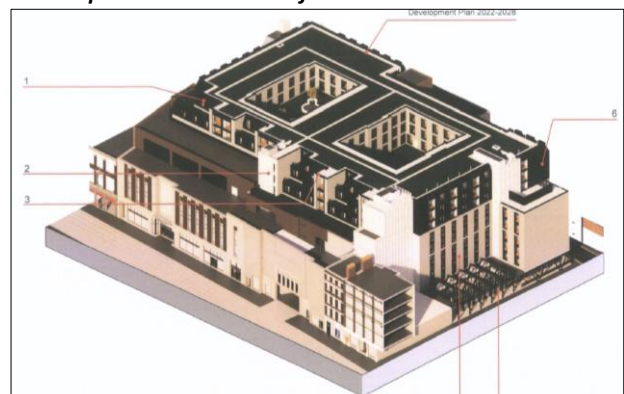
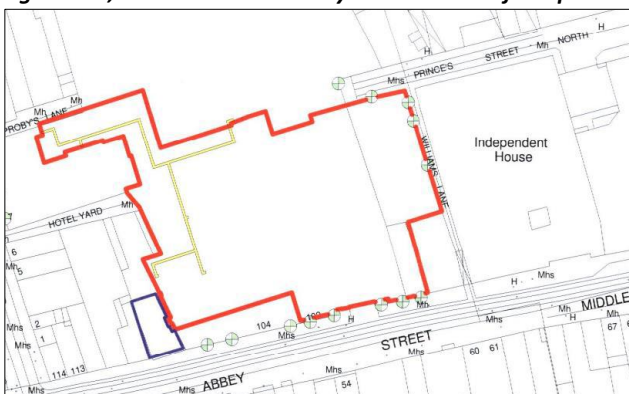
2.3 Permitted Development in the Area

The following developments recently permitted in the vicinity of the site are of relevance to this assessment.

2.3.1 DCC Reg. Ref. 4880/22 - Hotel Development at Arnott's

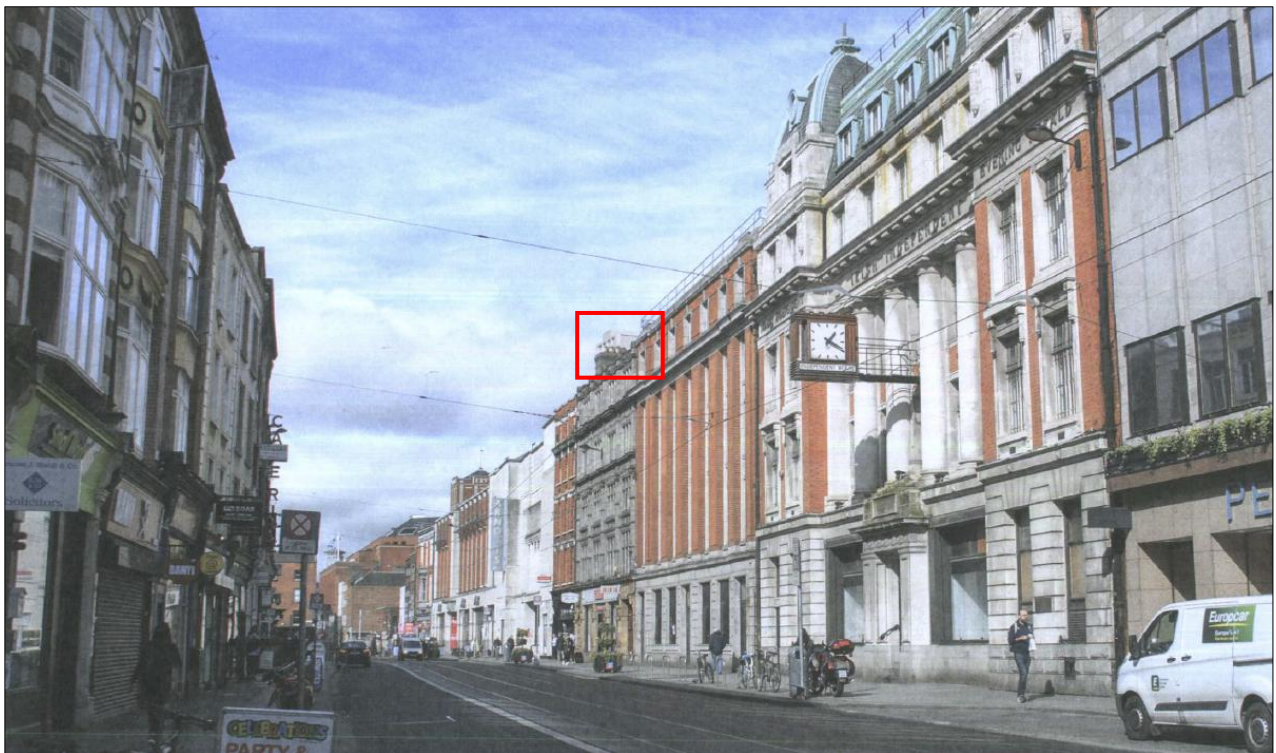
This is a hotel development on a site directly to the west of the subject site across William's Lane (see Figure 7a). The permitted development is a vertical extension over the Arnott's department store and car park, up to nine storeys tall (Figure 7b).

Figures 7a, 7b: The site boundary and a model of the permitted development to the west of the site across William's Lane



The new built form is concentrated in the northern part of the site, set back from Middle Abbey Street behind the existing street-front buildings. This will minimise the new building's protrusion above the existing roofline, although it will appear in some views - including above protected structures on the street. The photomontages of the permitted development (Figures 8a, 8b below) show that this will have no negative effect on the character or visual amenity of the street.

Figures 8a,b: Photomontages showing the slight protrusion of the permitted building (DCC Reg. Ref. 4880/22, neighbouring the subject site) above the existing Middle Abbey Street roofline



The permitted development will also appear in the view along Prince's Street North from O'Connell Street, rising behind the loading bay/office building on the subject site (see Figure 9).

Figure 9: Photomontage showing the visibility of the permitted building (DCC Reg. Ref. 4880/22, neighbouring the subject site) in the view along Prince's Street North from O'Connell Street



Most significantly, the permitted development will be visible from D'Olier Street on the south side of the Liffey. In that view (Figure 10) the new building will protrude above the roofline of the buildings fronting Bachelor's Walk on the far side of the Liffey. These are protected structures. The photomontage shows that the Bachelor's Walk buildings will remain legible in the view despite the new backdrop of taller modern buildings 150m to their rear.

Figure 10: Photomontage showing the protrusion of the permitted building (DCC Reg. Ref. 4880/22) above the roofline of Bachelor's Walk in the view from D'Olier Street



The grant of permission for DCC Reg. Ref. 4880/22 indicates that there is some tolerance for change in townscape character and the composition of views resulting from increased density and height in the site environs. Such change is unavoidable if the policy of compact growth/densification is to be realised in the city centre. The assessment of visual and townscape effects in Sections 5 and 6 below shows that the proposed development would have very similar effects to the permitted development on the neighbouring site.

2.3.2 Motel One Hotel, Middle Abbey Street and Liffey Street Upper

The Motel One Hotel at the western end of Middle Abbey Street, 115m west of the subject site, is eight storeys tall. This is a contemporary building fronting Middle Abbey Street and Liffey Street Upper.

Photo 20: The Motel One hotel at the corner of Abbey Street and Liffey Street Upper



2.3.3 Clink I Lar Hostel, Upper Abbey Street

The recently completed Clink I Lar hostel, 170m to the west of the site, is 11 no. storeys tall. This development forms part of an emerging mid-rise cluster of development on Upper Abbey Street between Liffey Street and Jervis Street. Permission has been granted for a residential and hotel development of the same height on the neighbouring site to the west, and for a vertical extension to the Jervis shopping centre across the street.

While these developments on Upper Abbey Street are in a different sub-area of townscape character (and one of lesser sensitivity) to the subject site's, there is an emerging corridor of consolidation and densification taking place along Abbey Street as a whole.

3.0 Relevant Policy

3.1 Dublin City Development Plan 2022-2028

3.1.1 Land Use Zoning

The site is zoned Z5 'City Centre' (see Figure 4, page 8 above). The Development Plan states:

"The primary purpose of this use zone is to sustain life within the centre of the city through intensive mixed-use development...

"The strategy is to provide a dynamic mix of uses which interact with each other, help create a sense of community, and which sustain the vitality of the inner city both by day and night...

"Ideally, a mix of uses should occur both vertically through the floors of buildings as well as horizontally along the street frontage. A general mix of uses, e.g. retail, commercial, residential, will be desirable throughout the area and active, vibrant ground floor uses promoted".

3.1.2 Core Strategy and Approach to the Inner City

DCDP Policy SC1: *"Consolidation of the Inner City - To consolidate and enhance the inner city, promote compact growth and maximise opportunities provided by existing and proposed public transport..."*.

3.1.3 Urban Consolidation and Density

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

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

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

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

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

- *enhance the urban form and spatial structure of the city;*
- *be appropriate to their context and respect the established character of the area;*
- *include due consideration of the protection of surrounding communities and provide for enhanced amenities for existing and future residents;*
- *be supported by a full range of social and community infrastructure such as schools, shops and recreational areas;*

- and have regard to the criteria set out in Chapter 15: Development Standards, including the criteria and standards for good neighbourhoods, quality urban design and excellence in architecture.”

3.1.4 Urban Design and Architecture

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

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

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

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

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

Section 4.5.4 of the DCDP 2022 states: *“Aligned with the principle of greater densification, will be the requirement to consider greater height in appropriate locations. It is important to note however, that higher density does not necessarily equate to high rise buildings and plot ratio and site coverage all contribute to the density of a particular built form...”*

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

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

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

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

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

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

“At a strategic level, Dublin City has an intrinsic quality as a predominantly low rise city. There is a recognised need to protect conservation areas and the architectural character of existing buildings, streets and spaces of artistic, civic or historic importance. In particular, development proposals must be sensitive to the historic city centre, the River Liffey and quays, Trinity College, Dublin Castle and medieval quarter, the historic squares and the canals. It is important to protect the skyline of the inner city and to ensure that any proposals for high buildings make a positive contribution to the urban character of the city and create opportunities for place making and identity.”

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

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

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

3.1.6 Conservation Areas

The site is not covered by CA or ACA designation. However, the O’Connell Street ACA extends along the north side of Prince’s Street North, across the road from the site. Additionally, development on the site would be visible from stretches of O’Connell Street itself, at its junctions with Abbey Street and Prince’s Street North.

“The special interest/value of Conservation Areas lies in the historic and architectural interest and the design and scale of these areas. Therefore, all of these areas require special care in terms of development proposals...”

“The City Council will encourage development which enhances the setting and character of Conservation Areas”.

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

Enhancement opportunities may include:

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

7. The return of buildings to residential use.”

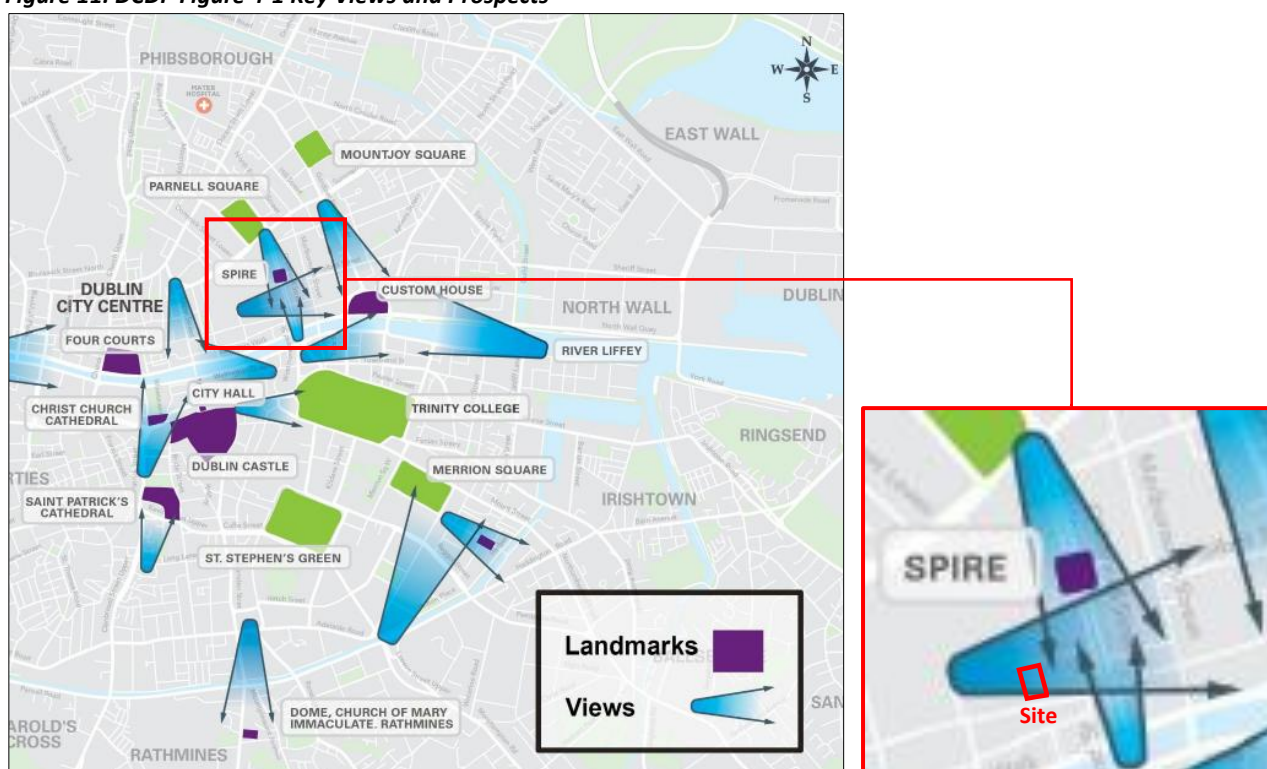
“Changes of use will be acceptable where in compliance with the zoning objectives and where they make a positive contribution to the character, function and appearance of the Conservation Area and its setting. The Council will consider the contribution of existing uses to the special interest of an area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

3.1.7 Key Views and Prospects

Figure 4-1 of the DCDP (Figure 11 below) identifies the Key Views and Prospects in the city.

- There is one Key View that would be directly impacted by the proposed development. This is the view east along Prince’s Street North towards Clery’s on the far side of O’Connell Street. The potential impact on this view is assessed by Viewpoint 13 in the visual effects assessment in Section 5 below.
- The view north along O’Connell Street from Aston Quay on the south side of O’Connell Bridge could also be affected, although less significantly. The impact is assessed by Viewpoints 2 and 3 in Section 5 below.
- The ZTV map shows that the Key View south along O’Connell Street would not be affected by the development. Viewpoints 15 and 16 assess views south along O’Connell Street.

Figure 11: DCDP Figure 4-1 Key Views and Prospects



3.1.8 Public Realm and Pedestrian Connectivity

In Section 4.5.1, regarding the Approach to the Inner City, the DCDP states: *“The focus of the strategy for the inner city will be to encourage a more liveable inner city, balanced economic investment and an increased focus on residential development coupled with significantly enhanced public realm and mobility measures to encourage more pedestrians and cyclists.”*

Policy SC2 states: “To develop the city’s character by:

- *developing a sustainable network of safe, clean, attractive streets, pedestrian routes and...lanes... in order to make the city more coherent and navigable and creating further new streets as part of the public realm when the opportunities arise;*
- *protecting the grain, scale and vitality of city streets and encouraging the development of appropriate and sustainable building heights to ensure efficient use of resources, services and public transport infrastructure and that protects the heritage and natural assets of the city...*”

In Chapter 7, the DCDP states a number of objectives for the public realm, including:

“Connections: *The public realm should be legible, connected and permeable and designed to encourage people to walk and cycle to their destinations (schools, shops, work, playgrounds etc.) and to easily access public transport. This will encourage and enable people to be physically active in their daily lives.*

Safety: *The public realm must be carefully managed and maintained. It should be decluttered and deter anti-social behaviour and crime to ensure people feel safe. Adjacent buildings should activate, animate and overlook the public realm thereby making the spaces more attractive and providing a sense of security to people using the space / passing through.*

High Quality Materials: *Spaces must be carefully designed, using high quality materials and detailing which respect and enhance the existing character of areas within the city. Landscape treatment, planting, street furniture and surface materials should be of good quality, fit-for-purpose, durable and sustainable.*”

Policy Objective CCUV05, regarding Underutilised and inactive City Centre Streets, states: “To reactivate the underutilised and inactive city centre streets and lanes in the city centre through the inclusion of art, landscaping, street furniture, outdoor dining, activity spaces and residential uses”. [emphasis added]

These policies are relevant to the site and the proposed development as Prince’s Street North and William’s Lane are both in sub-optimal condition as elements of the public realm and the pedestrian network. They lack activation and passive surveillance and do not feel safe. They are therefore underutilised.

3.2 National Policy

3.2.1 National Planning Framework

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

3.2.2 Urban Development & Building Height Guidelines

The Guidelines state: “Implementation of the National Planning Framework requires increased density, scale and height of development in our town and city cores... to meet the needs of a growing population without growing our urban areas outwards requires more focus in planning policy and implementation terms on reusing previously developed ‘brownfield’ land ... and either reusing or redeveloping existing sites and buildings that may not be in the optimal usage or format taking into account contemporary and future requirements...”

In Section 3.2 of the Guidelines, ‘development management criteria’ are set out to guide the evaluation of development proposals for buildings taller than the prevailing heights in the area. These are as follows:

At the scale of the relevant city/town:

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

At the scale of district/neighbourhood/street:

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

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

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

4.0 Proposed Development

The proposal is described in detail in the Architectural and Landscape Design Statements and drawings accompanying the planning application. The formal development description is provided in Section 1.1 above. The following are the aspects of the proposal most relevant to the TVIA.

4.1 Retention and Demolition

Retention and demolition are key aspects of the proposed development. From the townscape perspective, the following are the most notable elements of the proposal:

- **On Middle Abbey Street, Independent House and Emerald Chambers would be retained, with minimal modifications to the elevations.** To the lay observer, the most noticeable aspects of the development would likely be (a) the new uses visible in the ground floor windows (retail, student accommodation reception and study areas); (b) the renovation of the retained facades, and (c) new glass balustrades at the roofline, replacing the existing safety railings.
- **On Prince's Street North, the existing three storey loading bay/office façade along part of the site frontage would be retained, modified and incorporated into a larger new building (six storeys at the street-front) spanning the full site frontage to the street.** The retained façade includes the glazed brick piers and large, multi-pane windows at ground level, which are the only features of townscape/visual value in the existing frontage to the street (see Photos 3 and 4 above).

The retained facade would be legible in the wider architectural composition (see Figures 12, 13) due to (a) its concrete render walls contrasting with the brick of the larger building, (b) its different fenestration, (c) its slight forward projection from the main façade, and (d) the distinctive glazed brick piers and multi-pane windows at ground level.

Figure 12: Photomontage showing the retained and modified loading bay/office façade in the Prince's Street North elevation



Figure 13: Photomontage showing the retained and modified loading bay/office façade in the new Prince's Street North elevation



- **The warehouse building along William's Lane to the rear of Emerald Chambers would be demolished and replaced by the new student accommodation building.** In townscape and visual terms, the existing building has an entirely negative effect on William's Lane. Therefore, its replacement with a contemporary, mixed use building is a positive change in principle.

An important aspect of the proposal is that the new building would be set back from the existing building line, thereby widening William's Lane, making it a more comfortable pedestrian space. Additionally, at the centre of the site frontage, where the lane passes an entrance and amenity lounge in the student accommodation, the lane would be widened further, with the objective of creating a gathering place on the lane (see Figure 19 below).

Figures 14a,b: Existing and proposed views along William's Lane from Prince's Street North

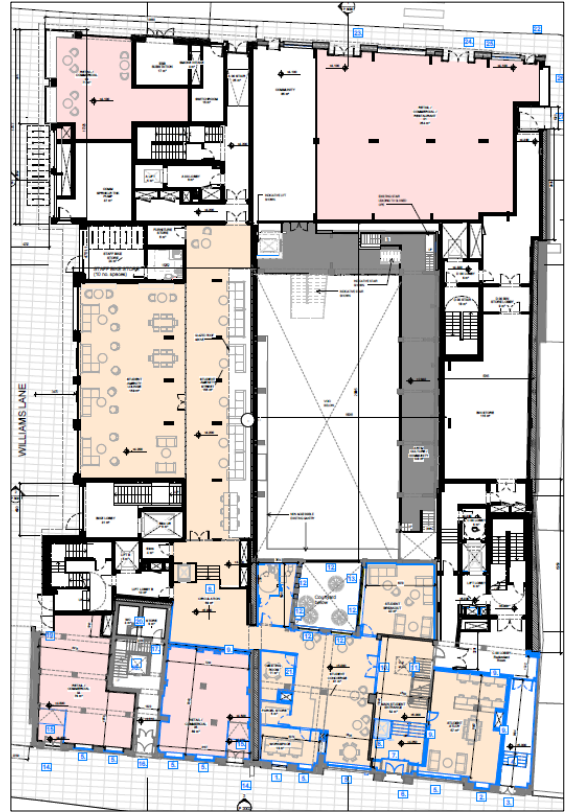


4.2 Arrangement of Uses

The proposed arrangement of ground floor uses is intended to maximise the activation benefit to the three adjacent streets/public spaces:

- **Along Middle Abbey Street**, two retail units are proposed in the ground floor of Emerald Chambers, and the main entrance to the student accommodation would reuse the original main entrance of the building. There would thus be three primary entrances (and two secondary) on the street, generating pedestrian traffic. The retail displays and windows into the student reception and study areas would animate the elevation.
- **Along Prince's Street North**, a large café/restaurant unit is proposed along the eastern half of the frontage and a smaller unit is located in the north west corner, wrapping around onto William's Lane (see Figure 14b). At the centre of the frontage is the entrance to a proposed new community, arts and culture facility, which is located in the centre of the development, reusing the retained printing hall. Three new active uses are thus proposed along Prince's Street North. The design seeks to maximise the value of these uses to the street by means of large windows in the ground floor façade (part of which is the retained office/loading bay façade with its multi-pane windows).
- In addition to a retail unit at each end of **William's Lane**, an entrance to the student accommodation is proposed at the centre of the frontage. Inside the entrance is a large student lounge, with its broad, glazed façade addressing the widened central stretch of the lane (see Figure 19). The combination of the entrance, the amenity space frontage and the widening of the lane along this stretch, with the provision of outdoor seating and planting in the lane, is intended to create a 'place' mid-way along the lane. This would be an important addition to the local public realm.

Figure 15: Proposed retail, café/restaurant and student amenity uses in the ground floor



4.3 Arrangement and Height of New Built Form

Independent House and Emerald Chambers would be retained on the site frontage to Middle Abbey Street. Therefore, the existing height of part five, part six storeys would be retained at the street-front. A single storey vertical extension is proposed over Independent House, replacing an existing, modern vertical extension on part of the roof. This would effectively retain the existing height of part five, part six storeys. The proposed sixth storey pop-up is set back from the street-front elevation to avoid any visibility above the existing roofline in views from Middle Abbey Street.

The proposed student accommodation building to the rear of the Independent House and Emerald Chambers takes the form of a perimeter block (three sides of the block, with the retained buildings forming the fourth side). The block surrounds the retained printing hall in the centre of the site. The new building is mostly eight storeys tall, with pop-up elements to give access to rooftop amenity space. These pop-up elements (the largest in the north west corner but set back from Prince's Street North and William's Lane) bring the overall height to nine storeys. Along most of the length of William's Lane behind Emerald Chambers, the building is eight storeys. Along Prince's Street North, the building steps down to six storeys at the street-front.

Figure 16: North-south section through the proposed development, showing:

- Independent House and Emerald Chambers retained on Middle Abbey Street;
- The perimeter block of student accommodation surrounding the retained Printing Hall, rising to eight storeys, with a nine storey pop-up giving access to rooftop amenity space;
- The step down from eight storeys to six at the Prince's Street North frontage.

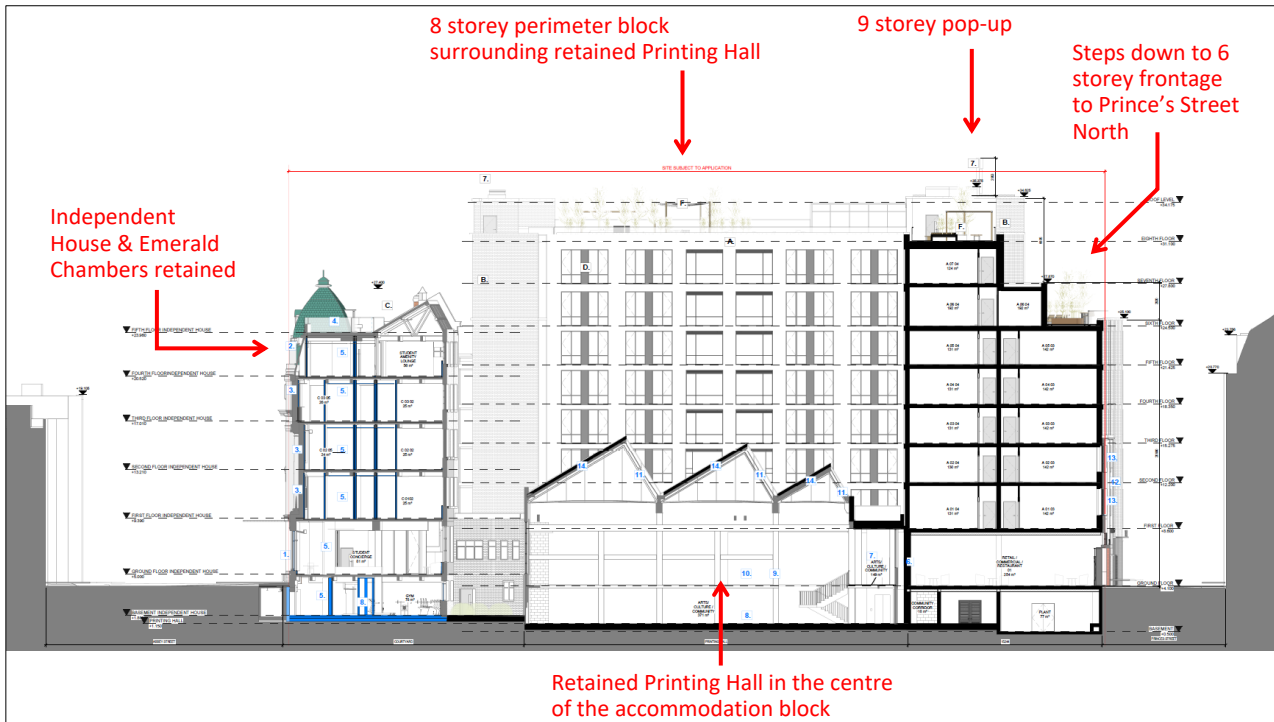


Figure 17: Bird's eye view showing the proposed arrangement and scale of new built form to the rear of Independent House and Emerald Chambers, and the new roofscape



Figure 18: Photomontage showing (a) the minor protrusion of the new building above the Middle Abbey Street roofline and (b) the replacement of the existing railing at the roof edge with a glazed balustrade



4.4 Façade Treatments

No significant changes are proposed to the front facades of Independent House and Emerald Chambers. The only noticeable effects of the development would be the facades' improved condition and the new uses in the buildings.

The student accommodation building to their rear has a residential design language (above ground level) deriving from the use of brick as the predominant material and generously sized windows. The grid pattern and detailing of the windows reference the site's industrial history - although it is also intended that the new building will be distinct from the retained loading bay/office façade on Prince's Street North to ensure the legibility of that façade.

The mixed use ground floor of the building is distinguished from the accommodation floors above by a different design treatment and materials. In the retained loading bay/office façade on Prince's Street North this is already done by the existing architecture, with the ground floor made distinct by the glazed brick piers and multi-pane windows (see Figure 19). Along the remainder of the ground floor facade, which includes service entrances and a 2nd retail unit, the main material is black glazed brick. The black brick is also used in the ground floor fronting William's Lane, along with large windows for intervisibility between the lane and the student lounge area (see Figure 20).

Figure 19: Proposed south elevation to Prince's Street North

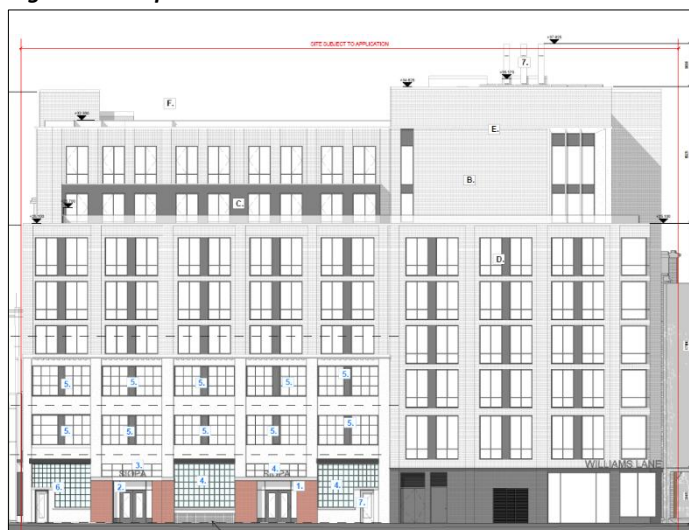


Figure 20: CGI view of William's Lane, also showing the permitted development on the neighbouring site west of the lane



4.5 Landscape/Public Realm Proposals

The main landscape/public realm proposals are focussed on William's Lane. The widened lane would be surfaced with high quality paving. A drainage channel running inside the site boundary (marking the historic building line) is proposed to be covered in a metal grill of bespoke design. Potted plants and bench seating are proposed along the wider stretch of the lane in front of the students lounge - for additional place-making effect (see Figure 20).

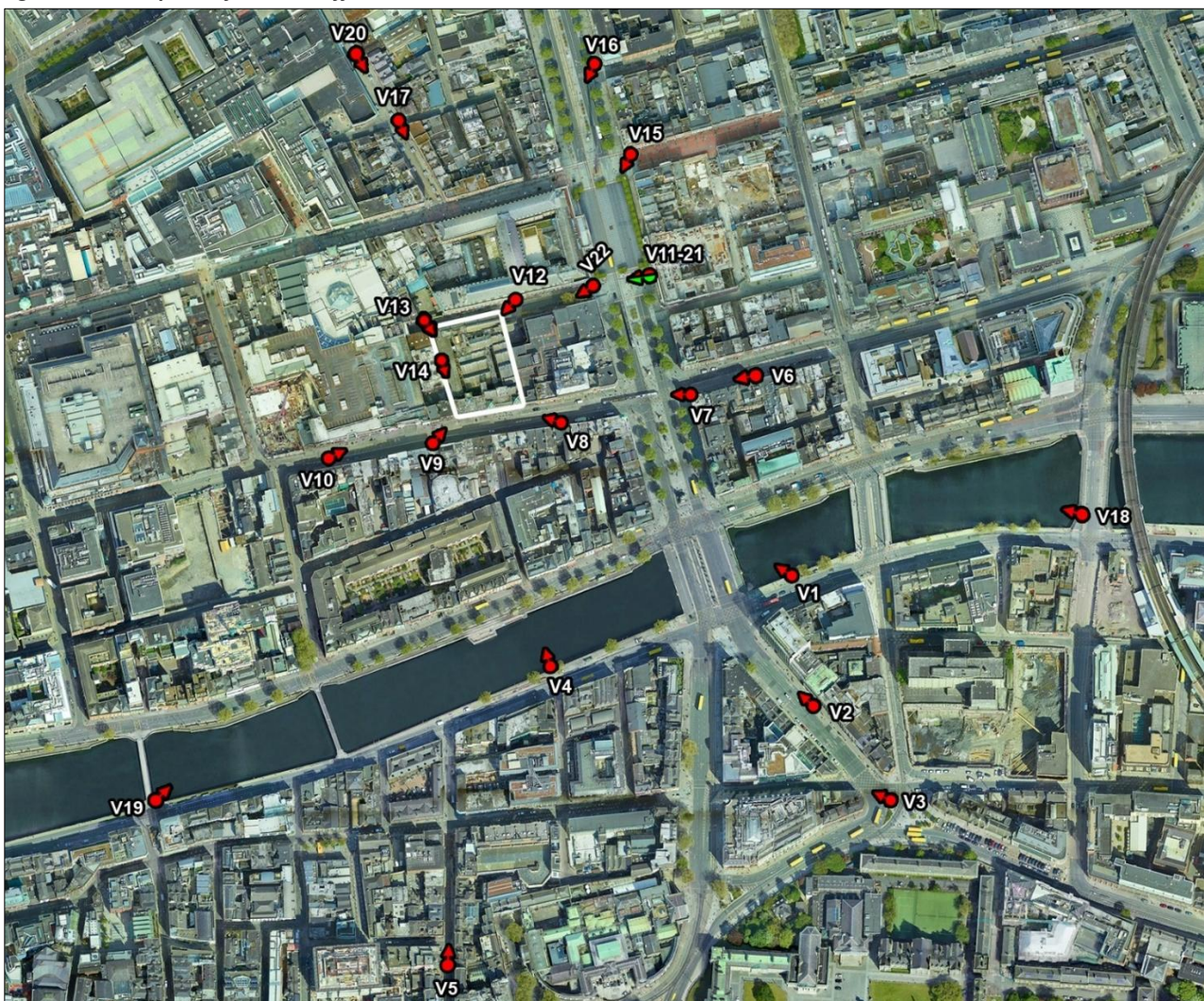
Amenity space is provided on the roof of the new building and on part of the roof of Independent House. These spaces include raised beds of ornamental planting and small, multi-stem trees. Where amenity access is not proposed, e.g. the roof of emerald Chambers, a green roof system is proposed (see Figure 17).

5.0 Visual Effects Assessment

Based on the ZTV analysis (Figure 5), the identification of key potential receptors (Section 2.2) and the DCC Opinion, 22 no. viewpoints were selected for detailed visual effects assessment informed by verified photomontages. Five of the viewpoints were added to the assessment in response to the DCC opinion. These are:

- Viewpoints 18 and 19 on the south quays. This responds to Item 1.a) of the Opinion, which states: *“The Applicant is requested to submit further CGIs/photomontages of the proposal viewed from the south Quays”*.
- Viewpoint 20 on Moore Street outside the National Monument (Nos. 14-17 Moore Street). This responds to Item 4.c) of the Opinion, which states: *“At nine stories in height the development could have a negative visual impact on the National Monument on Moore Street, associated with the Easter Rising of 1916. For this reason CGIs / photomontages of the proposed development viewed from the Moore Street National Monument are requested. This should be accompanied by an assessment of the visual impact.”*
- Viewpoints 21 and 22 (views along Prince’s Street North). This responds to Item 5.h) of the Opinion, which states: *“There is concern regarding the height of the new structure and its impact on the wider receiving environment, in particular the GPO and GPO Buildings. The Applicant is requested to consider a reduction in height of one storey along the Princes Street elevation”*.

Figure 21: Viewpoints for visual effects assessment



The effects on each viewpoints are assessed in Table 2 below. For the assessment methodology, refer to Appendix 1. The assessment should be read in conjunction with the verified photomontages provided under separate cover.

Table 1: Visual effects assessment

Viewpoint	Existing View	Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
Burgh Quay					
Viewpoint 1: Burgh Quay (see also Viewpoint 18 from Burgh Quay junction with Butt Bridge)	- This is a view of the townscape where two of Dublin's main arranging elements, the Liffey River and O'Connell Street, intersect. The combination of the river, the bridge, the handsome buildings fronting the north quays, and the trees, generates a high level of visual amenity. Viewpoint sensitivity: High - This is a view of – and from – the O'Connell Street ACA, featuring the CA-designated Liffey corridor and numerous protected structures. The view is thus of high sensitivity. - However, the composition – comprised of open space, diverse architecture and materials, a busy, cluttered public realm, trees and traffic - is complex. This complexity creates capacity to for some, minor change. If not too large or deviant from the existing elements of the composition, new features can be introduced without causing harm to the view.	High	- A small part of the proposed building (a section of horizontal, brick-clad parapet) would protrude marginally above the roofline of O'Connell Street. - In the complex, city-centre townscape, and seen from a distance of c. 250m, this would amount to a negligible change. Significance of effect: Not significant neutral. - The development would have no significant effect on the composition, character or visual amenity of the view.	Negligible	Not significant neutral
D'Olier Street					
Viewpoint 2: Mid-way along D'Olier Street	- The view along D'Olier Street is framed by buildings of diverse character and scale, including the Art Deco Dublin Gas Co. building, the 12 storey 1960s O'Connell Bridge House, a six storey, modern, brown brick office building, and the pitched roof and chimney stacks of the Lafayette building at the end of the street. - In the distance, beyond the Liffey, are terraced 3-5 storey Georgian and Victorian buildings fronting Bachelor's Walk, partially screened by trees on the quays. Steps in height and chimney stacks add to their complex roofline. Viewpoint sensitivity: Medium-High - This is a view of – and from – the O'Connell Street ACA, featuring the CA-designated Liffey corridor and numerous protected structures. The view is of high sensitivity. - However, the view also features buildings of diverse era, scale, architecture and materials, a busy streetscape, trees and traffic. This complexity creates capacity to accommodate minor change.	Medium-High	- Two parts of the proposed building would protrude marginally above the trees and the roofline of Bachelor's Walk. - In the complex, city-centre townscape, and seen from a distance of over 250m, this would amount to a negligible change. Significance of effect: Not significant neutral. <u>The Bachelor's Walk buildings would remain legible and undiminished by the slight protrusion above their roofline.</u> The development would have no significant effect on the composition, character or visual amenity of the view.	Negligible	Not significant neutral
Viewpoint 3: Southern end of D'Olier Street at	- On the west side of D'Olier Street is a terrace of eight Georgian houses, juxtaposed with a 21st century glass and metal-clad office building. - The buildings east of the street are a diverse mix, with the blank gable wall of the 12 storey O'Connell Bridge House an unfortunate feature. - These buildings frame the view towards the Liffey and the terraced Georgian buildings on the far side of the river at the corner of O'Connell Street and Bachelor's Walk. Viewpoint sensitivity: Medium-High - This is a view of – and from – the O'Connell Street ACA, featuring the CA-designated Liffey corridor and numerous protected structures. The view is of high sensitivity. - However, the view also features buildings of diverse era, scale, architecture and materials, a busy streetscape, trees and traffic. This complexity creates capacity to accommodate some change.	Medium-High	- The upper floors and roofscape of the proposed building would protrude above the distant roofline of Bachelor's Walk. - The building would be over 100m to the rear of the Bachelor's Walk buildings, and the contrasting architecture and materials would distinguish the new building from the historic buildings in front of it. - In the already complex, city-centre view, and seen from a distance of c. 400m, this would amount to a low magnitude of change. Nonetheless, due to its framed, focal-point position it would be noticeable, and it would affect a sensitive element of the view. Significance of effect: Slight negative. <u>In the evolving city centre, juxtapositions of development era, typology, scale, architecture and materials are not unusual, nor inappropriate. The existing view shows that such diversity adds character, visual interest and legibility to the townscape.</u> <u>However, the development would have the effect of slightly reducing the clarity and legibility of the Bachelor's Walk buildings (the roofscape in particular).</u>	Low	Slight negative

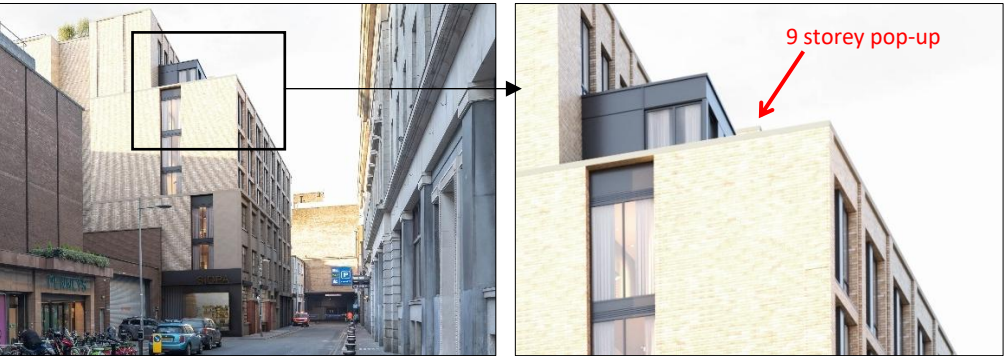
Viewpoint	Existing View	Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
Aston Quay					
Viewpoint 4: Aston Quay	- The ZTV map (Figure 5 above) shows an area of theoretical visibility on Aston Quay directly to the south of the site, across the Liffey from Litton Lane. (Litton Lane is a narrow gap in the built form north of the river, through which the development could theoretically be seen.) - Across the river, fronting the quays, are terraces of 4-5 storey buildings - some (e.g. the Arlington Hotel) dating from the 19th century, and some (the terrace to the left of the lane) modern replicas. - A tree on the north quay mostly screens the view along Litton Lane. Viewpoint sensitivity: High - This is a view of – and from – the Liffey corridor CA, featuring a number of protected structures. The uniformity in building typology and architecture gives the view a strong character, with limited capacity to accommodate change.	High	- The proposed development is entirely hidden from view by the buildings across the river and the tree blocking the view down Litton Lane. - Even if the tree were bare, any small part of the building discernible through the gap would be well below the river-front roofline and well back from the Liffey corridor buildings. This would amount to a negligible change. Significance of effect: Imperceptible neutral. - The development would have no effect on the composition, character or visual amenity of the view.	Negligible	Imperceptible neutral
Bedford Row/Anglesea Street					
Viewpoint 5: Anglesea Street	- Bedford Row and Anglesea Street are directly aligned with the western part of the site. <u>(The ZTV, Figure 5 above, shows that this is the only part of Temple Bar potentially affected by the proposed development.)</u> - In the foreground is the distinctive character area of Temple Bar, comprised of mostly small, elaborately decorated Victorian buildings lining narrow, cobbled streets. The viewer's attention is drawn to the foreground in Temple Bar. - The street however frames a view of distant Georgian buildings on Bachelor's Walk beyond the Liffey River. Viewpoint sensitivity: High - The majority of Temple Bar is covered by CA designation, and the buildings in view are all protected structures. The view is of high sensitivity.	High	- A part of the proposed building would protrude well above the roofline of the distant Georgian buildings beyond the Liffey. The building would be some 150m to the rear of Bachelor's Walk, and the clear contrasts in typology, architecture and materials would distinguish the new building from the historic buildings in front of it. - Although seen from a distance (i.e. forming part of the background), the introduction of a new building typology to the framed view would constitute a medium magnitude of change. Significance of effect: Moderate neutral. - The extent of the new building's protrusion above the Bachelors Walk roofline is sufficient for the two elements to be easily distinguishable – so that there would be no loss in legibility of the Bachelors Walk buildings despite the changed backdrop. <u>There would be a change in character in the distant townscape across the river, but the resulting composition would not be unsightly; it could be construed as designed/intended, with the distant, taller modern building adding visual interest to the view.</u> - The strength of character of Temple Bar is such that it can easily withstand the change in its wider context.	Medium	Moderate neutral
Abbey Street					
Viewpoint 6: Lower Abbey Street at Wynns Hotel	- The street is framed by ornately decorated 5-6 storey buildings, all dating from around 1920 (when Lower and Middle Abbey Street were largely rebuilt after the 1916 Rising). Unlike many other streets in the historic city core (typically more uniform in style and materials), the street elevation includes wide variations in façade design, detailing and materials. There is also a notable complexity at the roofline. - The 11 storey Clink i Lar hostel is a notable addition to Upper Abbey Street in the distance. Viewpoint sensitivity: Medium-High - This is a view of – and from – the O'Connell Street ACA, featuring numerous protected structures. However, the view also features buildings of diverse architecture and materials, and a busy city-centre streetscape. This complexity creates capacity to accommodate (minor) change.	Medium-High	- The proposed development would be entirely screened by the buildings at the corner of O'Connell Street and Abbey Street. Significance of effect: No effect.	None	No effect
Viewpoint 7: Junction of Abbey Street and O'Connell Street	- Middle Abbey Street is framed by ornate 5-6 storey buildings all dating from around 1920, with variety in façade design, detailing and materials, and notable complexity at the roofline. - To the right is the wide corridor of O'Connell Street, featuring statues in the central median, and its distinctive pleached trees. The streetscapes are wide and heavily trafficked (with the Luas running along both streets), and cluttered with signage, etc. Viewpoint sensitivity: Medium-High - This is a view of – and from – the O'Connell Street ACA, featuring numerous protected structures. However, the view also features buildings of diverse architecture and materials, and busy city-centre streetscapes. The complexity and texture of the composition create capacity to accommodate minor change.	Medium-High	- The proposed new building is hidden from view by the vaulted roof of Independent House and the buildings in the foreground. - The only discernible elements of the proposal are the new glass balustrades (replacing existing railings) at the roofline of Independent House and Emerald Chambers. At this distance, in a complex street elevation, this would amount to a negligible change. Significance of effect: Imperceptible neutral. - The development would have no effect on the composition, character or visual amenity of the view.	Negligible	Imperceptible neutral

Viewpoint	Existing View	Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
Abbey Street					
Viewpoint 8: Middle Abbey Street approaching site from the east	- Approaching the site from the east, at this point the distinctive architecture of Independent House and Emerald Chambers becomes appreciable. The façade and roof of Independent House are particularly ornate and eye-catching – even on a street where the buildings vie for attention. There is wide variety in façade design and materials, creating a highly textured street elevation. - There is a modest but notable step up to seven storeys at the end of the street (this is the recently constructed Motel One building). <u>This stretch of streetscape is not as successful a part of the public realm as some other streets in the vicinity.</u> This may be due to the presence of the Luas (giving the street a principally transport function), the mix of uses, or the vacancy of the site. Viewpoint sensitivity: Medium-High - Apart from the corner of Eason’s to the right, the area in view is not covered by CA or ACA designation – although a number of the buildings are protected structures including the two on the subject site. - The view features buildings of diverse architecture and materials, and a busy city-centre streetscape of less than optimal quality. There is some capacity to accommodate change.	Medium-High	- The facades of both Independent House and Emerald Chambers would be effectively unchanged, only <u>renovated, enhancing their appearance.</u> - The existing railings on the roof would be replaced by a new glass balustrade. Although only a minor element of the elevations, this would be a noticeable refinement to the buildings. <u>The most significant addition to the view is a small part of the new building protruding above the Pennys roofline to the side of Independent House.</u> This is clearly set back from the Independent House roof and in no way affects its integrity or legibility. - Although not clearly visible from this angle and distance, <u>the two retail units in the ground floor of Emerald Chambers and the main student entrance and reception in the ground floor of Independent House, would activate the streetscape along the site frontage, with knock-on effect on the wider street.</u> Significance of effect: Slight positive. - The development would have no significant effect on the view composition, the small part of the new building being a minor addition to the complex street elevation. - However, (a) the improved condition of both Independent House and Emerald Chambers, and (b) the animation resulting from the main accommodation entrance and retail units in the ground floor, would enhance the streetscape.	Low	Slight positive
Viewpoint 9: Middle Abbey Street approaching site from the west	- This view shows the diversity of 1920s façade designs, detailing and materials in the street elevation on the north side of Middle Abbey Street. The roof of Independent House, and to lesser extent the projecting clock, give the building some distinction in the busy street elevation. - While the buildings are impressive, this view shows again that this stretch of Middle Abbey Street is not as successful a part of the public realm as other streets in the area. This may be due to the presence of the Luas (giving the street a principally transport function), the mix of uses, or the vacancy of the site. Viewpoint sensitivity: Medium-High - This part of the street is not covered by CA or ACA designation – although a number of the buildings are protected structures, including the two on the subject site. - The diversity and texture in the street elevation, and a busy city-centre streetscape of less than optimal quality, contribute to some capacity for change.	Medium-High	- The facades of both Independent House and Emerald Chambers would be effectively unchanged, only renovated, enhancing their appearance. - The existing railings on the roof would be replaced by a new glass balustrade. Although only a minor element of the elevations, this would be a noticeable refinement to the buildings. <u>The most significant addition to the view would be a part of the new building protruding above the Abbey Chambers (protected structure) roofline to the side of Emerald Chambers.</u> This is set back from the protected structures’ streetfront facades, and of contrasting materials, so that it would not affect the integrity of form or the legibility of the protected structures. - The retail units in the ground floor of Emerald Chambers and the main student entrance and reception in the ground floor of Independent House would activate the streetscape along the site frontage. <u>From this side of the site, the increased level of usage of William’s Lane would also be visible.</u> Significance of effect: Slight positive. - The development would have no significant effect on the view composition, the small part of the new building being a minor addition to complex street elevation. - However, (a) the improved condition of both Independent House and Emerald Chambers, and (b) the greater animation resulting from the student accommodation entrance, the retail units and the improvements to William’s Lane, would enhance the streetscape.	Low	Slight positive
Viewpoint 10: Middle Abbey Street west of the site near Liffey Street junction	- This view shows the different character of Middle Abbey Street towards its western end, with the modern Arnotts façade prominent and the more complex and diverse 1920s elevation in the distance. The streetscape along the foreground stretch is notably enhanced by the Arnotts frontage. Viewpoint sensitivity: Medium - This part of the street is not covered by CA or ACA designation and fewer of the buildings (and none on the north side of the street) are protected structures. There is capacity for change in the view.	Medium	- A small part of the the building would protrude above the Arnotts roofline. Due to the contrasting materials, it would not affect the integrity or the legibility of the streetfront buildings. - At this distance, the replacement of the railings on the roof and any improvement to the condition of Independent House and Emerald Chambers would not be perceptible. The magnitude of change is negligible. Significance of effect: Not significant neutral. - The development would have no significant effect on the composition, character or visual amenity of the view.	Negligible	Not significant neutral

Viewpoint	Existing View	Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
Prince's Street North					
Viewpoints 11 and 21: O'Connell Street view west along Prince's Street North	- View 11 is a summer view and View 21 the winter view from the same position on the east side of O'Connell Street. <u>View 21 was included in the assessment to show the effects of the proposal when the trees on Prince's Street North have no foliage.</u> - The wide O'Connell Street corridor, with pedestrian and vehicular surfaces, pleached trees, the James Larkin statue, and various street furniture, is a key element of the view. - Across the street, the entrance to Prince's Street North is framed by the GPO to the right and Pennys to the left. Two street trees on Prince's Street North are a significant presence in the streetscape (in summer). - In the distance is the blank gable wall of the office/loading bay building on the site, and beyond that the gable wall of the Arnotts car park, including a dark entrance. <u>These elements at the far end of the street are unsightly and give Prince's Street North a utilitarian, unwelcoming character.</u> Viewpoint sensitivity: Medium-High - This is a view of – and from – the O'Connell Street ACA, featuring the GPO. - However, there are buildings from various eras, of different typologies, architecture and materials in the view. This contributes to some capacity for change. - Additionally, <u>there are detractors in the view, including the subject site, suggesting that change could be positive.</u>	High	- Although not prominent in the overall composition (with O'Connell Street, the GPO and Penneys remaining the defining elements of the view), the proposed development would be a notable change to Prince's Street North – replacing the disused loading bay/office building with a mixed use building with visible retail use in the ground floor, brick cladding, and facades articulated by windows. - Even from this distance and angle, the retention of the three storey loading bay/office façade to the street - as part of the new building – would be discernible. The building line along the site frontage would not change. <u>The building would read as six storeys tall, with the set-back 7th and 8th storeys screened or heavily filtered by the trees (winter vs summer). The nine storey volume not be visible.</u> - The building would complement Penneys in defining a stronger street elevation, improving the legibility of Prince's Street North as a street. - The height of the visible part of the building is similar to that of the Arnotts building beyond it. There would therefore be no significant increase in built/visual enclosure. Significance of effect: Moderate positive. - One of the two detractors in the view – a disused loading bay/office building - would be replaced by a new mixed use (student accommodation, retail, community) building of appreciable design and material quality. - The one distinguishing element of the existing building – the loading bay/office façade to the street - would be retained to lend character to the new building. - The introduction of an attractive building at the far end of the street would encourage pedestrian movement on the street, and the use would generate activity/animation, compounding this positive effect. <u>The portion of the Arnotts façade remaining in view would be diminished by the higher quality new building, but the foreground buildings (particularly the GPO) would be unaffected – except by the increase in the quality of its townscape context.</u>	Low-Medium	Moderate positive
Viewpoint 12 and 22: Prince's Street North, looking west	<u>View 22 was added to the assessment in response to the Opinion, to provide further assessment of the proposal's potential impact on the GPO.</u> It was specifically intended to test whether the nine storey volume of the proposed building would appear in views from further east along Prince's Street North. - In both views (12 and 22), to the left across the street is the Pennys building. This elevation of the building is of limited quality. View 12 shows the loading bay in an unsightly service volume adjoining the subject site. - A step in the building line on the street and the low height of the Pennys service volume combine to expose the broad, three storey blank gable wall of the loading bay/office building on the site. The complex roofline is distinctive. - The streetfront façade is similarly industrial in character, and in poor condition. However, certain elements of visual interest can be discerned (View 12 in particular), including the glazed brick piers flanking the loading bays and large, multi-pane windows at ground level (see Photo 4 above). - Beyond the site is a small building of similar character, beside the unsightly blank gable of the Arnotts car park, with a wide, dark entrance. - The GPO façade and the entrance to the GPO Arcade are to the right of the street. Viewpoint sensitivity: Medium - The views illustrates the poor environmental quality and limited visual amenity of Prince's Street North – despite the presence of the GPO. The streetscape and buildings (apart from the GPO) are utilitarian in character, and as a pedestrian space it is unattractive. There is considerable capacity/requirement for change. - However, the view is taken from the O'Connell Street ACA, beside the GPO, which raises the sensitivity of the viewpoint to medium.	Medium	- The disused and unsightly warehouse/office building would be replaced by a mixed use building of contemporary urban character and design and material quality. <u>The building would read as six storeys tall at the street-front, stepping up to seven and eight storeys away from the street. The nine storey volume in the north west corner would effectively not be visible (it is just discernible in View 22).</u> A small nine storey pop-up in the south east corner would be visible to the left (in View 12). <u>The three storey loading bay/office façade would be retained and incorporated into the new building.</u> Its (a) concrete render façade, (b) fenestration, (c) glazed brick piers and (d) slight forward projection from the new building all ensure that the historic façade would remain legible within the wider architectural composition. - There is no change to the building line, but the increase in height would increase the degree of built/visual enclosure along the street. The building is large but the perceived massing is reduced by design measures to articulate both the streetfront façade and the side elevation. - The ground floor includes a café/restaurant and a retail unit either side of the entrance to a community/cultural use. In combination with the retained loading bay/office facade, these uses would create an interesting and attractive street interface. Significance of effect: Significant positive. - One of the main detractors in the view (the disused warehouse) would be replaced by a building of appreciably high design and material quality and strong character – incorporating the retained loading bay/office façade. - The new student community and the active uses on the ground floor would activate the streetscape. - In summary, the net improvement in the quality of the built environment in combination with the mix of uses and the related activation of the street – would transform the character of Prince's Street North. - The GPO and O'Connell Street ACA would both benefit from this improvement in their townscape context.	Medium-High	Significant positive

Viewpoint	Existing View	Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
Viewpoint 13: Prince's Street North, looking east	- This view was included to capture: (a) the view east along Prince's Street north towards Clery's across O'Connell Street (<u>identified as a Key View identified in the DCDP – see 3.1.7 above</u>), (b) the site frontage to Prince's Street North, and (c) William's Lane along the west side of the site. <u>The view is dominated by the disused, unsightly newspaper loading bay/office building, which determines the character of both Prince's Street North and William's Lane.</u> <u>The utilitarian quality of the street and the particularly uninviting appearance of William's Lane outweigh even the presence of the GPO and the visibility of O'Connell Street and Clerys in the distance.</u> Viewpoint sensitivity: Medium - Like View 12, this view illustrates the poor environmental quality and limited visual amenity of the western half of Prince's Street North, and of William's Lane. - The site in its current condition (a) negatively affects the view of the GPO and Clery's (one of the DCDP's Key Views), and (b) effectively discourages people from experiencing that view (the street and lane in their current condition giving people little reason to find themselves here). There is thus considerable capacity/requirement for change. - However, the view is identified as a DCDP Key View due to the visibility of the GPO and Clerys, and this raises the sensitivity of the viewpoint to medium.	Medium	- The warehouse building would be replaced by a mixed use building of contemporary architecture, city-centre scale (six storeys at the streetfront, stepping up to nine), and design. Along Prince's Street North: <u>The three storey loading bay/office façade is retained and incorporated into the new building.</u> Its (a) concrete render façade, (b) glazed brick piers, (c) distinct fenestration and (d) slight forward projection from the new building, ensure that this historic element would be distinct and legible within the larger architectural composition. - There is no change to the building line, but the increase in height would increase the degree of built/visual enclosure along the street. Importantly, <u>this would not affect the view east, or the visibility or visual presence of either the GPO or Clerys in the distance.</u> - The building is large, but the perceived massing is reduced by highly articulated facades. The texture and colour of the brick also soften the building's presence. - The ground floor includes two retail units, one either side of a community use space. <u>In combination with the retained loading bay/office façade, these uses create an interesting and attractive street interface appropriate to a city centre street.</u> Along William's Lane: <u>The building line is set back within the site, widening the lane, allowing room for a generous pedestrian path and cycle parking.</u> Although the building is taller, due to its setback the extent of visible sky above the lane would remain similar to what it currently is. - The lane features quality surfacing, potted plants, and seating outside the accommodation entrance. - The corner retail unit and an entrance to the accommodation mid-way along the frontage activate and provide passive surveillance to the lane. Significance of effect: Very significant positive. - The loading bay/office building would be replaced by a building of high design and material quality and strong character – incorporating the retained and enhanced loading bay/office façade. - William's Lane would be transformed by its widening, resurfacing, furniture and planting and an attractive active frontage. - The new student community and the active uses on the ground floor would activate the streetscape and the lane. - In summary, the net improvement in the quality of the built environment, in combination with the mix of uses and the related animation of the public realm, would transform the character of both Prince's Street North and William's Lane. - The GPO and O'Connell Street ACA would both benefit from this improvement in their townscape context. The DCDP's Key View east along Prince's Street North would be significantly enhanced.	Very High	Very significant positive
William's Lane					
Viewpoint 14: William's Lane, looking south	- The narrow lane is enclosed by buildings of industrial character with few entrances and windows. The few that do exist are covered in security grating, and the windows are opaque. Waste storage clutters the already narrow space. - Ahead, the lane passes beneath Abbey Chambers, the building adjoining Emerald Chambers, to arrive on Middle Abbey Street. A small part of the rear façade of Emerald Chambers is visible to the left of the passage. Viewpoint sensitivity: Low - As well as being unsightly, the lane is uncomfortably narrow, secluded, and feels unsafe. It is of low sensitivity and could benefit from change.	Low	- The warehouse is replaced by a contemporary student accommodation building, <u>set back from the site boundary along most of its length to widen the lane.</u> - The architecture is contemporary but employs traditional, high quality materials, i.e. brick, metal and glass – <u>with notable use of glazed brick to distinguish the ground floor, referencing the loading bay/office façade around the corner on Prince's Street.</u> Seen from this proximity, the design and material quality are appreciable. - The entrance and student amenity area in the ground floor activate and enliven the lane, additional passive surveillance is provided by the accommodation above. - The lane is surfaced in high quality materials, and potted plants and seating are provided outside the entrance. Significance of effect: Significant positive. - The character, quality and visual amenity of William's Lane would be transformed - from unsafe, unsightly alley to a bright, vibrant and attractive pedestrian space, enhancing the local public realm and pedestrian network.	Very High	Significant positive

Viewpoint	Existing View	Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
O'Connell Street Views of GPO					
Viewpoints 15 & 16: O'Connell Street views of GPO	- The ZTV (Figure 5 above) shows that the proposed development would not be visible from O'Connell Street north of the Prince's Street junction. These views are included as further evidence of this. - The views are taken from the east side of the street, directed south west towards the GPO and the site. Viewpoint sensitivity: High - The view south along O'Connell Street is identified as a Key View in the DCDP (see Figure 10 above). The GPO is the most important and sensitive building on the street and there is low capacity to accommodate change (affecting the GPO) in the views.	High	- The proposed development is entirely screened, and well below the roofline of the GPO in both views. Significance of effect: No effect.	None	No effect
Moore Street					
Viewpoint 17: Moore Street (see also Viewpoint 20 from the National Monument at Nos. 14-17 Moore Street)	- Moore Street is so aligned that it provides a framed view south towards the GPO and the site. - This view was included to determine whether the proposed building would protrude above the GPO roofline. The view is taken from the junction of Henry Place, which is the northern extent of the ACA designation on Moore Street (refer to Figure 4 above). Viewpoint sensitivity: Medium-High - This is a view of an ACA designated street, featuring part of the GPO in a focal-point position. The mixed character and quality of the buildings in view and the busy streetscape create some capacity for change however.	Medium-High	- The proposed development is entirely screened, and well below the roofline of the GPO in the view. Significance of effect: No effect.	None	No effect
Views Included in Assessment in Response to DCC Opinion					
Viewpoint 18: Junction of Burgh Quay and Butt Bridge	- This viewpoint was added to the assessment in response to Item 1.a) of the Opinion, which states: <i>"The Applicant is requested to submit further CGIs / photomontages of the proposal viewed from the south Quays."</i> Viewpoint sensitivity: Medium-High - This is a view of – and from – the CA-designated Liffey corridor, which features the river and a number of protected structures. There are however several notable modern interventions which create some capacity for change.	Medium-High	- The proposed development would not be visible. Significance of effect: No effect.	None	No effect
Viewpoint 19: Junction of Wellington Quay and Millennium Bridge	- This viewpoint was added to the assessment in response to Item 1.a) of the Opinion, which states: <i>"The Applicant is requested to submit further CGIs / photomontages of the proposal viewed from the south Quays."</i> Viewpoint sensitivity: Medium-High - This is a view of – and from – the CA-designated Liffey corridor, which features the river and numerous protected structures. There are however several notable modern interventions which create some capacity for change.	Medium-High	- The proposed development would not be visible. Significance of effect: No effect.	None	No effect
Viewpoint 20: No. 17 Moore Street (National Monument)	- This viewpoint was added to the assessment in response to Item 4.c) of the Opinion, which states: <i>"At nine stories in height the development could have a negative visual impact on the National Monument on Moore Street, associated with the Easter Rising of 1916. For this reason CGIs / photomontages of the proposed development viewed from the Moore Street National Monument are requested. This should be accompanied by an assessment of the visual impact."</i> Viewpoint sensitivity: Medium-High - The northern stretch of Moore Street falls outside of the O'Connell Street ACA. Visual amenity is limited by the market use of the street (the market stalls add visual interest but detract from visual amenity) and the quality of the modern building on its west side (right in the view). The street does however frame a view of the GPO, and the National Monument (Nos. 14-17) in the foreground to the left adds further sensitivity to the view.	Medium-High	- The proposed development would not be visible. Significance of effect: No effect.	None	No effect

Viewpoint	Existing View	Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
Viewpoint 21:	- View 21 is the winter version of View 11, showing the trees on Prince's Street North without summer foliage. <u>The view was included in the assessment (in response to the Opinion – see Section 1.2.2 above) to provide additional information on the proposal's potential effects on the O'Connell Street ACA and the GPO.</u> - The O'Connell Street corridor, with wide pedestrian and vehicular surfaces, pleached trees, the James Larkin statue and various street furniture, is a key element of the view. - Across the street, the entrance to Prince's Street North is framed by the GPO to the right and Pennys to the left. Two trees on Prince's Street North filter the view of the sky above the subject site, which is located towards the far end of Prince's Street. - The gable wall of the office/loading bay building on the site is visible, stepping forward from the neighbouring Penney's façade. Beyond the site is the gable wall of the Arnotts car park. <u>These elements at the far end of the street (the site and Arnotts) are unsightly and give Prince's Street North a utilitarian, unwelcoming character.</u> Viewpoint sensitivity: Medium-High - This is a view of – and from – the O'Connell Street ACA, featuring the GPO. - However, there are buildings from various eras, of different typologies, architecture and materials in the view. This contributes to some capacity for change. - Additionally, <u>there are detractors in the view, including the subject site, suggesting that change could be positive.</u>	High	- Although not prominent in the overall composition (<u>with O'Connell Street, the GPO and Penneys remaining the defining elements of the view</u>), the proposed development would be a notable change to Prince's Street North. - The disused loading bay/office building would be replaced by a contemporary, mixed use building - with café/restaurant use visible in the ground floor – clad in brick, with the facades articulated by windows. - Even from this distance and angle, the retention of the three storey loading bay/office façade - as part of the new building – would be discernible. <u>The building would read as six storeys tall, with the set-back 7th and 8th storeys heavily filtered by the trees. The nine storey volume in the north west corner of the site would not be visible.</u> - The building would complement Penneys in defining a stronger street elevation, improving the legibility of Prince's Street North as a street. - The height of the visible part of the building is similar to that of the Arnotts building beyond it. There would therefore be no significant increase in built/visual enclosure. Significance of effect: Moderate positive. - One of the two detractors in the view – an unsightly loading bay/office building - would be replaced by a contemporary building of appreciable design and material quality. This would result in a net improvement in the built environment. - The one distinguishing element of the existing building – the loading bay/office façade to the street - would be retained to lend character to the new building. - The introduction of an attractive building at the far end of the street would encourage pedestrian movement on the street, and the use would generate activity/animation, compounding this positive effect. <u>The GPO (and Pennys) would not be diminished or negatively affected in any way by the taller new building. The only effect on the O'Connell Street ACA and the GPO would be the noticeable improvement in quality and character of their townscape setting.</u>	Low-Medium	Moderate positive
Viewpoint 22:	- View 22 was added to the assessment in response to the Opinion, to provide further <u>assessment of the proposal's potential impact on the GPO.</u> It was specifically intended to test whether the nine storey volume of the proposed building (in the north west corner) would appear in views from further east along Prince's Street North (than Viewpoint 12). - To the left across the street is the Pennys building. This elevation of the building is of limited quality (above ground level in particular), and at its far end, adjoining the site, is a wide loading in a single storey volume. - A step in the building line on the street and the low height of the Pennys service volume combine to expose the broad, three storey gable wall of the loading bay/office building on the site. The streetfront façade is industrial in character and in poor condition. However, certain elements of visual interest can be discerned, notably the glazed brick piers flanking the loading bays. - Beyond the site is a small building of similar character, beside the unsightly blank wall of the Arnotts car park, with a wide, dark entrance at the end of the street. - The GPO façade and the entrance to the GPO Arcade are to the right of the street. Viewpoint sensitivity: Medium - The views illustrates the poor environmental quality and limited visual amenity of Prince's Street North – despite the presence of the GPO. The streetscape and buildings (apart from the GPO) are utilitarian in character, and as a pedestrian space it is unattractive. There is considerable capacity/requirement for change. - However, the view is taken from the O'Connell Street ACA, beside the GPO, which raises the sensitivity of the viewpoint to medium.	Medium	- The disused and unsightly warehouse/office building would be replaced by a mixed use building of contemporary urban typology, scale and architectural character. - The building would read as six storeys tall at the street-front, stepping up to seven and eight storeys back from the street. <u>The nine storey volume in the north west corner would be just discernible but would have no significant effect on the view (or on the GPO).</u>  - The three storey loading bay/office façade would be retained and incorporated into the new building. Its (a) concrete render façade, (b) fenestration, (c) glazed brick piers and (d) slight forward projection from the new building all ensure that the historic façade would remain legible. - There would be no change to the building line, but the increase in height would increase the degree of built/visual enclosure along the street. The building is large but the perceived massing is reduced by design measures to articulate both the streetfront and side elevations. - The ground floor includes a café/restaurant and a retail unit either side of the entrance to a community/cultural use. In combination with the retained loading bay/office facade, these uses would create an interesting and attractive street interface. Significance of effect: Significant positive.	Medium-High	Significant positive

Viewpoint	Existing View	Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
			- One of the main detractors in the view (the disused warehouse) would be replaced by a building of appreciably high design and material quality and strong character (incorporating the retained loading bay/office façade). - The new student community and the active uses on the ground floor would activate the streetscape. - In summary, the net improvement in the quality of the built environment, in combination with the mix of uses and the related activation of the street, would transform the character of Prince’s Street North. The GPO and O’Connell Street ACA would both benefit from this improvement in their context.		

6.0 Townscape Effects Assessment and Conclusion

6.1 Townscape Sensitivity¹

The townscape sensitivity of the receiving environment can be classified medium-high.

Definition of high sensitivity: Areas where the townscape exhibits strong, positive character with valued elements, features and characteristics. The townscape character is such that it has limited/low capacity to accommodate change in the form of development. These attributes are recognised in policy or designations as being of national, regional or county value and the principal management objective for the area is the conservation of existing character.

Definition of medium sensitivity: Areas where the townscape has certain valued elements, features or characteristics but where the character is mixed or not particularly strong, or has evidence of alteration, degradation or erosion of elements and characteristics. The townscape character is such that there is some capacity for change. These areas may be recognised in policy at local or county level and the principal management objective may be to consolidate townscape character or facilitate appropriate, necessary change.

The medium-high sensitivity classification reflects the following:

- A large part of the receiving environment to the east of the site (O'Connell Street and parts of Prince's Street North and Middle Abbey Street) is designated ACA, and there are numerous protected structures in the area. Independent House and Emerald Chambers on the site are themselves protected structures.
- This part of the city attracts large numbers of visitors who are conscious and appreciative of the area's historic significance, its buildings/architecture, its townscape character and quality.

These factors demand a high degree of sensitivity and quality in the design of any new development in the area. There are also factors that indicate there is *some* capacity and tolerance for change on the site. These include:

- The buildings on the site have been unoccupied for over 20 years and have suffered damage because of the lack of maintenance. Independent House and Emerald Chambers remain impressive and valued features of Middle Abbey Street, but their disuse is evident and it creates a stretch of dead frontage to the street. The buildings and the adjacent streets/townscape could benefit from the buildings' refurbishment and reuse.
- The cluster of warehouse and office buildings attached to the rear of Independent House and Emerald Chambers are of lesser value in terms of townscape character and visual amenity. They detract from the character and quality of Prince's Street North and William's Lane. In addition to being unsightly, these buildings do not activate the adjacent street and lane and provide no passive surveillance. As a result, the street and lane feel unsafe and are underutilised as pedestrian routes/public realm.

¹ The GLVIA states that landscape/townscape sensitivity should be classified with consideration of (a) 'the particular project or development that is being proposed' and (b) 'the location in question'. Sensitivity is determined by two factors:

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

- The part of the site occupied by the loading bay/office buildings can be characterised as underutilised brownfield land. It is city and national policy (see Sections 3.1.1-3 and 3.2 above) for sites such as these to be brought to optimal density and intensity of use in the interest of compact growth and sustainable development.

6.2 Magnitude of Townscape Change

Informed by the assessment of visual effects in Section 5 above, the townscape effects on the key receptors in the receiving environment can be summarised as follows:

Table 2: Summary of effects on key townscape receptors

Townscape Receptors	Viewpoints	Townscape Effects
Middle Abbey Street	6, 7, 8, 9, 10	The development would have a <u>slight positive</u> effect on Middle Abbey Street (and neutral effects (or no effect) on Lower and Upper Abbey Street). The most significant effects on Middle Abbey Street would be (a) the renovation of the facades of Independent House and Emerald Chambers, (b) the introduction of retail and student accommodation uses to the buildings, and (c) the related activation and animation of the street. There would be limited visibility of the proposed new building to the rear of Independent House and Emerald Chambers. Only small parts of the top floor would protrude above the existing street-front roofline -with no negative effect on the integrity or legibility of the historic buildings. In summary, there would be little change to the appearance of Middle Abbey Street other than an improvement in its condition and a greater level of pedestrian activity on the street in the vicinity of the site.
Prince's Street North	11, 12, 21, 22, 13	The development would have a moderate to very significant positive effect on Prince's Street North, with the magnitude of change greatest towards the western end of the street (furthest from O'Connell Street). The existing warehouse/office building, which detracts from the appearance of the street, would be replaced by a building of design and material quality, incorporating the retained (but modified) loading bay/office façade. Six storeys tall at the street-front, there would be no sense of excessive built/visual enclosure resulting from the development, nor any changes to the visibility or visual presence of the GPO or Clerys to the east. In addition to the enhanced built frontage, the retail and community uses in the ground floor would activate the street. The street would also benefit from the passive surveillance from the student accommodation floors above. In summary, the improvement in the quality of the built environment, in combination with the mix of uses and the related activation of the street, would transform the western half of Prince's Street North. The GPO and the O'Connell Street ACA would benefit from this improvement in their context
William's Lane	13, 14	The development would have a significant positive effect on William's Lane. The character, quality and visual amenity of William's Lane would be transformed by (a) the replacement of an unsightly building of industrial character with a mixed use building of design and material quality, (b) the introduction of a retail unit at the corner of Prince's Street North and an entrance and amenity space along the frontage to the lane, (c) the widening of the lane, (d) its surfacing in high quality materials, and (e) planting and seating along the lane. The lane would also benefit

		from the passive surveillance of the student accommodation floors above ground level. These changes would complement the similar changes to take place on the west side of the lane on foot of the permission for DCC Reg. Ref. 4880/22 (hotel development on the Arnotts site). The net effect would be the transformation of William's Lane into a public realm/pedestrian asset.
O'Connell Street	7, 11, 21, 15, 16	The development would have a slight positive effect on O'Connell Street. The development would not be visible from the majority of O'Connell Street. Its only notable effect would be on the view along Prince's Street North (Viewpoints 11, 21). In this view, the unsightly loading bay/office building towards the end of the street would be replaced by an attractive mixed use building (with visible retail use in the ground floor). There would be no negative effect on the GPO, which would remain the defining element of the view.
Moore Street (including National Monument)	17, 20	The development would have no effect on the National Monument on Moore Street, and a not significant neutral effect on Moore Street overall. The development would not be visible from Moore Street outside of the National Monument, Nos. 14-17 (Viewpoint 20). Nor would it be visible from further south along Moore Street, closer to the GPO (Viewpoint 17). The ZTV (Figure 5) shows that the building would only be discernible from the northern end of Moore Street (to the north of the National Monument).
Liffey River South Quays (Aston and Burgh Quay)	1, 2, 4, 18, 19	The development would have a not significant neutral effect on Aston Quay and Burgh Quay. Most of the Liffey River south quays would be unaffected by the development. In views from small areas of the south quays either side of O'Connell Bridge (see ZTV map, Figure 5 and the photomontage for Viewpoint 1), the parapet of the new building would protrude marginally above the existing roofline on the north side of the Liffey. Seen from a distance of c. 250m, this would amount to a negligible magnitude of change in the already complex views. There would be no significant effect on townscape character or visual amenity.
D'Olier Street	2, 3	The development would have a slight negative effect on D'Olier Street. The alignment of D'Olier Street frames a view towards the site. From the southern end of the street (Viewpoint 3), some 400m from the site, the upper floors and roofscape of the proposed building would protrude above the distant roofline of Bachelor's Walk. Although the magnitude of change would be low, the development would have the effect of slightly reducing the clarity and legibility of the Bachelors Walk buildings (which are protected structures) in the view. It should be noted that similar effects will result from the permitted neighbouring development (Arnotts site hotel, DCC Reg. Ref. 4880/22). From the northern stretch of D'Olier Street, the effect would be less significant, and neutral.
Temple Bar (Bedford Row/Anglesea Street)	5	The development would have a slight neutral effect on the Temple Bar area. Only one street in Temple Bar (Bedford Row/Anglesea Street) affords a view towards the site. In this view, a part of the proposed building would protrude well above the roofline of the distant Georgian buildings beyond the Liffey. The clear contrasts in typology, architecture and materials would distinguish the new building from the historic buildings in front of it. This would cause a change in character in the distant townscape across the river, and would have no negative effect on Temple Bar. The remainder of Temple Bar would experience no effects. Therefore, while the effect on Viewpoint 5 has been classified 'moderate', the effect on Temple Bar as a whole would be 'slight'.

Taking account of (a) the limited zone of influence of the proposed development, (b) the effects on the key affected areas/receptors described above, and (c) the ongoing trend of change in the site context, **the overall magnitude of townscape change that would result from the proposed development can be classified medium.** (Definition of medium magnitude of townscape change: *Change that is moderate in extent, resulting in partial loss or alteration to key elements, features or characteristics of the townscape, and/or introduction of elements that may be prominent but not necessarily substantially uncharacteristic in the context. Such development results in change to the character of the townscape.*)

6.3 Conclusion - Significance and Quality of Townscape Effects

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

Taking account of the effects on the key receptors, summarised in Table 2 above, the townscape effects - on balance - would be positive. The significant positive effects on Prince’s Street North and William’s Lane, and slight positive effects on Middle Abbey Street and a small part of O’Connell Street, would far outweigh the slight negative effect on D’Olier Street.

In conclusion, the assessment has found that the site is well suited for intensification of land use through increased building height, as the new built form can be positioned on the site to avoid significant townscape and visual effects except on the immediate environs – specifically Prince’s Street North and William’s Lane. These elements of the townscape are both currently in poor condition and would benefit significantly from the proposed development.

The assessment of the design (in Section 4), and the potential visual effects (in Section 5) indicates that the proposal represents a carefully considered response to both the opportunity presented by the site and the many sensitivities in the area. Importantly, the development would have no negative effect on any of the local sensitive receptors such as the GPO, the O’Connell Street ACA, the Moore Street National Monument, or the many protected structures on Middle Abbey Street and elsewhere in the vicinity.

The proposed development’s effects on the townscape – in terms of its character, environmental quality, visual amenity and function (especially in relation to pedestrian permeability and activity) – would be overwhelmingly positive.

² See Appendix 1, Section 2.3 and Table 3.

APPENDIX 1 LANDSCAPE/TOWNSCAPE & VISUAL IMPACT ASSESSMENT METHODOLOGY

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

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

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

1.0 Key Principles of the GLVIA

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

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

1.2 Assessment of Both Landscape/Townscape and Visual Effects

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

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

2.0 Landscape/Townscape Effects Assessment

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

2.1 Landscape/Townscape Sensitivity

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

Table 1 Categories of Landscape/Townscape Sensitivity

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

2.2 Magnitude of Landscape/Townscape Change

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

Table 2 Categories of Landscape/Townscape Change

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

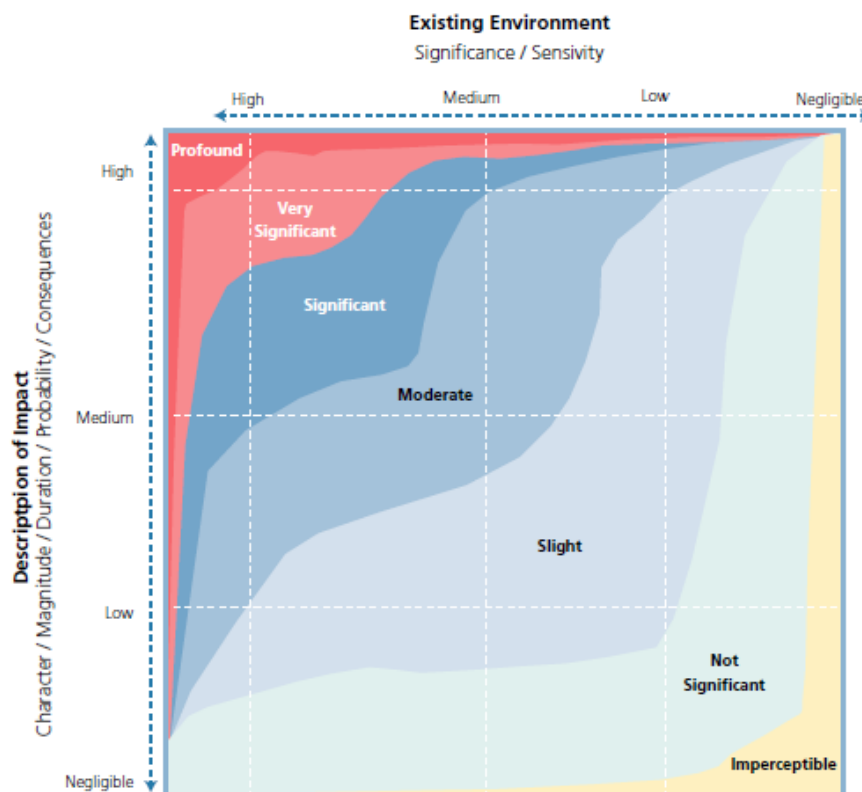
2.3 Significance of Landscape/Townscape Effects

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

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

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

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



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

Table 4 EPA definitions of environmental impact classifications

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

3.0 Visual Effects Assessment

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

3.1 Sensitivity of the Viewpoint/Visual Receptor

Viewpoint sensitivity is a function of two main considerations:

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

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

Table 5 Categories of Viewpoint Sensitivity

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

3.2 Magnitude of Change to the View

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

Table 6 Categories of Visual Change

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

3.3 Significance of Visual Effects

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

4.0 Quality of Effects

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

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

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