9.0 LANDSCAPE AND VISUAL IMPACT ASSESSMENT

9.1 Introduction

This chapter assesses the potential effects of the proposed development on the landscape character and visual amenity of the receiving environment. It should be read in conjunction with the verified photomontages separately enclosed with this application.

9.1.1 Expertise and Qualifications

The chapter was prepared by Richard Butler (BL Arch (Hons) (Landscape Architecture), MSc Spatial Planning, MILI MIPI), Director of Model Works Ltd. Richard has degrees in Landscape Architecture and Town Planning and is a member of the Irish Landscape Institute and the Irish Planning Institute. He has over 25 years' experience in development and environmental planning, specialising in Landscape and Visual Impact Assessment (LVIA). In the last number of years, he has prepared LVIA EIAR chapters and reports for the following projects among others:

- Blubell Waterways (for the LDA and Dublin City Council), Bluebell, Dublin;
- Independent House LRD, Abbey Street, Dublin;
- Prussia Street LRD, Stoneybatter, Dublin;
- Hendrons Building Residential Development, Dominick Street Upper, Dublin;
- Gowan House LRD, Naas Road, Dublin;
- Guinness Quarter, James's Street, the Liberties, Dublin;
- Project Montrose (former RTÉ lands) LRD, Donnybrook, Dublin;
- St Vincent's Hospital and Residential Development, Fairview, Dublin;
- O'Devaney Gardens SHD, Dublin;
- Emmet Road SHD, Inchicore, Dublin.

9.2 Methodology

9.2.1 Introduction

The assessment was carried out with reference to:

- *Directive 2014/52/EU* of the European Parliament and of the Council of 16 April 2014 amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment (EIA Directive).
- *Guidelines for Landscape and Visual Impact Assessment*, 3rd edition, 2013 (GLVIA), published by the Landscape Institute.
- *Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment,* 2018, published by the Department of Housing, Planning and Local Government.
- *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports*, 2022, published by the EPA.

The EPA Guidelines 2022 provide a general methodology and impact ratings for all environmental topics covered in an EIAR. The GLVIA provides specific guidance for landscape and visual impact assessment (LVIA). Therefore, a combination of the EPA guidelines and the GLVIA has informed the methodology for this assessment.

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

'Landscape' (or 'townscape' in built up areas such as the subject receiving environment) 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 impact assessment identifies the changes to this character which would result from the proposed development, and assesses the significance of those effects on the landscape/townscape as a resource.

Visual impact assessment is concerned with changes that arise in the composition of available views, the response of people to these changes and the overall effects on the area's visual amenity - with particular focus on public views and public visual amenity.

9.2.2 Methodology for Assessment of Townscape Effects

The assessment of potential townscape effects involves (a) classifying the sensitivity of the townscape (with reference to its main elements, features, characteristics and character areas, i.e. the 'townscape receptors'), (b) classifying the potential magnitude of change to the townscape (with reference to the receptors), (c) combining these factors to arrive at a classification of significance of the effects, and also the quality of the effects (positive, neutral or negative).

9.2.2.1 Townscape Sensitivity

The sensitivity of the townscape is a function of its land use, patterns and scale, visual enclosure and the distribution of visual receptors, and the value placed on the townscape. The nature and scale of the development in question are also taken into account, as are any trends of change, and relevant policy. Five categories are used to classify sensitivity, as set out in Table 9.1.

Sensitivity	Description
Very High	Areas where the townscape exhibits very strong, positive character with valued elements, features and characteristics that combine to give an experience of unity, richness and harmony. The townscape character is such that its capacity to accommodate change is very low. These attributes are recognised in 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 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. 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.

Medium	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 principle management objective may be to consolidate townscape character or facilitate appropriate, necessary change.
Low	Areas where the townscape 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 would make a positive change. Such townscapes 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 townscape exhibits negative character, with no valued elements, features or characteristics. The 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 townscapes include derelict industrial lands, 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 townscape through development, repair or restoration.

Table 9.1: Categories of Townscape Sensitivity

Note on definitions used in this assessment

The definitions of the classifications in Table 9.1 (townscape sensitivity), 9.2 (magnitude of townscape change), 9.5 (viewpoint sensitivity) and 9.6 (magnitude of visual change) are not taken from either the GLVIA or the EPA Guidelines 2022. Both of these guidance documents require that classifications of sensitivity and magnitude of change (such as high, medium, low, etc.) be used in the assessment process (see EPA Guidelines 2022 Figure 3.4 and GLVIA Box 3.1, Paragraph 3.26 and Figure 3.5) but neither guidance document provides definitions for such classifications.

The GLVIA specifically avoids being prescriptive in this this regard (GLVIA paragraph 1.20): *"The guidance concentrates on principles… It is not intended to be prescriptive, in that it does not provide a detailed 'recipe' that can be followed in every situation. It is always the primary responsibility of any landscape professional carrying out an assessment to ensure that the approach and methodology adopted are appropriate to the particular circumstances."* (emphasis added)

The EPA Guidelines 2022 states (Section 3, p.49): *"While guidelines and standards help ensure consistency, the professional judgement of competent experts plays a role in the determination of significance. These experts may place different emphases on the factors involved. As this can lead to differences of opinion, the EIAR sets out the basis of these judgements so that the varying degrees of significance attributed to different factors can be understood."* (emphasis added)

The GLVIA and EPA Guidelines 2022 thus require that the factors used in arriving at significance conclusions (i.e. classifications/definitions of sensitivity and magnitude) should be explained in the EIAR, but the guidelines do not provide the explanations themselves. It is for this reason that the definitions in Tables 9.1, 9.2, 9.5 and 9.6 are provided. These definitions have been developed and refined by LVIA practitioners in Ireland and the UK, including the chapter author, over decades of practice. They are not standard, i.e. the classifications/definitions used in this assessment may differ from those used by other practitioners. However, the author considers these definitions to be reasonable and appropriate for the purpose of classifying the

significance of landscape/townscape and visual effects. The same definitions have been used in many previous LVIA reports/chapters prepared by the author and accepted by the planning authorities.

9.2.2.2 Magnitude of Townscape Change

Magnitude of change is a factor of the scale, extent and degree of change imposed on the townscape by a development, with reference to its key elements, features, characteristics and character areas (i.e. the 'townscape receptors'). Five categories are used to classify magnitude of change, as set out in Table 9.2.

Magnitude	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 townscape, and/or introduction of large elements considered totally uncharacteristic in the context. Such development results in fundamental change in the character of the townscape.
High	Change that is moderate to large in extent, resulting in major alteration to key elements, features or characteristics of the townscape, and/or introduction of large elements considered uncharacteristic in the context. Such development results in change to the character of the townscape.
Medium	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 landscape.
Low	Change that is moderate or limited in scale, resulting in minor alteration to key elements, features or characteristics of the townscape, 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 townscape, and/or introduction of elements that are characteristic of the context. Such development results in no change to the townscape character.

Table 9.2: Categories of Magnitude of Townscape Change

9.2.2.3 Significance of Effects

To classify the significance of effects (for both townscape and visual impacts) the magnitude of change is measured against the sensitivity of the receiving environment/ receptor using the guide in Table 9.3 below.

		Sensitivity of the Townscape/View				
		Very High	**High**	**Medium**	**Low**	**Negligible**
Magnitude of Townscape/Visual 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

Table 9.3: Guide to Classification of Significance of Townscape and Visual Effects

This matrix is derived from the EPA Guidelines 2022 (specifically Figure 3.4 of the Guidelines).

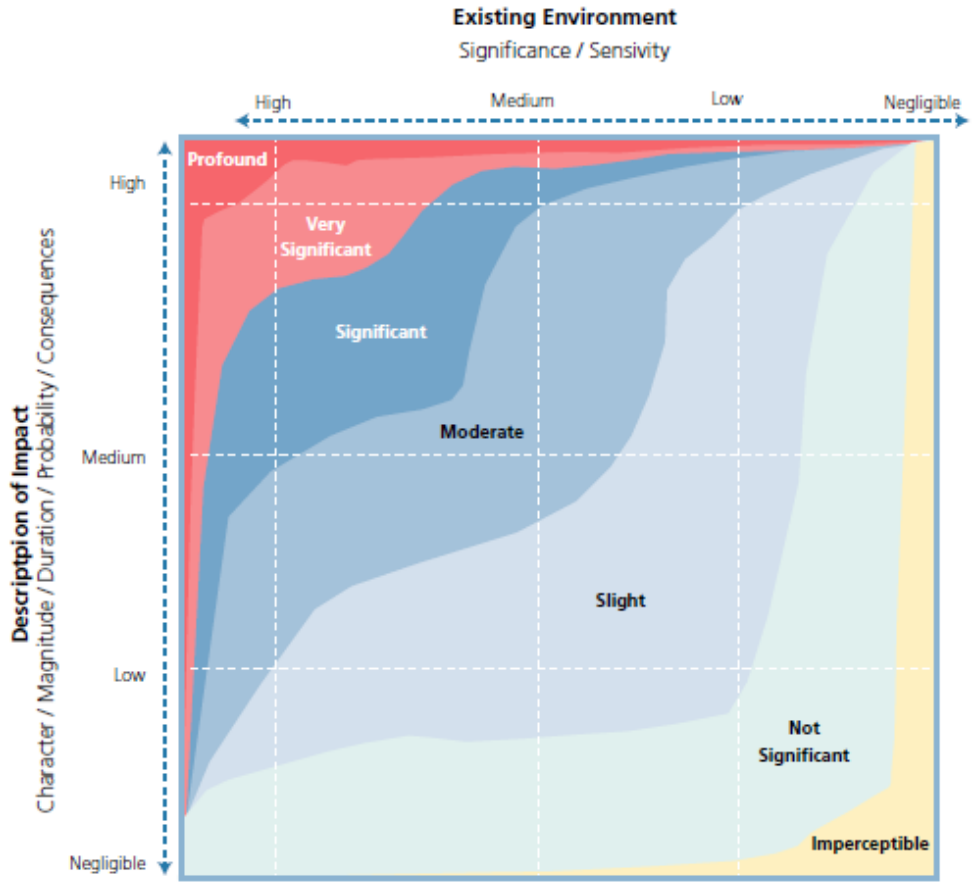


Figure 9.1: 'Chart showing typical classifications of the significance of impacts' (Source: Figure 3.4 of the EPA Guidelines 2022)

The matrix (Table 9.3) and the EPA's chart (Figure 9.1) are only a guide to the classification of impact significance. The assessor also uses professional judgement informed by their expertise, experience and common sense to arrive at a classification of significance that is reasonable and justifiable. In the EPA Guidelines 2022 the chart above is accompanied by a footnote that states: "*The depiction of significance classifications is indicative and should not be relied on as being definitive. It is provided for general guidance purposes"* (EPA Guidelines 2022, Section 3, page 53).

Having classified the sensitivity of the receptor and the magnitude of change (using the definitions in Tables 9.1, 9.2, 9.5 and 9.6), the matrix and chart above are thus used as a starting point for impact significance classification – using the assessor's judgement to arrive at a classification that is reasonable and sensible. For example, according to the EPA chart a change of high magnitude affecting a receptor of medium sensitivity may be classified as either 'significant' or 'moderate'. That judgement is made by the assessor.

The impact significance classifications are taken from the EPA Guidelines 2022, which defines the classifications as follows (Table 9.4):

Significance	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.

Table 9.4: Impact Significance Classifications (Source: Table 3.4 of the EPA Guidelines 2022)

9.2.3 Methodology for Assessment of Visual Effects

Assessment of visual effects involves identifying a number of key/representative viewpoints in the receiving environment, and for each one of these: (a) classifying the viewpoint sensitivity, and (b) classifying the magnitude of change which would result in the view (which can be seen in the separately enclosed Verified Views, Aerials & CGIs). These factors are combined to arrive at a classification of significance of the effects on each viewpoint.

9.2.3.1 Viewpoint/Visual Receptor Sensitivity

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 focused 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 attractions and places of 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 engagedin outdoor recreation where the surrounding landscape does not influence the experience, and people in their place of work or shopping (refer to GLVIA, paragraphs 6.32 and 6.33).

- 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 a viewpoint's sensitivity, as set out in Table 9.5.

Sensitivity	Description
Very High	Iconic viewpoints (views towards or from a townscape 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 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 (e.g. views from houses or outdoor recreation amenities focused on the townscape). The composition, character and quality of the view may be such that its capacity to accommodate change 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 includes viewsexperienced 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.

Table 9.5: Categories of Viewpoint Sensitivity

9.2.3.2 Magnitude of Visual Change

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). Five categories are used to classify magnitude of visual change to a view, as set out in Table 9.6.

Magnitude	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 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.

Table 9.6: Categories of Magnitude of Visual Change

9.2.3.3 Significance of Visual Effects

As with townscape 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 9.3 and Figure 9.1 above.

9.2.4 Quality of Effects

In addition to predicting the significance of the effects, EIA methodology requires that the quality of the effects be classified as positive, neutral, or negative. For townscape to a degree, but particularly for visual effects, this is an inherently subjective exercise. This is because townscape and visual amenity are *perceived* by people and are therefore subject to variations in the attitude and values - including aesthetic preferences - 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 townscape or view may vary.

Additionally, in certain situations there might be policy encouraging a particular development in an area, in which case the policy is effectively prescribing townscape and visual change. If

a development achieves the objective of the policy the resulting effect might be considered positive, even if the townscape character or views are profoundly changed. The classification of quality of townscape and visual effects should seek to take these variables into account and provide a reasonable and robust assessment.

9.2.5 Photomontage Methodology

The photomontages were produced by 3D Design Bureau. The methodology for photomontage production is included in the A3 booklet of verified views separately enclosed with this application.

9.3 Description of Receiving Environment

9.3.1 The Site

The application site is c. 4.74 ha (Figure 9.2). This includes (1) the principal development site of c. 4.26 ha; (2) two areas of proposed road works (c. 0.16 ha in total) outside the two proposed vehicular entrances to the scheme; (3) an area of Eglinton Road (c. 0.32 ha) in which drainage works are proposed.

The c. 4.26 ha principal development site (hereafter referred to as the site) is formerly part of the Milltown Park Jesuit Centre. It is comprised of two main parts:

- A complex of buildings (Milltown Park House, the 'Extension', Tabor House, the Chapel, Finlay Wing and the Archive) in the southern part of the site near the existing Milltown Park entrance off Milltown Road;
- A large area of parkland character, through which an access road leads from Sandford Road to the buildings. This area includes grassland fields, a hard standing area, and - most significantly - a broad belt of mature woodland inside the east and north boundaries (along Milltown Road and Sandford Road respectively). There is also a line of mature trees inside the north boundary (shared with the neighbouring estate, Norwood Park), and a line of maturing trees inside the west boundary (shared with a row of houses fronting Cherryfield Avenue).

Figure 9.2: Aerial photograph of the site context

A notable feature of the site is the tall (2m+) boundary wall along the north and east boundaries. The wall is of cement render along Sandford Road and a combination of cement render and exposed stone along the Milltown Road frontage (see Photo 9.1).

The character and visual presence of the site in the townscape are largely determined by the woodland belt and boundary wall. Even in winter with the trees out of leaf, these screen most of the interior of the site from view from the surrounding roads and properties. The building complex is partly exposed to view along a stretch of Milltown Road to the south east, where the road passes the existing entrance to Milltown Park.

Photo 9.1: A view into the site from Mount Sandford across Milltown Road, showing the stone boundary wall and the deciduous trees filtering the view of Tabor House (to the left)

9.3.2 Strategic Location

The site is located in the southern suburbs of Dublin, less than 3km by road from St Stephen's Green/Grafton Street, less than 1km from Ranelagh, 1.5km from Ballsbridge and 1km from the Richview entrance to UCD. It is thus favourably located for pedestrian and cycle access to the city. Additionally, Sandford Road and Milltown Road are served by Dublin Bus routes, and the Beechwood Luas stop is 1km from the site.

9.3.3 Evolution of the Townscape

The Ordnance Survey 6-inch map (Figure 9.3a overleaf), surveyed between 1837 and 1842, shows that the area was peri-urban in character at that time, mostly occupied by large houses in demesnes (including Milltown Park), and agricultural fields. A concentration of development is visible in Ranelagh to the north west, this being the southern extent of the city at that time. There is intermittent development fronting Ranelagh Road/ SandfordRoad, leading to another concentration of development along the banks of the Dodder to the south and east (mostly industrial buildings and labourers' housing).

The 25-inch map (Figure 9.3b), surveyed between 1888 and 1913, shows the effects of the suburbanisation which took place in the Victorian and Edwardian periods. Large estates of terraced houses had been built around Ranelagh and Donnybrook and along Marlborough Road. Notable changes around the site were the development of the residential streets Belmont Avenue, Hollybank Avenue, Eglinton Road and Clonskeagh Road. Also of note was the construction of the Dublin & South Eastern Railway, passing to the west of the site (now the Luas Green Line). Milltown Park and the neighbouring Sandford Hill and Sandford Grove demesnes remained intact.

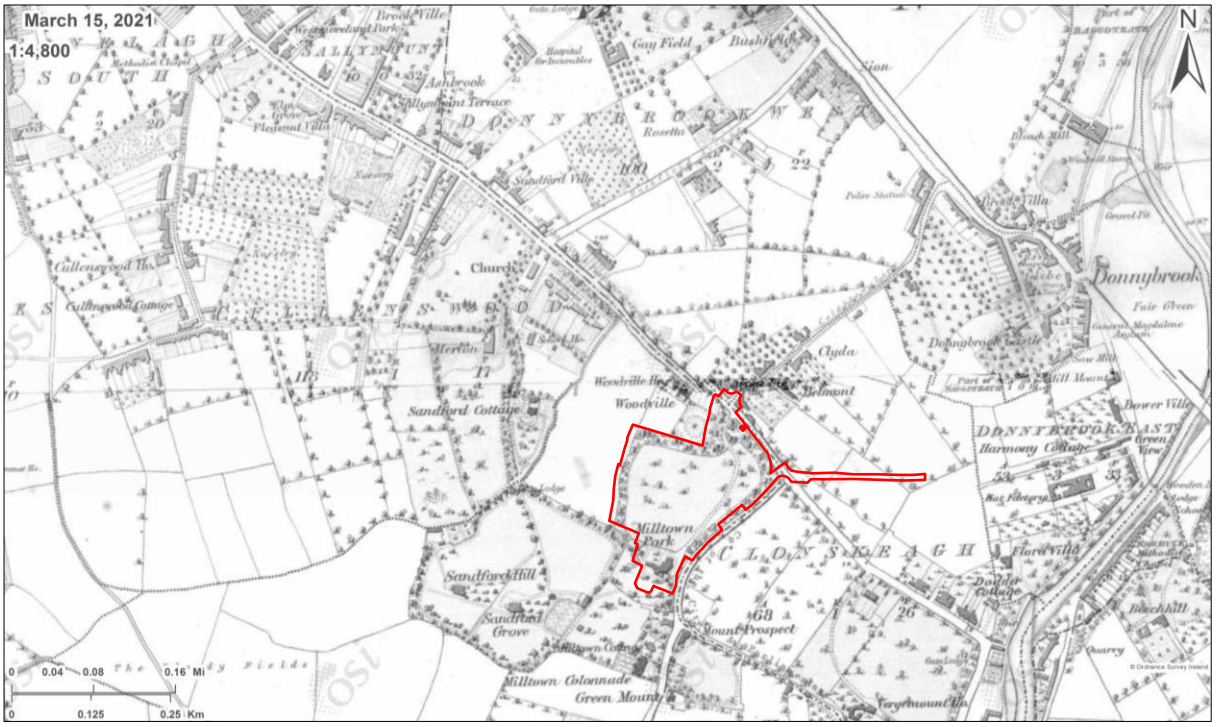


Figure 9.3a: Ordnance Survey 6 Inch Map (surveyed 1837-1842)

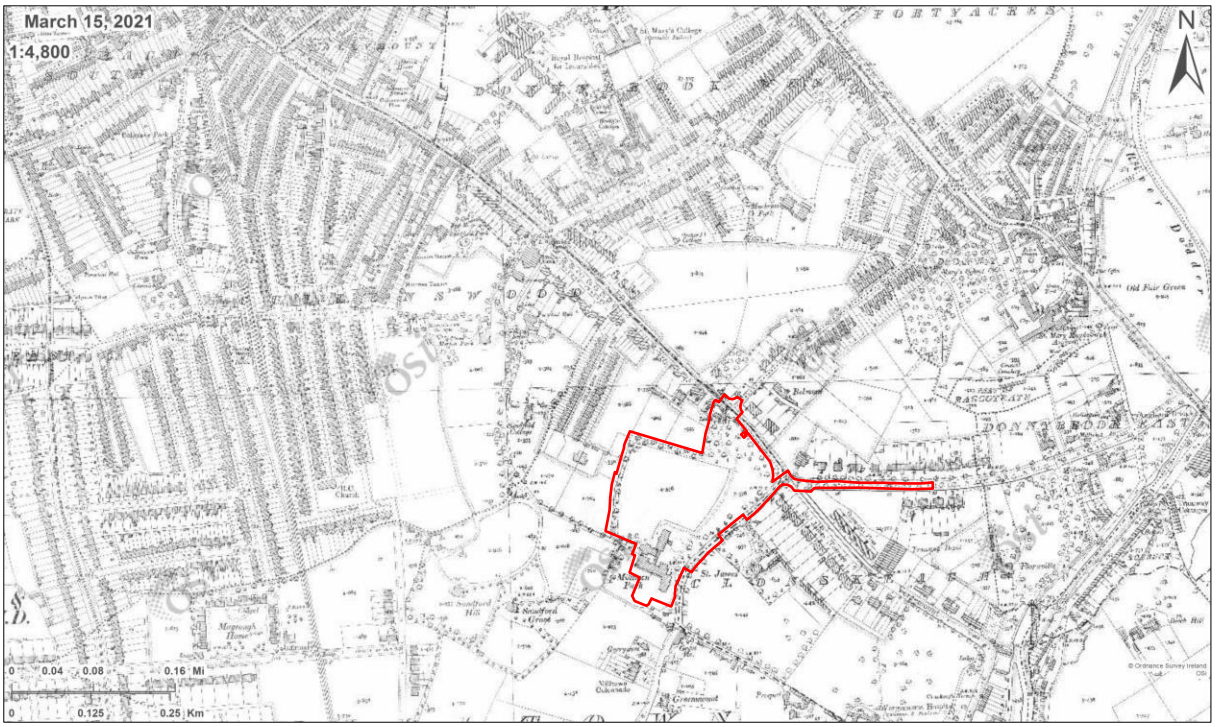


Figure 9.3b: 25 Inch Map (surveyed 1888-1913)

Over the course of the 20th century, the remaining agricultural lands were developed mostly for residential use, at low density, typical of the time. The big house estates/demesnes were either similarly developed or repurposed for institutional use, including Milltown Park (the site) for the Jesuit Community, Sandford Hill and Sandford Lodge as Gonzaga College, Muckross Park as a college, and Vergemount House as a hospital (now Clonskeagh Hospital).

Around the turn of the 20th century a further phase of evolution in the townscape tookplace with the start of the densification of the suburban area (see Figure 9.4). Immediately to the east of the site, across Milltown Road, two apartment developments were built, Cedar Hall and Grove House, both six storeys. The four storey Sandford Lodge apartment complex was built a short distance to the west. To the south along Milltown Road the former Mount St Anne's Convent was redeveloped as a mixed use residential and office complex incorporating the retained chapel and convent (repurposed for office use) and residential buildings of up to six storeys.

9.3.4 Present Townscape Context

The resulting townscape character of the site environs is mixed, with a distinct difference in character between the Sandford Road area to the north and the Milltown Road area to the south and east. The following are the main local character areas surrounding the site - and the main potential receptors of townscape and visual change:

- Sandford Road corridor:
  - Sandford Road and Clonskeagh Road;
  - Belmont Avenue;
  - Eglinton Road
  - Norwood Park;
  - Cherryfield Avenue and Hollybank Avenue;

- Milltown Road corridor:
  - Mount Sandford;
  - Cedar Hall;
  - Grove House;
  - Garrynure;

- Milltown Park and Gonzaga College.

These areas are identified on Figure 9.4 overleaf, and briefly described on the following pages.

- Sandford Road and Clonskeagh Road: Despite being a relatively wide urban thoroughfare (the 25-inch map shows a tramway at the centre of the wide street), Sandford Road is primarily a residential street. It is lined on both sides by large houses of up to three storeys; detached, semi-detached and terraced; mostly in large, mature gardens. (One notable exception is the petrol filling station diagonally across Sandford Road from the northern site entrance – Photo 9.2.) Many of the houses are zoned Residential Conservation Area, and a number are protected structures. The protected structures include two pairs of semi-detached houses directly across Sandford Road from the site, and a rowof semi-detached houses (St. James' Terrace) on the south side of Clonskeagh Road, the westernmost directly across Milltown Road from the site (see Photo 9.3).

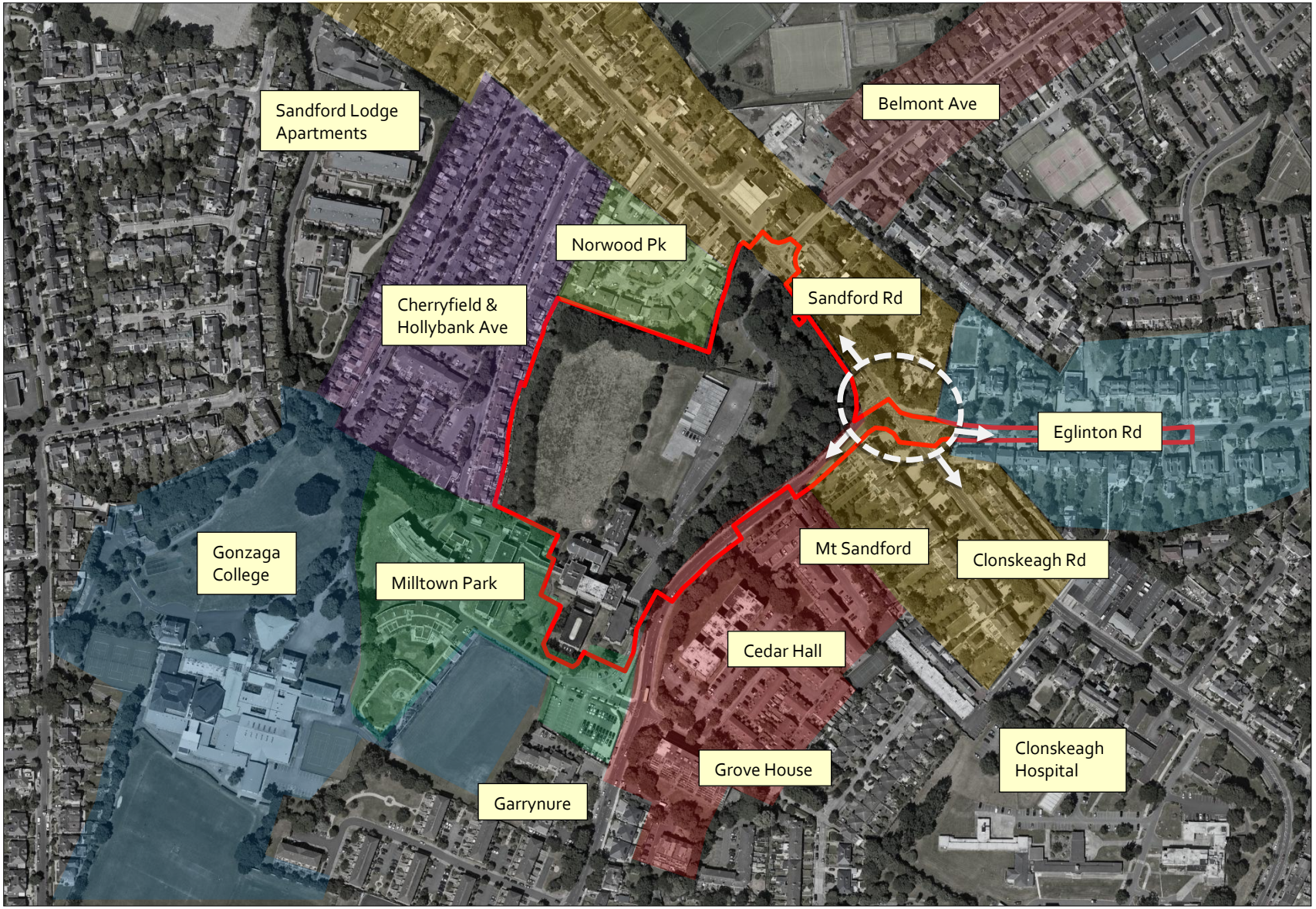


Figure 9.4: Main character areas (and potential receptors of townscape and visual change) in the receiving environment

Photo 9.2: The houses fronting Sandford Road just to the west of the site, across the road from the petrol filling station

Photo 9.3: The houses (St James's Terrace) fronting Clonskeagh Road to the east of the site across Milltown Road

- Belmont Avenue: Belmont Avenue is a narrow residential street leading north from Sandford Road. The street is an Architectural Conservation Area (ACA). Towards its southern end, approaching Sandford Road (and the site), Belmont Avenue is lined on both sides with a wide variety of houses, less consistent in design than some of the other local streets, and less impressive in scale. While the alignment of the street provides a view south towards the site (see Photo 9.4), the site is not visible from any ofthe houses' front or back rooms/windows.

Photo 9.4: A view towards the site along Belmont Avenue

- Eglinton Road: The street is lined with particularly large houses, detached and semi-detached, mostly of red brick and with a high degree of consistency in design. The street also features an avenue of mature London Plane trees, which contribute both to the street's visual amenity and to a high degree of visual enclosure. As on Belmont Avenue, the street alignment frames a view west towards the site (see Photo 9.5) but the houses do not have views towards the site from their front or back rooms/ windows.

Photo 9.5: A view towards the site along Eglinton Road

- Norwood Park: Norwood Park is a small estate of semi-detached houses immediately to the north and west of the site, accessed from Sandford Road a short distance from the site entrance. The single road of the estate is parallel with the doglegged northern site boundary. The houses south of the road back onto the site and the houses on the north side of the road face the site. Being adjacent to the site and effectively enclosed by it on two sides, Norwood Park has a high degreeof visual exposure to the site (see Photos 9.6 and 9.7).


Photos 9.6 & 9.7: Views from Norwood Park showing the trees inside the site's northern boundary protruding above the estate houses

- Cherryfield Avenue and Hollybank Avenue: To the west of Norwood Park and extending along the site's western boundary is the residential street of Cherryfield Avenue Upper and Lower (zoned Residential Conservation Area). The terraced two storey houses along the southern half of the street back onto the site and have a high degree of visual exposure to the site (from rear gardens and windows) although there is a belt of trees inside the site's western boundary behind the houses. Hollybank Avenue runs parallel to Cherryfield one block to the west. It is less exposed to the site due to the greater separation distance.

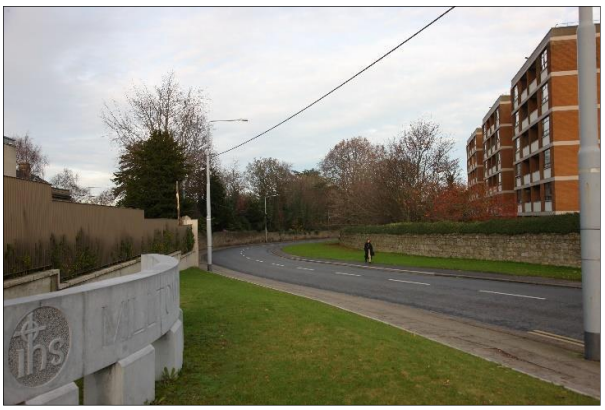
Photo 9.8: A view along Cherryfield Avenue showing the architectural uniformity and visual enclosure on the northern part of the street

Photo 9.9: A view between two houses in the southern part of Cherryfield Avenue, with the roof of Tabor House (on the site) visible

- Milltown Road: Across Milltown Road to the east of the site are several modern residential developments (see figure 9.4 above):

  - Mount Sandford is a complex of three storey duplex terraces, one of which faces the site across Milltown Road (see Photo 9.10). The other terraces are arranged to the rear of the front terrace and have no visual exposure to the site. The front terrace is set back behind a roughly 2m boundary wall and a narrow garden in which there is a row of maturing trees. These provide a visual screen additional to the belt of woodland inside the site's eastern boundary across the street. Nonetheless the terrace has a high degree of visual exposure to the site.
  - Cedar Hall is an apartment development directly across Milltown Road from the existing complex of buildings (chapel, etc.) in the southern part of the site (see Photo 9.11). The linear apartment building is six storeys tall and set back behind a strip of open space featuring a line of mature trees inside a boundary wall. Due to their aspect and elevation, the apartments (particularly the upper storeys) have a relatively high degree of visual exposure to the site (Photo 9.13). However, there are two belts of mature trees (either side of Milltown Road) providing some screening.
  - Grove House (Photo 9.12) is an apartment building south of Cedar Hall, diagonally across Milltown Road from the site's south eastern corner. The linear building is six storeys. It is aligned east-west and specifically designed to exploit the aspect and the view south towards the Dublin Mountains, although the site is visible from the north facing windows.

These modern, higher density developments on Milltown Road form a distinct local character area, very different from the residential streets to the north and west of the site (e.g. Sandford Road, Norwood Park, Cherryfield Avenue, etc.). The Milltown Road character area contributes, along with the institutional buildings on the Milltown Park site, to a diversity of townscape character in the site environs. It is one of the factors, in addition to the site vegetation and its position at a key junction in the urban structure, contributing to the site's capacity to accommodate large buildings.

Photos 9.10 & 9.11: The front terrace of Mount Sandford and the neighbouring Cedar Hall apartments, both facing the site across Milltown Road


Photos 9.12 & 9.13: Grove House and Cedar Hall across Milltown Road from the site, and a photo representing the view from Garrynure, across the parking area towards the complex of buildings in the southern part of the site

- Garrynure. Directly to the south of the site (west of Milltown Road) beyond the existing buildings and surface parking area retained for the Milltown Park Community, is a small development of two storey terraced houses. One of the terraces faces the retained Jesuit lands across an internal estate road and the parking area. The estate is bounded by a high wall and a row of trees, but from the first floor windows, views towards the site are afforded.

- Milltown Park and Gonzaga College: Although the larger part of Milltown Park was sold for development, the residential core of the Jesuit Centre was retained and will remain in institutional use. The remaining centre, adjacent and to the south west of the site, comprises (a) a red brick accommodation block (which was previously attached to the Milltown Park House extension, but which has now been separated following planning permission for this) and adjacent courtyard garden (Photo 9.14); (b) two modern buildings, one a four storey accommodation block and one a two storey care home; (c) access road and parking areas, and (d) extensive gardens contiguous with the grounds of Gonzaga College. Being adjacent to the site, the red brick building is visually exposed to the site, while the modern buildings are rather focussed on the grounds of Gonzaga College, away from the site.

Photo 9.14: The site buildings to the right, and the Milltown Park accommodation block to the left of the garden in the foreground

9.3.5 Relevant Planning Policy - Dublin City Development Plan 2022-2028 (DCDP 2022)

The following city level policies are most relevant to the subject site and the assessment of the proposed development's townscape and visual effects.

Zoning

The site's land use zoning is Z12 Institutional Land (Future Development Potential), with the objective: *"To ensure existing environmental amenities are protected in the predominantly residential future use of these lands."*

DCDP 2022 Section 14.7.12: *"Where lands zoned Z12 are to be developed, a minimum of 25% of the site will be required to be retained as accessible public open space to safeguard the essential open character and landscape features of the site. Where such lands are redeveloped, the predominant land use will be residential…"*

"On Z12 lands, the minimum 25% public open space shall not be split up into sections/fragmented and shall comprise soft landscape suitable for relaxation and children's play, unless the incorporation of existing significant landscape features and the particular recreational or nature conservation requirements of the site and area dictate that the 25% minimum public open space shall be apportioned otherwise."

Urban Consolidation and Density

Section 4.5.3 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… (emphasis added)

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

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

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

Overbearance

DCDP 2022 Section 15.9.18 states*: "'Overbearance' in a planning context is the extent to which a development impacts upon the outlook of the main habitable room in a home or the garden, yard or private open space service a home. In established residential developments, any significant changes to established context must be considered. Relocation or reduction in building bulk and height may be considered as measures to ameliorate overbearance.*

Building Height and the Identification of Areas for Increased Height and Density

Policy SC16 states: *"To recognise the predominantly low rise character of Dublin City whilst also recognising the potential and need for increased height in appropriate locations including the city centre, Strategic Development Zones, Strategic Development Regeneration Areas, Key Urban Villages and other locations as identified in Appendix 3, provided that proposals ensure a balance with the reasonable protection of existing amenities and environmental sensitivities, protection of residential amenity and the established character of the area."*

In Appendix 3: 'Achieving Sustainable Compact Growth - Policy for Density and Building Height in the City', it is stated: *"In considering locations for greater height and density, all schemes must have regard to the local prevailing context within which they are situated. This is particularly important in the lower scaled suburban areas of the city where broader consideration must be given to potential impacts such as overshadowing and overlooking, as well as the visual,*

functional, environmental and cumulative impacts of increased building height…"

In Section 9.7 (Section 9.5.1.2) below the proposed development is evaluated against the criteria contained in DCDP Appendix 3 Table 3 ('Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale').

Urban Design and Architecture

Section 4.5.5 of the DCDP 2022-2028 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…* (emphasis added)

"*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."* (emphasis added)

Policy SC 20 on Urban Design: "*Promote the guidance principles set out in the Urban Design Manual – A Best Practice Guide and in the Design Manual for Urban Roads and Streets (2013)."*

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)

Policy SC 22 on Historical Architectural Character states: "*To promote understanding of the city's historical architectural character to facilitate new development which is in harmony with the city's historical spaces and structures."* (emphasis added)

Protected Structures and Conservation Areas

The site does not include any protected structures. Nor is it covered by any Conservation Area (CA) or Architectural Conservation Area (ACA) designation. However, there are several protected structures in the immediate environs (including four houses across Sandford Road from the site, and a row of houses on the south side of Clonskeagh Road to the east). The Belmont Avenue/Mount Eden Road ACA extends to within 40m of the site on the opposite side of Sandford Road from the site's main entrance.

Regarding protected structures Policy BHA2(d) of the DCDP states 2022 states: "*Ensure that any development, modification, alteration, or extension affecting a protected structure and/or its setting is sensitively sited and designed, and is appropriate in terms of the proposed scale, mass, height, density, layout and materials."*

Key Views and Prospects

There are no views or prospects identified for protection in the site's receiving environment.

9.4 Characteristics of the Proposed Development

The proposed development description is as follows:

Sandford Living Limited intend to apply for permission for a Large-Scale Residential Development at a c. 4.26 hectare site at Milltown Park, Sandford Road, Dublin 6, D06 V9K7. Works are also proposed on Milltown Road and Sandford Road to facilitate access to the development including improvements to pedestrian facilities on an area of c. 0.16 hectares. The development's surface water drainage network shall discharge from the site via a proposed 300mm diameter pipe along Milltown Road through the junction of Milltown Road / Sandford Road prior to outfalling to the existing drainage network on Eglinton Road (approximately 200 metres from the Sandford Road / Eglinton Road junction), with these works incorporating an area of c. 0.32 hectares. The development site area, road works and drainage works areas will provide a total application site area of c. 4.74 hectares.

The development will principally consist of: the demolition of c. 4,847.5 sq m of existing structures on site including Milltown Park House (880 sq m), Milltown Park House Rear Extension (2,031 sq m), the Finlay Wing (622 sq m), the Archive (1,240 sq m) and the Link Building between Tabor House and Milltown Park House Rear Extension to the front of the Chapel (74.5 sq m); the refurbishment and reuse of Tabor House (1,575 sq m) and the Chapel (768 sq m) and the provision of a single storey glass entrance lobby to the front and side of the Chapel (52 sq m); and the provision of 562 No. residential units comprising 6 No. three-bed courtyard houses and 556 No. apartment units (70 No. studios, 176 No. one-bed units, 267 No. two-bed units and 43 No. three-bed units).

Block A1 will range in height from 5 No. storeys to 8 No. storeys and will comprise 81 No. apartment units; Block A2 will range in height from 6 No. storeys to 8 No. storeys and will comprise 139 No. apartment units; Block B will range in height from 3 No. to 7 No. storeys and will comprise 74 No. apartment units; Block C will range in height from 4 No. storeys to 7 No. storeys and will comprise 151 No. apartment units; Block D will range in height from 3 No. storeys to 5 No. storeys and will comprise 30 No. apartment units; Block E will be 2 No. storeys in height and will comprise 6 No. courtyard type houses; and Block F will range in height from 5 No. storeys to 7 No. storeys and will comprise 81 No. apartment units.

The development also includes the provision of: cultural/community space within Tabor House (4 No. storeys including lower ground floor level) and the Chapel (2 No. storeys including lower ground floor level and mezzanine level) (1,698 sq m) with associated outdoor space (248 sq m); a café/restaurant (179 sq m) and a creche (375 sq m) within Block F with associated outdoor creche play area; ancillary residents' amenities and facilities (324 sq m) within Blocks B & C; and a single storey bin store and substation adjacent to Block F (101 sq m).

The development also provides a new access from Milltown Road (which will be the principal vehicular entrance to the site) in addition to utilising and upgrading the existing access from Sandford Road as a secondary access principally for deliveries, emergencies and taxis; new pedestrian access points; pedestrian/bicycle connections through the site; 319 No. car parking spaces (288 No. at basement level and 31 No. at surface level); set down area for deliveries;

bicycle parking; 22 No. motorcycle spaces; bin storage; boundary treatments; private balconies and terraces facing all directions; hard and soft landscaping including public open space and communal open space; green/blue roofs; PV panels; substations; lighting; plant; lift cores and overruns; and all other associated site works above and below ground.

The proposed development has a gross floor space of c.50,196 sq m above ground level over a partial basement (under part of Blocks A1 and A2 and under Blocks B and C) measuring c. 10,550 sq m, which includes parking spaces, bin storage, bike storage and plant.

The proposal is described in detail in the architectural and landscape design statements submitted with the planning application, and in Chapter 3 of the EIAR. The key aspects of the proposal with regard to its potential townscape and visual effects are (1) the layout, massing and height, (2) the façade treatments, and (3) the landscape proposals. These are discussed below.

9.4.1 Layout, Massing and Height

The layout of the proposed development has been determined by several factors. These include (a) the objective to retain the woodland/tree belts inside the north and east boundaries - to use these for screening of taller buildings and to lend biodiversity, landscape and visual amenity to the future neighbourhood; (b) the retention of Tabor House and the Chapel (while removing the other existing buildings from the site), and (c) the objective to achieve high density use on the site while avoiding excessively pronounced steps in scale between the site and neighbouring developments.

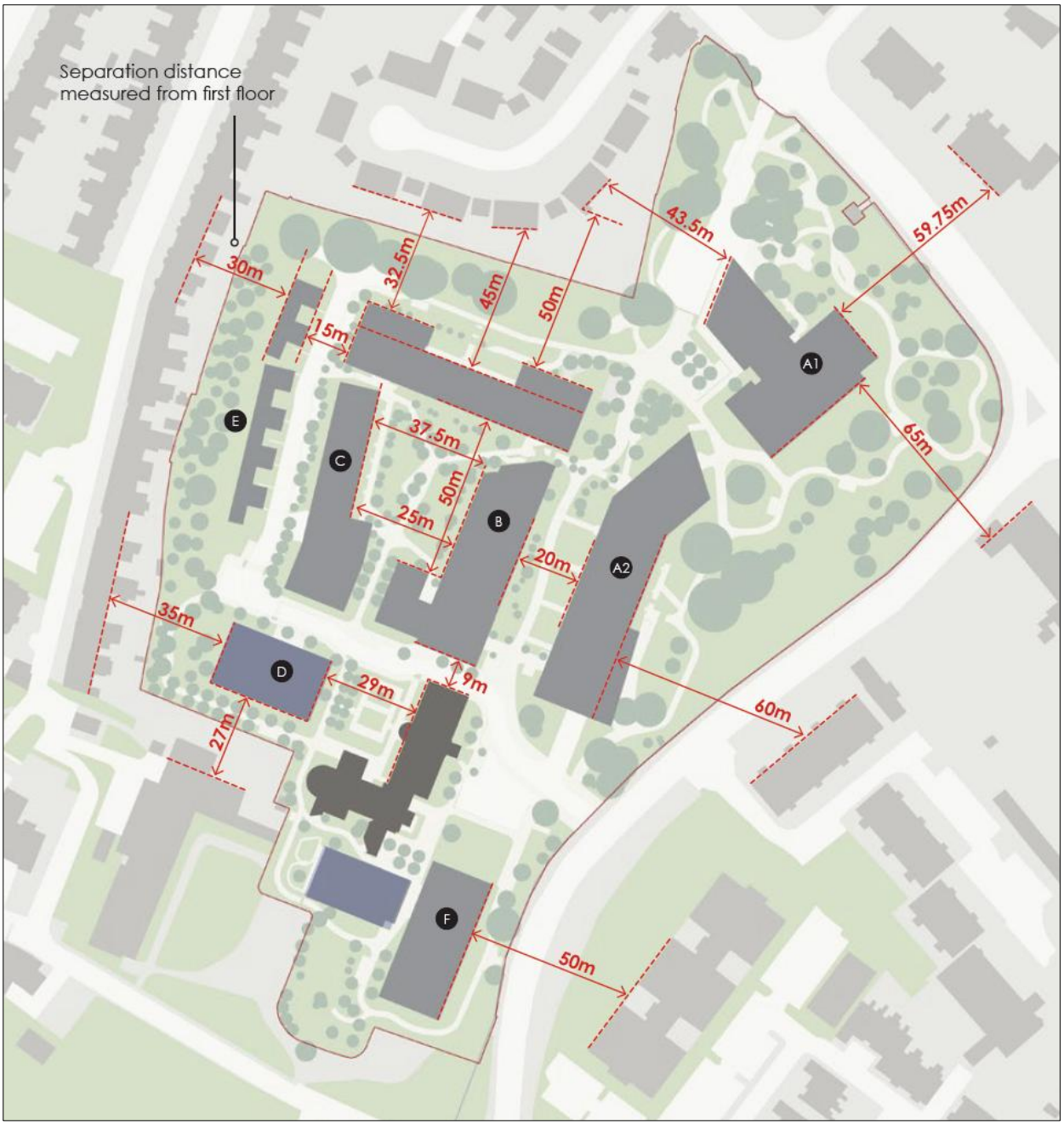


Figure 9.5: Proposed layout

Figure 9.6: Proposed height strategy

Figure 9.7: Aerial photomontage showing proposed layout and building height

Block A

Block A1 is located in the north eastern part of the site at the corner of Sandford Road and Milltown Road, but set back from the streets (and the protected structures across the streets) behind the retained woodland belt. The building is "L" shaped in plan, so that it presents (set-back) frontage to both streets.

Block A1 ranges from five to eight storeys in height. The intention is to take advantage of the building's separation distance from neighbouring properties/sensitivities (due to the set-back behind the woodland belt) and the screening provided by the trees/woodland, to achieve density and also mark the junction of Sandford Road and Milltown Road with the eight storey accent volume.

Block A2 is a cranked linear block aligned roughly parallel with Milltown Road. It is also set back behind the woodland belt, with the retained trees incorporated into a new public park inside the boundary wall. The building has a complex form, incorporating an eight-storey volume at its southern end, with the main linear element being 6-7 no. storeys, the step in height forming a terraced frontage overlooking the park (see Figure 9.8). Block A2 is attached to A1 at its northern end, forming a bridge over a wide pedestrian link between the buildings. Together they form a highly articulated built frontage to the park and Milltown Road (although the buildings would be heavily filtered by the trees in views from the road).

Figure 9.8: CGI showing the east facade of Blocks A1 and A2 fronting the park inside the Milltown Road boundary

Block F, Tabor House and the Chapel

It is proposed to retain and refurbish Tabor House and the Chapel for use as cultural/ community spaces. They would be located on the west side of a new forecourt/entrance plaza off Milltown Road, with Tabor House forming the focal point at the main entrance to the scheme. Block F is located on the south side of the entrance plaza (see Figure 9.9), combining with Tabor House and the southern end of Block A2 to provide built enclosure to the entrance court/plaza. Block F and A2 also serve to frame the view of Tabor House from Milltown Road. Block F is seven storeys in height, with a five storey projection to the west alongside the chapel (see Figure 9.9).

Figure 9.9: CGI view of Tabor House, the Chapel and Block F

Blocks B and C

Blocks B and C occupy a central position in the site. Together they form a perimeter block, ranging from three to seven storeys. This combined block (a) encloses a large (50m x 25-37m) central courtyard, and (b) combines with the other buildings (A2 to the east, Tabor House and Block D to the south, and Block E to the west) to form the scheme's internal streets. Blocks B and C are thus an important arranging element, giving the scheme a grid layout and serving to define and enclose thestreets, generating urban character in this central area (contrasting with the parkland character of the eastern area facing Milltown Road).

The height of the north-facing range of Block C is of particular importance. This building is positioned closest to the neighbouring Norwood Park estate to the north, to the rear of a row of houses (see Photos 9.6 and 9.7 above). This northern volume of Block C is 4-5 storeys tall (5th storey set back behind a four storey shoulder), its height moderated to avoid overbearance of the neighbouring houses. The proposed retention of the mature trees inside the site boundary will further mitigate the building's visual impact (see Figure 9.11 below).

Figure 9.10: CGI showing the courtyard enclosed by Blocks B and C

Figure 9.11: CGI showing the north façade of Block C (in the foreground), which faces Norwood Park across an open space with a line of retained mature trees

Blocks D and E

Blocks D and E are positioned inside the west boundary to the rear of a terrace of houses fronting Cherryfield Avenue. The building typologies and height of Blocks D and E are intended to avoid overbearance of the neighbouring houses.

Block D is a five storey apartment building, with a step down to three storeys at its western end to the rear of the houses of Cherryfield Avenue. Block E is comprised of six two-storey, flat-roofed houses. The houses are positioned back-to-back with the neighbouring houses of Cherryfield Avenue, in a typical urban/suburban arrangement. Block E thus forms a buffer between Cherryfield Avenue and the taller Block C in the central part of the site.

Figure 9.12: CGI view of the internal street between Block E (left) and Block C (right)

9.4.2 Façade Treatments

The proposal includes five different materials palettes (see Figures 9.7 to 9.12), which are intended to be complementary but sufficiently diverse to achieve architectural and visual interest, and place-identity within the scheme.

The principal material throughout the development is brick (complementing the predominant material in the residential buildings of the receiving environment), ranging in colour from light to dark grey, buff and red. The palettes also include pre-cast concrete cladding panels in a variety of colours and textures (degrees of aggregate exposure), metal cladding, and metal window frames and balconies.

9.4.3 Landscape Proposals

The landscape proposals are described under two headings below, i.e. (1) tree removal, retention and planting, and (2) landscape masterplan.

9.4.3.1 Tree Removal, Retention and Planting

A survey by CMK Horticulture and Arboriculture identified 387 No. trees on the site (including Eglinton Road). The trees are in varying condition, from high quality (Category A) to moderate quality (Category B), low quality (Category C) and unsuitable for retention (category U):

- Category A (6% of the 387 No. trees)
- Category B (51%)
- Category C (30%)
- Category U (13%)

It is proposed to remove 252 No. trees and retain 135 No. trees. The strategy behind the proposal has several objectives:

- To retain as many as possible of the Category A and B trees, which have arboricultural and ecological value. (82% of the Category A trees and 57% of the Category B trees would be retained.)
- To retain the main tree groups/features on the site, for their value as structural/ spatial elements of the landscape, their ecological value, their visual amenity value and visual screening function. Despite substantial thinning, the tree/woodland belt inside the eastern, north eastern and northern site boundaries would be retained (Figure 9.13b). The thinning of these tree belts would allow them to function as part of the recreational open space of the development.
- As far as possible, to remove mostly Category C and U trees – the trees of low arboricultural or ecological value, or otherwise unsuitable for retention. (100% of Category U trees and 95% of Category C trees would be removed.)
- To remove the minimum number of trees required to accommodate the proposed basement, buildings and infrastructure on site. This includes a double line of trees inside the west boundary, a line of trees across the central field, and trees from the woodland belt inside the roadside boundary (Figure 9.13a).

Figure 9.13: (a) Trees to be removed, (b) trees to be retained, and (c) proposed trees

As part of the development, 230 No. new trees and large shrubs are proposed to be planted. Given that these specimens would all be in better condition than the majority of the 252 No. trees to be removed, and that the 135 No. retained trees would mostly be in better condition than they currently are (due to the thinning of the woodland and the maintenance of each retained specimen), there would be a similar quantity, and a net improvement in quality, of tree cover on the site as a result of the development.

9.4.3.2 Landscape Masterplan

The main elements of the proposed landscape masterplan, with regard to potential landscape/ townscape and visual impacts, are described below.

Figure 9.14: Proposed landscape masterplan (excerpt of Drawing No. C0111 L1000)

Retained woodland/ tree belt in main public open space

A large number of the existing trees of good quality (Categories A and B) in the woodland belt would be retained in a new public park comprised of 'green buffer' areas around the boundary (i.e. woodland including understorey), open lawn areas with scattered trees, a playground, fitness areas, seating and picnic areas. The park is traversed by a network of walkways, which can be accessed from within the site and from the three entrances (one on Sandford Road, one on Milltown Road and one at the corner). This park is intended to function as a public open space, i.e. fully accessible for public use.

Boundary treatment – wall and railing

It is proposed that a section of the existing cement-rendered wall along Sandford Road would be replaced with a low wall (of salvaged stone) and railing. This would make the boundary visually permeable, exposing the park to view from the street. The existing stone wall along Milltown Road would be retained as is (to retain an element of the site's character) - apart from the opening of a new entrance to the site in front of Tabor House.

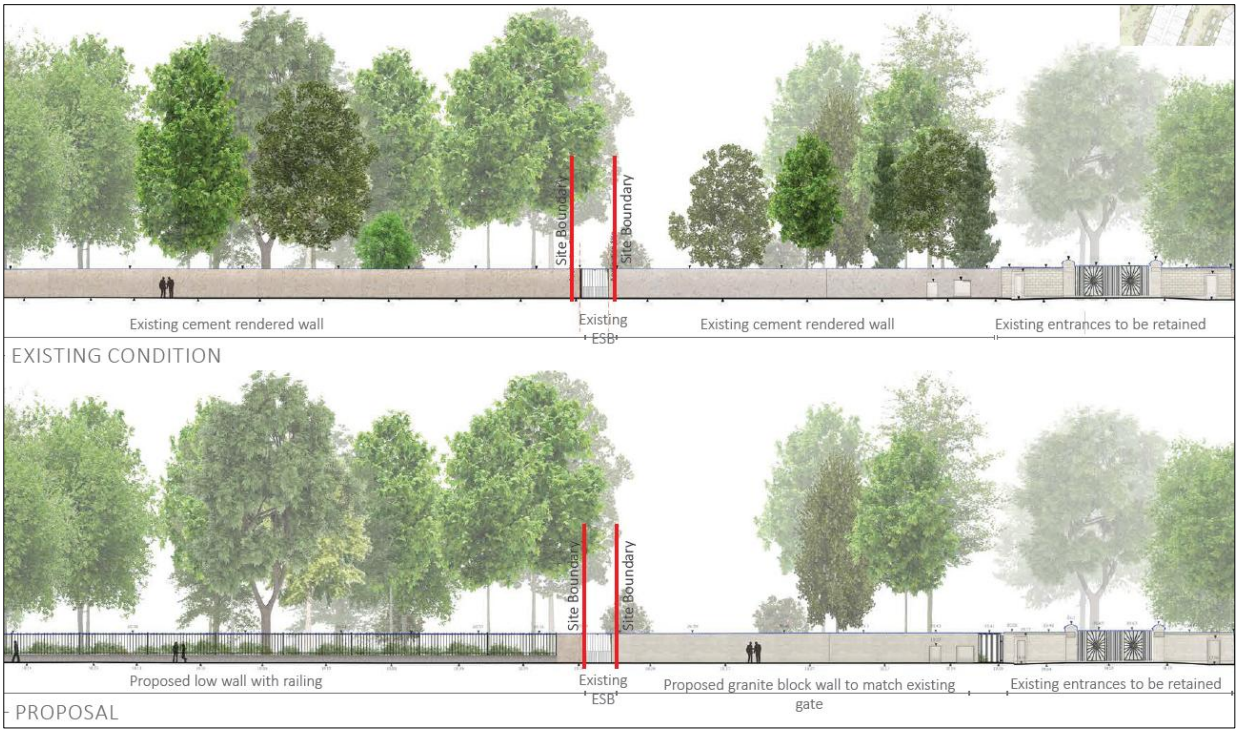


Figure 9.15: Proposed change to boundary wall

Retained trees in linear public open space inside northern/ Norwood Park boundary

A number of existing trees in good condition inside the boundary shared with Norwood Park would be retained (see Figure 9.13 above) in a linear open space also featuring natural play areas and exercise equipment, beds of ornamental shrub planting, etc. This area is intended to function (a) as a green buffer between Block C and the houses of Norwood Park, and (b) as an area of public open space (being accessible from the entrance on Sandford Road).

Retained trees inside western/Cherrywood Avenue boundary

There is a line of alternating lime trees and cherry cultivars inside the west boundary to the rear of the neighbouring houses on Cherryfield Avenue. It is proposed to retain a number of these

trees in a 'biodiversity corridor' inside the boundary, and to supplement the retained trees with new trees and an understorey of groundcover. The trees in this biodiversity corridor would also serve a visual screening function for the houses of Cherryfield Avenue.

Formal entrance forecourt and gardens around Tabor House and the Chapel

A large forecourt is proposed inside the main entrance off Milltown Road, in front of Tabor House and the Chapel. This area incorporates the main vehicular access (and ramp to the basement parking), pedestrian and cycle paths, a number of parking spaces, a lawn area with a retained mature birch tree, and formal planting in front of the historic buildings. The open space of the forecourt would provide a respectful setting for Tabor House and the Chapel and preserve the view of the historic buildings from Milltown Road. The space would be activated by the community/cultural uses in Tabor House and the Chapel, and a proposed café/restaurant in the ground floor of Block F.

To the rear (west) of Tabor House, in a courtyard enclosed to the south by the Chapel and to the west by Block D, a 'secret garden' is proposed, to complement the community/cultural space in Tabor House and the Chapel.

Other spaces

The other spaces - including a garden area to the south of Block F, the large internal courtyard between Blocks B and C, a 'green boulevard' between Blocks B and A2 which provides a pedestrian connection through the site from Milltown Road to Sandford Road, and the internal streets - would have no direct impact on the wider townscape or views from the public realm. However, all of these proposed spaces are characterised by a high proportion of soft surfaces and intensive planting including numerous new trees. They would result in a particularly verdant new neighbourhood.

In addition to the ground level landscape, it is proposed to provide extensive green roofs on all of the apartment buildings, as well as a communal amenity space on the upper floor level of Block A1.

9.5 Potential Impacts of the Proposed Development

9.5.1 Visual Effects

9.5.2.1 Construction Phase

During construction the site and immediate environs would be disturbed by construction activities and haulage, and the incremental growth of the buildings on site. In the earlier stages, until the buildings reach substantial height above ground, the effects would be largely limited to the immediate environs (adjoining streets and properties). As the buildings begin to grow above ground level the visual effects would be more widespread.

The magnitude of change would range from negligible to medium-high and would vary over time; therefore the significance of the effects would also vary – although they would typically be negative during construction. Such temporary negative visual effects are unavoidable and not unusual in the urban context where change is continuous.

9.5.2.2 Operational Phase

Some 22 No. viewpoints were selected for assessment of the proposal's visual effects informed by Verified View Montages (VVMs or photomontages). The viewpoints were selected to represent visual receptors in all of the potentially affected character areas around the site, as identified in Section 9.3.4 above, and to show the proposal from a range of angles and distances (see viewpoint map, Figure 9.16 below). The viewpoint selection is considered representative of the receiving environment and adequate for the purpose of assessing the proposal's potential visibility and visual effects. The viewpoints are as follows:

VVM No.	Location
Sandford Road	
1	Sandford Road mid-distant view
2	Sandford Road local view
3	Sandford Road opposite site – Representing view from houses (protected structures) across street
Belmont Avenue	
4	Belmont Avenue approaching junction with Sandford Road, opposite site entrance (outside ACA)
5	Belmont Avenue distant view (inside ACA)
Eglinton Road	
6	Eglinton Road – Distant view
7	Eglinton Road – Middle distant view
8	Junction of Eglinton Road and Clonskeagh Road
Clonskeagh Road	
9	Clonskeagh Road approaching site
Norwood Park	
10	Norwood Park – View south along street
11	Norwood Park – View east along street
Cherryfield Avenue	
12	Cherryfield Avenue Lower
13	Cherryfield Avenue Upper
Milltown Road	
14	Milltown Road opposite site
15	Mount Sandford entrance opposite site
16	Mount Sandford view from front terrace
17	Milltown Road footpath alongside site

18	Milltown Road – Distant view
19	View representing Garrynure
Milltown Park	
20	Milltown Park access road
21	Milltown Park – View from rear of accommodation block
Albany Road	
22	Albany Road – distant view from west

Table 9.7: Viewpoints for Visual Effects Assessment

The viewpoints are assessed in Table 9.8 below. The assessment should be read in conjunction with the baseline views and VVMs provided under separate cover (see separately enclosed Verified Views, Aerials & CGIs). For each viewpoint, a baseline/existing view (photograph) and a proposed view (photomontage/ VVM) are provided - for both summer and winter. The summer and winter views are provided to show the varying screening effect of vegetation between the seasons. For the methodology and the criteria and terms used in the assessments, refer to Section 9.2.2.3 and 9.2.3 above.

Note on impact significance classifications: It should be noted that the matrix (Table 9.3) and the EPA's chart (Figure 9.1) guiding the classification of impact significance are a guide. The assessor also uses professional judgement informed by their expertise, experience and common sense to arrive at a classification of significance that is reasonable and justifiable. In the EPA Guidelines the chart (Figure 9.1 above) above is accompanied by a footnote that states: *"The depiction of significance classifications is indicative and should not be relied on as being definitive. It is provided for general guidance purposes"* (EPA Guidelines Section 3, page 53).

Once the assessor has classified the sensitivity of the receptor and the magnitude of change (using the definitions in Tables 9.1, 9.2, 9.5 and 9.6 as a guide), the matrix and chart (Table 9.3 and Figure 9.1) are used as a starting point for the impact significance classification – using the assessor's professional judgement to arrive at a classification that is reasonable and sensible. For example, according to the EPA chart a change of high magnitude affecting a receptor of medium sensitivity may be classified as either 'significant' or 'moderate'. That judgement is made by the assessor.

Figure 9.16a: Viewpoints for Visual Effects Assessment – Local Views

Figure 9.16b: Viewpoints for Visual Effects Assessment – Distant Views

No	Viewpoint Location	Baseline View	Sensitivity	Proposed Change	Magnitude of Change	Significance of Effects
Viewpoints 1-13 address the Sandford Road character area, comprised of low density residential streets, to the north and west of the site. Viewpoints 14-21 address the Milltown Road area, of more diverse character, to the east and south of the site.						
1	Sandford Rd mid-distant view (approx. 200m)	View 1 shows the consistency of character along Sandford Road, with the houses all 2-3 storeys, mostly of red brick with pitched roofs, set back from the road behind shallow front gardens. The road itself is relatively wide, with two vehicular lanes, dedicated cycle lanes both sides, and footpaths – an urban street specification. The trees on the site can be seen from a distance and gain in prominence on approach (Views 2 and 3).	Medium	The eight storey Block A1 would be discernible, protruding marginally above the roofline of the street-front buildings and the tree line on the site - the building set well back from the street behind the trees. The extent of protrusion is minor, and there would be no significant change in character or visual amenity. (The visibility of a development of higher density typology would not be inappropriate at this location, at a key junction on an important thoroughfare.)	Low	Not significant neutral
2	Sandford Road – local view (approx. 65m)	The petrol station is one of the few deviations from low density residential use in the Sandford Road corridor. This contributes to a shift in character approaching the site and the junction with Milltown Road.	Medium	The development would not be visible.	None	No effect
3	Sandford Road opposite site	The view represents road users and the houses (protected structures) across the road from the site. At this proximity to the junction with Milltown Road the road widens to three lanes. Across the road is the high boundary wall of the site and beyond that the belt of trees/woodland, which even in winter presents as a dense bank of vegetation, closing the vista.	Medium-High	The site boundary wall would be replaced by a low stone wall topped by a railing, exposing the interior of the site to view. The site's main landscape asset, the trees inside the boundary, would be largely retained and supplemented with additional planting. Block A1, set well back from the boundary, would be visible through the bare tree canopy in winter. (In summer it would be largely screened.). Being lower than the treeline, the building would cause no increase in visual enclosure. At this proximity the design and material quality of the building would be evident. The introduction of a building of urban typology and scale would cause a change in character. However, in the context, at the junction of two main thoroughfares, this	Medium	Moderate positive

				is not inappropriate. The combination of (a) the improved boundary wall/railing, (b) the exposure of the retained vegetation and open space inside the boundary, and (c) a building of design and material quality, would form an attractive composition.		
4	Belmont Avenue approaching Sandford Rd junction, opposite site entrance (outside ACA)	Approaching the junction with Sandford Road, the view is framed by the wide gable walls of the two houses at the junction - the house to the left a protected structure. Across the road is the site entrance flanked by high boundary walls and inside the walls the site's dense woodland.	Medium	In winter, parts of Block A1 and Block C would be visible through the retained vegetation inside the boundary. The site would retain its park-like character despite the presence of the buildings (the open space and trees would lend the development a park-like character). In summer the buildings would be largely screened. The character of the townscape/view would be slightly altered, but not inappropriately for the location, and there would be no change in visual amenity.	Low	Slight neutral
5	Belmont Avenue distant view (inside ACA)	The view is taken from further north along Belmont Avenue, some 150m from the site, within the ACA. The view along the narrow road is framed by two storey houses, all pre-20th century but of varying style and materials. There is a recently completed mixed density development including an apartment block behind the houses to the right, on a former part of the Muckross Park College grounds. The Sandford Road junction, the site entrance and the trees inside the boundary are visible in the distance.	Medium-High	As in View 1, seen from a distance, the eight storey accent volume of Block A1 would protrude just above the tree line in the site. Due to its modern urban typology, contrasting with the existing buildings in view, the development would shift the character of the townscape towards a more urban condition. This is not inappropriate in the location, and the scale of the building is such that it would not dominate the foreground houses. The photomontage shows that Belmont Avenue can withstand the change in its environs without diminution of its townscape value and visual amenity.	Low	Slight neutral

No	Viewpoint Location	Baseline View	Sensitivity	Proposed Change	Magnitude of Change	Significance of Effects
6 & 7	Eglinton Road distant (230m) and mid-distant (115m) views	Eglinton Road is characterised by large, mostly 3 storey Victorian houses set back behind long front gardens. The road corridor is wide, with two vehicular lanes, cycle lanes and verges/parallel parking with rows of mature street trees. The trees add visual amenity to the street, and a high degree ofvisual enclosure. While the character of Eglinton Road is strong, the environs are changing, reflecting the urban location. At the opposite end of the street from the site, at the junction with Donnybrook Road, a high density residential scheme of up to 12 storeys has been completed, and another is permitted (Jefferson House).	Medium-High	In summer the development would be largely screened by the street trees and site woodland in bothViews 6 and 7. In winter the eight storey accent volumes of Blocks A1 and A2 would just be discernible in the middle distance. Similar visibility would likely be experienced from the front gardens of some of the houses. From closer to the site (View 7), the replacement of the boundary wall at the corner of the site with a low wall and railing would also be discernible, but would have limited effect. Overall, the visual impact on Eglinton Road would be negligible. The character of the road is sufficiently strong that it can withstand the change without diminution of its character, and there would be no reduction in visual amenity.	Negligible	Not significant neutral

No	Viewpoint Location	Baseline View	Sensitivity	Proposed Change	Magnitude of Change	Significance of Effects
8	Junction of Eglinton Road and Clonskeagh Road	The view is taken from Eglinton Road approaching the double-junction of Eglinton Road and Clonskeagh Road, Sandford Road and Milltown Road.  The stretched, non-orthogonal junction occupies a large space and channels a large volume of traffic between the city centre and UCD/Clonskeagh, Donnybrook and Milltown. The mature trees and handsome houses lend visual amenity. However, the status of the junction in the urban structure is not reflected in the surrounding built form. As a 'place' the junction lacks definition and makes limited contribution to legibility.	Medium	The eight storey accent volume of Block A1, set back behind the retained woodland belt, would be a prominent addition to the view in winter, when it would be visible through the trees In summer, just the top of the building would be visible above the tree line. In winter, the building would be sufficiently exposed to be identifiable, and its design and material quality appreciable. Due to its separation distance from the street and the surrounding houses, and the screening effect of the trees, the building can be comfortably accommodated beside the wide junction. A new architectural feature of high quality would be introduced in an appropriate location, adding visual interest and improving legibility, with no negative effect on any valued features (no sense of dominance of the nearest houses). Another element of note is the proposed treatment of the boundary wall and the new pedestrian entrance at the corner of the site. These would encourage public access and use of the open space internal to the site, which has heretofore been closed to public use.	Medium	Moderate positive
9	Clonskeagh Road mid-distant view (approx. 110m)	The street is characterised by large houses (St James' Terrace, a protected structure) set back behind mature gardens, generating a high degree of visual amenity. However, on the approach to the junction with Eglinton Rd and Milltown Rd there is a lack of legibility.	Medium-High	The development would be screened in summer. In winter the eight storey accent volume of Block A1 would be just discernible through the bare tree canopy. This would constitute a negligible change, with no effect on townscape character or visual amenity.	Negligible	Not significant neutral

No	Viewpoint Location	Baseline View	Sensitivity	Proposed Change	Magnitude of Change	Significance of Effects
10	Norwood Park – view south	Norwood park is a small estate off Sandford Road, comprised of a single, curved road lined by semi-detached houses. The houses on the south side of the road (directly ahead in View 10) back onto the site boundary. In the view south along the estate road the mature trees inside the site's northern boundary can be seen between and rising above the houses.	Medium-High	In summer the development would be almost entirely screened by the retained trees. In winter the five storey element of Block C would be visible through the bare tree canopy behind the houses. The combination of the separation distance (c. 40m between Block C and the houses in view), the building's light colouring and textured façade (brick) and the filtering effect of the trees would limit its visual presence. In the evolving urban context, driven by compact growth policy, this type and magnitude of change is not unusual and can be considered neutral. (The visibility of new development, including higher density typologies, is not inappropriate.) The Norwood Park houses and public realm would retain a high level of visual amenity.	Low-Medium	Moderate neutral
11	Norwood Park – view east	The view east along the estate road is similar to the view south, with the mature trees on the site rising above the houses' roofline, adding to visual amenity as well as enclosure.	Medium-High	In summer the development would be screened by the trees in the foreground and the retained trees on site. In winter, parts of Block A1 (left) and A2 (right) would be visible, c. 45m to the rear of the Norwood Park houses, filtered by the bare canopies in the intervening landscape. Being enclosed on two sides by the site, Norwood Park has a high degree of exposure (potential) to the site. Some degree of visual impact on the estate (intrusion of new, taller buildings and increased enclosure) is unavoidable if the site is to be developed at a higher density, as encouraged by compact growth policy. The positioning of Blocks A and C away from the Norwood Park boundary, the retention of the trees inside the boundary and the considered design of the buildings - as proposed - would avoid excessive visual impact on the Norwood Park. There would be a change in character but no significant loss of visual amenity.	Low-Medium	Moderate neutral

No	Viewpoint Location	Baseline View	Sensitivity	Proposed Change	Magnitude of Change	Significance of Effects
12	Cherryfield Avenue Lower	The northern section of Cherryfield Avenue (the part zoned Residential Conservation area) is lined by a continuous terrace of houses positioned close to the street, generating a high degree of visual enclosure.	Medium-High	A terrace of two storey, flat roofed houses (Block E) is proposed inside the west site boundary, c. 30m to the rear of the Cherryfield Avenue houses. The rear gardens of the proposed houses are separated from the shared boundary by a 'biodiversity corridor' (c. 12-15m wide) in which a line of existing trees would be retained and a large number of new trees planted. The taller proposed apartment buildings are further to the east, within the site, removed from Cherryfield Avenue. The proposed development would not be visible from the street/public realm. The proposed Block E houses would be visible from the rear windows and gardens of the Cherryfield houses, but (a) they are two storey and flat-roofed (therefore low), (b) they are separated from the Cherryfield Avenue houses by c. 30m, and (c) they would be at least partially screened by the retained and proposed trees in the biodiversity corridor. The proposal thus responds to the sensitivity of Cherryfield Avenue in the arrangement typologies, height and screening vegetation.	None	No effect
13	Cherryfield Avenue Upper	Cherryfield Avenue Upper is more recently developed than the lower section. Rather than a continuous terrace, the mid-20th century houses are arranged in terraces of four or six houses. The end of terrace houses have adjoining garages, and there are views from the street towards the site over the garages. At one of these gaps (Viewpoint 13) the corner of a roof of Tabor House can be glimpsed in the distance.	Medium	Block D in the south west corner of the site, is three storeys at its western end (closest to Cherryfield Avenue, c. 35m - at 1st floor level - from the nearest houses), and steps up to five storeys deeper within the site. Block D would be glimpsed from the street between the Cherryfield Avenue terraces, screening the small part of Tabor House that is currently visible. The retained and supplemented trees inside the site boundary would filter the views, softening the building's presence. In the urban environment, the resulting view would not be unusual, and there would be no significant change in visual amenity.	Low	Slight neutral

				The proposed building would be visible from the rear windows and gardens of the Cherryfield Avenue houses, but (a) the moderated height (3-5 No. storeys), (b) the separation distance of 35m (at 1st floor level), and (c) the screening effect of the retained and proposed trees in the biodiversity corridor would mitigate the effect.		
Viewpoints 1-13 address above the Sandford Road character area, comprised of low density residential streets, to the north and west of the site. Viewpoints 14-21 address the Milltown Road area, of more diverse character, to the east and south of the site.						
14	Milltown Road opposite site	This view, taken from a position across Milltown Road from the site's eastern boundary, shows the screening effect of the boundary wall and the woodland belt inside the site boundary.	Medium	No change is proposed to the boundary wall. In summer the proposed development would be screened from view. In winter, Block A - set well back from the boundary behind a park incorporating the retained trees - would be visible but heavily filtered by the trees. There would be a slight change in character, and no loss of visual amenity.	Low	Slight neutral
15 & 16	Mount Sandford entrance and view from front terrace opposite site	Views 15 and 16 represent the view that would be experienced by all the residents of Sandford Lodge on departure from the estate, and the views from the front terrace across Milltown Road from the site. The front terrace is set back behind a boundary wall and a narrow garden witha row of maturing trees (see View 16). These provide a visual screen additional to the woodland inside the site's east boundary. The woodland screens the interior of the site although in winter Tabor House can be discerned through the bare tree canopy (View 15).	Medium	In summer the development would be almost entirely screened. In winter, Block A2 - set well back behind the park incorporating retained mature trees - would be exposed to view, filtered by the tree canopies, softening the building's presence. Enough of the building would be exposed for its architecture to be appreciated - notably the articulated form and variations in materials. Tabor House would remain visible to the left. Milltown Road is already characterised by mixed (including high) density residential development. Considering (a) this context, (b) the retention of the trees and the site's sylvan character, (c) the retention of visibility of Tabor House, and (d) the setback of the building, avoiding any sense of overbearance, the visual effect can be classified as neutral.	Low-Medium	Slight - Moderate neutral

No	Viewpoint Location	Baseline View	Sensitivity	Proposed Change	Magnitude of Change	Significance of Effects
17	Milltown Road footpath alongside site	This viewpoint represents the views which would be experienced by vehicular, cycle and pedestrian traffic travelling north towards the junction with Sandford Road – where traffic diverts to the city centre via Ranelagh, or to Donnybrook or Clonskeagh/UCD. The summer view shows the screening effect of the trees on both sides of the road. The 6 storey Cedar Hall building to the right is barely visible. In winter the Cedar Hall apartment buildings are prominent although set well back from the road and filtered by the trees inside the boundary.	Low-Medium	In the foreground, a tree line inside the boundary wall is removed – apart from a large copper beech tree that overhangs the boundary wall (prominent in the summer view). The eight storey accent volume of Block A2 is a visible - though heavily filtered in winter, and largely screened in summer by the retained copper beech tree. The building presents its south elevation to the approaching street. It marks the new entrance to the site (in front of Tabor House). A belt of trees/woodland inside the boundary further down the street, buffers the rest of Block A from the street. While the composition of the view would be altered, the townscape character would not. Milltown Road would remain characterised by trees and higher density building typologies behind high walls. There would be no loss of visualamenity.	Low	Slight neutral
18	Milltown Road – Distant view	To the right, softened by boundary vegetation, is the Grove House apartment development, with Cedar Hall further down the street. To the left is the entrance to the Garrynure estate, and a small part of the upper floor of 'the Extension' (part of the complex of buildings on the site) can just be seen. Like View 17, the existing mixed to high density development that characterises the Milltown Road corridor reduces the sensitivity of the viewpoint.	Low-Medium	Block F is visible, protruding above the boundary walls and vegetation in the intervening landscape. The setback from the street (similar to the existing apartment buildings in the view), the stepped profile and variations in materials reduce the massing and the building's overall presence in the view. There would be a slight reinforcement of existing character, and no loss of visual amenity.	Low	Slight neutral

No	Viewpoint Location	Baseline View	Sensitivity	Proposed Change	Magnitude of Change	Significance of Effects
19	View representing Garrynure	South of the site beyond a parking area serving Gonzaga College, is Garrynure, a small estate of two storey houses. A row of houses faces the site, set back from the boundary behind an access road and a green strip with trees. In views from the front windows (1st floor only) part of the site is visible over the wall and through the trees, beyond the parking area. This viewpoint represents these views, although the trees in front of the houses (behind the View 19 camera position) provide additional screening. The existing site buildings can be seen (partly screened by trees), specifically a part of Milltown Park House and parts of the Finlay Wing and the Extension. To the right across Milltown Road, the Cedar Hall apartments are prominent.	Medium	The cluster of historic buildings would be replaced in the view by the new complex of apartment buildings. Block F is most prominent, presenting its narrow south elevation, with a stepped profile (due tothe setback of the top floor). Block D is visible in the distance to the left. Part of Block A is visible in the distance to the right. From this proximity (to Block F) ,the design and material quality of the building are appreciable. The development also benefits from the mature trees in its setting, and together the buildings and trees form an attractive composition, complementing Cedar Hall on the far side of Milltown Road.	Medium	Moderate positive

No	Viewpoint Location	Baseline View	Sensitivity	Proposed Change	Magnitude of Change	Significance of Effects
20	Milltown Park access road	The access road to Milltown Park passes the cluster of buildings in the southern part of the site. In this view from the access road, the red brick accommodation block (part of the Jesuit centre, external to the subject site) is to the left, and the Extension and a part of the Chapel are to the right (both part of the site). The foreground buildings enclose a green courtyard which is external to the site.	Medium	The Extension building would be replaced in the view by the five storey, red brick volume of Block F. Block F is set back further from the boundary than that of the Extension. This opens up more of the Chapel to view. A cluster of buildings would be visible within the site, framed by Block F and the accommodation block. These include the refurbished Chapel and parts of Blocks B, Cand D. The combination of open space and buildings from various eras creates a complex but interesting composition, of higher visual amenity than the existing view.	Medium	Moderate positive
21	Milltown Park – view from rear of accommoda -tion block	From the north side of the new Milltown Park accommodation building there is a view into the south west corner of the site (in winter; in summer the view is largely blocked by the tree in the foreground). The older, red brick accommodation building (external to the site) is to the right, and the houses at the end of Cherryfield Avenue Upper are to the left, framing the view into the site. A part of the Chapel roof is visible in the middle distance and in winter a part of Tabor House is visible.	Medium	In summer the majority of the development would be screened by the tree and existing buildings in the foreground. In winter, part of the development would be exposed, specifically Block D in the south west corner, stepping up from three storeys inside the boundary to five storeys further into the site where it would screen a part of Tabor House. A taller element of Block C wouldalso be visible beyond Block D, forming a coherent, stepped composition of built form. The change to the already complex composition would cause no reduction or improvement to visual amenity. However, the winter view in particular shows the responsiveness of the proposal to the context.	Medium	Moderate neutral
22	Albany Road distant view (approx. 350m)	The alignment of Albany Road frames a view east towards the site. The view along the road is framed by two storey red brick houses and a line of street trees to the left.	Medium	The top of Block A1 may just be discernible above the distant houses' roofline. There would be no effect on the character of the view, and no loss of visual amenity.	Negligible	Imperceptible neutral

Table 9.8: Assessment of Potential Visual Effects

9.5.2 Townscape Effects

9.5.2.1 Construction Phase

The construction process would entail the following:

- Set up site perimeter hoarding;
- Set up site construction compound, tree and biodiversity protection measures, internal transport routes;
- Demolition and site clearance;
- Excavation;
- Site services installations;
- Construction of new buildings, frames and envelopes;
- Interior fit-out of buildings;
- Exterior streetscape, landscaping and site boundary works.

During construction the site would be disturbed by the above activities and the incremental growth of the buildings, with indirect effects on the surrounding character areas (changes to their setting). The magnitude of change to the townscape in the immediate vicinity of the site would be medium-high (although temporary), and the effects would reduce with increased distance from site. Overall, the sensitivity of the townscape can be considered medium (refer to 9.5.1.2). Therefore, the effects on the townscape would be 'moderate' and negative in the immediate vicinity of the site, reducing in significance with distance from the site. The effects would be temporary.

9.5.2.2 Operational Phase

Townscape Sensitivity

There are several sensitive receptors (areas and elements/features of the townscape) in the receiving environment. These include:

- **Belmont Avenue ACA**;
- **Sandford Road, Clonskeagh Road, Eglinton Road and Cherryfield Avenue** Residential Conservation Areas;
- **Norwood Park**, a more recently developed estate enclosed by the site to the east and south, also zoned Residential Conservation area;
- **The protected structures in close proximity to the site**, including 132, 134, 136, 138 Sandford Road, and the western end of St James's Terrace on Clonskeagh Road;
- **The historic buildings on the site**;
- **The mature trees/woodland on the site**.

Balancing the area's sensitivities, there are also indications of capacity to accommodate change in the townscape, which are given heightened importance by compact growth policy. These characteristics include:

- **Milltown Road** character area. This corridor is characterised by (a) a wide variety of plot and building typologies, scale and architecture, with a high proportion of modern development including mid-high density residential developments, and (b) infill development on previously institutional lands. The site has a greater presence in the

Milltown Road character area than it does in the Sandford Road area.

- **Location at a key junction**. The junction of Sandford Road, Milltown Road, Clonskeagh Road and Eglington Road funnels traffic from three urban cores, i.e. Clonskeagh/UCD, Milltown and Donnybrook, towards the city centre via Ranelagh. The site occupies the most prominent of the four quadrants around the junction. Due to a number of factors, including the non-orthogonal configuration of the junction, the absence of buildings at the corner of the site, and the wall and trees along the site boundary, the junction does not manifest as a distinct 'place' in the townscape. Despite the large houses and trees around the junction it does not figure clearly in people's mental map of the area and does not contribute positively to legibility.

  The junction as a place, and the streets to which the site has frontage, warrant greater emphasis in the townscape – to give better definition to the junction locally, and to improve the legibility of the urban structure. This can be achieved only by built form on the site (the other quadrants around the junction all being already developed). However, the site's main landscape asset, the belt of trees inside the boundary, is a constraint to development that would seek to address the roads and junction. Any building in the corner must be set back behind the trees. It is only through substantial height that a building on the site will achieve the dual objective of place-making and legibility.

- **The historic buildings on the site**. As well as being a sensitivity, the historic buildings present an opportunity for creating positive tension and visual interest in the evolving townscape, through juxtaposition with contemporary buildings and spaces, and for giving identity to new development.

- **The mature trees/woodland on the site**. As well as being a sensitivity, the woodland belt (up to 40m wide in places) and tree lines inside the north and west boundaries constitute opportunities due to their screening effect. These trees also add character and amenity to the site itself as a residential land use resource.

Informed by the above, **the sensitivity of the receiving environment can be classified 'medium'** (definition: *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*).

Magnitude of Townscape Change

The magnitude of townscape change which would result from the proposed development can be classified 'medium' (definition: *Change that is moderate in extent, resulting in partial loss or alteration to key elements, features or characteristics of the 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*).

The proposed development is relatively large in spatial extent, and the buildings - at up to eight storeys - are relatively tall for the context. However, the photomontages show that (a) the retention of a large number of trees on the site, providing visual screening, and (b) the

considered positioning of the buildings, and the arrangement of height with respect to the most sensitive neighbouring properties, would moderate the effects on the townscape.

For example:

- There would be limited effect on Cherryfield Avenue to the west (Viewpoints 12 and 13), and even on Norwood Park (Viewpoints 10 and 11), which is enclosed by the site on two sides. (These are the most sensitive potentially affected residential receptors.)
- There would be negligible effect on much of the Sanford Road-Clonskeagh Road corridor (e.g. Viewpoints 1, 2, 4, 9). It is only from adjacent to the site (Viewpoint 3) that any significant effect would be experienced – and in that view the retained trees inside the northern boundary combined with the setback of Block A1 would avoid any negative effect.
- Viewpoint 8 (the junction of Eglinton Road and Sandford Road/Clonskeagh Road) shows that at this key junction, the development would be sufficiently exposed (in winter) to have positive, place-making effect.
- The photomontages representing the Milltown Road corridor (Viewpoints 14-19) show that the development would fit comfortably into the already mixed density character of that area.

Significance of Townscape Effects

Measuring the magnitude of change against the townscape sensitivity (refer to Table 9.3 above), **the significance of the effects is predicted to be 'moderate'** (definition: *An effect that alters the character of the environment in a manner that is consistent with existing and emerging baseline trends*).

Townscape change of some significance is unavoidable with the development of a large opportunity site, in a prominent position (at a key junction in the urban structure, with long frontage to two main thoroughfares), at the interface between two different character areas (one being characterised by low density development). Contemporary, high-density development that fits comfortably into the Milltown Road area will inevitably contrast with the Sandford Road area.

Such tensions in the townscape are increasingly common and are not undesirable in the evolving urban environment. There is an established, policy-driven trend of redevelopment of previous institutional lands in inner suburban areas. The access of these areas to public transport, neighbourhood centres and other urban amenities is too valuable not to exploit. The resulting change should therefore be viewed as neutral in principle, and if it can also deliver benefits additional to density, e.g. public open space, improved legibility, place identification or the introduction of buildings of high design and material quality, thereby adding to the character and visual interest of the townscape, its effects can be positive - even if it contrasts with some of the context development. It will not be possible to achieve high density in historically low density areas without such change in townscape character and the composition of views.

The GLVIA (Section 5.37) states: *"One of the more challenging issues is deciding whether the landscape effects should be categorised as positive or negative. It is also possible for effects to be neutral in their consequences for the landscape. An informed professional judgement should be made about this and the criteria used in reaching the judgement should be clearly stated. They might include, but should not be restricted to:*

- *the degree to which the proposal fits with existing character;*
- *the contribution to the landscape that the development may make in its own right, usually by virtue of good design, even if it is in contrast to existing character…"*

The proposed development is deliberately a departure from the existing character of (part of) its immediate environs. It is driven by the policy of compact growth, the purpose of which is to see the introduction of new buildings of larger scale to previously lower density urban contexts. The Building Height Guidelines, National Planning Framework and DCDP 2022-2028 recognise that such change needn't necessarily be (or be considered to be) negative. **Developments of scale, that cause change in the landscape character and the composition of views, can be designed with consideration of their context, so that their effects, while significant, are not unduly harmful to the receiving environment**.

Table 3 of Appendix 3 of the DCDP 2022-2028 provides a set of criteria which can be used in assessing schemes of high density, to evaluate whether they may be considered to be of high urban design and architectural quality, and would achieve positive placemaking. The proposed development is assessed against the DCDP 2022 criteria below to inform the classification of the proposal's landscape effects as positive, neutral or negative.

Performance Criteria	Assessment
1. To promote development with a sense of place and character… Enhanced density and scale should:	
• respect and/or complement existing and established surrounding urban structure, character and local context, scale and built and natural heritage and have regard to any development constraints,	**As a contemporary, high-density development adjacent to an historic, low density character area (along the Sandford Road- Clonskeagh Road corridor), the proposal diverts from the established character of *that* area**. **It fits more comfortably in the evolved character of Milltown Road, which already features developments such as Mount St Anne's, Grove House and Cedar Hall**. (The site has a longer boundary on Milltown Road and the main entrance is from that road. Therefore the development would have a greater presence and effect on Milltown Road than Sandford Road.) The divergence from the character of the Sandford Road area to the north and west is an unavoidable and *not undesirable* outcome of compact growth policy. Such change can be complementary to the existing urban structure and character. There are several aspects of the proposal that display respect/consideration of the context and the constraints in the area, including: - The (1) tree/woodland belt inside the north and east boundaries would be retained (albeit thinned out), along with (2) a line of mature trees inside the north boundary shared with Norwood Park, and (3) a line of trees inside the west boundary shared with Cherryfield Avenue. **These are important elements of the landscape, contributing to the area's leafy character**. **They also provide visual screening, and are valuable habitat features**. - Block A is positioned well back from the north and east boundaries, inside the retained tree/woodland belt – to (a) facilitate the trees' retention (in a new public park), and (b) benefit from the visual screening provided by the trees. - Block C is positioned well back from the northern boundary shared with Norwood Park – to (a) facilitate the retention of the tree line inside the boundary, and (b) benefit from the screening provided by the trees. The element of Block C facing/closest to Norwood Park is limited to 4/5 storeys. The height steps up away from Norwood Park, into the centre of the site. - Inside the west boundary, to the rear of the neighbouring houses on Cherryfield

	Avenue: (a) Block E is a row of two storey, flat roofed houses, positioned inside a 'biodiversity corridor' with a retained line of trees; (b) Block D is a small apartment building, three storeys at its western end, stepping up to five storeys (behind a deep setback) away from Cherryfield Avenue. The proposal responds to the surrounding sensitivities, while retaining the site's main vegetation features and using them the development's advantage – for visual screening, landscape/visual amenity, and habitat. The proposal also responds to certain opportunities: - The positioning of the accent volume of Block A1 would (subtly, due to the vegetation screening) mark the junction of Sandford Road/Clonskeagh Road and Milltown Road/Eglinton Road. This is a key junction in the urban structure, which currently lacks legibility. - The retention and repurposing of Tabor House and the Chapel as a community/cultural facility would improve their condition and expose them to view/use by a larger cohort of the community. - By positioning the main entrance in front of the retained Tabor House (refurbished for community/cultural use), with the entrance forecourt in front of it, the historic building is given prominence both as part of the development and in views from the public realm of Milltown Road. **The proposed development thus respects and seeks to complement the existing urban character and structure, and retains the most valued elements of built and natural heritage to the advantage of the development and the surrounding townscape**. 
• have a positive impact on the local community and environment and contribute to 'healthy placemaking',	The proposed development includes several 'placemaking' elements supporting physical and community health, including: - **The provision of a new public open space in the north east corner of the site, visible (through a new railing replacing part of the high boundary wall) and accessible to the local community**. The park includes a large number of retained trees, lawn areas with scattered trees, a playground, fitness areas, seating and picnic areas. It is traversed by a network of walkways, which can be accessed from within the site and from three entrances to the development (one on Sandford Road, one on Milltown

	Road and one at the corner). - By positioning the main entrance in front of the retained Tabor House, with the entrance forecourt in front of it, flanked by two new buildings, **the historic building and its cultural/ community use are given prominence both as part of the development and in views from Milltown Road**.
• create a distinctive design and add to and enhance the quality design of the area,	**By responding to specific elements, features and characteristics of the site and the context, the proposed design – in layout, arrangement of built form (height, massing, stepping) and open space, materials, landscaping and boundary treatments – is bespoke, distinctive, and appropriate to the site and context**. The CGIs and photomontages provide evidence of the high quality of design and materials. The net effect of the development would be to elevate the quality of the built environment locally.
• be appropriately located in highly accessible places of greater activity and land use intensity,	The site is in a highly accessible location, less than 3km by road from St Stephen's Green/Grafton Street, less than 1km from Ranelagh, 1.5km from Ballsbridge and 1km from the Richview entrance to UCD. It is thus favourably located for pedestrian and cycle access to the city. Additionally, Sandford Road and Milltown Road are served by Dublin Bus routes, and the Beechwood Luas stop is 1km from the site.
• have sufficient variety in scale and form and have an appropriate transition in scale to the boundaries of a site/adjacent development in an established area, • not be monolithic and should have a well considered design response that avoids long slab blocks,	**There is considerable variation in the height and massing of built form across the site in response to the character and conditions around the boundaries**. For example: - Inside the west boundary, to the rear of the neighbouring houses on Cherryfield Avenue, Block E is a row of two-storey, flat roofed houses. These provide a buffer/ transition in scale between Cherryfield Avenue and the taller buildings within the site. - Also inside the west boundary, Block D steps down from five to three storeys to the rear of the Cherryfield Avenue houses. Block D is also set back from the boundary behind a landscape buffer. - The tallest volumes (eight storeys) bookend Block A, to mark the site entrance on Milltown Road and the Sandford Road/Milltown Road junction. - There are seven storey volumes in Blocks B and C, centrally located in the site, well removed from the surrounding sensitive receptors. The variations in height between the buildings - and between the component volumes of buildings - are emphasised by variations in façade treatment and materials. This contributes to the avoidance of 'monolithic' appearance. 

	
• ensure that set back floors are appropriately scaled and designed.	Block D is three storeys at its western end, stepping up to five storeys within the site. The setback is particularly deep to ensure it is effective in protecting the neighbouring residential properties from excessive visual enclosure and other effects on residential amenities. There are other setbacks and steps in height in Blocks A, B, C and F, responding to surrounding sensitivities, ensuring daylight/sunlight access, and to articulate the built form. They are appropriately scaled and designed to achieve these objectives. 
2. To promote appropriate legibility… Enhanced density and scale should:	
• make a positive contribution to legibility in an area in a cohesive manner, • reflect and reinforce the role and function of streets and places and enhance permeability.	The proposed eight storey accent volumes at the northern and southern ends of Block A are intended to mark (1) the Sandford Road/Milltown Road junction, and (2) the main entrance to the site on Milltown Road. Due to the screening effect of the retained trees inside the north and east boundaries, the landmarking effect of the accent volume of Block A 1 would be limited – notable only in views from the junction itself (e.g. Viewpoint 8). The seven storey Block F (along with the accent volume of Block A2) would also have some place-making effect in the Milltown Road corridor (refer to the photomontages for Viewpoints 17, 18, 19). **The grid-like arrangement of built form and spaces/streets within the site is intended to promote permeability and integration of the development with the surrounding urban structure/grain**.

	Each space and street is designed to have a particular function and identity, whether for public or communal use, and for circulation or recreation. This is illustrated by the differences in design between the 'green boulevard' (between Blocks A2 and B) and the 'homezone/street' (between Blocks C and E) below. 
3. To provide appropriate continuity and enclosure of streets and spaces … Enhanced density and scale should:	
• enhance the urban design context for public spaces and key thoroughfares, • provide appropriate level of enclosure to streets and spaces, • provide adequate passive surveillance and sufficient doors, entrances and active uses to generate street-level activity, animation and visual interest.	The retention of the tree/woodland belt inside the north and east boundaries, and the setback of Block A1 to minimise its visual impact, is limiting of its potential urban-enclosure/definition function for Sandford Road and Milltown Road. **However, Block A would provide enclosure, high quality built frontage, and passive surveillance of the new public open space in the north east part of the site**. **A new plaza-type space would be provided inside the main entrance off Milltown Road, enclosed by Tabor House, Block A2 and Block F**. The position of this space in front of Tabor House and its activation by the community/cultural use in Tabor House and the Chapel and a café/restaurant in Block F, would result in (a) a high quality area of public realm on the site (in addition to the park), and (b) an 'event' (or node) along the Milltown Road corridor, enhancing the built environment locally.

• provide appropriate level of enclosure to streets and spaces, • not produce canyons of excessive scale and overbearing of streets and spaces, • generally be within a human scale and provide an appropriate street width to building height ratio of 1:1.5 – 1:3,	As a high density development, there would be a high degree of enclosure of the streets and spaces in places. **However, the built form is sufficiently modulated to avoid excessive enclosure and to ensure that sunlight reaches the ground plain and sky is visible**. The taller elements in the development (the 7-8 storey volumes of Block A and the seven storey volumes of Blocks B, C and F, are located adjacent to open spaces, providing an appropriate street width to building height ratio. 
4. To provide well connected, high quality and active public and communal spaces… Enhanced density and scale should:	
• integrate into and enhance the public realm and prioritises pedestrians, cyclists and public transport, • be appropriately scaled and distanced to provide appropriate enclosure/ exposure to public and communal spaces, particularly to residential courtyards, • provide for people friendly streets and spaces.	**The provision of a new public park at the corner of Sandford Road and Milltown Road, and entrances to the park from the streets - would integrate the development's open space network with the surrounding public realm**. The layout of the development is such that all of the residential buildings have physical and visual access/exposure to communal or public open space providing a range of active and passive recreation opportunities. The CGI views of the proposal provide evidence of a street and open space network of particularly high quality. 

Items 5-8 and 10 of the DCDP Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale are not directly relevant to landscape/townscape and visual amenity. The proposal is assessed against those criteria elsewhere in the application documents.	
5. To protect historic environments from insensitive development… Enhanced density and scale should:	
• not have an adverse impact on the character and setting of existing historic environments including Architectural Conservation Areas, Protected Structures and their curtilage and National Monuments… • assess potential impacts on key views and vistas related to the historic environment.	There are several protected structures in the receiving environment, including houses directly across Sandford Road (Nos. 132, 134, 136, 138) and Milltown Road (St James' Terrace) from the site. There is also an ACA (Belmont Avenue) which extends to some 40m from the site boundary. The development would take place in the townscape setting of these heritage assets. In all three cases (the Sandford Road houses, St James' Terrace and Belmont Avenue ACA), the proposed buildings would be separated from the heritage assets by (a) a busy urban thoroughfare, and (b) a belt of retained mature trees/woodland on the site. **The development would be visible from these buildings/areas (see Viewpoints 3, 4, 5, 8, 9), and as part of views *with* these buildings/areas, but - due to the separation distance and the buffering effect of the roads and vegetation - the development would not dominate or otherwise negatively affect them**. It would simply form a part of the evolving urban environment around them. Since the development itself would also be of high design and material quality, it would have no adverse effect on the setting of the protected structures or the ACA. The retained historic building on the site (Tabor House and the Chapel) would benefit from their repurposing for community/cultural use and their incorporation into a high quality new urban neighbourhood/environment.

Table 9.9: Assessment of proposal against DCDP 2022 Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale

In summary, based on the analysis of the proposal against the relevant criteria of Table 3 of Appendix 3 of the DCDP 2022, **the townscape effects of the proposed development can be classified as positive**.

9.5.3 The 'Do Nothing' Approach

The site would remain as a large area of formerly institutional land of parkland character within an urban area of mixed character, with no public access to the lands. In the current situation, as a component of the local green infrastructure network, the site provides some visual amenity and ecosystem services. However, in the context of compact growth, the site is considered an unsustainable use of the land resource and the public have never enjoyed any right of access to these privately owned lands.

9.6 Mitigation (Remedial/Reductive Measures)

9.6.1 Construction Phase

Apart from (a) the measures incorporated in the proposed design (see 9.6.2 below), (b) the measures for tree protection (as recommended in the Tree Protection Strategy prepared by CMK Horticulture & Arboriculture Ltd) and biodiversity protection (as recommended in Chapter 8), and (c) standard best practice construction site management (e.g. erection and maintenance of site hoarding, orderly storage of materials and vehicles, etc.), no additional mitigation measures are proposed for townscape and visual effects.

9.6.2 Operational Phase

The proposal has been subject to detailed environmental impact assessment, including of potential townscape and visual effects, throughout the design and pre-planning process – for the previous SHD and LRD applications and the current application. Informed by this assessment, the proposal has been designed to avoid causing any significant negative townscape and visual effects. Important mitigation measures built into the proposal from the outset include:

- The retention of the tree/ woodland belt inside the north and east boundaries as part of the scheme's main open space. (Not all of the trees would be retained, but most of the better quality trees – a sufficient volume to retain the tree belt as a feature of the landscape – would be retained.)

- The retention of tree lines inside the northern boundary (shared with Norwood Park), and the west boundary (Cherryfield Avenue).

These measures would (a) retain the site's 'parkland' character in views from Sandford Road and Milltown Park, (b) provide screening of the buildings, and (c) lend maturity, character and landscape/ visual amenity to the new neighbourhood.

- The positioning of Block A1 well back from Sandford Road and Milltown Road. This allowed for the tree/woodland belt to the retained, and limited the visual impact of the building on these roads and the houses across the roads.

- The positioning of Block C well back from the boundary shared with Norwood Park. This allowed for the retention of the tree line inside the boundary. This provided a visual buffer/ screen for the neighbouring estate. The height of the northern volume of Block C was limited to 4/5 storeys, as an additional measure to avoid excessive visual impact on the houses.

- The positioning of a row of two storey, flat-roofed houses (Block E) and a small apartment building of 3-5 storeys (Block D) inside the west boundary to the rear of the neighbouring houses on Cherryfield Avenue. These buildings provide a buffer/ transition in scale between Cherryfield Avenue and the taller buildings within the site. Both Blocks D and E are set back from the shared boundary with Cherryfield Avenue behind a 12m+ 'biodiversity corridor', which includes a row of retained trees and a large number of new trees for additional visual screening.

- The retention of Tabor House and the Chapel on the site. The dual intention was to (a) preserve these assets in the interest of cultural/ architectural heritage conservation, and (b) to lend maturity, character and landscape/ visual amenity to the new neighbourhood.

- High quality design and materials. The proposed scheme is conceived as a high density neighbourhood of the highest architectural and landscape quality, commensurate with the qualities of the context. Therefore, even when visible from the surroundings (as a higher density development unavoidably would be from some vantage points), the buildings and landscape would be attractive. The townscape character and views would change, but their quality would be maintained.

No further mitigation measures are recommended.

9.7 Predicted Impacts of the Proposed Development

9.7.1 Visual Effects

9.5.2.1 Construction Phase

The magnitude of change to views in the receiving environment would range from none and negligible to medium and would vary over time; therefore the significance of the effects would also vary – although they would typically be negative during construction. Such temporary negative visual effects are unavoidable and not unusual in the urban context where change is continuous.

9.5.2.2 Operational Phase

No mitigation measures have been recommended for visual effects (refer to 9.6.2 above). The residual effects are therefore the same as the potential effects described in Section 9.5.1, and summarised in Table 9.10 below.

No	Viewpoint Location	Sensitivity	Magnitude of Change	Significance & Quality of Visual Effects		
				Construction (Temporary)	Operation (Permanent)	Residual (Permanent)
1	Sandford Rd mid-distant view (approx. 200m)	Medium	Low	Not significant negative	Not significant neutral	Not significant neutral
2	Sandford Road – local view (approx. 65m)	Medium	None	No effect	No effect	No effect
3	Sandford Road opposite site	Medium-High	Medium	Slight negative	Moderate positive	Moderate positive
4	Belmont Ave approaching Sandford Road	Medium	Low	Not significant negative	Slight neutral	Slight neutral
5	Belmont Avenue distant view (inside ACA)	Medium-High	Low	Not significant negative	Slight neutral	Slight neutral
6	Eglinton Road distant view (230m)	Medium-High	Negligible	Not significant negative	Not significant neutral	Not significant neutral
7	Eglinton Road mid-distant view (115m)	Medium-High	Negligible	Not significant neutral	Not significant neutral	Not significant neutral
8	Junction of Eglinton Road and Clonskeagh Road	Medium	Medium	Slight negative	Moderate positive	Moderate positive
9	Clonskeagh Road mid-distant view (110m)	Medium-High	Negligible	Not significant negative	Not significant neutral	Not significant neutral
10	Norwood Park – view south	Medium-High	Low-Medium	Slight negative	Moderate neutral	Moderate neutral
11	Norwood Park – view east	Medium-High	Low-Medium	Slight negative	Moderate neutral	Moderate neutral

12	Cherryfield Avenue Lower	Medium-High	None	No effect	No effect	No effect
13	Cherryfield Avenue Upper	Medium	Low	Slight negative	Slight neutral	Slight neutral
14	Milltown Road opposite site	Medium	Low	Not significant negative	Slight neutral	Slight neutral
15	Mount Sandford entrance – view west	Medium	Medium	Slight negative	Moderate neutral	Moderate neutral
16	Mount Sandford entrance – view north west	Medium	Low	Slight negative	Slight neutral	Slight neutral
17	Milltown Road footpath alongside site	Low-Medium	Low	Not significant negative	Slight neutral	Slight neutral
18	Milltown Road – Distant view	Low-Medium	Low	Slight negative	Slight neutral	Slight neutral
19	View representing Garrynure	Medium	Medium	Slight negative	Moderate positive	Moderate positive
20	Milltown Park access road	Medium	Medium	Slight negative	Moderate positive	Moderate positive
21	Milltown Park – from rear of accommodation block	Medium	Medium	Slight negative	Moderate neutral	Moderate neutral
22	Albany Road distant view (approx. 350m)	Medium	Negligible	Imperceptible neutral	Imperceptible neutral	Imperceptible neutral

Table 9.10: Predicted residual visual effects

The most notable results of the visual effects assessment are as follows:

- **Limited, neutral or positive visual effect on the Sandford Road corridor**. The only elements of the proposed development that would be visible from Sandford Road, Belmont Avenue, Eglinton Road and Clonskeagh Road, are Block A1 and the changes to the boundary wall along Sandford Road (replacing part of the cement render and stone wall with a low wall and railing). In most views (e.g. Viewpoints 1, 4, 5, 6, 7, 9), Block A1 would protrude only marginally above the tree line on the site (or not at all, e.g. Viewpoint 2), with no significant effect on the character or quality of the view. In the two views closer to the site (Viewpoints 3, 8), Block A1 (only) would be more exposed to view, and it would combine with the retained trees in the new public park (visible through the new boundary railings), to form an attractive composition. In neither case would there be any negative visual effect.

- **Limited effects, and no negative effects, on the setting and views of protected structures**. The protected structures closest to the site are the houses across Sandford Road to the north and St James's Terrace across Milltown Road to the east. The proposed Block A1 is separated from these houses by some 60 m or more, and there are wide, busy streets and the retained mature trees in the park on the site between them. Therefore, despite the relative height of Block A1, it would have limited, and no negative, effect on the setting or views of or from these protected structures (refer to the photomontages for Viewpoints 3, 4, 8 and 14).

- **Limited visual effects on Cherryfield Avenue (Residential Conservation zoned-area)**. The reduction in height of the proposed buildings towards the western site boundary limits the extent to which the proposed development would intrude in views from Cherryfield Avenue and the houses on the east side of the street, which back onto the site. While these houses would experience change in their views, the residual views would be similar to those of the majority of the houses in the area, which are typically arranged back-to-back with other houses.

- **Moderate but neutral visual effects on Norwood Park**. The retention of the trees inside the boundary shared with Norwood Park, the positioning of Blocks C and A1 well back from the boundary, and the limited height of the elements of these buildings nearest to the boundary, would mitigate the visual effects on Norwood Park. The buildings would be visible (from the street – see Viewpoints 10, 11 - and from the rear windows and gardens of the houses), but overbearance would be avoided.

- **Limited, neutral or positive effects on Milltown Road and adjacent properties/ developments**. Due to the retention of mature trees inside the east boundary and the setting back of Block A behind the wide open space, the development would have limited effect on views from Milltown Road or the properties across the road (e.g. Viewpoints 14-19). Where the buildings would be visible (Viewpoints 15, 18, 19) they would make a positive contribution to the visual amenity of the already urban townscape corridor of Milltown Road.

9.7.2 Townscape Effects

No mitigation measures have been recommended for townscape effects. The residual effects are the same as the potential impacts described in Section 9.5.2 above.

9.7.2.1 Construction Phase

The magnitude of townscape change in the immediate vicinity of the site would be medium. The effects would reduce with increased distance from site. While there are variations in character and sensitivity in the area, overall, the sensitivity of the townscape can be considered medium (refer to 9.5.2.2). Therefore, the effects on the townscape would be 'moderate' and negative in the immediate vicinity of the site (most notably affecting Norwood Park and parts of Cherryfield Avenue), reducing in significance with distance from the site. These effects would be temporary.

9.7.2.2 Operational Phase

Measuring the magnitude of proposed change against the sensitivity of the receiving environment (refer to 9.5.2.2), **the significance of the townscape effects is predicted to be 'moderate'** (definition: *An effect that alters the character of the environment in a manner that is consistent with existing and emerging baseline trends*).

Townscape change of some significance is unavoidable with the development of a large opportunity site in a prominent position (at a junction, with frontage to two main thoroughfares), at the interface between two different character areas (one being characterised by low density development). Contemporary, high density development that fits comfortably into the Milltown Road area will inevitably contrast with the Sandford Road area.

Such tensions are increasingly common in the city as former institutional lands are redeveloped for high density residential use. This is not undesirable in the 21st century city, evolving in response to the sustainable development imperative and compact growth policy. The access of urban/suburban, previously private institutional properties to public transport, neighbourhood centres, places of employment and education, public open space and other urban amenities is too valuable not to exploit. The resulting change should therefore be viewed as neutral in principle. **If a proposed development is responsive to the sensitivities in the receiving environment, and if it can also deliver townscape gains/ benefits (additional to sustainable land use/ density) then its effects can be positive - even if it contrasts with some of the context development**.

The assessment has found that the proposed development would achieve significant townscape benefits, including the provision of high quality new public open space for the future residents and the wider community, and place identification and improved legibility. **Importantly, the development would retain the site's main natural and cultural/ architectural heritage assets, i.e. the woodland belt, Tabor House and The Chapel, incorporating these as features/ focal points of the new neighbourhood**.

Additionally, in its arrangement of built form and height the proposal demonstrates consideration of the sensitivities in the receiving environment, specifically the neighbouring residential streets and nearby protected structures. The complete avoidance of juxtaposition of building typologies and scale is not possible when high density development is introduced to historically low density areas. However, considering the context, such juxtaposition (excessively pronounced or abrupt transitions in scale) has been minimised. Only at the site interface with Norwood Park, and between Cherryfield Avenue and Block D would there be any significant difference in typology and scale across the boundary. Here, the potential negative effects are minimised by (a) the setback of the buildings from the boundary, (b) steps down in height towards the boundary, and (c) the retention and supplementation of existing trees inside the boundary (forming a landscape bufferbetween the new buildings and the neighbouring houses.

In summary, considering the sensitivities and opportunities in the receiving environment, the degree of compliance with relevant planning policy (see Table 9.9) and the considered design of proposed development (including the embedded mitigation measures), the townscape effects are predicted to be positive.

9.8 Monitoring

The retention of existing trees on site is an important element of the proposal. Any unplanned loss of trees beyond that considered and designed for in the application could result in negative townscape and visual impacts.

The planning application is accompanied by a Tree Protection Strategy prepared by CMK Horticulture & Arboriculture Ltd., which includes the requirement for (a) a Site Arborist to be appointed for the project, (b) the monitoring of tree protection measures by the Site Arborist throughout construction, (c) supervision by the Site Arborist of all works in the vicinity of trees, and (d) the specification by the Site Arborist of remedial works in the event of any damage to trees. The strategy also requires a re-survey of the retained trees post construction to ensure their survival in optimum condition.

9.9 Cumulative Impacts

There are several recently permitted developments and proposed developments currently in the planning process, for a range of development types including high density residential schemes, in the vicinity of the site. These are listed in Table 9.11 below.

None of these permitted or proposed developments is (a) so close to the subject site, and/or (b) of such large scale that they could interact with the proposed development to result in townscape or visual impacts of *greater significance* than those predicted in Section 9.7 above. (There would be some cumulative townscape effect – see comment on the Eglinton Road SHD scheme and Jefferson House redevelopment below - but this would not change the significance or quality classifications in 9.7.1.2.)

The Eglinton Road SHD scheme (PL29S.307267), now built and operational, is the largest of the permitted developments in the site vicinity. This development is located at the opposite end of Eglinton Road from the site. It comprised the demolition of houses at Nos. 1, 3, 5, 7, 9 and 11 Eglinton Road and their replacement by an apartment building of up to 13 No. storeys. Across Eglinton Road from this development is Jefferson House, a 20th century office building. Planning permission (Reg. Ref. 3386/22) has been granted for the redevelopment of this site, and the replacement of the office building with a 12 No. storey apartment building. Together, these two developments will create a gateway (expressed in built form and height) to Donnybrook (and the city centre) on the Stillorgan Road, transforming the townscape character and views locally, affecting Eglinton Road. These are examples of the change taking place in the site vicinity.

The Eglinton Road and Jefferson House schemes could not be seen along with the proposed development in any one of view (being at opposite ends of Eglinton Road, which has a curved alignment) and some 600 m apart. However, they would jointly contribute to a shift in townscape character experienced by the residents and users of Eglinton Road.

This is an example of how the proposed development *would* interact with other proposed developments, permitted developments and the already constructed higher density developments in the area (e.g. Cedar Hall, Grove House, etc.) to result in a general shift in townscape character - towards a more urban, mixed density condition. This change is the result of compact growth policy, and it is not a negative change. While the introduction of higher density development will unavoidably cause a change in character and the composition of views, low density housing will remain the predominant development typology in the site vicinity.

Reg. Ref.	Address	Summary of Development	Decision	Status
DCC Reg. Ref. 3937/23 (amended under DCC Reg. Ref. WEB2142/24)	RDS, Dublin 4	The demolition of the existing Anglesea Stand and Anglesea Terrace structure and the provision of to a new grandstand (6,775 person capacity), a 2 level (storey) hospitality and services building (Pocket Building), a club shop and substation (overall 8,892 sq.m). Amendment: minor alterations to the internal arrangement; alterations to the external elevations to include an increase in the overall height to c.24.04m (c.2.74m increase); increase in total capacity of stand to 6,844 (69 no. additional spectators).	**Final Grant**: DCC Granted Permission on 14th September 2023 (Amendment: DCC Granted Permission on 16th December 2024)	Under Construction
DCC Reg. Ref. 3307/24	RDS, Dublin 4	The relocation of players' changing rooms and facilities from the existing Anglesea stand to the south stand, also known as the Grandstand. The proposal will comprise partial removal and replacement of the stand scaffold to allow for the insertion and construction of a single-storey structure (gross floor area 439 sq m).	**Final Grant**: DCC Granted Permission on 30th May 2024	Commencement Notice issued, no compliance submissions made.
DCC Reg. Ref. 3386/22	The Eglinton, (formerly Jefferson House), No. 2 Eglinton Road, Donnybrook, Dublin 4	The development will consist of the demolition of the existing 5-storey office/residential building on site (the total area for demolition is 2,910 sq.m.) and the construction of a new residential scheme on 11 floors at a height of 42.1m above ground level over an existing and extended basement. The residential development will comprise 20 no. 3-bed units all with winter gardens, communal roof garden and winter garden, terraces at fifth and seventh floors, residential amenity space at ground floor including meeting room, concierge and gym.	**Final Grant**: DCC Granted Permission on 17th August 2022	Not commenced.
DCC Reg. Ref. WEB5434/25	Former Donnybrook Laundry at The Crescent, Donnybrook, Dublin 4	The provision of 38 No. residential units comprising the refurbishment of the existing laundry building to provide 4 no. units (2 no. duplex units and 2 no. houses) and the construction of 3 no. new blocks ranging in height from 3-6 storeys to provide 34 no. units comprising (31 no. apartments & 3 no. houses).	**Status:** Pending Decision	N/A - Live Application

DCC Reg. Ref. WEB5106/25	Junction of Donnybrook Road and Brookvale Road, Donnybrook, Dublin 4, D04K3T8	The demolition of existing buildings and structures on site and the construction of a 143 No. aparthotel development with a restaurant/ take-away unit and a café/retail unit provided within a 7 No. storey building.	**Status:** Live Application (submitted to DCC on 25th November 2025)	N/A - Live Application
DCC Reg. Ref. 2843/21 **ABP Reg. Ref. ABP-311692-21**	The Royal Hospital Donnybrook, Morehampton Road, Donnybrook, Dublin 4, D04 HX40	Construction of Donnybrook Primary Care Centre comprising 4 No. storeys over basement level accommodating HSE medical diagnostics, consulting and treatment rooms plus ancillary offices	**Final Grant:** ACP Granted Permission on 22nd December 2021	Not Commenced
DCC Reg. Ref. 2477/21	No. 47 Ranelagh Road, Ranelagh, Dublin 6	The demolition of a single storey rear return and provision of 2 No. residential units; and the provision of a new part 2 to part 4 No. storey structure to the rear of the site accommodating 10 No. residential units.	**Final Grant:** DCC Granted Permission on 19th January 2022	Not Commenced
DCC Reg. Ref. 4115/21 (ACP Ref. ABP-313048-22) **(Amended under DCC Reg. Ref. WEB2775/24)**	11C and 9/14 Milltown Road, Milltown, Dublin 6	The proposed development will consist of the following: Demolition of the existing buildings on site, with a total combined gross floor area (GFA) of 1,739 sq.m; Construction of a Build-to-Rent (BTR) residential development, comprising 97 No. BTR apartments with a mix of 48 No. 1 bed units and 49 No. 2 bed units in 3 No. blocks of part 3, part 4, part 5 and part 6 storeys in height, over basement level, including resident support and amenity facilities. The total GFA, including the basement level, of the proposed development is 9,216 sq m. (Amendment Application: alter the permitted development from a Build to Rent apartment scheme to a standard apartment scheme with no change in units proposed)	**Final Grant**: ACP Granted Permission on 26th July 2023 (Amendment: Granted by DCC on 28th July 2025)	Not Commenced

DCC Reg. Ref. 3116/22	The Jesuit House of Studies, Milltown Road, Dublin 6	Planning permission for the development will consist of the construction of a two-storey archive storage and office building with c.765 sq m of combined floorspace provided including the following: (i) a reception area, an oratory, an archive storage room, research reading room, offices, storage rooms, staff canteen, toilets, shower, passenger lift, audio room and ancillary space; (ii) rooflights, photovoltaic panels and lift over-run at roof level; (iii) 9 No. parallel car parking bays along the existing roadway with the existing fence relocated to the site boundary and 15 No. new cycle parking spaces; (iv) residual car parking, hard and soft landscaping, heat pump and all associated site development works.	**Final Grant**: DCC Granted Permission on 30th June 2022	Not Commenced
DCC Reg. Ref. 4578/22 (ACP Ref. PL29S.322089)	'Dunelm', Rydalmount, Milltown Road, Dublin 6	The demolition of the existing building and structures on site and the construction of a 63 No. unit Build-to-Rent scheme within 2 No. blocks ranging between 4 No. storeys and 8 No. storeys in height.	**Status**: ACP Granted Permission 18th January 2024. Decision quashed by Order of the High Court and is remitted to ACP under new case number ACP Ref. PL29S.322089. Still awaiting decision at the time of writing.	N/A - Live Application
DCC Reg. Ref. WEBLRD6063/25-S3 (ACP Ref. LH29S.323142)	Former Paper Mills site and adjoining properties Clonskeagh Road, Dublin 6	The construction of a purpose-built student accommodation (439 No. bedspaces) and residential development (16 No. apartments) in 5 no. blocks ranging from part 1 to part 7 no. storeys in height above a lower ground level, and extension and renovation of 14 no. existing residential dwellings at Clonskeagh Road.	**Status**: ACP Granted Permission 12th November 2025	Not Commenced
DCC Reg. Ref. WEB2190/24	Gonzaga College, Sandford Road,	The development will consist of: the internal reconfiguration and full renovation of an existing 2 storey science block (c. 830 sq m) and the construction of a new 3 storey extension with a	**Final Grant**: DCC Granted Permission on 21st January	Not Commenced

	Dublin 6, D06 KF95	rooftop observatory (c. 1,431 sq m) located to the north-east of the college. The extension will connect to the existing 2 storey science building to the south via a double-height atrium and to the existing Sandford Grove House (educational use) to the west via a new glazed walkway at second floor level.	2025	
DCC Reg. Ref. 4283/24	Rear of 50 Sandford Road, Ranelagh, Dublin 6	Permission is being sought for development a protected structure, comprising construction of a 72 sqm one bed two storey mews with access onto Marlborough Lane, Dublin 4, and all associated services and site works	**Final Grant**: DCC Granted Permission on 16th December 2024	Not Commenced
DCC Reg. Ref. 3011/24 (ACP Ref. ABP-320695-24)	No. 79, Sandford Road, Dublin 6, D06 CK83	Demolition of 169 sq.m of existing commercial buildings and construction of 6 two-storey (plus attic) townhouses.	**Final Grant**: ACP Granted Permission on 23rd July 2025.	Compliance submissions made
DCC Reg. Ref. LRD6003/22-S3 (ACP Ref. ABP-315488-23) **(Live Amendment Application No. 1: DCC Reg. Ref. WEBLRD6081/25-S3)** **(Live Amendment Application No. 2: DCC Reg. Ref. WEBLRD6092/25-S3)**	A site which previously formed part of the overall RTÉ Campus at Montrose, Donnybrook, Dublin 4	Demolition of the existing structures and construction of a 608 No. apartment scheme and creche, all within 9 No. blocks ranging in height between 2 No. storeys and 10 No. storeys. (Amendment Application No. 1: The amendments proposed will reduce the total number of permitted residential units by 98, resulting in an overall total of 510 no apartment units now proposed. The revised residential mix will comprise 8 no. Studios; 125 no. 1-beds, 326 no. 2-beds and 51 no. 3-bed apartments. It is also proposed to omit Condition Nos. 7 & 8 to remove the Build-to-Rent aspect of the development) (Amendment Application No. 2: the change of use from the permitted restaurant/café and retail use to a wellness facility and café/retail use and the provision of a new single storey swimming pool building)	**Final Grant**: DCC Granted Permission on 12th July 2023	Not commenced
DCC Reg. Ref. WEB2320/25 (ACP Ref. ACP-323451-25)	No. 14 Morehampton Lane, Donnybrook,	The demolition of the existing single-storey garage and the construction of a new three-storey mews dwelling.	**Notification of Decision**: DCC decided to Grant Permission on 1st	Live Application

	Dublin 4, D04Y6W0		August 2025 **Status**: Pending Decision from ACP	
DCC Reg. Ref. 4437/23	No. 4 Chelmsford Close, Ranelagh, Dublin 6, D06XW20	The development will consist of the construction of a new 2 No. storey 2-bedroom house with study to the side of existing dwelling.	**Final Grant**: DCC Granted Permission on 11th December 2023	Commencement Notice issued & Compliance submissions made.
DCC Reg. Ref. 3129/21 (ACP Ref. ABP-314166-22)	Errigal House, Eglington Court, Eglington Road, Dublin 4	The development will consist of alterations to an apartment block known as Errigal House which will increase the quantum of residential units from 20 No. apartments to a total of 28 No. apartments and will result in the provision of a five-storey apartment building.	**Final Grant**: ACP Granted Permission on 8th December 2023	Not commenced.
DCC Reg. Ref. 4093/23 (ACP Ref. ABP-318615-23)	No. 66 Eglington Road, Donnybrook, Dublin 4, D04P2X9	Demolition of existing garage and the construction of a single storey dwelling to the rear of the existing dwelling.	**Final Grant**: DCC Granted Permission on 10th July 2024	Not commenced.
DCC Reg. Ref. 3854/21 (ACP Ref. ABP-313312-22)	Woods Way to the rear of No. 20 Mount Eden Road, Donnybrook, Dublin 4	Demolition of the existing workshop/shed and boundary wall to Woods Way and the construction of a 2 No. storey 2-bedroom terraced mews dwelling.	**Final Grant**: ACP Granted Permission on 14th September 2023	Not commenced.

Table 9.11: Cumulative developments

9.10 Interactions

9.10.2 Biodiversity (see Chapter 8 of this EIAR)

The proposed open space within the site will provide amenity areas for residents, including play areas, fitness areas and benches. This will involve thinning of trees within the woodland, which, without mitigation to protect the wildlife, could impact on wildlife in the area for which the woodland provides cover and foraging ground.

It is proposed to remove 252 No. and retain 135 No. of the 387 No. trees identified on the site, to facilitate the development (and/or due to their current poor condition). The strategy is to retain as many as possible of the Category A and B trees (better quality specimens) and remove Category U and C (low quality) trees where necessary to accommodate the development, and also to thin the overly dense woodland areas for healthier growth of the retained trees and enable the use of these areas as open space.

As part of the development, 230 No. new trees and large shrubs are proposed to be planted. Given that these specimens would all be in better condition than the majority of the 252 No. trees to be removed, and that the 135 No. retained trees would mostly be in better condition than they currently are (due to the thinning of the woodland and the maintenance of each retained specimen), there would be a similar quantity, and a net improvement in quality, of tree cover on the site as a result of the development. The planting of native shrubs will enhance the understory in the woodland as it presently is dominated by non-native shrub species, and the species selected will also ensure that the area along the perimeter is largely inaccessible to the public, maintaining a commuting/foraging corridor for species that may be using the woodland habitat.

Overall, these measures will provide a habitat for wildlife to safely commute around the wilder margins of the Site and will also provide nesting/feeding opportunity for birds. Therefore, the interactions between biodiversity and landscape are considered to be long-term, slight and neutral.

9.10.3 Population and Human Health (Chapter 5 of this EIAR) / Wind (Chapter 17 of this EIAR)

The proposed development would introduce a new, high density residential neighbourhood to the townscape, making more sustainable use of the valuable urban land resource. The proposal includes a substantial area of communal and public open space, most notably a new public park (including a playground and a network of footpaths) inside the site boundaries along Sandford Road and Milltown Road. The park would be visible and accessible from the public realm around the site, representing a significant gain in public open space - with long-term, positive and significant impacts on the health of the existing population and the new resident community. Additionally, in its arrangement of built form and height the proposal demonstrates consideration of the sensitivities in the receiving environment, specifically the neighbouring residential streets and nearby protected structures.

The interactions between the proposed development and its environs and human health have been evaluated within the Wind Assessment. The modelling has included the proposed design, the proposed landscaping strategy and the existing landscape which will remain, in conjunction with the existing buildings surrounding the development. The combination of all interactions has resulted in a comfortable environment for pedestrians within the proposed development, and the interaction between population/human health, landscape and wind

will be long-term, neutral and imperceptible.

9.10.4 Architectural Heritage (Chapter 7 of this EIAR)

The proposed development would retain Tabor House and the Chapel - the two most valuable existing architectural features of the site - as part of the cluster of buildings. Their condition, and the character and condition of their setting would be improved by the development, with both buildings opened up to view from Milltown Road.

As a remnant of the Milltown Park demesne, the woodland belt inside the Sandford Road and Milltown Road boundaries ,and the stone wall on the Milltown Road boundary, are also cultural heritage features. While the proposed development includes the removal of a large number of trees from the woodland belt, the majority of specimens in good condition would be retained (and supplemented by new planting) - so that the woodland belt remains as a distinct landscape feature of the site.

The boundary wall along Milltown Road is also a remnant of the former demesne. This section of the wall would be retained. Along Sandford Road, where the wall has already been modified (and therefore is of lesser heritage value), the wall would be replaced by a low wall and railing - allowing greater public appreciation of the woodland as a landscape/ cultural heritage feature. The impact of the interaction between architectural heritage and landscape is considered to be long-term, moderate and positive.

9.11 Difficulties Encountered in Preparation of the Chapter

No difficulties were encountered in the preparation of the Landscape and Visual Impact Assessment chapter.

9.12 References

1. Dublin City Development Plan 2022-2028, Dublin City Council;
2. Guidelines for Landscape and Visual Impact Assessment, 3rd edition (2013), Landscape Institute and Institute of Environmental Management and Assessment.
3. Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment, 2018, published by the Department of Housing, Planning and Local Government.
4. Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (2022), Environmental Protection Agency.
5. Photography and Photomontage in Landscape and Visual Impact Assessment (2011), Landscape Institute.
6. Townscape Character Assessment, Technical Information Note 05/2017 (2017), Landscape Institute.
7. Urban Design Manual – A Best Practice Guide (2009), Department of Environment, Heritage and Local Government.
8. Urban Development and Building Height Guidelines for Planning Authorities (2018), Department of Housing, Planning and Local Government.