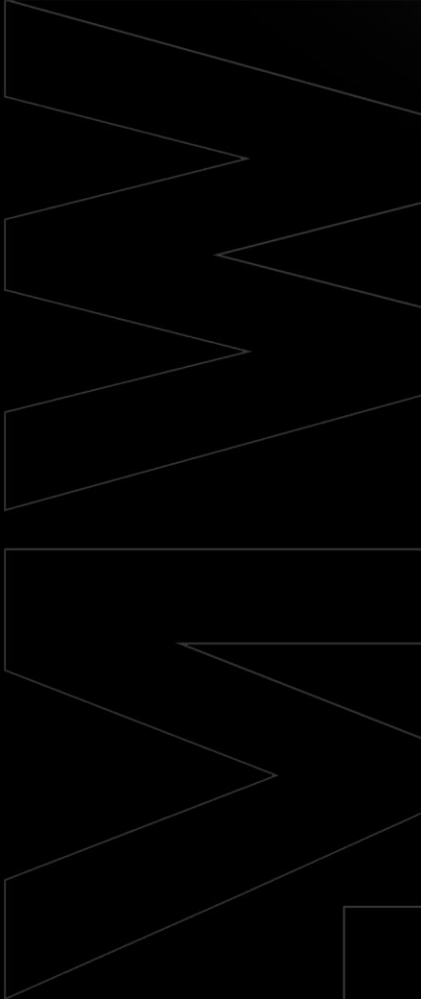


Townscape and Visual Impact Assessment

Proposed Strategic Housing Development, Former Blakes and Esmonde Motors Site, Lower Kilmacud Road and The Hill, Stillorgan, Co. Dublin

Prepared by Model Works Ltd for
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Contents

1.0	Introduction	1
1.1	Methodology	1
2.0	The Receiving Environment	1
2.1	The Site	1
2.1.1	<i>Site Planning History</i>	3
2.2	Key Townscape Elements and Character Areas of the Receiving Environment	7
2.2.1	<i>Stillorgan District Centre</i>	7
2.2.2	<i>Surrounding Residential Neighbourhoods</i>	10
2.2.3	<i>The N11/Stillorgan Road Corridor</i>	10
3.0	Relevant Policy	15
3.1	Dun Laoghaire Rathdown County Development Plan 2016-2022	15
3.2	Stillorgan Local Area Plan 2018-2024	16
3.2.1	<i>Building Height and Visual Impact</i>	16
3.2.2	<i>Public Realm Objectives</i>	17
3.2.3	<i>Site Specific Objectives - Blakes/Esmonde Motors</i>	17
3.2.4	<i>Key Development Sites Objectives</i>	17
3.3	National Planning Framework	17
3.4	Urban Development & Building Height Guidelines (2018, updated 2020)	18
4.0	Proposed Development	19
4.1	Arrangement of Built Form and Open Space	19
4.2	Building Height	20
4.2.1	<i>Lower Kilmacud Road</i>	20
4.2.2	<i>The Hill</i>	21
4.2.3	<i>The N11</i>	22
4.3	Façade Treatment and Materials	23
4.3	Landscape/Public Realm Proposals	23
5.0	Townscape Impact Assessment	25
5.1	Townscape Sensitivity	25
5.2	Magnitude of Townscape Change	26
5.3	Significance of Townscape Effects	28
6.0	Assessment of Visual Effects	28
7.0	Conclusions	40
7.1	Townscape Effects	40
7.2	Visual Effects	41

1.0 Introduction

This report discusses the potential townscape and visual impacts of a proposed Strategic Housing Development (SHD) on the former 'Blakes & Esmonde Motors' site in Stillorgan, Co Dublin.

1.1 Methodology

The townscape and visual impact assessment (TVIA) was carried out with reference to the Landscape Institute *Guidelines for Landscape and Visual Impact Assessment 2013 (GLVIA)*, the Institute's Information Note *Townscape Character Assessment 2017*, and the EPA draft *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports 2017*. The assessment methodology including explanation of the criteria and terms used is provided in Appendix 1. The assessment was carried out by Richard Butler MILI MIPI of Model Works Ltd.

The European Landscape Convention defines landscape as *"an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors"*. The word 'townscape' is used in urban/built-up areas. GLVIA requires that the effects on views and visual amenity be assessed separately from the effects on the townscape, although the topics are linked:

- Townscape results from the interplay between the physical, natural and cultural components of our environment. Different combinations of these elements create variations in landscape/townscape character. Townscape impact assessment is concerned with the effects of a proposed development on the *character and value of the townscape as an environmental, cultural and economic resource*. The potential townscape impact of the proposed development is assessed in Chapter 5.
- Visual impact assessment is concerned with changes that arise in the composition of available views, the response of people to those changes and the overall effects on the area's visual amenity. The potential effects on 23 no. viewpoints in the receiving environment are assessed in Chapter 6, informed by verified photomontages (provided under separate cover).

2.0 The Receiving Environment

2.1 The Site

The site is located in Stillorgan district centre. It is a brownfield land parcel of approximately 1.4ha, roughly triangular in shape. It is known locally as the 'Blakes (restaurant) & Esmonde Motors' site, referencing its former uses.

The site includes a land parcel owned by Dun Laoghaire Rathdown County Council (DLRCC) at the corner between Stillorgan Road (the N11) and Lower Kilmacud Road.

Planning permission has twice previously been granted for the site's redevelopment (see 2.2.1 below) and there are no longer any buildings on the site.

Figure 1: Proposed development site



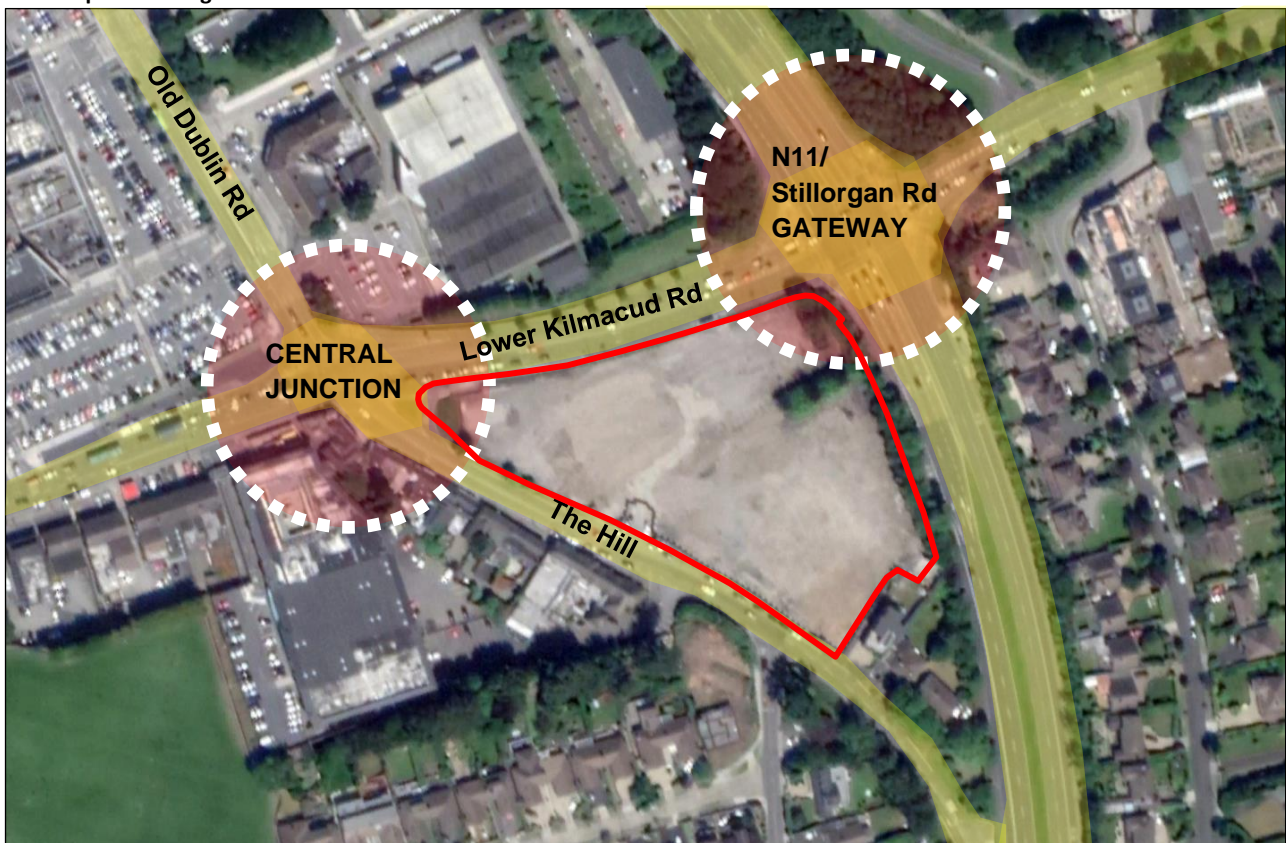
The site is surrounded on three sides by roads:

- To the north it has frontage to Lower Kilmacud Road. This is the main thoroughfare serving Stillorgan district centre, and the entrance to the centre from the N11. Until recently the character of Lower Kilmacud Road as it entered/exited the district centre (i.e. the stretch passing by the site) was that of a dual carriageway, with no buildings fronting the road on either side. Development has now begun on the north side of the road (opposite the site) on the former Leisureplex site (see Figures 6 and 7 below), initiating the road's transformation into an urban streetscape.
- To the east the site has frontage to the N11 (Stillorgan Road). This is one of the main road arteries serving the Dublin metropolitan area – a six lane dual carriageway connecting the city centre to the southern half of the metropolitan area extending as far as Bray. Stillorgan is one of the designated urban centres along the N11, and the site has the potential to announce and define the character of Stillorgan district centre in the Stillorgan Road corridor.
- To the south west the site has frontage to the Hill. This is a two lane road lined (across the road from the site) by mostly small scale commercial premises in converted one- and two storey houses. The Hill is at the edge of the retail core of Stillorgan district centre.

The north west corner of the site faces the junction of Lower Kilmacud Road, the Hill and Old Dublin Road. This is the centre of Stillorgan district centre. The north east corner faces the junction of Lower Kilmacud Road and the N11. This is the gateway to Stillorgan from the N11.

The site thus has frontage to three important roads, the central junction and the gateway junction to Stillorgan district centre. The site forms a large part of the district centre, and defines the eastern edge of the centre against the N11. Its potential contribution to the planned re-structuring and re-imaging of the Stillorgan townscape is very significant. The site's importance and potential are reflected in its identification as a Key Development Site in the Stillorgan Local Area Plan 2018-2024 (the LAP).

Figure 2: Aerial view showing the site context, and its frontage to three important roads and two key junctions in the evolving townscape of Stillorgan



As well as showing the site's strategic position in the Stillorgan townscape, the aerial photograph (Figure 2) shows the dominance of road infrastructure in the area. There are vast areas dedicated to vehicular traffic and parking and, currently, the built form is secondary to the road infrastructure in defining the townscape character.

This was recognised during the making of the LAP. The Strategic Environmental Assessment Screening Report (Appendix II of the LAP) states: "The area is traversed by a heavily trafficked road network and dominated by a major traffic node at the junction of the Kilmacud Road Lower, Old Dublin Road and The Hill. The landscape is dominated by traffic and surface car parking."

2.1.1 Site Planning History

Two previous permissions have established that the receiving environment is considered capable of accommodating a development of town centre character in terms of land use mix, density, height and architecture.

2.1.1.1 Reg. Ref. D04A/0674, 2005

In 2005 permission was granted for a mixed use development on the Blakes portion of the site, incorporating apartment, restaurants, retail units, a public house and live-work units. The stone-clad building had a sinuous linear form parallel to Lower Kilmacud Road and rose in height from six storeys beside the central junction to 12 storeys fronting the N11. It would thus have had a very significant presence in the townscape and would have transformed the character of both Stillorgan town centre and a stretch of the N11 corridor.

The proposal was granted permission by Dun Laoghaire Rathdown County Council (DLRCC). An Bord Pleanála (ABP) upheld the decision following 3rd party appeal. The Board stated in the reasons for its decision that "... the proposed development would not be unduly visually obtrusive [and] would not seriously injure the amenities of the area or of property in the vicinity...". The permission was not implemented.

Figure 3a-c: A selection of drawings and visualisations from the 2004 application D04A/0674

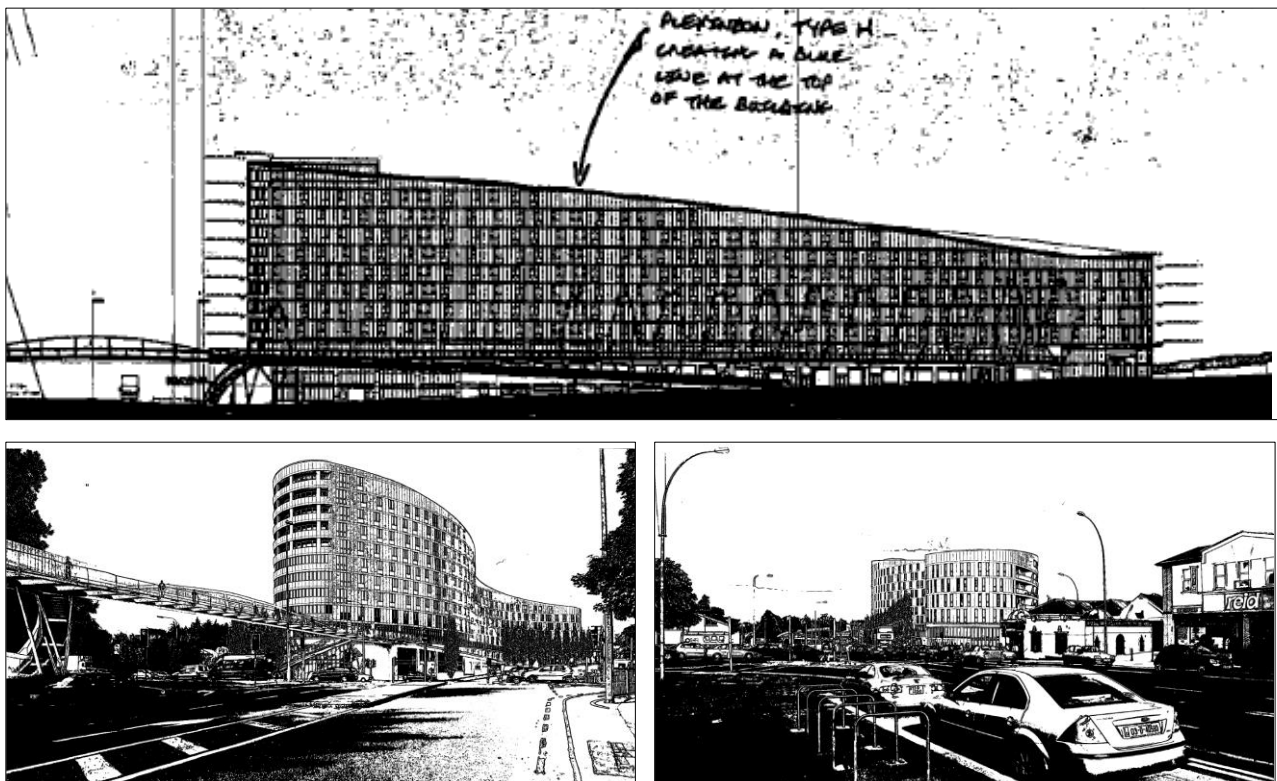
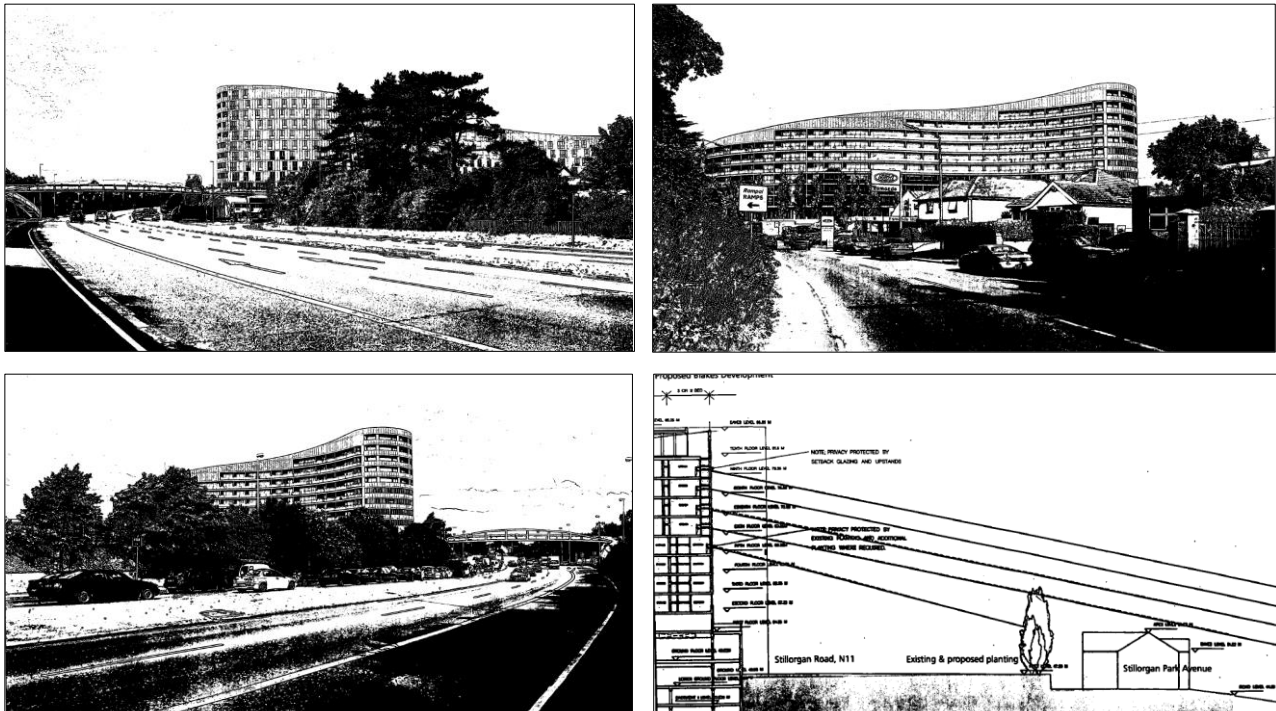


Figure 3d-g: A selection of drawings and visualisations of the 2005 permission



It is notable that the impact on the houses of Stillorgan Park Avenue (across the N11 to the east of the site) was considered in the planning process (see section drawing, right above), and the effect was deemed acceptable.

2.1.2.2 ABP-300520-17, 2018

In 2018 permission was granted for a site including the former Blakes and Esmonde Motors properties and the DLRCC plot at the corner, for a mixed use development comprising the demolition of the existing structures and the construction of 179 no. student accommodation units, 103 no. apartments, retail, cafe, a community sports hall and co-working spaces, in four buildings ranging from three to nine storeys.

This scheme retained the continuous, strong frontage to Lower Kilmacud Road (established with the 2005 permission) and a landmark element at the N11 junction. It also included strong linear frontage to both the N11 and the Hill on the Esmonde Motors portion of the site. The buildings combined to form a perimeter block enclosing a series of internal courtyard spaces. A notable element was a new plaza space on the Hill, formed by a setback in the building line.

Figure 4a, b: A selection of drawings and visualisations of the development currently permitted for the site



Figure 4c: A selection of drawings and visualisations of the development currently permitted for the site



The architecture and materials of the 2017/2018 scheme were very different to that of the 2005 permission. The built form had a more formal, rectilinear, urban quality and the more subdued architectural character was reinforced by the buildings' cladding in brick. The landmark volume addressing the N11 was designed to appear slender when seen from approaches on the N11.

The following excerpts from the DLRCC Report of Chief Executive on the Strategic Housing Development are of note (emphasis has been added):

- *"A site area of 1.345 hectares is relatively large in a suburban environment and this allows the site to set its own context for development and in particular at this location where the site is bounded on three sides by public roads."*
- *"It is considered that a distinct mixed-use area will be created and the provision of the civic space area facing south adjacent to the commercial area [the Hill] and community sports hall is welcome."*
- *"Overall it is considered that the proposed layout is generally a positive design response to the site in question providing frontage, urban realm benefits and scale and massing that reflects the district centre zoning of the site and responds to the adjoining area."*
- *"There is a consistency through all external materials to be provided on the four buildings. Brick is the dominant finish with varying shades proposed. The provision of brick is welcomed."*
- *"Given the scale of the proposed development it is inevitable that there will be a significant alteration on the receiving environment and to perceptions of the site from a wide area. Notwithstanding, the subject site, apart from a relatively limited residential area adjacent to the south of the site, is effectively located on an 'island' located between the N11/Stillorgan Dual Carriageway (which is over 30m in width), Kilmacud Road Lower and The Hill... It is considered that the proposed development is not unduly overbearing on site or on the receiving environment including the existing commercial development on the opposite side of The Hill, the residential units on the opposite side of the N11 and the adjoining residential units to the south east."*

The following excerpts from the ABP Inspector's Report are relevant (emphasis has been added):

- *"The proposed development will introduce new street elevations to The Hill and Lower Kilmacud Road. In combination with a new built form, there will be improvements to pedestrian facilities such as wider footpaths and a better junction configuration at The Hill and Lower Kilmacud Road. In addition, there will be a strong urban edge at the entrance to Stillorgan from the N11. I view these urban design and public realm changes as improvement... In my view, the proposed development will open up an otherwise closed urban block and provide a positive contribution to the built form and urban fabric at this location."*

- *“Stillorgan is low rise, little remains of the former historic village and the area has been dominated by the shopping centre which was developed half a century ago. Road infrastructure and large expanses of surface car parking dominate and the public realm and open spaces for pedestrians are few. I note and understand the concerns raised by many observers in relation to building height and the general scale and massing of the development proposed. However, the Development Plan and Local Area Plans have set out standards and controls to ensure that new urban development is appropriately located and designed... In addition, I note that national planning guidance favours higher densities and consequently larger and taller buildings at appropriate locations.”*
- *“There are other locations along the N11 that are punctuated by tall buildings. The applicant has used these examples to demonstrate the appropriateness of their proposal. On the other hand, observers have used these examples to argue against the height and bulk given the site context. In my mind, the proposed development is ideally positioned at this location and serves to define a visual entrance to Stillorgan.”*
- *“The precedent of a bulky and tall building form has been set on the site, as demonstrated by previous permissions... The planning authority are supportive of the proposed building height at this location in Stillorgan Village and note that the development responds appropriately to the provisions set out in the County Development Plan and the Draft LAP... In my view, the planning history of the site is instructive and can establish certain development potential parameters...”*
- *“I have no major concerns about how this building [the building along the N11] presents itself. The N11 elevation reads as a continuous linear block and this is appropriate given the proportions of the road it will address. Visual relief is provided by the creation of a bridge connection between Building 02 and 04 allowing views to the site interior... in my view, I consider that the proposed building line along the N11 will present a bold urban edge and reinforce the landmark function of Building 04.”*
- *“In my view, the composition of the building blocks is thoughtful and responds well to the site and orientation. Attention has been paid to the nearest residential development along The Hill to the south and there are no other sensitive residential receptors in the immediate vicinity...I find the development to be acceptable in terms of building height, scale and massing.”*
- *“Existing residential development in the vicinity is primarily located to the south east of the subject site and comprises single storey houses along The Hill. There are also houses located on rising ground along Glenalbyn Road and at Linden Lea Park, a distance to the south. The rear of houses along Stillorgan Park Avenue are located to the east across the N11 dual carriageway.”*
- *“In my view the residential properties most impacted upon by the proposed development are those located to the south along The Hill... In terms of overbearing appearance or overshadowing, given the separation distances involved, the upward sloping topography of the site along The Hill and the stepped design of the residential apartments in Buildings 01 and 02, I have no concerns that the residential amenity of property in the immediate vicinity will be adversely impact upon.”*
- *“A large number of observers are concerned about the size and bulk of the proposed development and the resultant impact upon residential amenity. The majority of objections are raised by residents along Stillorgan Park Avenue and their concerns relate to overbearing appearance, overshadowing, loss of daylight/sunlight and the reverberation of road noise due to the scale of the building elevation facing the N11. Firstly, I note that the separation distances between the proposed development and the rear elevations of dwellings along Stillorgan Park Avenue range between 49 and 53 metres. In addition, the N11, a busy dual carriageway separates the subject site from housing to the east. The N11 also has a wide grass margin planted with mature trees and low vegetation.”*
- *“... it is considered that... the proposed development would not seriously injure the residential or visual amenities of the area or of property in the vicinity, would respect the existing character of the area and would be acceptable in terms of traffic and pedestrian safety and convenience. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.”*

The previous assessments of proposals for the subject site confirm the planning authority's and the Board's acceptance in principle of the site's capacity to accommodate a development of similar nature to that now proposed (in terms of land use mix and the general arrangement of built form on the site).

2.2 Key Townscape Elements and Character Areas of the Receiving Environment

The main elements and character areas of the receiving environment (i.e. the main potential receptors of townscape and visual impacts) can be summarised as follows:

- Stillorgan district centre
- Surrounding residential neighbourhoods:
 - to the south and south west
 - Residential neighbourhood to the north west
 - Residential neighbourhood to the north east
 - Residential neighbourhood to the east across the N11
- The N11/Stillorgan Road corridor

2.2.1 Stillorgan District Centre

The subject site forms part of Stillorgan district centre. The district centre is comprised of Lower Kilmacud Road, the Old Dublin Road and The Hill (with their crossroads at the core), and the lands fronting these roads. Stillorgan has a wide range of urban amenities, including a large and diverse retail offering, numerous restaurants, recreation facilities including a cinema, a public library and sports facilities (Kilmacud Crokes). In social and economic terms the district centre functions well. However, the townscape is characterised by a poor quality public realm (being dominated by roads and parking) and a predominance of poor quality building stock for a town centre environment.

'Stillorgan Village' shopping centre has become the de facto 'town centre'. This is a typical 20th century suburban mall, a complex of low buildings set back from Lower Kilmacud Road and the Old Dublin Road behind a surface parking area. Although upgraded in recent years, this development typology (a mall set back behind parking area) is outdated (for its town centre location). The Leisureplex centre across the road was of similarly low quality in terms of architecture and contribution to the townscape. Combined with the disused subject site these lands/developments made for an unsightly town centre lacking in the elements/factors that generate an attractive townscape, including (a) buildings of architectural merit, (b) built enclosure/definition of streets and spaces, (c) quality public realm/open space, and (d) legibility (see Photo 1 below). The mix of uses in the centre was also dominated by retail, with little residential use.

The entrance into Stillorgan from the N11 is also of inappropriate character and quality for a gateway to a town centre. The absence of buildings of urban and character on both sides of Lower Kilmacud Road at the junction means that there is no announcement of the gateway. The resulting lack of legibility in the N11 corridor is tangible. Stillorgan can easily be bypassed by road users without their knowing the town centre is there, the core less than 150m off the dual carriageway.

One element that contributes positively to the character of the area is the row the converted houses on the west side of The Hill opposite the site. These are mostly small, single storey cottages, which have been converted for commercial use. They form a distinctive if somewhat cluttered/untidy built frontage to The Hill (see Photo 2 below). Bolands pub at the northern end of the street, facing the central junction across The Hill from the site, is not an attractive building but it is distinctive, and may be considered the only 'landmark' building in the town centre. This is largely due to it being the only building addressing the central junction.

Photos 1 & 2: A view of the Lower Kilmacud Road streetscape in the town centre showing the weak townscape character, and a view of the shops in converted cottages on The Hill opposite the site



Another asset to the landscape and amenities of the town centre is Kilmacud Crokes GAA club. The club grounds include grass and all-weather pitches, tennis courts and indoor facilities. It is located behind the retail frontage to Lower Kilmacud Road and the Odeon Cinema, minutes' walk from the central junction and the subject site.

With its wide range of retail and recreation facilities and services Stillorgan is capable of catering to a larger residential community, and the centre would benefit from substantial enhancement of the townscape. The Stillorgan Local Area Plan 2018-2024 (the LAP) provides a comprehensive planning strategy for the transformation of the district centre.

The LAP Introduction states: *“The Strategy Map... shows the indicative location of proposed primary land uses in Stillorgan. The Map shows the N11 Corridor boundary to the LAP as a focus, primarily, for new residential development. The Strategy also includes a number of key objectives, such as the designation of areas for taller buildings, at the Gateway sites of LeisurePlex and Environs and the former Blakes development. The Strategy also includes a number of site specific objectives including one for the comprehensive redevelopment of the Library site...”*

Figure 5: Stillorgan LAP Strategy Map



- The site outlined on the LAP Strategy Map, showing:
- Its position in the urban core occupying one quadrant around the central junction;
 - Its gateway and edge position with respect to the N11;
 - Its frontage to three key streets;
 - The residential land use objective.

The assessment of townscape and visual effects must take account not only of the existing character of the receiving environment, but also the vision for the area as set out in the LAP, and recent planning decisions. Two important decisions have been taken subsequent to DLRC's adoption of the LAP, for sites identified as Key Development Sites in the LAP. The two permissions together make up the 'LeisurePlex Library and Environs' Key

Development Site, which is one of two large sites (the other being the subject site) with significant potential to change the character of Stillorgan district centre and its eastern edge along the N11.

- The planning permission for the LeisurePlex site (currently under construction across Lower Kilmacud Road from the site) is for five interconnected blocks ranging in height from four to eight storeys, providing 232 no. residential units, two retail units and several restaurants. The restaurants are arranged fronting a linear plaza alongside Lower Kilmacud Road opposite the site. The eight storey block is positioned towards the N11 and the remainder of the frontage to Lower Kilmacud Road is six storeys.
- The planning permission for the Library site is for a linear building between the Leisureplex site and the N11, aligned parallel to the N11. The building steps in height from two storeys to nine storeys addressing the junction of Lower Kilmacud Road and the N11, with a seven storey volume further along the N11 frontage. The development will contain a new public library and residential use.

Figure 6a, b: Permitted development on the Leisureplex site



Figure 7a, b: The combined elevation of the Leisureplex and Library developments across Lower Kilmacud Road from the site

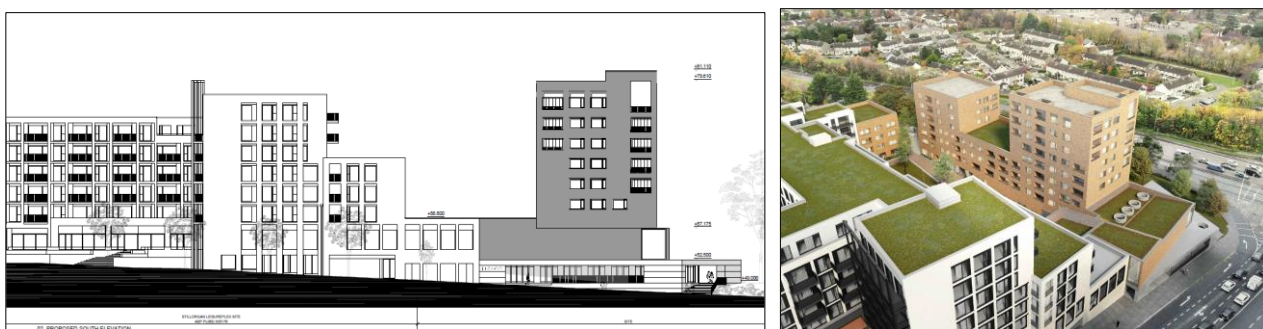


Figure 7c: A view of the permitted 'gateway' to Stillorgan showing the three permitted developments



Stillorgan district centre is thus on the verge of transformation into a contemporary urban core characterised by high density, mixed use development, modern buildings of design and material quality, an improved 20th century shopping centre, and retail streets of diverse character and a high quality public realm. There will be a concentration of density, massing and height at the eastern edge along the N11 corridor, and along Lower Kilmacud Road, with a designed 'gateway' of tall buildings at the junction.

One notable anomaly in the evolving district centre is a row of three houses on a small triangle of land immediately to the south of the site, in the corner between the N11 and The Hill. The northernmost of these houses ('Dún Fanóir') shares a boundary with the site. It should be noted that these three properties are also included in the LAP boundary and zoned District Centre (the same zoning as the subject site and the Leisureplex and Library site).

The evolving district centre described above is the context in which the proposed development would take place, and the area that would experience direct townscape change. The areas surrounding the centre, which would experience changes in their views (towards the centre), are discussed below.

2.2.3 The N11/Stillorgan Road Corridor

The users of the N11 are the largest group of potential visual receptors of change on the site. Stillorgan is one of the main urban cores along the route of the N11 as it approaches Dublin city centre.

Citing the Building Height Strategy included as an Appendix to the Dún Laoghaire-Rathdown County Development Plan 2016-2022 (the CDP), the LAP states: *"In relation to Stillorgan and the provision of taller buildings along the N11 corridor, the Strategy states that 'the N11, owing to its width, strategic importance, and public transport facilities, has the potential to become an attractive urban corridor enclosed by taller buildings of high quality, at locations which are also proximate to social and community infrastructure.'"*

It is thus a strategic objective of the Council to develop tall buildings along the N11 corridor, with the dual objective of (a) generating urban-type street enclosure (which must be commensurate with the road's width) with high quality buildings, and (b) to identify locations of social and community infrastructure, i.e. the urban cores, including Stillorgan.

Stillorgan and Cornelscourt (3km to the south along the N11) are the only two designated town/district centres on the N11 in the CDP. This suggests that these urban cores warrant particular emphasis in the road corridor.

There is already an established pattern of urban/density clusters interspersed along the road, most notably at Galloping Green 700m to the south, and an extended cluster at Merrion 750m to the north of the site/ Stillorgan. Photos 11 and 12 below illustrate that the wide road corridor can comfortably accommodate seven and eight storey buildings, and that this scale is required to generate a sense of urban-type street enclosure.

Currently, the stretch of the N11 approaching and passing by Stillorgan lacks any built enclosure, or buildings marking the Lower Kilmacud Road junction. As a result legibility along this stretch of the road is particularly poor. This weakness in townscape character is exacerbated by the status of Stillorgan as a district centre.

Photo 11: Eight storey apartment buildings at Galloping Green, 700m from the site (not in a designated town/district centre)



Photo 12: Eight storey apartment buildings at Merrion, 750 from the site (not in a designated town/district centre)



Photo 13: The N11 approach to the Lower Kilmacud Road junction from the south. There is currently no indication that the road is approaching the entrance to a district centre



Photo 14: The N11 approach to the Lower Kilmacud Road junction from the north



There is no potential to address this weakness by developing urban character/enclosure on the east side of the road approaching the junction/gateway, since the area to the east is already built up (and suburban in character). The objectives to achieve street enclosure and visibility of Stillorgan in the N11 corridor can therefore only be achieved by development of the subject site and the Leisureplex and Library site. This is recognised in the LAP, which refers to the two sites as 'Gateway Sites'. The LAP states:

"The Strategy also includes a number of key objectives, such as the designation of areas for taller buildings, at the Gateway sites of LeisurePlex and Environs and the former Blakes development..."

"The 'gateway' sites located at either side of the Lower Kilmacud Road at the junction with the N11 are particularly appropriate for an element of infill residential development, by virtue of their location proximate to public transport and the site characteristics..."

"The LAP provides for two locations for taller buildings – up to nine storeys – at opposite sides of Lower Kilmacud Road at the junction with the N11. As these two buildings will form an important 'gateway' feature to Stillorgan, it is crucial that the relationship between the two buildings is carefully considered."

Planning permission has been granted for both these gateway sites, and the permitted developments both include nine storey elements addressing the junction.

2.2.2 Surrounding Residential Neighbourhoods

2.2.2.1 Neighbourhoods to the S and SW – St Brigid's Drive, Linden Lea Park, Glenalbyn Road, Ard Lorcaín

To the west of The Hill and south of the district centre is an area of mostly 20th century suburban housing. This area includes **Linden Lea Park, Glenalbyn Road, Ard Lorcaín** and **St Brigid's Drive** see Figure 8 below).

The houses are mostly large, semi-detached two story houses with gardens, although there are some apartments along St Brigid's Drive. This neighbourhood has the dual benefit of attractive suburban character and proximity to the district centre.

Figure 8: Residential neighbourhoods surrounding Stillorgan district centre



Photos 3 & 4: Views towards the site from Linden Lea Park and the northern end of St Brigid's Drive



2.2.2.2 Neighbourhoods to the W and N – Allen Park, Beaufield Park, Woodside, St Laurence's Park

On both sides of Lower Kilmacud Road to the west of the town centre (and the site) there are suburban residential streets and estates. These include **Allen Park** to the south and **Beaufield Park** to the north of the road (see Figure 8 above). There are similar residential areas to either side of the Old Dublin Road to the north of the town centre. These include the **Woodlands** and **St Laurence's Park** estates.

These areas are well removed from the site, and buffered from the proposed development by distance and intervening land use/development. For example, Allen Park is buffered from the site by the Kilmacud Crokes sports grounds (see Figure 8); Beaufield Park and Woodland are buffered from the site by Stillorgan Village shopping centre; St Laurence's Park is buffered from the site by the Leisureplex site.

Photos 5 & 6: Entering the town centre from the west on Lower Kilmacud Road, and a view from Beaufield Park towards the site



2.2.2.3 Neighbourhood to the North East – Patrician Villas

The N11 forms a wide barrier in the townscape, separating the eastern suburbs of Stillorgan from the district centre. The road corridor is some 40m wide. To the north east of the site, diagonally across the junction of Lower Kilmacud Road and the N11, is the **Patrician Villas** estate. The houses are set well back from the N11 behind a corridor of open space including a belt of woodland (see Figure 8). The open space, woodland and the N11 combine to form a buffer between the estate and the subject site.

Photos 7 & 8: A view from the N11 approaching the Lower Kilmacud Road junction passing by Patrician Villas (to the left behind the trees), and a view towards the site from the central street in Patrician Villas



2.2.2.4 Neighbourhood to the East – Stillorgan Park Avenue

Directly to the east of the site across the N11 is **Stillorgan Park Avenue**, a street of suburban residential character that runs parallel to the N11. Stillorgan Park Avenue is lined on both sides by large, detached houses in mature gardens. The row of properties on the west side of the street backs onto the N11, opposite the subject site (see Figure 9). The houses have relatively shallow back gardens resulting from the widening of the N11.

These houses can be considered among the most sensitive receptors to change in the receiving environment. The site lies directly to the rear of the houses, although it is separated from them by the wide dual carriageway.

Figure 9: The position of the site relative to Stillorgan Park Avenue to the east of the N11



Photos 9 & 10: Views from Stillorgan Park Avenue towards the site



3.0 Relevant Policy

3.1 Dun Laoghaire Rathdown County Development Plan 2016-2022

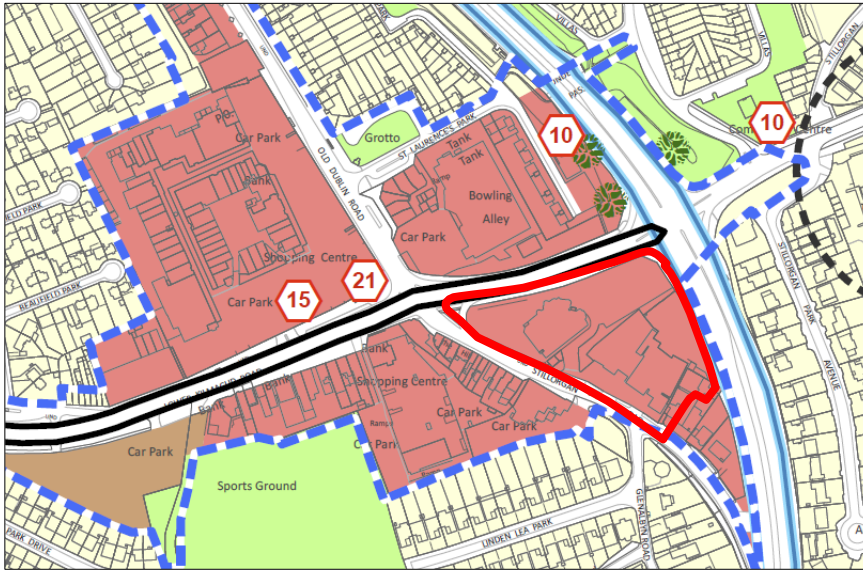
In the CDP the site is zoned objective DC: *“To protect, provide for and/ or improve mixed-use district centre facilities”*.

3.1.1 Draft County Development Plan 2022-2028

In the Draft County Development Plan 2022-2028 (Draft CDP) the zoning objective for the site remains DC: *“To protect, provide for and-or improve mixed-use district centre facilities”* (red shading on the extract from the Draft CDP Map 2 below).

The dashed blue line on the map is the outline of the Stillorgan LAP area. The LAP provides specific guidance/objectives for the development of Stillorgan District Centre.

Figure 10: Extract of Draft County Development Plan Map 2. The site outlined in red occupies a large part of the urban core



3.2 Stillorgan Local Area Plan 2018-2024

The vision of the LAP is as follows:

“... The high-quality regeneration and redevelopment of key sites in Stillorgan District Centre will be encouraged, in tandem with a radically improved public realm, to provide a coherent and balanced urban environment in respect of scale, design and layout. Stillorgan will successfully perform its role as a high-quality, accessible retail and commercial centre serving the needs of the wider community...”

“New residential development in Stillorgan will assist in improving the diversity of the housing mix in the area and reversing the long-term trends of population decline in the area. The residential amenity of established residential areas on the fringes of the District Centre is to be protected and, where possible, enhanced through the successful integration of future developments with the existing built fabric of Stillorgan.”

3.2.1 Building Height and Visual Impact

Objective BH1 *“It is an objective of the Council promote higher densities and allow for increased building heights around public transport nodes and centres of activity... To aid assessment, a design statement will be required for applications for taller buildings (any development where building heights exceed six storeys) in the Plan area...”*

“The design statement shall address development context, development objectives, urban design principles, scale and massing, density, materials, details, lighting (day and night time) existing and proposed land and building uses, ground floor uses, treatment of roof top/crown, ground floor treatment and public realm strategy.”

Objective BH2: *“An impact assessment study will also be required to illustrate the impact on the context, especially on residential amenities and significant views. This should be done through accurate visual modelling of proposals – photomontages or three-dimensional computer models (buildings fully rendered) – from relevant assessment points defined by the Council. Proposals should be shown in daylight and nightlight conditions.”*

Objective BH3: *“Consideration will be given to the application of upward or downward modifiers in relation to building heights, with reference to site characteristics and the protection of residential amenity”.*

3.2.2 Public Realm Objectives

Objective PR3: *“It is an objective of the Council to create multi-functional streets that balance ‘movement’ and ‘place’ and safety for all users, within a traffic calmed environment.”*

Objective PR4: *“It is an objective of the Council to promote high quality urban design with particular reference to the ‘12 Criteria’ outlined in the ‘Urban Design Manual - A best practice guide’ (2009).”*

3.2.3 Site Specific Objectives - Blakes/Esmonde Motors

Built Form/Design Guide

- *“Create a building line that enhances a vital street frontage onto The Hill/Lower Kilmacud Road.*
- *Provide for pedestrian/cycle permeability through the site.*
- *High quality design/placemaking.*
- *Protect residential amenity of adjacent residents at The Hill.*
- *Use of high quality, robust materials, which is particularly important of the more prominent taller buildings where maintenance and weathering must be considered.”*

Building Height

- *“Benchmark height of five storeys across the site, with a landmark building of up to nine storeys at the corner of the N11/Lower Kilmacud Road junction.*
- *The transition between the landmark height (9 storeys) and the benchmark height (5 storeys) must be designed to ensure that excessive massing or bulk in the overall design does not detract from the ‘landmark’ nature of the nine storey element.”*

Public Realm and Landscape

- *“Provides a high quality public plaza/civic space at the corner of The Hill/Lower Kilmacud Road.*
- *High quality design/placemaking.*
- *Tree planting at Lower Kilmacud Road.*
- *Consideration should be given to how any new development supports the achievement of an ‘Age Friendly’ environment providing safe, accessible and walkable spaces.”*

3.2.4 Key Development Sites Objectives

KDS4: *“It is an objective of the Council to improve public realm through the promotion of high quality architecture, urban design and an open, pedestrian friendly environment.”*

KDS5: *“It is an objective of the Council to provide a mix of public spaces with high quality landscaping and street furniture.”*

KDS6: *“It is an objective of the Council to promote design of buildings that respect and have regard to their context and neighbouring amenity.”*

3.3 National Planning Framework

Compact growth is one of the main principles and intended outcomes of the NPF. This encourages higher density - and therefore taller - development in urban areas where supporting infrastructure and services, particularly public transport, are available.

Regarding brownfield development the NPF states: *“The National Planning Framework targets a significant proportion of future urban development on infill/brownfield development sites within the built footprint of existing urban areas...”*

National Policy Objective 11 states: *“In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities... subject to development meeting appropriate planning standards and achieving targeted growth.”*

3.4 Urban Development & Building Height Guidelines (2018)

The Guidelines state: *“Reflecting the National Planning Framework strategic outcomes in relation to compact urban growth, the Government considers that there is significant scope to accommodate anticipated population growth and development needs, whether for housing, employment or other purposes, by building up and consolidating the development of our existing urban areas...”*

“A key objective of the NPF is therefore to see that greatly increased levels of residential development in our urban centres and significant increases in the building heights and overall density of development is not only facilitated but actively sought out and brought forward by our planning processes and particularly so at local authority and An Bord Pleanála levels.”

In Section 3.2 of the Guidelines, ‘development management criteria’ are set out to guide the evaluation of development proposals for buildings taller than the prevailing heights in the area. The following criteria from Section 3.2 of Guidelines are most relevant to the consideration of a taller building’s landscape/townscape and visual impacts:

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

At the scale of the relevant city/town:

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

At the scale of district/neighbourhood/street:

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

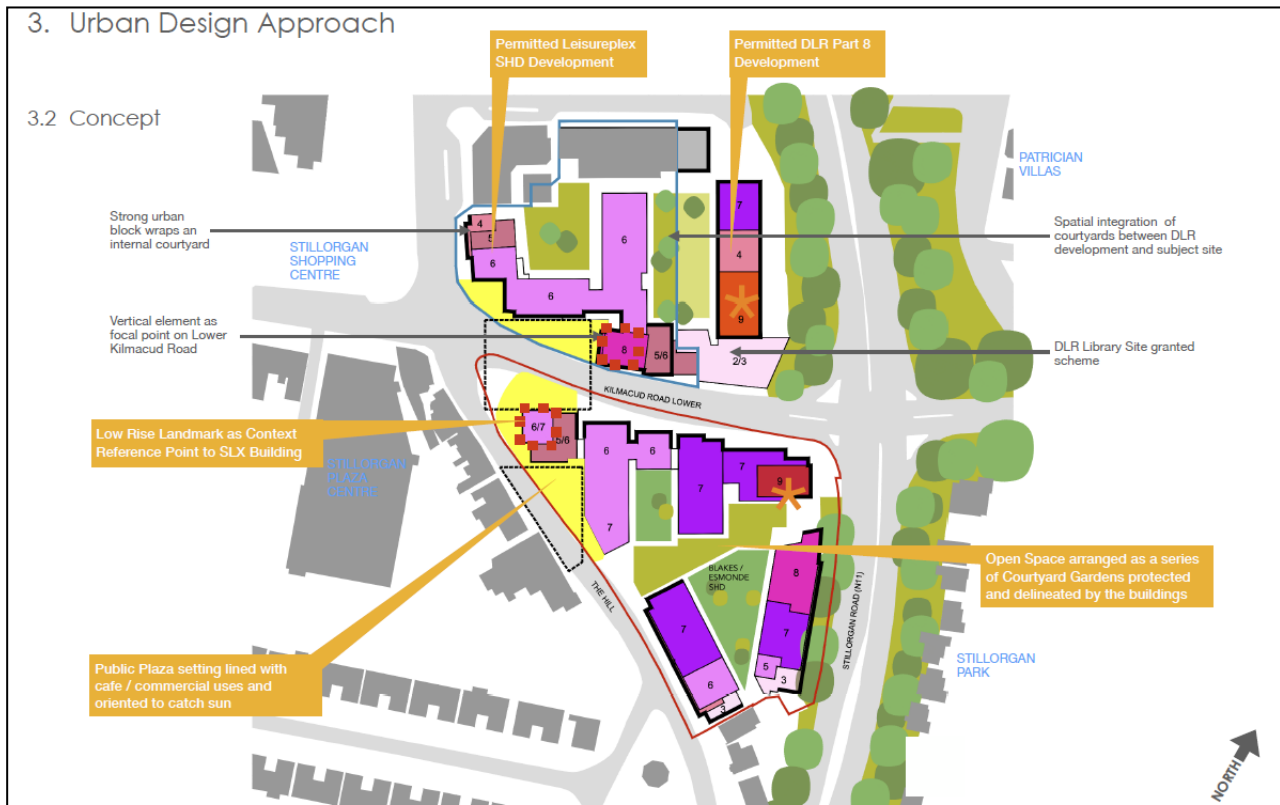
4.0 Proposed Development

The main characteristics of the proposal with regard to potential townscape and visual impact are as follows:

4.1 Arrangement of Built Form and Open Space

The proposed layout is similar to that of the previously permitted development. It responds to (a) the site's 'town centre + urban edge + gateway' position, (b) the three streets/streetscapes of very different character surrounding the site, and (c) the varied land uses and sensitivities to all sides of the site.

Figure 11: The urban design approach



The proposal is comprised of six buildings arranged around the perimeter of the triangular block, with a corridor of open space traversing the site from east to west providing a connection between the N11 and The Hill.

- Buildings 03, 04, 05 and 06 form a staggered building line along the Lower Kilmacud Road frontage. Although connected to form a continuous frontage to the street, visually the buildings are divided into distinct volumes by steps in the building line (to maintain the frontage to the curved road) emphasised by vertical recesses in the elevation.
- Building 06 is set back from the sharp north west corner of the site. This setback from the street creates a wide plaza space at the junction, in front of the café in the ground floor of B6.
- Buildings 06, 05 and 01 together form the frontage to The Hill. The arrangement of B5 and B6 forms a small triangular plaza contiguous with the street, in front of the community sports hall in the ground floor of B5. A wide gap between B5 and B1 forms the main entrance to the site, giving access to a series of connected courtyards internal to the perimeter block (and a public pedestrian route across the site to the N11). Along with the triangular plaza this breaks up the street elevation, which faces the row of shops in converted cottages across the street. The intention of the arrangement of form along The Hill is to avoid dominance of the smaller buildings across the road, while delivering sustainable density on the site. B1 is a linear block in the south west corner of the site fronting The Hill.

- Buildings 02 and 03 together form the built frontage to the N11 corridor. In contrast to the more complex arrangement of form along Lower Kilmacud Road and The Hill, Building 02 has a simple linear form responding to the straight, wide road along that boundary. (This ‘continuous linear block’ was considered an appropriate response to the N11 context by the ABP Inspector in the 2018 application.)

An important change to the proposed development (compared to the permitted development) is that a wide space is now proposed between Buildings 02 and 03 along the N11 frontage. This is to (a) make the open space/pedestrian connection across the site visible from the N11, and (b) to differentiate Building 03 more clearly as a landmark/gateway building.

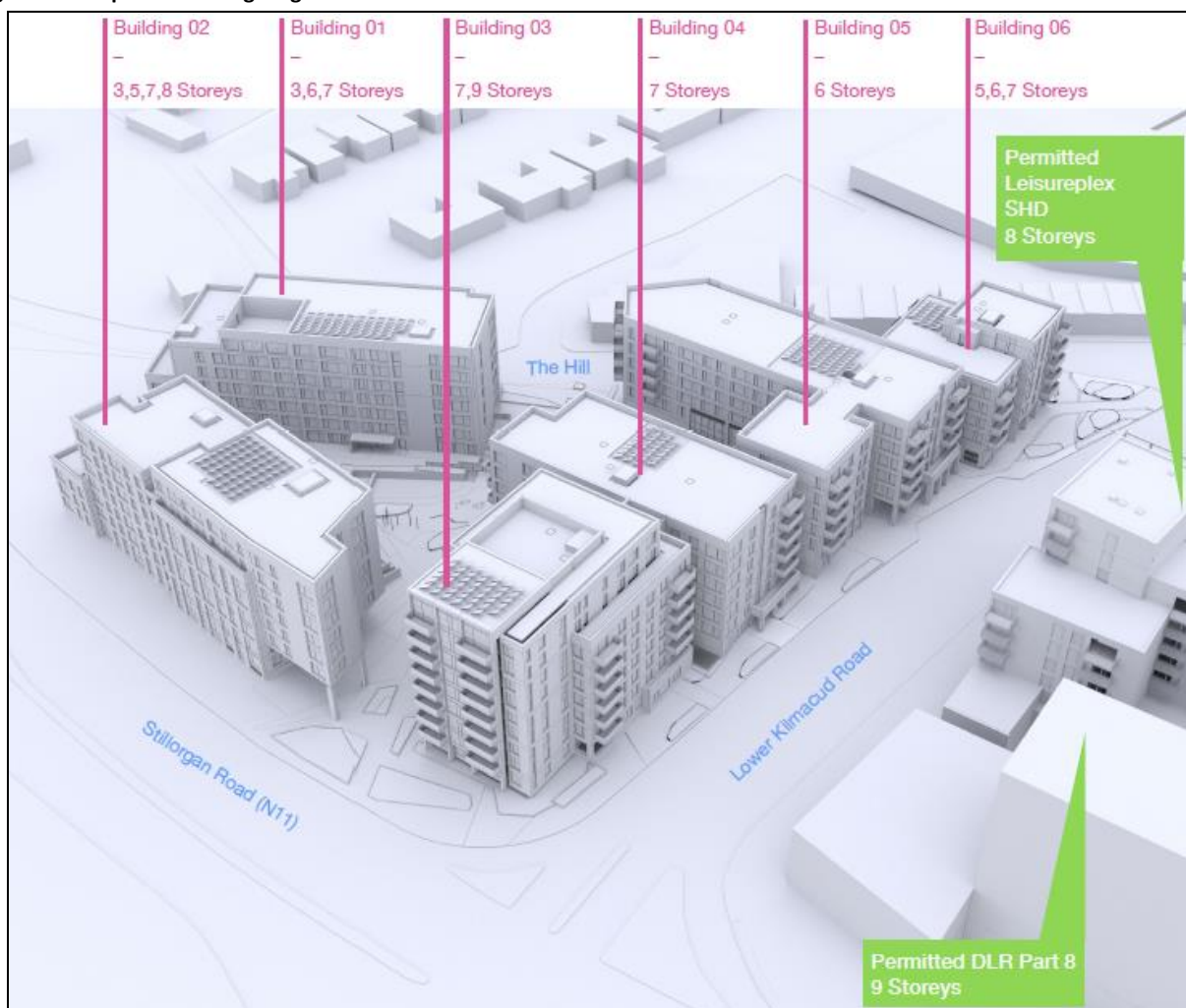
- Building 03 stands at the junction of the N11 and Lower Kilmacud Road and is intended to combine with the permitted Library site development to form the new eastern gateway to Stillorgan town centre.

4.2 Building Height

4.2.1 Lower Kilmacud Road

The proposed Building 03 is nine storeys. This is in accordance with the Stillorgan LAP and matches the height of the permitted ‘gateway building’ on the Library site across the road. The building is turned to present its principal/gateway elevation to the east, i.e. towards the junction of the N11 and Lower Kilmacud Road. This differs from the permitted building which faces north towards the city. The proposed change has the subtle effect of more clearly identifying the building as part of the gateway to Kilmacud Road Lower and the district centre ‘behind’ the gateway.

Figure 12: Proposed building height

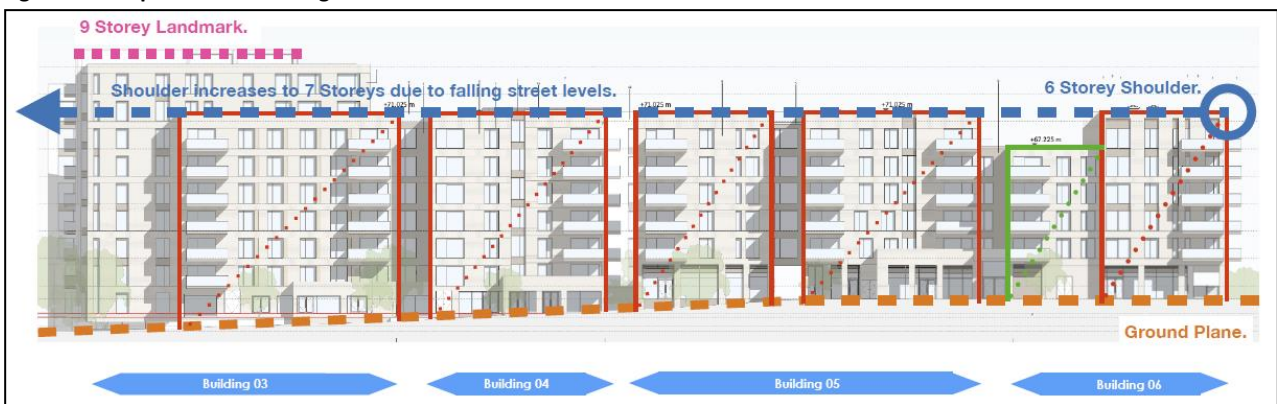


The height of Buildings 03, 04, 05 and 06 along Lower Kilmacud Road ranges from five to nine storeys. However, the buildings are designed (using the fall in topography, and a setback in Building 03) to read as a more uniform six-seven storey shoulder typical of an urban street elevation.

The drawing below (Figure 13) shows how vertical recesses (combined with steps in the building line), strips of expressed balconies and variations in fenestration are used to articulate the built form. There is a subtle but noticeable increase in scale/grain from Building 03 in the finer grained town centre to Building 06 at the N11 frontage.

The small five storey volume in Building 06 plays an important role. It is intended to differentiate the six storey corner volume more clearly as a local landmark building, identifying the junction at the centre of Stillorgan. (This differs from the permitted scheme, in which Building 06 at the corner was lower and appears deliberately 'subdued' in its architecture.)

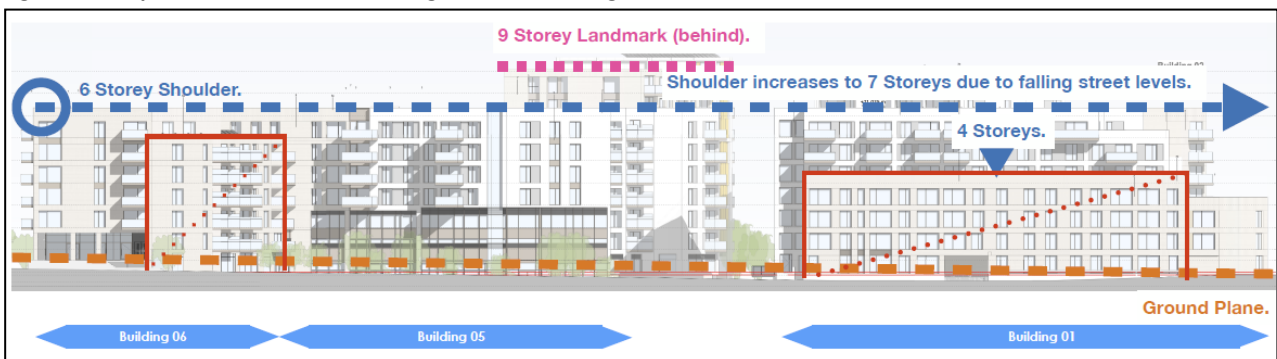
Figure 13: Proposed built frontage to Lower Kilmacud Road



4.2.2 The Hill

The proposed arrangement of height along The Hill is similar to that along Lower Kilmacud Road. Building 06 at the corner is six storeys and this establishes the parapet height for the street elevation. With the fall in topography to the south the height of Building 01 increases to seven storeys.

Figure 14: Proposed west elevation fronting The Hill - Buildings 06, 05, and 01



The built frontage to The Hill is less uniform - in building line/continuity, shoulder height and façade treatment. Between Buildings 06 and 05 a triangular plaza space is formed off the street, fronted by the café and the sports hall in the ground floors. Between Buildings 05 and 01 is the main entrance to the development, including vehicular access to the basement parking, and the opening to the corridor of open space across the site, which includes a new public pedestrian link between The Hill and the N11.

Figure 15: Graphic showing the less uniform in building line/continuity, shoulder height and façade treatment along The Hill



At the southern end of Building 01 there are a series of steps to bring the building height down to three storeys at the site interface with the neighbouring residential property 'Dún Fanóir'. This is the nearest of the three houses to the south of the site, occupying part of the triangular 'island' (formed by the N11, Lower Kilmacud Road and The Hill) as the site.

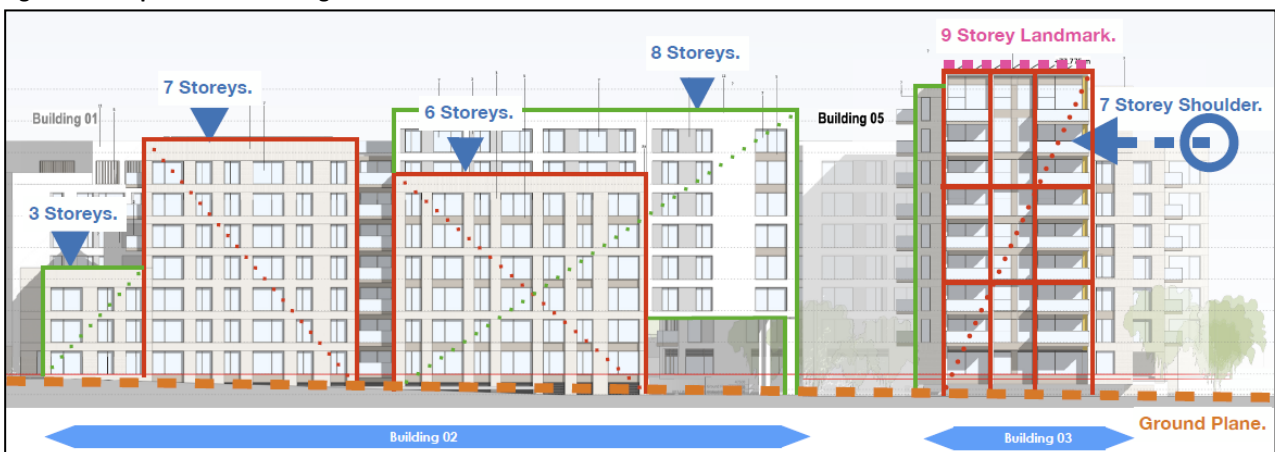
4.2.3 The N11

Building 02 is similarly stepped at its southern end, with the objective of avoiding visual dominance of the neighbouring house Dún Fanóir.

Although deliberately a large, linear block with the objective of establishing a strong urban edge and built frontage to the N11, Building 02 is also designed with consideration of the houses to the east, across the N11 on Stillorgan Park Road). Using vertical recesses, setbacks and variations in materials the massing of Building 02 is reduced and there is an appreciable gradation in height towards the north, i.e. towards the 'Stillorgan gateway'.

Figure 16 shows the wide gap between Buildings 02 and 03. This is the opening of the linear open space (and public pedestrian route) across the site onto the N11. The gap, in combination with the step up in height, also has the effect of differentiating Building 03 clearly as the landmark/gateway building in the N11 corridor.

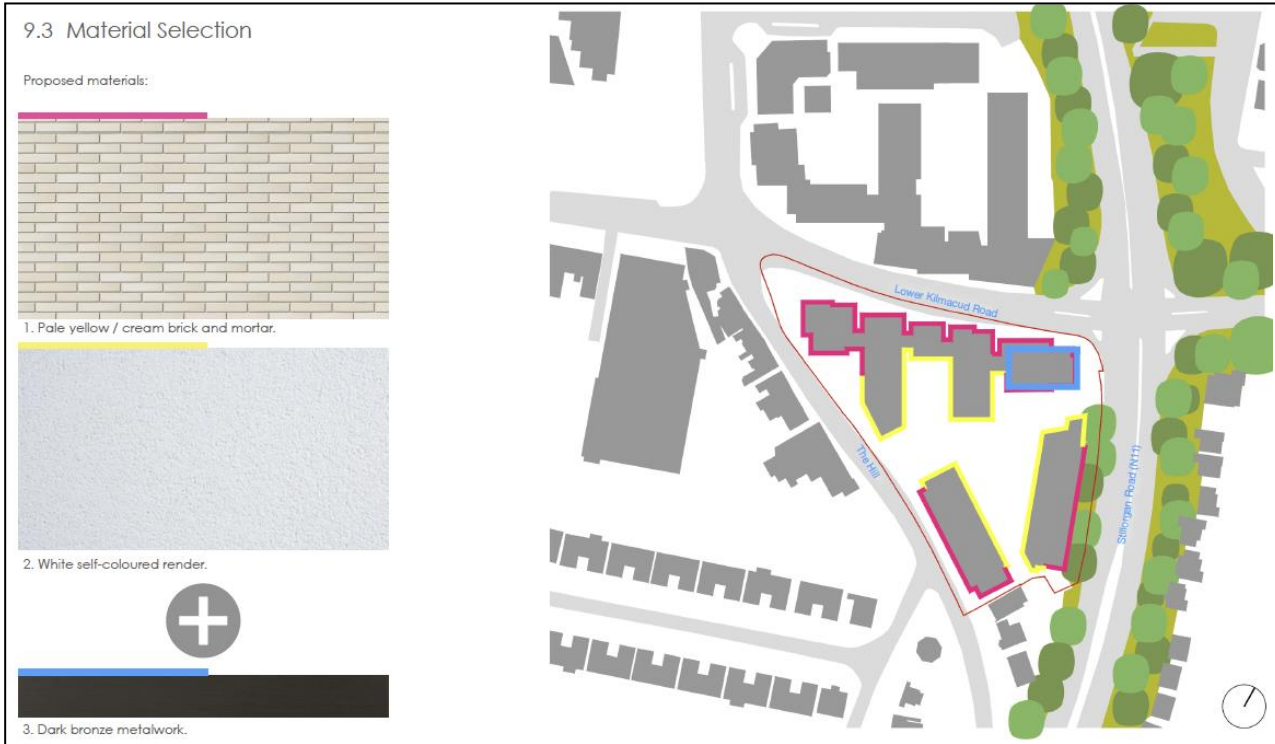
Figure 16: Proposed built frontage to the N11 corridor



4.3 Façade Treatment and Materials

The predominant material in the elevations facing the public realm is a pale yellow/cream brick. Patterned brickwork/coursing is used for detailing and variation across the facades. Certain parts of these facades (e.g. Building 05 fronting The Hill and a setback volume of Building 02 fronting the N11) and all the facades facing the internal courtyards, are a white render. Dark bronze metalwork is applied to building 03 – particularly to the east elevation facing the N11 - to reinforce its landmark/gateway role.

Figure 17: Proposed material selection



The brick colour is one of the main differences (along with the increase in height of a number of the buildings) between the proposed development and the permitted scheme. The permitted buildings are all clad in shades of brown brick. This material is characteristic of ‘urban residential’ buildings. The lighter brick is also a high quality, durable material, but the colour reflects a more dynamic vision of the site within the new Stillorgan town centre. Another key difference between the proposed buildings and the permitted development is the use of balconies. The permitted scheme had no balconies resulting in less articulated and less animated facades than those now proposed.

4.3 Landscape/Public Realm Proposals

The proposed development includes several important additions to the public realm of the town centre:

- **Lower Kilmacud Road.** A generous footpath is formed along Lower Kilmacud Road in front of the stepped building line (responding to the curve of the road). Pairs of street trees are planted in beds of low ornamental planting where underground services allow space for the root balls. This street has an active frontage, with numerous entrances to the residential buildings, three ground floor café/restaurant units and the office suites. The width of the footpath is intended to allow for both the large volume of pedestrian movement along this route of entry into the town centre (from the N11) and the lingering/gathering that takes place on a commercial street.

- **Central junction plaza.** At the north west corner of the site the footpath broadens into a wide plaza space between building 06 and the central junction. This provides an informal gathering space outside of the café in Building 05, with views of the town centre and the street activity.

Figure 18: The proposed landscape masterplan



- **The Hill.** The treatment of the Hill streetscape is varied. At the northern end the footpath widens into the central junction plaza. Just south of this, between Buildings 06 and 05, a new triangular plaza space is formed off the street. This space features outdoor seating for the café, a small events space, and a number of trees. The streetscape treatment south of the main site entrance, in front of Building 01, focusses on creating privacy and amenity for the ground floor apartments facing the street. Privacy strips of planting are proposed in front of the apartments, in addition to the street trees in the footpath.
- **The N11.** There is a belt of mature vegetation along the west side of the N11 (Photo 13 above). In order to construct the proposed development it is necessary to remove a proportion of these trees. Eight of the most significant specimens will be retained. It is proposed to supplement the retained trees with new planting to restore the vegetation belt in time (see Figure 19 below). It is important to note that while the existing vegetation has value as green infrastructure, in landscape/townscape and visual terms it is sub-optimal (refer to Photo 13). The N11 streetscape approaching the Stillorgan gateway warrants a

more formal treatment. The proposed development would provide this, while also providing visual screening for the development itself and visual receptors on the east side of the road.

- Open Spaces Internal to the Site. The interior of the perimeter block is divided into a series of courtyard spaces by the rear projections of buildings 04 and 05. Apart from the vehicular entrance from The Hill to the underground parking area, these spaces are dedicated to pedestrian and cycle circulation, and recreation/amenity space. The main circulation feature is a broad pedestrian and cycle route east-west across the site connecting The Hill to the N11. The courtyard areas feature a variety of lawn areas, ornamental grasses and shrubs, with scattered trees. A playground is proposed at the centre of the space, adjacent to the creche at the ground floor of Building 01. Seating is provided alongside the footpaths, and level changes are used to create other informal outdoor gathering places. Privacy strips of hedge planting are proposed in front of the internal facades of Buildings 01 and 02.

5.0 Townscape Impact Assessment

5.1 Townscape Sensitivity

The sensitivity of the receiving environment can be classified **medium**¹. This takes account of the following main factors:

- Stillorgan district centre area has a weak townscape character and limited visual amenity due to a lack of (a) buildings of architectural merit, (b) built enclosure/definition of streets and spaces, (c) quality public realm/open space, and (d) legibility. The environment is dominated by roads, parking and traffic.
- The site is a brownfield land parcel, zoned for District Centre development and identified as a Key Development Site and a 'gateway' site in the Stillorgan LAP, with allowance for a building of nine storeys at the gateway. It has frontage to three main thoroughfares/ streets in the town centre (the N11, Lower Kilmacud Road and The Hill), and to both the town centre junction and the gateway junction.
- The planning history of the site includes an expired permission for a landmark building of 12 storeys, and an extant permission for a development similar in nature to that now proposed (in terms of the arrangement of built form and open space on the site, and a landmark building at the junction of the N11 and the Lower Kilmacud Road).
- There are several other permissions for developments on nearby sites (one such under construction at Leisureplex), which, when completed, will fundamentally the character of Stillorgan. The district centre is on the verge of transformation into a contemporary urban core characterised by high density, mixed use development, modern buildings of design and material quality, an improved 20th century shopping centre, retail streets of diverse character and a high quality public realm. There will be a concentration of density, massing and height at the eastern edge along the N11 corridor, and along Lower Kilmacud Road, with a designed 'gateway' of tall buildings at the junction.
- There are no protected structures, Architectural Conservation Areas or other cultural heritage constraints in close proximity to the site.
- There are relatively few sensitive residential receptors in close proximity to the site.

¹ Medium sensitivity 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 principle management objective may be to consolidate landscape character or facilitate appropriate, necessary change' – refer to Section 2.1, Appendix 1)

- The nearest are three houses to the south of the site, one of which Dún Fanoir, shares a boundary with the site. These houses are part of the triangle of land defined by the N11, The Hill and Lower Kilmacud Road. They are within the LAP boundary and, although in low density residential use, are zoned District Centre.
- The other sensitive residential receptor with significant exposure to the site is the row of houses on the west side of Stillorgan Park Avenue, across the N11 to the east of the site. Although separated from the site by the wide dual carriageway these properties have views from their rear windows and gardens towards the site. Like the houses to the south, it must be accepted that these houses are located opposite a large District Centre opportunity site fronting the N11 and designated for landmark/ gateway development.
- The site has over 100m frontage to the N11 beside the Kilmacud Road junction (the gateway to Stillorgan). The N11 is recognised in the DLRCDP as having “*potential to become an attractive urban corridor enclosed by taller buildings of high quality*”. Stillorgan is one of only two recognised urban cores along the N11 designated in the DLRCDP as a town or district centre. Currently, the stretch of the N11 approaching and passing by Stillorgan lacks built enclosure and building of note. Legibility along this stretch of the road is particularly poor. There is a need for a strong built frontage on the site, including taller buildings to identify the gateway.

Taking the above factors into account, the townscape sensitivity could be classified low (i.e. having a high capacity for change and few constraints – see Table 1, Appendix 1). However, due to (a) its position (i.e. its frontage to three important streets, the town centre junction and the N11 gateway), (b) its large size, and (c) the few existing houses in close proximity to the site, the site’s redevelopment has the potential to cause significant change to the townscape character and quality of the area. It is in recognition of this potential that the townscape sensitivity is classified medium.

5.2 Magnitude of Townscape Change

The main townscape impacts of the proposed development would be as follows:

- **Land use pattern:** A high density residential development would be introduced to Stillorgan, with the density concentrated along the eastern edge of the town centre facing the N11 (as prescribed in the LAP), with restaurant and café uses at street level fronting Lower Kilmacud Road and The Hill, and a Community Sports Hall and creche accessed from The Hill. The combination of high density residential use, café/restaurant and community uses would be a significant change to the land use mix in the district centre, delivering key objectives of the LAP.
- **Plot and building typologies, scale and architecture:** The perimeter block arrangement of the buildings would strengthen the urban structure of a part of Stillorgan that has historically suffered from weak definition/character (the area between the Old Dublin Road/The Hill and the N11). All three of the roads around the site would benefit from improved built enclosure, with the buildings defining streets of distinctly urban character. The arrangement and design of the buildings respond appreciably to the immediate context of each building:
 - Building 03 is designed to (a) complement the permitted Library building in forming gateway to Lower Kilmacud Road from the N11, marking Stillorgan as an important ‘place’ in the landscape of Dun Laoghaire Rathdown and the N11 corridor.
 - Buildings 03, 04, 05 and 06 form a strong, distinctively stepped building line to Lower Kilmacud Road, generating urban-type street enclosure (complemented by restaurant and café uses at street level). The six-seven storey shoulder height (for uniformity) and the nine storey gateway building complement the heights of the permitted Leisureplex and Library developments across the road.

- Buildings 06, 05 and 01 form a legible but less continuous building line to The Hill, with the built frontage broken by the new plaza and the main entrance to the site. The buildings are distinctly urban in typology, use and scale, suitable for a town centre street. While unavoidably contrasting with the converted cottages across the street, such juxtaposition of type and scale would generate a desirable, attractive townscape complexity. (It is the converted cottages that might be considered the anomaly in the modern district centre townscape, not the development on the site.) Building 01 steps down to three storeys where it faces the neighbouring house, Dún Fanoir.
- Building 02 presents a linear frontage of 6-8 storeys to the N11 (also stepping down to three storeys facing Dún Fanoir). The eight storey maximum height is an appropriate response to the wide road (seven lanes wide along this stretch, with a central median – c. 30m in total). The building is of a scale that has (a) proved effective in generating a degree of urban-type street enclosure seen elsewhere along the N11, and (b) would have sufficient presence to announce the road's arrival at a major junction and gateway to an urban core. This Gateway, would be emphasised by Building 03. In consideration of its visibility from the houses at Stillorgan Park Avenue across the N11, the east façade is designed to reduce the perception of massing and also to present an attractive façade.
- **Public Realm:** Several important elements of the town centre public realm would be provided or improved by the development, including:
 - A wide pedestrian pavement on the south side of Lower Kilmacud Road, with numerous café/restaurant and residential entrances to the buildings (Buildings 03, 04, 05, 06) generating an active frontage, and street trees in beds of groundcover to green the streetscape and soften the built frontage. This is a key pedestrian corridor of entry to the town centre from the N11 and its provision would constitute a significant improvement to the townscape at this location.
 - A plaza space at the corner of Lower Kilmacud Road and The Hill, wrapping around Building 06. This junction is the 'centre' of Stillorgan and currently the public realm around the junction is (a) underwhelming in spatial provision and quality, (b) lacking in built enclosure/definition, and (c) caters poorly for pedestrians. The space would provide an informal gathering place on the street, animating and elevating the quality of the town centre streetscape.
 - A wide pedestrian pavement and a new plaza on the east side of The Hill. The most significant addition to the townscape in this area is the triangular public space alongside the street, formed/ fronted by Buildings 05 and 06 which contain the Community Sports Hall and a café at ground level. The plaza includes an outdoor seating area for the café, a flexible events space and trees and planting areas.
 - A pedestrian/parkland route traversing the site between the N11 and The Hill. The wide pedestrian and cycle path forms the spine of a parkland corridor across the centre of the site. The space widens towards the east, where it opens onto the N11 between Buildings 02 and 03, thus dividing the built frontage (allowing Block 03 to read clearly as a gateway/landmark building) and inviting public entry/movement across the site. This is a significant new element to the pedestrian and cycle route network in Stillorgan.

These are all significant functional additions to the townscape, catering for and encouraging pedestrian and cyclist movement and activating the public realm, as well as elevating its overall quality.

- **Landscape/Green Infrastructure:** A large number of trees and a quantity of shrubs and groundcover would be introduced to the streetscapes of Upper Kilmacud Road and The Hill. Within the site, the courtyards are mostly green-surfaced and feature numerous trees as well as lawn areas, ornamental planting and hedges for the privacy of ground floor apartments. Additionally, some 60% of the roof space would be green roofs, providing additional habitat and water attenuation.

One significant short term impact would be the removal of a proportion of the belt of trees along the site's east boundary along the N11. Eight of the most significant specimens in this belt would be retained;

however the removal of the other trees is necessary to facilitate the site's development. The retained trees would provide some mature tree cover along the new built frontage, while the replacement/supplementary planting matures. In the medium term (within 8-15 years) the tree belt would return to a breadth, height and density similar to the current levels, and overall there would be a significant increase in vegetation cover on the site, providing a range of ecosystems services.

In summary, taking account of the above changes to the key elements and aspects of the townscape, the overall magnitude of townscape change would be **high**².

5.3 Significance of Townscape Effects

Measuring the magnitude of change against the sensitivity of the receiving environment, **the townscape effects are predicted to be 'significant' and positive.** The development would:

- a) Improve the mix of uses in the town centre, enlivening the area by day and night.
- b) Introduce a cluster of buildings that responds to and strengthens the evolving urban structure, complementing the developments on the Library and Leisureplex sites and shifting the Stillorgan townscape towards a contemporary urban character (in keeping with its district centre designation).
- c) Introduce a built frontage of appropriate scale and quality to the N11, including a building of gateway/landmark character beside the Lower Kilmacud Road junction, announcing the presence of the Stillorgan town centre along a stretch of the N11 where legibility is particularly poor.
- d) Introduce or improve several key elements of the town centre public realm, including the streetscapes of the N11, Lower Kilmacud Road and The Hill (using the new buildings to improve their enclosure/definition, new uses to activate the streets, and adding public gathering spaces and vegetation to the streetscapes) and a pedestrian link in a parkland corridor across the site between the N11 and The Hill.
- e) Considerably increase the overall quantity of vegetation on the site and in the surrounding streetscapes, despite the short term loss of a proportion of the trees along the east site boundary (along the N11).

6.0 Assessment of Visual Effects

23 no. viewpoints were selected for detailed visual effects assessment informed by verified photomontages. The viewpoints were selected to represent the main character areas and groups of visual receptors in the receiving environment (i.e. Stillorgan town centre, the N11 corridor, and the residential neighbourhoods surrounding the site - see Section 2.2 above).

The viewpoints are as follows (see Figure 19 overleaf):

- **Views from the N11 from the south**
 - Viewpoint 01: Junction of N11 and N31/ Brewery Rd
 - Viewpoint 02: N11 near Merville Rd
 - Viewpoint 03: N11 approaching the junction with Lower Kilmacud Road from the south
 - Viewpoint 04: Stillorgan Park bus stop across the N11 from the site

² High magnitude of change definition: *'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'*.

- **Views from the N11 from the north**
 - Viewpoint 05: N11 approaching the junction with Lower Kilmacud Road from the north
 - Viewpoint 06: N11 at the junction with Lower Kilmacud Road, looking south

- **Views from Stillorgan Park Road from the east**
 - Viewpoint 07: Stillorgan Park Road approaching the junction with the N11

- **Views from Lower Kilmacud Road from the west**
 - Viewpoint 08: Lower Kilmacud Road entering Stillorgan from the west
 - Viewpoint 09: Lower Kilmacud Road approaching the central junction (The Hill and Old Dublin Road)
 - Viewpoint 10: Junction of Lower Kilmacud Road and The Hill

- **Views from the Old Dublin Road from the north**
 - Viewpoint 11: Old Dublin Road approaching the central junction (Lower Kilmacud Road and The Hill)

- **Views from The Hill from the south**
 - Viewpoint 12: Lower Kilmacud Road entering Stillorgan from the west
 - Viewpoint 13: Lower Kilmacud Road approaching the central junction (The Hill and Old Dublin Road)
 - Viewpoint 14: Junction of Lower Kilmacud Road and The Hill

- **Surrounding residential neighbourhoods**
 - Viewpoint 15: St Brigid's Drive
 - Viewpoint 16: Linden Lea Park
 - Viewpoint 17: Ard Lorcaín
 - Viewpoint 18: Kilmacud Crokes parking area
 - Viewpoint 19: Beaufield Park
 - Viewpoint 20: Patrician Villas
 - Viewpoint 21: Stillorgan Park Avenue (1)
 - Viewpoint 22: Stillorgan Park Avenue (2)
 - Viewpoint 23: Stillorgan Grove

The effects on these viewpoints are assessed in Table 1 below. For the methodology, terms and criteria used in the assessment refer to Appendix 1.

The assessments should be read in conjunction with the baseline photographs and verified photomontages provided in A3 format under separate cover. For each viewpoint the following views are provided:

- **Baseline view:** Photograph of the existing scenario.
- **Permitted view:** Photomontage of the permitted development on the site (ABP-300520-17). This is provided for information purposes. The visual effects assessment below does not compare the now proposed development against the permitted development.
- **Proposed view:** Photomontage of the proposed development.
- **Cumulative view:** Photomontage of the proposed development + the permitted Leisureplex and Library site developments.


In the assessment below the magnitude of change and significance of the effects of the proposed development are measured against the existing/baseline scenario (and not the permitted scenario).


Objective BH2 of the Stillorgan LAP requires that photomontages for the visual impact assessment show the proposal in 'daylight and nightlight conditions'. In response to this requirement, for four of the viewpoints night time views have been provided in addition to the day time photomontages. The four viewpoints (Nos. 16, 20, 21 and 22) represent surrounding residential neighbourhoods.



Figure 19: Viewpoints for visual effects assessment




Table 1: Assessment of Visual Effects

No.	Viewpoint Location	Existing & Permitted Views	Viewpoint Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
Views from the N11 to the south						
01	Junction of N11 and N31/ Brewery Rd	<p><u>Existing</u></p> <ul style="list-style-type: none"> At this point 700m south of the site the N11 passes through an existing high density cluster (at Galloping Green) which includes the Grange and Beechwood developments (9 and 8 storeys respectively). These generate a degree of urban enclosure and character in the N11 corridor.  <p>Unlike Stillorgan, this location is not a designated urban centre in the CDP Core Strategy, although the concentration of density does respond to a key junction of Primary Roads.</p> <ul style="list-style-type: none"> In the view north beyond the junction (towards the city) the 6 lane road is flanked by belts of vegetation and in the distance ahead some small buildings can be seen beside the road. There is notably no built enclosure and no markers of places along the road corridor ahead. The following quote from the LAP is relevant: <i>“In relation to Stillorgan and the provision of taller buildings along the N11 corridor... the N11, owing to its width, strategic importance, and public transport facilities, has the potential to become an attractive urban corridor enclosed by taller buildings of high quality, at locations which are also proximate to social and community infrastructure.”</i> This indicates that there is a high capacity for change in the N11 corridor. 	Medium	<p><u>Proposed</u></p> <ul style="list-style-type: none"> Buildings 01 and 03 would be visible in the distance, rising behind the existing buildings at the edge of Stillorgan. The new buildings’ typology and scale would be in keeping with the Grange and Beechwood developments (and other concentrations of density along the N11) - therefore not out of character in the N11 corridor. In combination the new development and the smaller buildings on St Brigid’s Road would form a distinct urban cluster, with a visible diversity of form, scale and architecture as is the norm in an urban centre. The height of Building 03, although modest, is sufficient to function as a marker, suggesting a place of importance in the townscape. The development would achieve the CDP and LAP objective of using building height in the N11 corridor to mark centres of social and community infrastructure. Although at 700m the development’s visual presence would be relatively limited, it would have positive effect on the character and legibility of the N11 townscape corridor. 	Low	Slight positive
02	N11 near Merville Rd	<p><u>Existing</u></p> <ul style="list-style-type: none"> This view is taken from roughly halfway between Galloping Green and Stillorgan. The curve in the road combined with the roadside trees limits the distance of the view ahead. The viewpoint was selected to assess whether the proposed development would be tall enough to be visible at this location, and thereby signal the road’s approach to Stillorgan. 	Medium	<p><u>Proposed</u></p> <ul style="list-style-type: none"> The proposed development would not be visible. The gateway building (Building 03 beside Lower Kilmacud Road junction) would need to be three or more storeys taller to achieve visibility. 	None	No effect

No.	Viewpoint Location	Existing & Permitted Views	Viewpoint Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
03	N11 approaching the junction with Lower Kilmacud Road from the south	<p><u>Existing</u></p> <ul style="list-style-type: none"> This view is taken from the N11 approaching the site's south east corner. The junction with Lower Kilmacud Road is in the middle distance (approximately 175m distant). The view illustrates the lack of built frontage to the road, and the related lack of legibility along this stretch of the N11. On both sides of the 6 lane thoroughfare there are houses facing away from the road, with high boundary walls and vegetation defending the properties from the traffic and noise. The junction ahead is visible but there is no indication that this is the entrance/ gateway to an urban district centre. The Stillorgan LAP recognises this weakness in character and legibility and requires that the site be developed to address this by means of high density residential use concentrated in 'taller buildings of high quality' along the east boundary. 	Medium	<p><u>Proposed</u></p> <ul style="list-style-type: none"> The development would be visible in the gap between the trees, and Building 02 would protrude sufficiently above the roadside trees to (a) visibly address the road, and (b) be identifiable/recognisable. The light coloured brick and render would contribute to the development's visibility. The intensification of land use on the approach to the junction, and the design and material quality of the east facade, would contribute to the realisation of "an attractive urban corridor enclosed by taller buildings of high quality, at locations which are also proximate to social and community infrastructure". Importantly, the view shows that the proposed height of Building 02 can be comfortably accommodated in the wide road corridor. 	Low-Medium	Moderate positive
04	Stillorgan Park bus stop across the N11 from the site	<p><u>Existing</u></p> <ul style="list-style-type: none"> The view is taken from the bus stop opposite the site, where passengers disembark to access Stillorgan. The view shows how the lack of built frontage to the N11 limits the district centre's visibility from the adjacent thoroughfare. The LAP recognises this weakness in character and legibility and states: <i>"The Map shows the N11 Corridor boundary to the LAP as a focus, primarily, for new residential development. The Strategy also includes a number of key objectives, such as the <u>designation of areas for taller buildings, at the Gateway sites of LeisurePlex and Environs and the former Blakes development.</u>"</i> 	Medium	<p><u>Proposed</u></p> <ul style="list-style-type: none"> Building 03 would stand prominently beside the junction, combining with the Library site development on the far side of the junction (as shown in the cumulative view) to define a new gateway to the district centre. The slender form and the architecture and materials of Building 03 are of appreciably high quality and reinforce the building's landmark function. Between Buildings 03 and 02 is a broad corridor of open space through which a new pedestrian path would provide access across the site to The Hill. The visibility of this green route from the bus stop is an important gain in townscape legibility and visual amenity. In combination the developments (as shown in the cumulative view) would achieve a strong but permeable built frontage to the N11, avoiding excessive enclosure and revealing the depth of the urban area behind the road front – inviting entry to a transformed Stillorgan district centre. The proposed development would make the defining contribution to the vision of an 'attractive urban corridor enclosed by taller buildings of high quality, at locations proximate to social and community infrastructure'. 	Very High	Significant positive

No.	Viewpoint Location	Existing & Permitted Views	Viewpoint Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
Views from the N11 to the north						
05	N11 approaching the junction with Lower Kilmacud Road from the north	<p><u>Existing</u></p> <ul style="list-style-type: none"> This view is taken from the N11 approaching the Lower Kilmacud Road junction from the north. Similar to View 03, the view illustrates the lack of built frontage to the road, and the related lack of legibility along this stretch of the N11. On both sides of the 6 lane thoroughfare there are houses set well back from the road behind belts of vegetation and local access roads. The junction ahead is discernible but there is no indication that this is the entrance/ gateway to an urban district centre. 	Medium	<p><u>Proposed</u></p> <ul style="list-style-type: none"> Building 03 would be visible above the roadside trees in the middle distance beyond the junction. In combination with the Library site the development would establish a new built frontage to the N11, marking the urban centre in the road corridor, and defining a gateway to Stillorgan from the road. 	Medium	Moderate positive
06	N11 at the junction with Lower Kilmacud Road, looking south	<p><u>Existing</u></p> <ul style="list-style-type: none"> The existing view shows the complete lack of built frontage to the N11 which contributes to a particular lack of legibility along this stretch of the N11. There are no buildings addressing any of the four roads at the junction. Therefore, there is no indication of the proximity to an urban district centre. 	Medium	<p><u>Proposed</u></p> <ul style="list-style-type: none"> Building 03 would be prominent addition to the N11 corridor, achieving its intended landmark function. The principal elevation (the more slender and more articulated facade) faces east (as opposed to north). This subtly indicates that the town centre lies to west, off the thoroughfare. Building 02 also has a strong presence along the N11, so that the collective built frontage is substantial – commensurate with the width of the road. The view shows that the buildings’ height can be comfortably accommodated without excessive enclosure. (The gap between Buildings 02 and 03 contributes to this.) The 9 storey frontage of Building 03 to Lower Kilmacud Road (set back behind a 7 storey shoulder) would face a 2 storey library across the road (outlined green on the inset aerial view of the permitted Library site development). This step down in height on the Library site creates the capacity for the 9 storey height on the site side of the road. The development would contribute to the realisation of an ‘attractive urban corridor’ along the N11 and a legible gateway to Stillorgan town centre. Neither the N11 nor Lower Kilmacud Road would be excessively enclosed by built form; the streetscapes of both roads would benefit from improved definition by buildings of appreciable design and material quality. 	High	Significant positive

No.	Viewpoint Location	Existing & Permitted Views	Viewpoint Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
Views from Stillorgan Park Road to the east						
07	Stillorgan Park Road approaching the junction with the N11	<p><u>Existing</u></p> <ul style="list-style-type: none"> The existing view shows the lack of built frontage to both the N11 and Lower Kilmacud Road beyond the junction. This contributes to a weakness in townscape character and legibility. The existing buildings beyond the site (west of The Hill) can be seen in the distance but these are underwhelming as an urban district centre. 	Medium	<p><u>Proposed</u></p> <ul style="list-style-type: none"> From this angle Building 03 is very clearly differentiated as a landmark in both form and facade treatment. The frontage to Lower Kilmacud Road (Buildings 03, 04, 05, 06) is intricately stepped in its building line and roofline. This distinctive street elevation draws the eye to the distant junction at the centre of Stillorgan, inviting entry. In the cumulative view it can be seen that the setback of the 9 storey gateway volume on the Library site behind a low street-front volume (the library) creates capacity for more uniform height across the road (the site). The consistent shoulder height of the proposed buildings 04, 05 and 06 contrasts with the more staggered building line and height on the Library and Leisureplex sites. This creates a varied and visually interesting composition of form. Such complexity is desirable in an urban centre. In combination the developments would achieve(a) a strong but permeable built frontage to the N11, avoiding excessive enclosure of either the N11 or Lower Kilmacud Road (and revealing the depth of the urban area behind the road-front), and (b) a highly legible gateway to a transformed Stillorgan town centre. 	High	Significant positive
Views from Lower Kilmacud Road to the west						
08	Lower Kilmacud Road entering Stillorgan from the west	<p><u>Existing</u></p> <ul style="list-style-type: none"> This view is taken from the recently improved road as it enters the town centre. To the left is a row of houses converted for commercial use and to the right is a parking area. Ahead are the refurbished shopping centre and another 20th century commercial building framing the town centre streetscape. Despite the improved streetscape and shopping centre the entry to Stillorgan from the west is underwhelming and there is capacity/requirement for transformational change given its district centre status. 	Low	<p><u>Proposed</u></p> <ul style="list-style-type: none"> The proposed development would be visible in the distance. Although some distance away its contemporary urban typology and scale would be appreciable and it would contribute to a positive change in townscape character and legibility. In the cumulative view, even at this distance (300m) the combination of the Leisureplex development and the proposed development would visibly establish a new urban core characterised by buildings of contemporary typology, scale and architecture and well defined streets. The negative influence of the 20th century buildings would be diminished in the larger, more complex and re-imaged town centre. 	Low	Slight positive
09	Lower Kilmacud Road approaching the central junction (The Hill and Old Dublin Road)	<p><u>Existing</u></p> <ul style="list-style-type: none"> This view is illustrative of the weak townscape character of Stillorgan town centre. It shows (a) the dominance of road surface and parking areas, (b) the lack of built enclosure to the streets, (c) the lack of buildings of architectural value, (d) a related lack of legibility of the urban structure, and (e) the limited quality of the public realm. As an urban centre of 'district centre' status it is underwhelming and there is considerable capacity/requirement for transformational change. <p><u>Permitted</u></p> <ul style="list-style-type: none"> The permitted development would be visible on one side of Kilmacud Road beyond the central junction, the buildings stepping up in height along the road towards the N11 (and conversely stepping down in height towards the town centre junction and the small existing buildings in the foreground). It would contribute to a positive change in the townscape character and legibility. 	Low	<p><u>Proposed</u></p> <ul style="list-style-type: none"> The proposed development would be visible on one side of Kilmacud Road beyond the central junction, establishing a strongly urban character on that section of Lower Kilmacud Road, contrasting with the foreground buildings. The buildings (06, 05, 04, 03) step up in height as the road drops in elevation towards the N11 in the distance, so that from this angle they present a fairly consistent shoulder height (refer to Figure 13 above). The degree of contrast between Building 06 and the Bolands pub at the central junction would be pronounced. However, in the 21st century era of compact growth and the re-imaging of Stillorgan as a high density, mixed use district centre, a building such as Bolands cannot dictate the new built form. In the future scenario Bolands will be seen as the anomaly in the transformed town centre, lending character and visual interest to the area. In the cumulative view, the combination of the Leisureplex development and the proposed development would establish a new urban core characterised by buildings of contemporary typology, scale and architecture, and well defined streets. The presence and influence of the 20th century buildings would be diminished. 	Medium	Moderate positive

No.	Viewpoint Location	Existing & Permitted Views	Viewpoint Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
10	Junction of Lower Kilmacud Road and The Hill	<p><u>Existing</u></p> <ul style="list-style-type: none"> This view is taken from the junction in the centre of Stillorgan. Recognising that this is a view focussed mainly on the vacant site, it nonetheless illustrates the imbalance between built form and road infrastructure in Stillorgan – due in part to the wide roads but also the small scale of the existing buildings in and around the town centre. The distinctive but unsightly Bolands pub in the foreground is the only building that addresses the central junction currently. Extending along the right side of The Hill opposite the site are a row of converted cottages in commercial use. The cottages are a valued element of the townscape. They have character/charm and are visually interesting. However, it must be questioned whether (a) they warrant, and (b) they would benefit, from any attempt to avoid a pronounced step in height between them and the site across the road (i.e. whether development density on the site should be limited in consideration of the cottages). A degree of dominance by development across the road is unavoidable. 	Low	<p><u>Proposed</u></p> <ul style="list-style-type: none"> The proposed development would be a prominent addition to the townscape, transforming the character of The Hill, Lower Kilmacud Road and the central junction. Building 06 would have a 'local landmark' quality, marking the central junction as a place of significance. The generous footpath/plaza space around the building, including several trees, contributes to this effect. To the left along Lower Kilmacud Road, after a step down (to emphasise 06 at the corner) Buildings 05, 04, 03 step up in height as the road falls towards the N11, so that they present a fairly consistent shoulder height to the street (refer to Figure 13 above). A key question for this view is whether Buildings 06 and 01 (further along The Hill to the right) would cause harm to the older, smaller buildings across the road. The photomontage shows that despite the pronounced change in character and scale across the road, the converted cottages (and even the unsightly Bolands pub – to an extent) would continue to contribute positively to the streetscape/townscape character. In fact, the unique composition of built form, architecture and materials would be pleasing. The proposed development would have a positive, transformative effect on The Hill, Lower Kilmacud Road, the central junction and the Stillorgan townscape as a whole. 	High	Significant positive
Views from the Old Dublin Road to the north						
11	Old Dublin Road approaching the central junction	<p><u>Existing</u></p> <ul style="list-style-type: none"> The view is taken from the road in front of the shopping centre car park. Across the road is a 20th century terrace of shops. Ahead along the road is the junction at the centre of Stillorgan but there is no indication of this in the surrounding built form. 	Low	<p><u>Proposed</u></p> <ul style="list-style-type: none"> Buildings 06 and 05 would be visible in the middle distance. Being of contemporary urban character the development would contrast strongly with the existing townscape in view, and would initiate a positive shift in character appropriate to the district centre location. The cumulative view shows how the proposed development and the Leisureplex development (currently under construction) would work in concert to establish a new character and strengthen the urban structure by marking the central junction and bringing built frontage (and active use) to the streets. 	Low	Slight positive
Views from The Hill						
12	The Hill opposite the site entrance	<p><u>Existing</u></p> <ul style="list-style-type: none"> The view is taken from The Hill across the road from the site, looking north towards the junction with Lower Kilmacud Road at the centre of Stillorgan. In the foreground is a low thatched building housing a restaurant and beyond that – mostly hidden from view – are the cottages converted for commercial use. Bolands can be seen in the middle distance at the junction and beyond that is a feature element of Stillorgan shopping centre. The large vacant site occupies the area to the right of the road. The view shows the weak townscape character, poor public realm and lack of legibility in the town centre. 	Medium	<p><u>Proposed</u></p> <ul style="list-style-type: none"> The development would transform the character of The Hill. In the foreground is the corner of Building 05 overhanging the vehicular entrance to the site, beside the entrance to the community sports hall. Further along the street the plaza between Buildings 05 and 06 can be seen. The café in the ground floor of Building 06 would activate this space, and Building 06 itself would mark the central junction. To the right (just out of view) the pedestrian and cycle route across the site to the N11 would be visible, passing through the central open space in the site. This view is noticeably different to views along Lower Kilmacud Road. The built form is more permeable and the architecture more varied. The uses are also different, with the sports hall and creche fronting the street. A key question is whether the proposed development would harm buildings across the road since in scale and architecture the new buildings would contrast strongly with the thatched restaurant and the converted cottages. In a contemporary urban centre such juxtapositions are not undesirable; they add to the character and strength of identity of the place. In the future context it is the older, smaller buildings that would be seen as the anomaly, and while they are valuable elements of the townscape, they should not dictate the scale and density of new development on the site/in the district centre; this would be unsustainable. 	Very high	Significant positive

No.	Viewpoint Location	Existing & Permitted Views	Viewpoint Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
13 & 13a	Views of the interface with the neighbouring residential property	<p><u>Existing</u></p> <ul style="list-style-type: none"> These viewpoints were selected specifically to show the interface of the proposed development with the neighbouring house Dún Fanóir. This residential property shares a boundary with the site and is unavoidably exposed to any new development on the site. 	Medium	<p><u>Proposed</u></p> <ul style="list-style-type: none"> In View 13 the proposed Building 01 steps down from seven to three storeys in a series of steps (see Figure 14 above) to reduce the height at the boundary. Building 02 rises behind the house, similarly stepping from three storeys up to seven away from the house. The deconstructed forms are complemented by variations in material to reduce the perceived massing. The views show the unavoidably abrupt and pronounced transition between the house to the south and a high density development on the district centre, gateway-designated site. Although the buildings are not unsightly, the increase in built/visual enclosure would constitute a loss in visual amenity for this property. It should be noted that, like the subject site, the three houses to the south are included in the LAP boundary and zoned District Centre (the same zoning as the site and the Leisureplex and library sites). This indicates that there is an acceptance that the houses' environment will change significantly with the implementation of the LAP. It also allows for the possibility of these properties themselves being redeveloped in future to adapt to the evolved urban context. 	High	Moderate negative
14	View from The Hill to the south of the site, approaching from the N11	<p><u>Existing</u></p> <ul style="list-style-type: none"> The view is taken from The Hill just after the exit to Stillorgan from the N11. This is a key route of entry to the town centre and currently the street and the view are lacking in built enclosure or features of note. There is no indication of the road's approach to the district centre. 	Low	<p><u>Proposed</u></p> <ul style="list-style-type: none"> The proposed development would transform the streetscape ahead, with Buildings 01, 05 and 06 enclosing the street on one side, following the curve of the road and strengthening the urban structure. The variations in façade design between the three buildings add visual interest to the street elevation, and the 'landmark entrance' to the sports hall in Building 05 is particularly legible. The gaps in the built frontage, i.e. the main entrance (and landscaped corridor) between Buildings 01 and 05, and the plaza between 05 and 06, can be discerned from this distance, and as the viewer moves along the street these open spaces will be more clearly revealed. In this view the smaller-scale older, smaller buildings across the street are not visible, so there is no sense of dominance of any existing building/feature, or of excessive enclosure of the street. The overall effect would be to create an attractive contemporary approach/entrance to the town centre. 	Medium-High	Moderate positive
Views from the surrounding residential neighbourhoods						
15	St Brigid's Drive/ Glenalbyn Road	<p><u>Existing</u></p> <ul style="list-style-type: none"> St Brigid's Drive/ Glenalbyn Road provides access to a mixed density residential neighbourhood to the south of Stillorgan town centre. This neighbourhood includes Linden Lea Park and Ard Lorcaín (Viewpoints 16 and 17), both low density suburban estates, as well as the Woodview Court and Churchview apartment developments. The view is taken from junction of Linden Lea Park. The vacant site lies ahead beyond The Hill and the absence of development on the site contributes to a weak townscape character and poor legibility. There is no indication of the proximity to the town centre. 	Medium	<p><u>Proposed</u></p> <ul style="list-style-type: none"> Building 01 would be a prominent addition to the view at the end of the street, causing a significant shift in townscape character towards a more urban condition. The topography is favourable in that the building would not appear excessively tall despite its 7 storey height, and the massing is successfully broken down by the setback above the fourth storey and the associated change in façade treatment. 	Low-Medium	Moderate positive
16	Linden Lea Park	<p><u>Existing</u></p> <ul style="list-style-type: none"> Linden Lea Park lies to the south west of the site behind the commercial premises on The Hill. It is thus directly adjacent to Stillorgan town centre, only minutes' walk from the central junction. The street is lined with relatively low (dormer-type) houses. 	Medium	<p><u>Proposed</u></p> <ul style="list-style-type: none"> The stepped southern end of Building 01 (approximately 125m distant) would protrude marginally above the roofline of the houses down the street. The change to the composition would be limited and would have no effect on visual amenity. The visibility of contemporary urban development from the street would cause a slight shift in character towards a more urban condition. This is not inappropriate at this location. 	Low	Slight neutral
16N	Linden Lea Park at night	Objective BH2 of the Stillorgan LAP requires that the photomontages for the visual impact assessment show the proposal in 'daylight and nightlight conditions'.	Medium	<p><u>Proposed</u></p> <ul style="list-style-type: none"> The lights of a number of upper floor apartments of Building 01 would be visible at night. Similar to the daytime effect, it would simply mark/identify the adjacent high density town centre, and would not reduce the amenities of Linden Lea Park. Such effects – on older residential neighbourhoods surrounding urban cores - are unavoidable in the process of compact growth. 	Low	Slight neutral

No.	Viewpoint Location	Existing & Permitted Views	Viewpoint Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
17	Ard Lorcain	<u>Existing</u> <ul style="list-style-type: none"> Ard Lorcain is on a rise beyond Linden Lea Park. The viewpoint was selected to test how far the proposal's visual effects would extend to the south west of the site. 	Medium	<u>Proposed</u> <ul style="list-style-type: none"> The proposed development would not be visible. 	None	No effect
18	Kilmacud Crokes parking area	<u>Existing</u> <ul style="list-style-type: none"> A sports facility is not considered a sensitive visual receptor since viewers tend to be focussed on their activity rather than the surroundings. Nonetheless, a club is a place of community congregation and playing fields typically afford relatively unobstructed long distance views (for an urban area). Due to the size of Kilmacud Crokes any visual impact at this location would be experienced by a large number of people. 	Low	<u>Proposed</u> <ul style="list-style-type: none"> The proposed development would protrude marginally above the existing roofline in the distance. It would have very limited effect on the view although it would indicate the presence of an urban core in the vicinity. 	Negligible	Not significant neutral
19	Beaumont Park	<u>Existing</u> <ul style="list-style-type: none"> Beaumont Park is to the north west of the site beyond Stillorgan shopping centre. In this view from the nearest estate street to the site, the rooftop plant of the shopping centre can be seen above the boundary hedge. There is a notable absence of built form in the surroundings given the location adjacent to the town centre. 	Medium	<u>Proposed</u> <ul style="list-style-type: none"> The proposed development would be barely discernible from this location. The cumulative view shows that the permitted developments on the Library and Leisureplex sites will be prominent additions in the middle distance. Their distinctly urban typology and scale will cause a shift in character towards a more urban condition appropriate to the district centre location. 	Negligible	Imperceptible neutral
20	Patrician Villas	<u>Existing</u> <ul style="list-style-type: none"> Patrician Villas is the only potentially affected area to the north east of the site. The estate lies beyond the wide junction of the N11, Lower Kilmacud Road and Stillorgan Park Road. The houses of the estate are set well back from these busy roads behind belts of trees and lawn areas. The terraced houses along the central access road frame a view towards the site and the vista is closed by the dense belt of mature trees along the N11 boundary. 	Medium	<u>Proposed</u> <ul style="list-style-type: none"> The 9 storey building would rise above the tree line in the middle distance beyond the junction of the N11 and Lower Kilmacud Road. The extent of the protrusion is sufficient that it would be identifiable, marking the gateway and the urban edge of Stillorgan district centre in the wider landscape. The cumulative view shows that in combination with the Library site development it would achieve the LAP's objectives of a legible gateway and a strong urban edge along the N11. The visibility of several buildings of urban scale and character would cause a shift in character towards a more urban condition. This is not inappropriate at this location, and there would be no reduction in visual amenity in Patrician Villas. 	Low-Medium	Slight positive
20N	Patrician Villas at night	Objective BH2 of the Stillorgan LAP requires that the photomontages for the visual impact assessment show the proposal in 'daylight and nightlight conditions'.	Medium	<u>Proposed</u> <ul style="list-style-type: none"> The lights of the upper floors of Building 03 would be visible. Similar to the daytime effect, it would simply mark/identify the nearby town centre, and would not reduce the amenities of Patrician Villas. Such effects – on older residential neighbourhoods surrounding urban cores - are unavoidable in the process of compact growth. 	Low	Slight neutral
21 & 22	Stillorgan Park Avenue (1 & 2)	<u>Existing</u> <ul style="list-style-type: none"> Stillorgan Park Avenue runs parallel to the N11 directly to the east of the site. A row of houses³ on the west side of Stillorgan Park Avenue present their rear facades towards the site. They have short back gardens but are separated from the site by the wide road corridor (approximately 30m wide), so that the houses themselves are some 50m from the site boundary. There are lines of vegetation on both sides of the road, against the boundary wall of the houses and along the site boundary. This provides some screening in views from the rear windows and gardens of the houses. The Stillorgan LAP states: <ul style="list-style-type: none"> <i>"The Strategy Map... shows the N11 Corridor boundary to the LAP as a focus, primarily, for new residential development. The Strategy also includes a number of key objectives, such as the designation of areas for taller buildings, at the Gateway sites of LeisurePlex and Environs and the former Blakes development."</i> <i>"In relation to Stillorgan and the provision of taller buildings along the N11 corridor... the N11, owing to its width, strategic importance, and public transport facilities, has the</i> 	Medium	<u>Proposed</u> <ul style="list-style-type: none"> Buildings 02 and 03 would stand prominently on the far side of the N11, causing a high magnitude of change to the views. The photomontages show the beneficial effects of the embedded mitigation in the design, specifically (a) the steps in height, vertical recesses and horizontal setbacks to reduce the massing, and (b) variations in cladding material and fenestration for additional articulation. The visual effects would nonetheless be significant. The landscape context of the affected Stillorgan Park Avenue houses would be substantially altered. This effect must be considered in the context of the houses being located on the N11 opposite a major District Centre development site designated in the LAP for taller development to (a) mark the gateway to the district centre, (b) define the urban edge of the centre, and (c) form an 'attractive urban corridor' along the N11 'enclosed by taller buildings of high quality'. Assessments by DLRCC and ABP of previous applications for development on the site have acknowledged the requirement of this form of intervention on the site (see Section 2.2.2 above). 	High	Significant neutral

³ In the commentary on Viewpoints 21 and 22 the buildings on Stillorgan Park Avenue across the N11 from the site are all referred to as 'houses'. One of the buildings (Wolverton) is in fact a small apartment building – although in form and height it is not dissimilar to the large houses on the road. For brevity Wolverton is referred to as one of the 'houses' on Stillorgan Park Avenue.

No.	Viewpoint Location	Existing & Permitted Views	Viewpoint Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
		<p><i>potential to become an attractive urban corridor enclosed by taller buildings of high quality, at locations which are also proximate to social and community infrastructure.</i></p> <ul style="list-style-type: none"> The LAP effectively prescribes that taller development should take place along the site's east boundary fronting the N11, directly across the road from the Stillorgan Park Avenue houses, with additional height at the Lower Kilmacud Road junction to mark the gateway. 		<ul style="list-style-type: none"> Compact growth policy has implications for townscape character and the composition of views in the areas in which it is implemented. The intrusion of taller buildings into views from the public realm and existing residential properties cannot be avoided; nor should it necessarily be 'minimised'. In some cases visual impact is required. The objective should rather be to ensure that the new taller buildings are of a high quality so that, even if prominent, they elevate the quality of their receiving environment and may be considered acceptable even by affected residents in the area. The proposal is such a development. It would have a significant effect on the Stillorgan Park houses to the east across the N11, but the location for this intervention is appropriate and the design is of a high quality. 		
21N & 22N	Stillorgan Park Avenue (1) at night	Objective BH2 of the Stillorgan LAP requires that the photomontages for the visual impact assessment show the proposal in 'daylight and nightlight conditions'.	Medium	<p><u>Proposed</u></p> <ul style="list-style-type: none"> The lights of the upper floors of Buildings 02 and 03 would be visible above the foreground roofline and trees, on the far side of the already well-lit N11 dual carriageway. Such effects on older residential neighbourhoods surrounding urban cores are unavoidable in the process of compact growth. 	High	Significant neutral
23	Stillorgan Grove to the east of the site	<p><u>Existing</u></p> <ul style="list-style-type: none"> Stillorgan Grove lies to the east of Stillorgan Park Avenue. The road is so aligned as to frame a view towards the site, and the viewpoint was selected to test how far the proposed development's visual effects would extend to the east of the site. 	Medium	<p><u>Proposed</u></p> <ul style="list-style-type: none"> Small parts of Buildings 01 and 02 would be visible through gaps between the foreground houses and trees. Although the change to the composition would be very limited, and would have no effect on visual amenity, the visibility of evidently 'urban' development would cause a slight shift in character towards a more urban condition. This change is not inappropriate. 	Negligible	Not significant neutral

7.0 Conclusions

The receiving environment is an urban core adjacent to one of Dublin's main road arteries, the N11. Stillorgan is undergoing a plan-led transformation from a low density district centre developed incrementally through the 20th century and dominated by road infrastructure, to a high density, mixed use 21st century district centre. Key to this transformation are the two 'Key Development Sites' and 'gateway sites' identified in the Stillorgan LAP, i.e. the Leisureplex and Library site and the Blakes and Esmonde Motors site. In combination the redevelopment of these sites has the potential to address a number of major weaknesses in the area, including:

- A lack of buildings of architectural merit/value (other than the single and two storey cottages on The Hill);
- The lack of built enclosure/definition of the streets;
- Domination of the townscape by roads and parking areas;
- Poor quality public realm and pedestrian facilities, and limited green infrastructure.

As a result of the above Stillorgan has a weak urban structure and townscape character, and poor legibility. These characteristics are experienced both internally (i.e. within the urban centre) and externally, e.g. along the N11. There is currently no built form along the N11 to signal its approach to Stillorgan or define a gateway into the centre. The centre is also not visible from even the nearest surrounding residential suburbs. Additionally, there is an absence of residential land use in the centre to sustain urban vitality by day and night.

The LAP recognises these issues and provides a policy framework for the area's transformation, confirming that the receiving environment has a high capacity for townscape change. This is further evidenced by the site's planning history. The two previous permissions have established that the site is considered capable of accommodating a development of landmark, town centre character in terms of land use mix, density, height and architecture.

7.1 Townscape Effects

The sensitivity of the receiving environment to townscape change can be classified medium⁴. There are several factors pointing to a high capacity for change in the area (see Section 5.1 above). However, due to (a) its position (i.e. its frontage to three important streets, the town centre junction and the N11 gateway), (b) its large size, and (c) the few existing houses in close proximity to the site, the site's redevelopment has the potential to cause significant change to the townscape character and quality of the area.

The proposed development would cause a high⁵ magnitude of townscape change (see Section 5.2 above). It would change the land use pattern, introducing a combination of high density residential use, café/restaurant and community uses to the district centre. The perimeter block arrangement of tall, contemporary buildings would change the urban grain (the mix of plot and building typologies) and architecture in the area. It would also change a number of important elements in the public realm, including the streetscapes of Lower Kilmacud Road and The Hill, two key streets in the urban centre.

⁴ Medium sensitivity 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 principle management objective may be to consolidate landscape character or facilitate appropriate, necessary change' – refer to Section 2.1, Appendix 1)

⁵ High magnitude of change definition: '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'.

Measuring the magnitude of change against the sensitivity of the receiving environment, **the townscape effects are predicted to be significant' and positive.** The development would:

- a) Improve the mix of uses in the town centre, enlivening the area by day and night.
- b) Introduce a cluster of buildings that responds to and strengthens the evolving urban structure, complementing the developments on the Library and Leisureplex sites and shifting the Stillorgan townscape towards a contemporary urban character (in keeping with its district centre designation).
- c) Introduce a built frontage of appropriate scale and quality to the N11, including a building of gateway/ landmark character beside the Lower Kilmacud Road junction, announcing the presence of the Stillorgan town centre along a stretch of the N11 where legibility is particularly poor.
- d) Introduce or improve several key elements of the town centre public realm, including the streetscapes of the N11, Lower Kilmacud Road and The Hill (using the new buildings to improve their enclosure/ definition, new uses to activate the streets, and adding public gathering spaces and vegetation to the streetscapes) and a pedestrian link in a parkland corridor across the site between the N11 and The Hill.
- e) Considerably increase the overall quantity of vegetation on the site and in the surrounding streetscapes, despite the short term loss of a proportion of the trees along the east site boundary (along the N11).

7.2 Visual Effects

23 no. viewpoints were selected for detailed assessment informed by verified photomontages. The viewpoints represent the main character areas and groups of visual receptors in the receiving environment (i.e. Stillorgan town centre, the N11 corridor, and the residential neighbourhoods surrounding the site). The potential effects on these locations are summarised in Table 2 below.

Table 2: Summary of visual effects assessment

No.	Viewpoint Location	Viewpoint Sensitivity	Magnitude of Change	Significance of Effects
Views from the N11 to the south				
01	Junction of N11 and N31/ Brewery Rd	Medium	Low	Slight positive
02	N11 near Merville Rd	Medium	None	No effect
03	N11 approaching the junction with Lower Kilmacud Road from the south	Medium	Low-Medium	Moderate positive
04	Stillorgan Park bus stop across the N11 from the site	Medium	Very High	Significant positive
Views from the N11 to the north				
05	N11 approaching the junction with Lower Kilmacud Road from the north	Medium	Medium	Moderate positive
06	N11 at the junction with Lower Kilmacud Road, looking south	Medium	High	Significant neutral
Views from Stillorgan Park Road to the east				
07	Stillorgan Park Rd approaching the junction with the N11	Medium	High	Significant neutral
Views from Lower Kilmacud Road to the west				
08	Lower Kilmacud Road entering Stillorgan from the west	Low	Low	Slight positive
09	Lower Kilmacud Road approaching the central junction (The Hill and Old Dublin Road)	Low	Medium	Moderate positive

No.	Viewpoint Location	Viewpoint Sensitivity	Magnitude of Change	Significance of Effects
10	Junction of Lower Kilmacud Road and The Hill	Low	High	Significant positive
Views from the Old Dublin Road to the north				
11	Old Dublin Road approaching the central junction	Low	Low	Slight positive
Views from The Hill				
12	The Hill opposite the site entrance	Medium	Very High	Significant positive
13	View of the interface with the neighbouring residential property	Medium	High	Moderate negative
14	View from The Hill to the south of the site, approaching from the N11	Low	Medium-High	Moderate positive
Views from the surrounding residential neighbourhoods				
15	St Brigid's Drive/ Glenalbyn Road	Medium	Medium	Moderate positive
16	Linden Lea Park	Medium	Low	Slight neutral
16N	Linden Lea Park at night	High	Low	Slight neutral
17	Ard Lorcaín	Medium	None	No effect
18	Kilmacud Crokes parking area	Medium	Negligible	Not significant neutral
19	Beaumont Park	Medium	Negligible	Imperceptible neutral
20	Patrician Villas	Medium	Low-Medium	Slight positive
20N	Patrician Villas at night	Medium	Low	Slight neutral
21	Stillorgan Park Avenue (1)	Medium	High	Significant neutral
21N 22N	Stillorgan Park Avenue (1) at night	Medium	High	Significant neutral
22	Stillorgan Park Avenue (2)	Medium	Medium	Moderate neutral
23	Stillorgan Grove to the east of the site	Medium	Negligible	Not significant neutral

The key findings are as follows:

- Views from the N11 (e.g. viewpoints 1-6):
 - The proposed 3-8 storey height of Building 02 would achieve a visible intensification of land use on the approach to the Kilmacud Lower junction, and the design and material quality of the east facade would contribute to the realisation of *"an attractive urban corridor enclosed by taller buildings of high quality, at locations... proximate to social and community infrastructure"* (as required by the LAP).
 - The photomontages show that the proposed height of Building 02 can be comfortably accommodated in the wide road corridor (as it has been elsewhere, e.g. at Galloping Green and Merrion).

- The wide gap between Buildings 02 and 03, through which the pedestrian route leads across the site to The Hill, is an important introduction to the scheme. (As previously permitted (ABP-300520-17) this was a bridged entrance.) The greater visibility of this green route from the N11 is an important gain in townscape legibility, navigability and visual amenity.
- The proposed Building 03 would deliver the landmark/gateway building envisioned in the LAP. It would be differentiated from the remainder of the new built frontage to the N11 by its 9 storey height, its distinctive architecture and the open space corridor between Buildings 02 and 03. It would therefore stand prominently at the junction, combining successfully with the Library site development to define a new gateway to Stillorgan.
- In combination the two developments would achieve a strong but permeable built frontage/urban edge to the N11, avoiding excessive enclosure and revealing the depth of the urban area behind the road front – inviting entry to a transformed town centre.
- Views from the town centre junction (of Lower Kilmacud Road, the Old Dublin Road and The Hill), e.g. Viewpoints 10 and 11:
 - The proposed Building 06 would have a ‘local landmark’ quality, marking the central junction as a place of significance in the townscape. The generous footpath/plaza space around the building, including several trees, would contribute to this effect.
 - The cumulative view for Viewpoint 11 shows how the proposed development and the Leisureplex development (currently under construction) would work in concert to establish a new character and strengthen the urban structure by marking the central junction and bringing built frontage (and active use) to the streets.
- Views from The Hill (e.g. Viewpoints 9, 12, 14):
 - A key question regarding views along The Hill is whether Buildings 06, 05 and 01 would cause harm to the older, smaller buildings across the road including the converted cottages (in commercial use). The photomontages show that despite (and indeed because of) the pronounced change in character and scale from one side of the street to the other, the resulting compositions would be visually interesting and attractive. The unique composition of built form, architecture and materials would lend character and identity to the area.
 - In the future context it is the older, smaller buildings that would be seen as the anomaly, and while they are valuable elements of the townscape, they should not dictate the scale and density of new development on the site/in the district centre; this would be unsustainable.
- Effects on the neighbouring residential properties to the south (Viewpoints 13, 13a):
 - Viewpoints 13 and 13a were selected specifically to show the interface of the proposed development with the neighbouring house Dún Fanóir. This property shares a boundary with the site and is unavoidably exposed to any new development on the site.
 - The photomontages show the steps down in height – in Buildings 01 and 02 – towards the boundary with Dún Fanóir, so that both buildings are three storeys where they face the boundary. Nonetheless, there would be a pronounced transition in building typology and scale between the houses to the south and the high density development on the district centre, gateway-designated site. Although the proposed buildings are not unsightly and mitigation measures have been incorporated in the proposal, the increase in built/visual enclosure would constitute a loss in visual amenity for the neighbouring property.
 - It should be noted that, like the subject site, the three houses to the south are included in the LAP boundary and zoned District Centre (the same zoning as the site and the Leisureplex and library sites). This indicates that there is an acceptance that the houses’ environment will change significantly with the implementation of the LAP. It also allows for the possibility of these properties themselves being redeveloped in future to adapt to the evolved urban context.

- Views from the surrounding residential neighbourhoods:
 - A key finding of the assessment is that the visual effects on the residential suburbs surrounding Stillorgan district centre (Viewpoints 15-23) would generally be relatively limited.
- Views from Stillorgan Park Avenue:
 - The main exception to the above (apart from Dún Fanóir) is Stillorgan Park Avenue to the east of the site across the N11. A row of houses (and one small apartment building) on the west side of Stillorgan Park Avenue present their rear facades towards the site, approximately 50m from the site boundary.
 - In views from these properties Buildings 02 and 03 would stand prominently on the far side of the N11, causing a high magnitude of change. The photomontages show the beneficial effects of the embedded mitigation in the design, specifically (a) the steps in height, vertical recesses and horizontal setbacks to reduce the massing, and (b) variations in cladding material and fenestration for additional articulation.
 - The visual effects would nonetheless be significant. The landscape context of the affected Stillorgan Park Avenue houses would be substantially altered.
 - This effect must be considered in the context of the houses being located on the N11 opposite a major District Centre development site designated in the LAP for taller development to (a) mark the gateway to the district centre, (b) define the urban edge, and (c) form an 'attractive urban corridor' along the N11 'enclosed by taller buildings of high quality'.
 - Assessments by DLRCC and ABP of previous applications for development on the site have acknowledged the requirement of this form of intervention on the site (see Section 2.2.2 above).

In conclusion, compact growth policy has implications for townscape character and the composition of views in the areas in which it is implemented. The intrusion of taller buildings into views (from the public realm and existing residential properties) cannot be avoided; nor should it necessarily be 'minimised'. The objective should rather be to ensure that the new buildings are of a high quality so that, even if prominent, they elevate the quality of their receiving environment and may be considered inoffensive even by affected residents in the area. The proposed development would achieve this and may be considered an appropriate intervention in the evolving townscape of Stillorgan.

Compact growth policy has implications for townscape character and the composition of views in the areas in which it is implemented. The intrusion of taller buildings into views from the public realm and existing residential properties cannot be avoided; nor should it necessarily be 'minimised'. In some cases visual 'impact' is required. The objective should rather be to ensure that the new development typologies (including taller buildings) are of a high quality so that, even if prominent, they elevate the quality of their receiving environment and may be considered acceptable even by affected residents in the area. The proposed development would achieve this and may be considered an appropriate intervention in the evolving townscape of Stillorgan.

APPENDIX 1 LANDSCAPE/TOWNSCAPE & VISUAL IMPACT ASSESSMENT METHODOLOGY

The TVIA methodology is informed by the *Guidelines for Landscape and Visual Impact Assessment*, 3rd edition 2013 (hereafter referred to as the GLVIA) and the EPA draft *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports*, 2017.

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

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

1.0 Key Principles of the GLVIA

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

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

1.2 Assessment of Both Landscape/Townscape and Visual Effects

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

‘Landscape/townscape’ results from the interplay between the physical, natural and cultural components of our surroundings. Different combinations and spatial distribution of these elements create variations in landscape/townscape character. ‘Landscape/townscape character assessment’ is the method used in LVIA to describe landscape/townscape and by which to understand the effects of development on the landscape/townscape as a resource.

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

2.0 Townscape Effects Assessment

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

2.1 Landscape/Townscape Sensitivity

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

Table 1 Categories of Landscape/Townscape Sensitivity

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

2.2 Magnitude of Landscape/Townscape Change

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

Table 2 Categories of Landscape/Townscape Change

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

2.3 Significance of Landscape/Townscape Effects

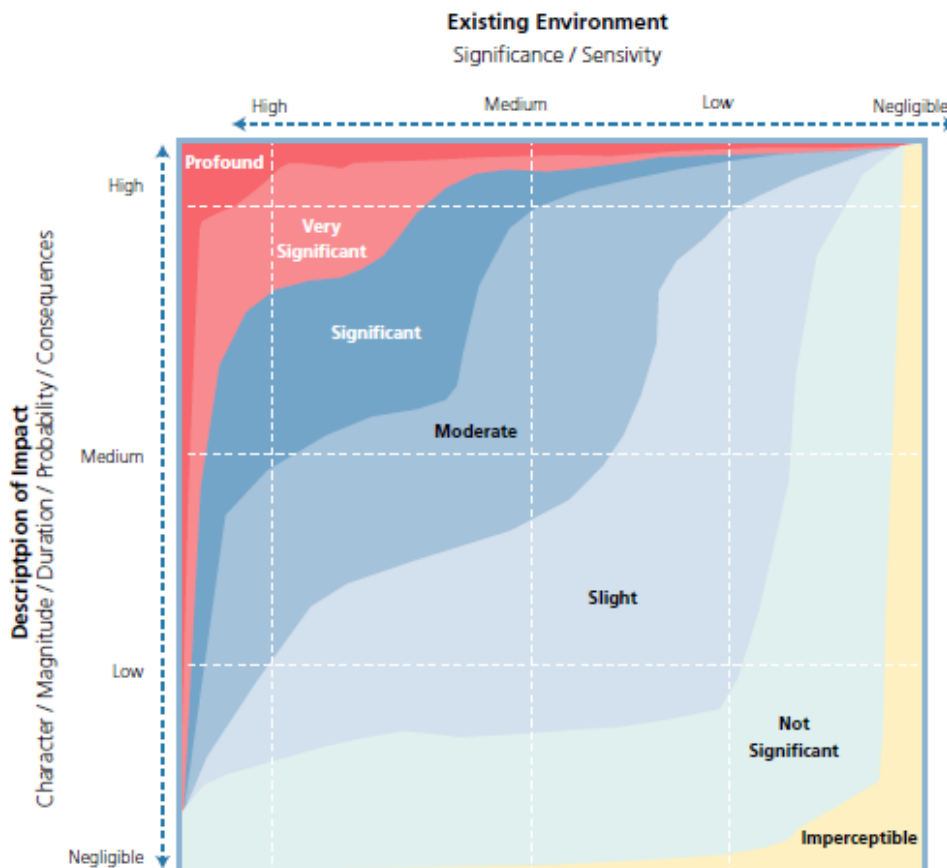
To classify the significance of effects the magnitude of change is measured against the sensitivity of the landscape/townscape using Table 3 and Figure 1 as a guide. The significance classification matrix (Table 3) is derived from the EPA’s Draft Guidelines on the Information to be Contained in Environmental Impact Assessment Reports, 2017 (specifically Figure 3.5 of the Guidelines – see Figure 1 below). In addition to this guidance the assessor uses professional judgement informed by their expertise, experience and common sense to arrive at a classification of significance that is reasonable and justifiable.

There are seven classifications of significance, namely: (1) imperceptible, (2) not significant, (3) slight, (4) moderate, (5) significant, (6) very significant, (7) profound.

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

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

Figure 1: ‘Chart showing typical classifications of the significance of impacts’ (Source: Figure 3.5 of the EPA’s Draft Guidelines on the Information to be Contained in Environmental Impact Assessment Reports, 2017)



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

Table 4 EPA definitions of environmental impact classifications

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

3.0 Visual Effects Assessment

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

3.1 Sensitivity of the Viewpoint/Visual Receptor

Viewpoint sensitivity is a function of two main considerations:

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

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

Table 5 Categories of Viewpoint Sensitivity

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

3.2 Magnitude of Change to the View

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

Table 6 Categories of Visual Change

Magnitude of Change	Description
Very High	Full or extensive intrusion of the development in the view, or partial intrusion that obstructs valued features or characteristics, or introduction of elements that are completely out of character in the context, to the extent that the development becomes dominant in the composition and defines the character of the view and the visual amenity.
High	Extensive intrusion of the development in the view, or partial intrusion that obstructs valued features, or introduction of elements that may be considered uncharacteristic in the context, to the extent that the development becomes co-dominant with other elements in the composition and affects the character of the view and/or the visual amenity.

Medium	Partial intrusion of the development in the view, or introduction of elements that may be prominent but not necessarily uncharacteristic in the context, resulting in change to the composition but not necessarily the character of the view or the visual amenity.
Low	Minor intrusion of the development into the view, or introduction of elements that are not uncharacteristic in the context, resulting in minor alteration to the composition and character of the view but no change to visual amenity.
Negligible	Barely discernible intrusion of the development into the view, or introduction of elements that are characteristic in the context, resulting in slight change to the composition of the view and no change in visual amenity.

3.3 Significance of Visual Effects

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

4.0 Quality of Effects

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

For landscape effects to a degree, but particularly for visual effects, this is an inherently subjective exercise since landscape and views are perceived and therefore subject to variations in the attitude and values of the receptor. One person's attitude to a development may differ from another person's, and thus their response to the effects of a development on a landscape or view may vary. Additionally, there might be policy encouraging a particular development in an area, in which case the policy is effectively prescribing landscape change. If a development achieves the objective of the policy the resulting effect might be considered positive, even if the landscape character is profoundly changed. The classification of quality of landscape and visual effects should seek to take these variables into account and provide a reasonable and robust assessment.

