

Landscape and Visual Impact Assessment

Proposed Large-Scale Residential Development – Sea Gardens Phase 1 Block A, Bray

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1.0 Introduction

This report assesses the potential landscape and visual impacts of a proposed Large-Scale Residential Development (LRD) of 159 no. dwellings on a site of c. 1.38 ha at the former Bray Golf Club Lands off the Dublin Road and Ravenswell Road, Bray, County Dublin.

1.1 Proposed Development

The proposed development will consist of the provision of 159 no. residential units over/around a shared 2-level podium comprising of: 9 no. 4-bedroom, 3 and 4-storey terraced townhouses with associated private terraces; and 150 no. apartments in 2 no. blocks ranging in height from 6 to 10-storeys (Block A1) and 7 to 11-storeys (Block A2) and consisting of a total of 48 no. 1-bedroom units, 58 no. 2-bedroom units, 44 no. 3-bedroom units, all with private balconies or terraces. The blocks will also include communal lounge areas; a communal gym in Block A1; refuse storage areas; and associated plant.

The shared 2-level podium will include car, motorcycle and bicycle parking, with additional car parking provided within the curtilage of 5 no. of the proposed townhouses.

The proposed development will also include: public open space including play areas; communal open space within the central podium courtyard; pedestrian / cycle linkages with adjoining existing and permitted developments; associated connections to the surrounding road network; all associated landscaping and public lighting; an ESB substation; drainage arrangements; utility connections; and all site development works.

A detailed development description is set out in the Planning Report prepared by RPS and enclosed as part of the LRD application package.

1.2 Landscape and Visual Impact Assessment Methodology

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

The European Landscape Convention defines landscape as “*an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors*”. The GLVIA requires that the effects on views and visual amenity be assessed separately from the effects on the landscape, although the topics are linked:

- Visual impact assessment is concerned with changes that arise in the composition of available views, the response of people to those changes and the overall effects on the area’s visual amenity. The potential effects on 14 no. viewpoints in the receiving environment are assessed in Chapter 5, informed by verified photomontages (provided under separate cover).
- Landscape 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. Landscape impact assessment is concerned with the effects of a proposed development on the character and value of the landscape as an environmental, cultural and economic resource. The potential landscape impact of the proposed development is assessed in Chapter 6.

1.2.1 LVIA Author Credentials

The LVIA was prepared by Richard Butler (Bachelor of Landscape Architecture, MSc Spatial Planning, Member of the Irish Landscape Institute, Member of the Irish Planning Institute) of Model Works Ltd. The author has over 25

years' experience in development and environmental planning, specialising in LVIA. In the last number of years he has prepared LVIA reports and EIAR chapters for the following projects among others:

- Sea Gardens Phase 2, Bray, Co. Wicklow;
- Fassaroe Phase 1, Bray, Co. Wicklow;
- Project Montrose LRD, former RTE lands, Donnybrook, Dublin;
- Gowan House LRD, Naas Road, Dublin;
- Sandford Road LRD, Dublin;
- St Vincent's Hospital and Residential Development, Fairview, Dublin;
- Guinness Quarter, James's Street, the Liberties, Dublin;
- O'Devaney Gardens SHD, Dublin;
- Emmet Road SHD, Inchicore, Dublin;
- Newtownpark Avenue SHD, Blackrock, Co. Dublin;
- Pembroke Quarter (Irish Glass Bottle and Fabrizia sites) Phases 1, 1B, 2, A, Poolbeg West SDZ, Dublin;
- Dublin Arch (Connolly Quarter);
- Augustine Hill (Ceannt Station), Galway.

2.0 Receiving Environment

2.1 The Site

The site is a roughly rectangular plot of 1.38 ha located in the emerging coastal quarter of Sea Gardens in Bray (although the site falls into the jurisdiction of Dún Laoghaire Rathdown Co. Co.). The site was part of the former Bray Golf Club, which is currently in the process of redevelopment. The landscape is in a disturbed/transitional condition, with the site in use as a construction compound. The site has frontage to the Dublin to Rosslare railway line and the coast to the east, Corke Abbey Valley Park to the north, and the partially constructed Sea Gardens quarter to the west and south.

Figure 1a,b: The site and its location in the context of Bray



2.1.1 Site Planning History

Two planning applications have previously been made for development of the site:

Strategic Housing Development Application ABP-311181-21

In 2021 the site was included in a Strategic Housing Development application, ABP-311181-21. The proposed development included three apartment blocks, Blocks A (the subject site), B and C, an estate of terraced houses and duplexes, and a creche, café, commercial units, circulation network and a network of open space. The application received a split decision, with Blocks A and B, the two apartment blocks facing the coast, not permitted. The DLRCC Chief Executive's Report recommended refusal, stating:

“Block A, by virtue of its monolithic form and massing relative to the receiving environment, would be visually dominant at this location and, when viewed in conjunction with Block B in the context of this coastal environment, would be over scale and of insufficient design to alleviate the impact of same”.

The CE's Report also noted that Block A would present a continuous facade in excess of 40m and suggested that the uniform layout and pattern of balcony elements and fenestration would have a negative cumulative visual impact with Block B which was of similar design. The Report suggested that the predominance of render and proposed mix of materials would not successfully break up the overall massing and form of the apartment blocks, and the development would not contribute to the neighbourhood or streetscape relative to the coastline.

The ABP Inspector considered that the site was capable of accommodating high density, taller development, but also raised concerns over the proposed design and potential visual impact of Blocks A and B, with the Inspector's Report stating:

“I consider Blocks A and B would detract from the visual amenity of the area, and while I acknowledge that views can be fleeting..., it is of importance that the design quality of Blocks A and B is such that the blocks can sit comfortably at this location and are of a quality appropriate to this site. In my mind issues arise with these blocks as a result of the width of the blocks and their orientation toward the coast/railway line, lack of significant variation/modulation in height between/within the blocks, lack of variety or visual relief in terms of elevational treatment, and proposed use of render throughout as a finish (with the exception of the ground floors), which overall in my view results in a monolithic profile from the east coast...” [emphasis added]

The ABP Order granting permission for the development apart from Blocks A and B stated:

“Having regard to the Urban Development and Building Heights Guidelines for Planning Authorities, issued by the Department of Housing Planning and Local Government in December 2018, it is considered that the proposed Blocks A and B by reason of poor design in terms of facade treatment and architectural expression, in combination with their disposition on the site, would not constitute an adequate design response to the context and the opportunity presented on this coastal urban site, and would not, therefore, be in accordance with the criteria set out under section 3.2 of the Urban Development and Building Heights Guidelines for Planning Authorities 2018 and would not be in accordance with the proper planning and sustainable development of the area”.

The weight given by ABP to the *Urban Development and Building Heights Guidelines for Planning Authorities* (the 'Building Height Guidelines') is notable. It is also notable that ABP recognised the 'opportunity presented by the coastal urban site'. **The Inspector's Report suggested that an improved design could make higher density development acceptable on the site and gave clear guidance on possible design solutions, including (a) reducing the width of the blocks presenting to the coastline, (b) varying/modulating height within and between blocks to avoid a monolithic profile, and (c) avoiding excessive use of render.**

Strategic Housing Development Application ABP-314686-22

In 2022 the site was included in a second SHD application, ABP-314686-22 for the same overall site. The proposed development included all the previously permitted elements (with modifications as required by conditions of the extant permission), with a revised design for Blocks A and B.

Block A was revised to address DLRCC's and ABP's concerns over massing, architectural expression and façade treatment. The block was comprised of two C-shaped buildings, up to seven storeys tall, enclosing a podium-level courtyard. The buildings stepped down in height to the west, away from the coastline, transitioning to the smaller scale of the houses and duplexes. The gap between the two facing C-shaped buildings maintained spatial/visual permeability to the coastline. Block B had a similar configuration.

The DLRCC Chief Executive's Report recommended permission be granted, stating:

Figure 2: Layout of permitted scheme ABP-314686-22



"The Planning Authority is satisfied that the subject site is capable of accommodating increased height which would accord with the proper planning and sustainable development of the area and comply with the applicable performance based criteria set out in... Appendix 5 of the Dun Laoghaire Rathdown County Development Plan 2022-2028. "The massing of Block A, comprising the constituent buildings of A1 and A2 (with minimum setback between same in excess of 20m), with central communal open space area at podium level of same, treatment of balcony and fenestration detailing on external elevations of Block A overall, and contrasting but complementary brick finish to buildings A1 and A2, represents a considerable modification from the form previously proposed and refused by An Bord Pleanála at the subject site under ABP-311181-21, in terms of overall massing, architectural expression and design, external finishes, and facade treatment. It is the opinion of the Planning Authority that Block A, as proposed, represents an acceptable design response to the receiving coastal environment and is acceptable at this location" (RPS emphasis in bold)." [emphasis added]

The ABP Inspector considered that Block A was appropriately designed and positioned to minimise impacts on neighbouring properties, but suggested that Block B was excessively tall and should be reduced by the removal of three floors. The Inspector's Report stated:

"I am satisfied that with the exception of the excessive height of Block B, the proposed development would be of a scale, height, design and layout, and would not have any unacceptable impacts on the visual amenity or character of the area. The upper-floor element of Block B is a relatively minor aspect of the overall development, and my concerns would be satisfactorily addressed by the removal of three floors (floors 7-9). This would reduce this element to a maximum of 9 storeys, while still maintaining a suitable variation in building height and a landmark focus at this prominent position. I do not consider that this would adversely impact on the overall integrity of the design approach..."

The proposal includes a wide range of building typologies. And while I acknowledge that some blocks are of significant scale, particularly Blocks A & B, I consider that the design approach avoids a monolithic appearance through a variety of heights, finishes, and elevational detailing. Blocks A & B will present as 4 separate blocks which will be suitably separated and distinguished by a variety of heights, finishes, and

façade treatment. I am satisfied that the excessive height of Block B could be reduced while still maintaining an appropriate variety of height and massing...

Subject to this suggested amendment, I consider that the proposed development would be consistent with local policy as outlined in the DLRCDP, the WCDP, and the Bray LAP. It would also be consistent with regional and national policy/guidance, including the Building Height Guidelines, to support increased height and density subject to compliance with the criteria as outlined in this section. Notwithstanding its comparative scale and height, the amended proposal would satisfactorily integrate with its environment and would not detract from the character or amenities of the area in any unacceptable way. Accordingly, I have no objections in relation to design, layout, and the landscape/visual impacts of the proposed development subject to the suggested amendment.”

The ABP Order granted permission for the development with a conditioned reduction of Block B by three storeys, to a height of nine storeys. The Order stated the following reason for its ABP’s decision:

“... the proposed development would be in accordance with the provisions of the Dun Laoghaire Rathdown County Development Plan 2022-2028, the Wicklow County Development Plan 2022-2028, and the Bray Municipal District Local Area Plan 2018- 2024, would constitute an acceptable quantum of development at this accessible location which would be served by an appropriate level of public transport, social and community infrastructure, would provide an acceptable form of residential amenity for future occupants... [and] would not seriously injure the visual amenities of the area or the amenities of property in the vicinity, would be acceptable in terms of urban design, height and scale of development... The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area”.

ABP’s grant of permission for ABP- 314686-22, supported by DLRC and WCC, established that (a) higher density development on the sites of Blocks A and B is acceptable in principle, and (b) that C-shaped blocks are a suitable configuration of built form for the sites. This achieved the varying/modulated height identified as preferable in the decision on the first SHD application, avoiding a monolithic frontage/profile to the coastline.

Figure 3: Artist’s impression of the permitted Sea Gardens Phase 1 scheme in the context of Bray (Note, the tallest building nearest to the harbour (Block B) was reduced by condition from 12 no. to 9 no. storeys)



The Applicant is currently progressing with the construction of the western portion of the overall scheme as permitted under ABP-311181-21. However, the Applicant no longer intends to provide Build-To-Rent apartments as permitted under ABP-314686-22. The Applicant is therefore proposing further revisions to Block A to provide a greater proportion of family-sized homes and ensure its alignment with the requirements of the Dun Laoghaire Rathdown County Development Plan 2022-2028 and relevant development guidelines. The current proposal also seeks to increase the height of Block A to up to 11 no. storeys.

2.2 Surrounding Landscape Character

The site location and the nature of the adjacent lands (to north, east, south and west) are key factors in the consideration of the site's capacity to accommodate development (particularly buildings of scale) and the potential landscape and visual impacts of development on the site.

2.2.1 East of the Site – The Railway, Open Space and Coastline

The Dublin to Rosslare Railway line passes immediately to the east of the site. East of the railway is a strip of land zoned open space (a former landfill) fronting the coastline. At its nearest point the site is only c. 50m from Bray Back Strand north of Bray Harbour and the adjacent harbour industrial complex.

Figure 4: The site environs



The site's coastal location is its most important characteristic - for the following reasons:

- **The coastal location provides unrivalled visual amenity for future development/residents of Block A.** This should be used to its maximum sustainable potential (considering also access to Bray town centre and railway station, etc.).

- **There are no sensitive receptors to the east of the site.** The strip of open space between the railway line and the beach (Bray Back Strand) is a former landfill. Coastal erosion had previously exposed the landfill but this has been remedied and the strip is now being developed as an open space with a coastal walk and cycleway – providing views of the sea to the east, Bray Head to the south, and the coastline curving up to Killiney Hill and Dalkey Island to the north. Users of this space will be focused primarily on the seascape as opposed to the development area to the west (which is separated from the open space is separated by the railway line).

Views from the sea are a consideration but the very small number of people that experience these views should not place an unnecessary restriction on the development of coastal sites. In any view from the sea, development on the site would be seen in the context of Bray’s broad frontage to the coastline and against a backdrop of the Dublin and Wicklow Mountains.

- **Marine frontage in urban areas is recognised as an enabling factor for building height.** The vast space of the coast and sea provides breathing space for tall buildings. The Building Height Guidelines’ Development Management Criteria (Section 3.2) includes the following criterion for consideration in the assessment of development proposals:

“The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure...” [emphasis added]

2.2.2 North of the Site – Corke Abbey Valley Park, Woodbrook Glen and Woodbrook Golf Club

Immediately to the north of the site is Corke Abbey Valley Park. This is a broad, densely wooded zoned open space, with its trees/woodland protected by the DLRCDP. The open space extends inland from the coastline and is c. 150m wide. Due to the tree cover there is a high degree of visual enclosure within the park. On the far side of the park from the site is (a) Woodbrook Glen Golf Club, which extends north along the coastline, and (b) Woodbrook Glen, a large estate of two storey houses. Woodbrook Glen is buffered from the site by the 150m wide park. In summer the trees/woodland in the park form a dense screen in views south towards the site, and in winter the bare canopies of the deciduous trees filter the view.

Photo 1: Summer view south towards the site from Woodbrook Glen



Photo 2: Winter view south towards the site from Woodbrook Glen



2.2.3 West of the Site – Sea Gardens Phase 1, Ravenswell Schools and Corke Abbey Estate

Immediately to the west of the site is the first phase of the Sea Gardens quarter (permitted under ABP-311181-21 and ABP-314686-22 – see Figures 2 and 3 above), currently under construction. The neighbourhood has a grid layout and comprises mainly 2-3 storey terraced houses and duplexes. There is a small apartment block at the northern edge adjacent to Corke Abbey Valley Park, and a larger block (Block C) at the southern edge facing the Sea Gardens Phase 2 site. The architecture of the neighbourhood is a modern interpretation of Bray’s seaside Art Deco architecture, employing pastel colours and, in the apartment buildings, generous balconies and rounded corners. The subject site, Block A, faces a terrace of three storey houses across a street internal to this neighbourhood.

Figure 4: Illustration of the previously permitted Block A facing duplex terraces across a new street and green corridor



As a receptor of landscape and visual change, the Phase 1 development west of the site is not highly sensitive. This is a contemporary mixed density residential neighbourhood incorporating a variety of housing typologies and building heights. The houses are as yet unoccupied, and there is an adjacent planning application (Sea Gardens Phase 2 currently in planning - WCC Ref. 2560207) which includes further tall buildings and a mix of uses. By comparison to Bray's earlier, more traditional inner and outer suburbs, this area has a higher tolerance for contemporary multi-storey development.

West of Sea Gardens Phase 1 is the Ravenswell school campus, which includes two recently built schools and a sports pitch, and the Corke Abbey housing estate. The schools campus and playing pitch are not of high sensitivity to change in their context. They are part of the emerging mixed density, mixed use urban neighbourhood north of the Dargle River. The Corke Abbey estate is more sensitive but is well removed from the site (c. 150m) and buffered from any future development by the Phase 1 development now nearing completion (see Figure 3 above).

2.2.4 South of the Site – Sea Gardens Phase 2 Planning Application Site

Directly to the south of the site and Block B, also fronting the railway line but extending inland alongside the Dargle River, is the Sea Gardens Phase 2 site. A planning application for a large, mixed use, mixed density development – the core of a new riverside and coastal town centre quarter - has been lodged for this site (WCC Ref. 2560207). The buildings range from a cluster of riverside retail and F&B pavilions (Block G) to an estate of three storey townhouses and duplex blocks, a four storey mixed use building (Block H), a 10 storey hotel (Block F) and a 15 storey landmark apartment building (Block E).

Figure 5: Layout of proposed Sea Gardens Phase 2 development, alongside Phase 1 – including Blocks A and B



Like Sea Gardens Phase 1, the design of Phase 2 is inspired by Art Deco seaside resort architecture, but there is variety in character across the site, responding to the varying surrounding conditions.

The proposed Block E in Sea Gardens Phase 2 responds to its position at the intersection of the Dargle River and the coast (Bray's two main linear topographical features), overlooking the harbour and the sea. It seeks to exploit the visibility of the location to create a landmark - to give Sea Gardens a strong identity as a contemporary, high density urban quarter, and to give the new quarter a presence in the townscape of Bray.

The Sea Gardens Phase 2 site is not sensitive to development of the type proposed at Block A. The two proposed developments are complementary, informed by a common understanding of the function of Sea Gardens in the evolution of Bray. They would provide mutually favourable context for each other.

2.3 The Wider Environs – Bray Urban Morphology and Character

The site is located in Dún Laoghaire Rathdown and is therefore subject to the planning policy and development management of DLRCC. However, in landscape terms the site is integral to the Bray urban area and the assessment of its landscape impact must be considered in that context.

2.3.1 Bray in the Metropolitan Context

In 2023, Bray had a population of 33,500. It is the largest town in Co. Wicklow (extending into Dún Laoghaire Rathdown) and the 9th largest in Ireland. In the Eastern and Midland Regional Spatial and Economic Strategy 2019-2031 (RSES), Bray is identified as one of three Key Towns in the metropolitan area of Dublin. The Key Towns are described as

“Large economically active service and/or county towns that provide employment for their surrounding areas and with high-quality transport links and the capacity to act as growth drivers to complement the Regional Growth Centres”. [emphasis added]

The Key Towns are described as ‘important in a regional context’ due to their capacity to accommodate ‘above average growth’. The RSES strategy for Key Towns is to:

“Provide for the sustainable, compact, sequential growth and urban regeneration in the town core of identified Key Towns by consolidating the built footprint through a focus on regeneration and development of identified Key Town centre infill / brownfield sites”. [emphasis added]

Regarding Bray specifically, the RSES notes that population growth in the town has been modest compared to other parts of the metropolitan area. This is due to several constraints to the urban area's growth, including the coast to the east, Bray Head/Sugarloaf Mountains to the south and the M11 to the west. The RSES states that for the town to fulfil its growth potential, the lands at Fassaroe west of the M11 will need to be developed, along with the former Bray Golf course and Harbour Lands (of which the subject site is a part), which are designated for *“high density new mixed-use development with improved town centre functions”*. [emphasis added]

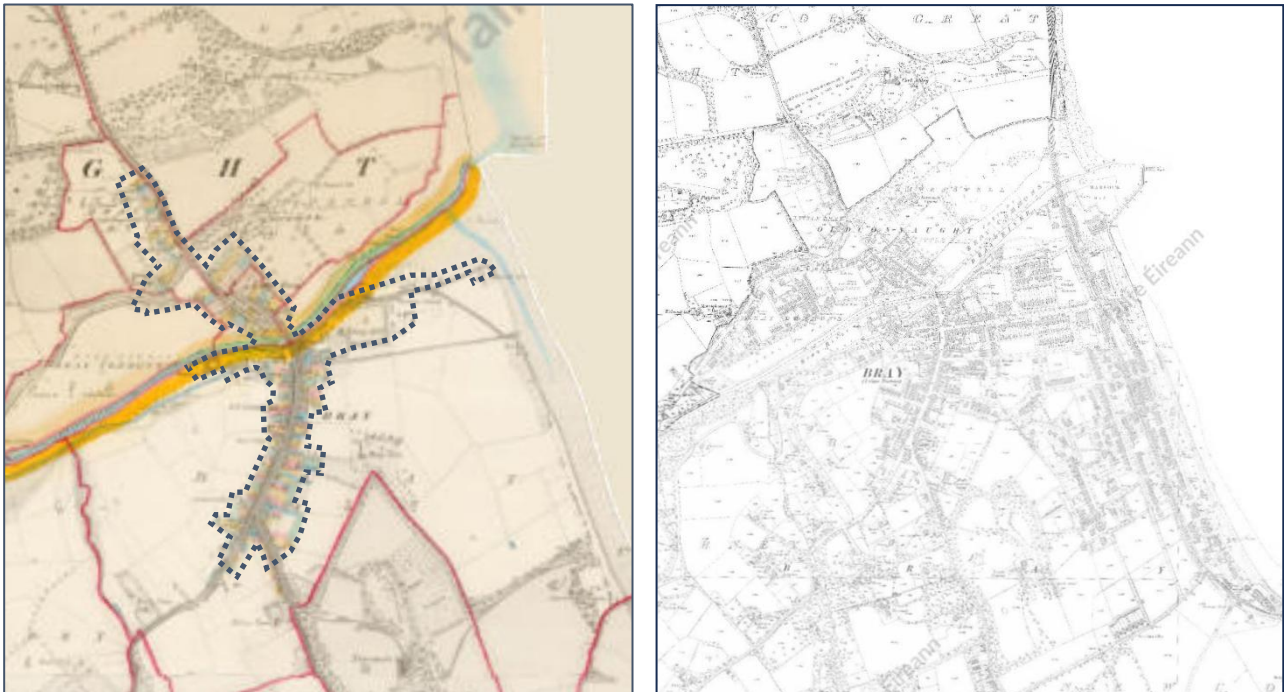
Bray's place at the apex of the urban hierarchy of Co. Wicklow, its status as a Key Town in the Dublin metropolitan area (its functions being to accommodate above average population growth and drive economic growth), and the particular importance of the former Bray Golf Club lands in fulfilling the town's growth potential, are important to note. These have implications for the evolution of the town.

2.3.2 Bray's History of Development

The 1st edition Ordnance Survey 6 inch map (Figure 6) from the mid 19th century shows that at that time Bray was already a sizeable town. It was centred on the bridge over the Dargle River, well back from the seafront to the east. The main urban area was comprised of Main Street south of the river and 'Little Bray' on the north side. The urban area was equally spread to the north and south of the Dargle, and there were clear differences in character between the northern and southern sides of the town. In addition to the north-south spine, there were premises along the south side of the Dargle, forming an east-west spine - giving the town a cruciform layout. The main urban area was set well back from the coastline.

In 1854 the railway line to Bray was built as part of the Dublin and Kingstown Railway expansion. The railway connection initiated the Victorian transformation of the town - in terms of function (seaside resort), character and scale - and established Bray as part of the metropolitan city-region. Over the remainder of the 19th century a number of important changes occurred in the urban structure, which can be seen in the OS 25 inch map from the early 20th century (Figure 7).

Figures 6, 7: OS 6 inch map showing pre-Victorian Bray, and the 25 inch map showing the Victorian expansion



The most widely recognised addition to the town was the seafront promenade, fronted by grand Victorian villas and hotels. At the northern end of the Promenade, Bray Harbour had been built. These coastal elements were separated from the inland urban area by the railway line. An important addition to the urban structure was Quinsborough Road, aligned east-west, connecting the historic town centre (Main Street) to the train station and the Promenade. Quinsborough Road was lined by large Victorian houses and hotels. South of Quinsborough Road, between the railway line and Main Street, was a growing residential neighbourhood. Another notable addition was a new neighbourhood built in the former Bray Commons area north of the Dargle and west of Little Bray. From the Victorian phase of Bray's development, the following points are important to note:

- The new railway and harbour infrastructure initiated a rapid urban expansion, particularly to the south along the seafront as far as Bray Head, and to the west along the Dargle Valley.
- There was a shift in the town's orientation from the Dargle River towards the seafront - although Main Street remained the commercial core and the bridge over the Dargle the pivotal point in the urban structure.

- Several new character areas had been added to the town, including the Promenade, the harbour, Quinsborough Road, the eastern Victorian streets and squares, and the Bray Commons neighbourhood.

Over the course of the 20th century, Bray expanded further, adding suburban residential, retail and employment zones to the townscape. The 2005 aerial photograph (Figure 8) shows that this occurred mostly to the south up to the lower slopes of Bray Head and Little Sugarloaf, and west as far as the Dargle River valley and the M11. Other notable elements on the 2005 aerial photo include (a) Bray Golf Club on the north side of the Dargle River (now enclosed within the urban footprint but close to the town centre, the train station, the harbour and the coastline), and (b) the access road to Fassaroe under construction to the west of the M11.

Figure 8 - 2005 aerial photograph showing Bray after the 20th century suburban expansion



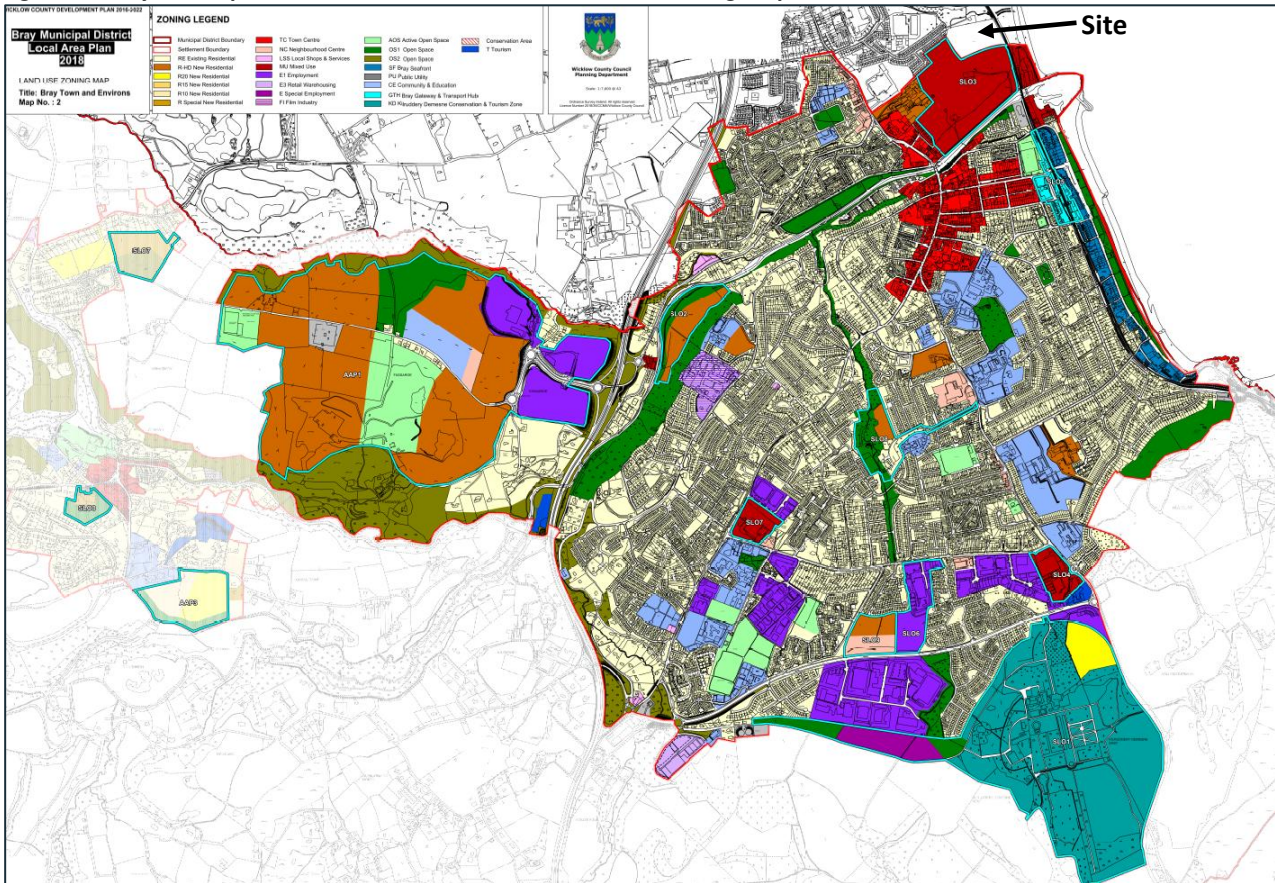
At that stage in the town's development Bray had encountered obstacles to its further growth - to the east (the coastline), south (Bray Head, Little Sugarloaf), and west (the M11). This was a constraint to the town's required growth in line with its role in the county and the metropolitan region. The Fassaroe area to the west of the M11 was first identified as a strategic growth area. Then, in the early 21st century the potential of Bray Golf Club for the expansion of the town centre and substantial residential use was recognised. The Bray Town Development Plan 2005-2011 stated:

"The impending development of the Golf Club Lands... will contribute enormously to the success of the town... the development of the Golf Club Lands will yield significant benefits for the town in terms of alleviating the enormous housing pressure within the town and in facilitating the provision of expanded employment, retail, leisure, social and cultural opportunities for the town's residents."

The Bray Municipal District Local Area Plan 2018 (Figure 9) cemented the two significant future changes to Bray's urban area, i.e. the western suburban expansion into Fassaroe and the expansion of the town centre across the Dargle River into the area of the former Bray Golf Club.

This coincided with a shift in planning/development policy towards compact growth. The position of Bray Golf Club adjacent to the existing town centre, close to the train station, and with frontage to both the Dargle River and the coast, translates into particular potential for density and height. The granting of permission for ABP-311181-21 and ABP-314686-22 initiated the realisation of this potential, establishing a contemporary, high density residential and mixed use quarter in the town.

Figure 9 - Bray Municipal District Local Area Plan 2018 land use zoning map



The planning and management of Bray's growth has been led by WCC, but DLRCC has supported it - under the umbrella of the Eastern and Midland RSES - through complementary planning and management of its part of the town.

This includes the Residential zoning of the subject site and the Green Belt zoning of the Woodbrook Golf Club and Corke Abbey lands to the north. This zoning encloses the site with the urban area of Bray (as part of the Sea Gardens quarter) and delineates the northern edge of the town.

Figure 10: Dun Laoghaire Rathdown County Development Plan zoning



2.3.3 Summary of Bray Townscape Character

In summary, although of compact form (due to the natural topographical constraints to its expansion), Bray is a large town (in population - the 9th largest settlement in Ireland) and has the 'feel' of a larger town or even a small city due to its diversity and strength of character. This gives Bray capacity to accommodate further change (the ability to absorb/withstand change without dilution or loss of value of existing character).

Photo 3: A view over the eastern half of the town from Bray Head



2.4 The Wider Environs – Dún Laoghaire Rathdown Coastal Development

While the site is integral to Bray, in planning terms it is a development site (an urban, seaside development site) in Dún Laoghaire Rathdown and is subject to the planning policy and development management of DLRCC.

There is a well-established pattern of coastal/seaside development in the county, seeking to take advantage of the seascape amenity combined with proximity and access to Dublin. This development has taken many forms, from the large houses of Killiney (e.g. the prominently located Sorrento Terrace) to higher density developments such as at Bullock Harbour, and more recently Woodbrook – a mixed density development overlooking the golf course and the coast just to the north of the site.

Photo 4: Sorrento Terrace, Dalkey – an example of where development located and designed to take advantage of seascape/visual amenity has resulted in the strengthening of landscape character



Woodbrook includes buildings up to seven storeys tall (adjacent to a new DART station). Woodbrook is establishing a new urban area, and the seven storey height is permitted in order that the development will function as a landmark or beacon, identifying the new urban core in the landscape. The subject site is similarly part of a new urban quarter, fronting open space and the railway line, but part of an existing, large, diverse (in landscape terms), self-sufficient town much more capable of accommodating density.

Figure 11 – The location of Woodbrook (currently under construction) relative to the subject site

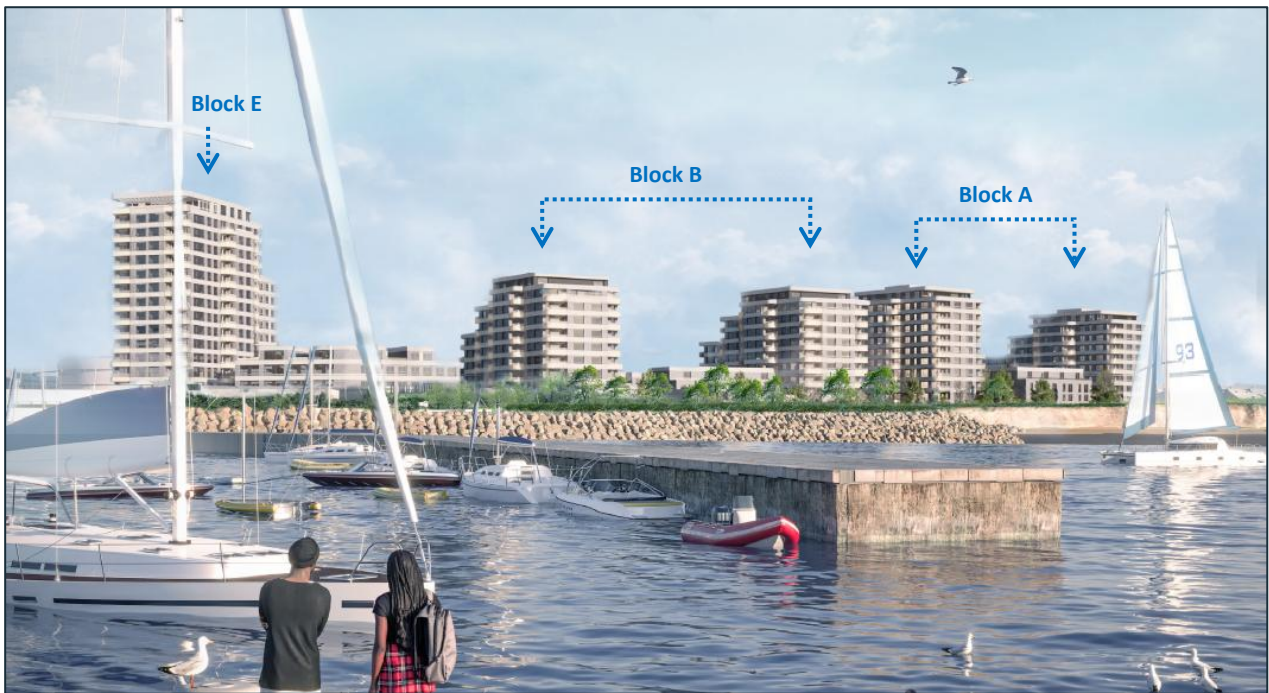


3.0 Proposed Development

The proposed development reflects a revised design approach to the Sea Gardens frontage to the coast. The permitted Blocks A and B (ABP-314686-22) both presented broad elevations to the coastline, with each building divided by a central gap (see Figures 2 and 3 above).

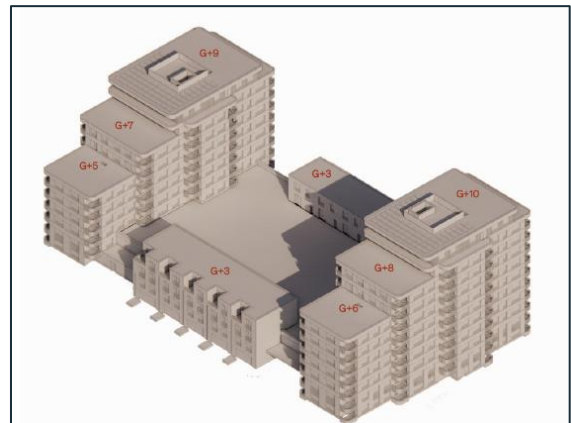
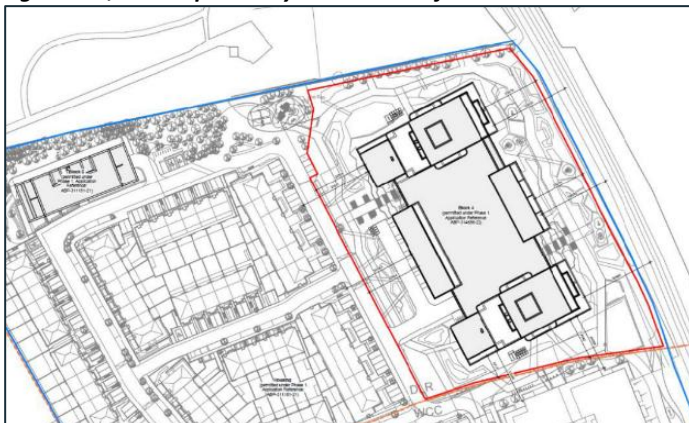
The revised approach envisages the seafront buildings turned perpendicular to the coastline, presenting narrow elevations to the sea. This results in a more permeable built frontage. In addition to the east-west alignment of the buildings, there is a gradation in height towards the south, to the tallest building in the new quarter (Block E, Phase 2) positioned at the intersection of the coast and the Dargle River, overlooking the harbour, closest to the town centre. The proposed Block A would form the northern part of this series of seafront buildings.

Figure 12: The revised design approach to the Sea Gardens frontage to the coast



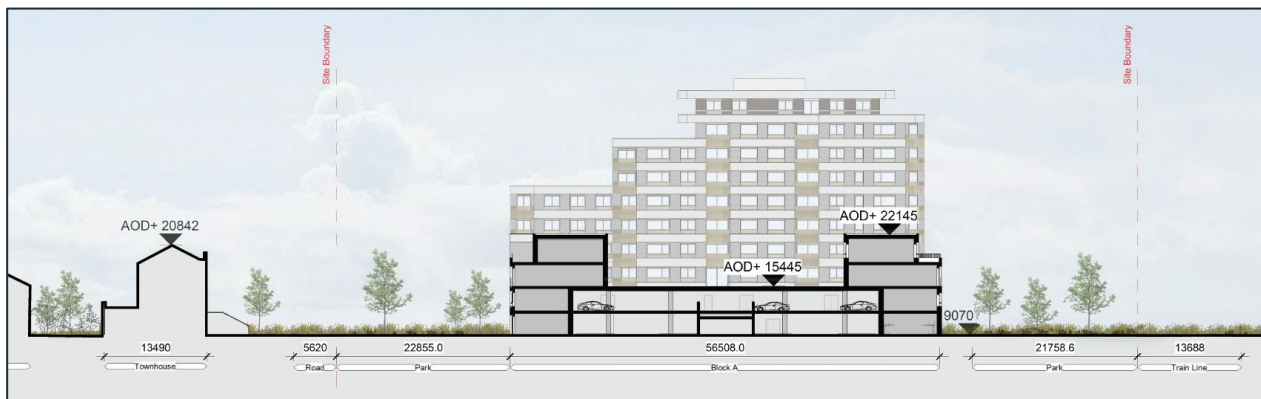
Block A is comprised of a rectangular two storey podium with linear volumes (Blocks A1 and A2) rising from the podium at its northern and southern ends, aligned east-west. Block A1 rises to 10 storeys overall, stepping down to six storeys at its western end. Block A2 rises to 11 storeys, stepping down to seven storeys at its western end. Two terraces of 3-4 storey townhouses are positioned against the eastern and western edges of the podium. One faces the railway and the sea, and the other faces the internal street shared with Phase 1.

Figures 13, 14: Proposed layout and built form



Block A is set well back from the street, maintaining the separation distance (of over 35m) between the building from the duplex terraces across the street - and the concept of a street and parallel green corridor (on the east side of the street in front of Block A).

Figure 15: Section showing the separation distance and scale relationship between the proposed Block A and the duplex terrace across the street



The majority of Block A's frontage to the street, facing the duplexes, is four storeys, with Blocks A1 and A2 - six and seven storeys respectively at the street-front - bookending the four storey elevation of the town-houses. Similarly, on the east side, facing the railway, the coastal open space and the sea, the majority of the elevation is four storeys, but Blocks A1 and A2 rise to 10 and 11 storeys in response to the space of the seascape and the absence of sensitive receptors to the east.

Figure 16: A view along the street showing (a) the separation distance between the Phase 1A (Shoreside Park) duplex terraces and Block A, (b) the stepping down of Block A1 to the street and Phase 1A (Shoreside Park) to the west, and (c) the linear open space parallel to the street



The proposed design is inspired by Art Deco seaside resort architecture. This is evident in the strongly expressed floor plates and horizontal bands of windows, generous, set-back balconies (integral to the form as opposed to expressed/projecting), rounded corners, and the building's light colouring.

Figure 17: Proposed Block A seen from the south east



The proposed building is positioned at the centre of the site, wide spaces to all sides (see Figure 18). It is proposed to densely plant the space on the north side of the building where the site interfaces with the Corke Abbey Valley Park. The green corridor along the street to the west of the building is also densely planted to soften the built frontage. The space to the east has breaks in the planting to afford views of the coastline and the sea.

Figure 18: Landscape masterplan



5.0 Visual Impact Assessment

15 no. viewpoints were selected for visual impact assessment informed by verified photomontages. The viewpoints were selected to represent the key landscape/visual receptors in the receiving environment, as identified in Section 2 above.

Table 1: Viewpoints for Visual Impact Assessment

No.	Viewpoint Location
Views from nearest residential receptors	
1	Corke Abbey estate – nearest houses to the site (approx. 175m west of site)
2	Corke Abbey estate – further houses (approx. 300m west of site)
3	The Green, Woodbrook Glen estate (approx. 200m north of site)
4	The Lawn, Woodbrook Glen estate (approx. 250m north west of site)
Views from Dublin Road, Castle Street and Fran O’Toole Bridge/Main Street	
5	Dublin Road (approx. 650m west of site)
6	Fran O’Toole Bridge, Main Street (approx. 650m south west of site)
7	Entrance to Sea Gardens from Fran O’Toole Bridge/Castle Street (approx. 610m from site)
Seymour Road and Quinsborough Road	
8	Seymour Road, northern end
9	Seymour Road at Quinsborough Road junction
Views from the harbour	
10	Bray Harbour south wall (approx. 440m from site)
11	Harbour Road bridge over Dargle River mouth (approx. 270m from site)
Views from the Promenade	
12	Strand Road, northern end of Promenade (approx. 500m from site)
13	Bray Promenade, middle section (approx. 850m from site)
Views from Bray Head	
14	Bray Head, cliff walk viewpoing point (approx. 2.1km from site)
15	Bray Head, summit (approx. 2.6km from site)

The impacts on these views are assessed in Table 2 below. For the methodology, terms and criteria used in the assessment refer to Appendix 1.

The assessments should be read in conjunction with the verified photomontages (produced by 3D Design Bureau) provided in A3 format under separate cover.

For each viewpoint the following views are provided:

- **Existing** (photograph);
- **Baseline/Permitted** (photomontage of permitted Sea Gardens Phase 1 including the permitted Block A);
- **Proposed** (photomontage of permitted Sea Gardens Phase 1 with proposed amendment to Block A);
- **Cumulative** (photomontage of permitted Sea Gardens Phase 1, proposed amendment to Block A and proposed Phase 2 currently in planning);
- **Cumulative with key** (identifying the permitted, proposed and planned Sea Gardens buildings);
- **Cumulative with Block B Amendment** (photomontage of permitted Sea Gardens Phase 1, proposed amendment to Block A, proposed Phase 2, and a possible future amendment to Block B)

Summer and winter versions of the above are provided for all views to show variations in the development’s visibility in the different seasons.

Figure 19a: Viewpoints for Visual Impact Assessment – Local Views



Figure 19b: Viewpoints for Visual Impact Assessment – Distant Views

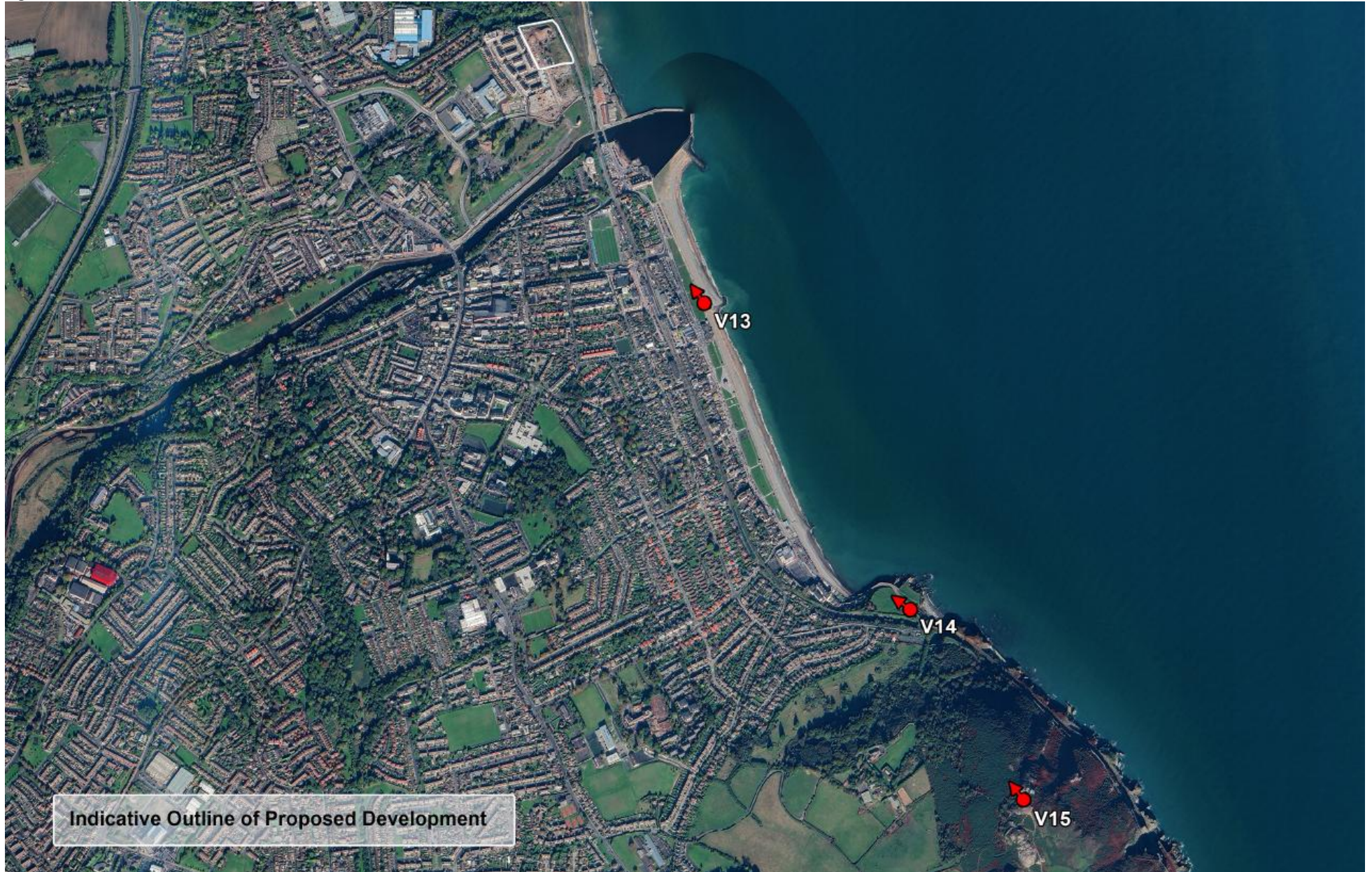
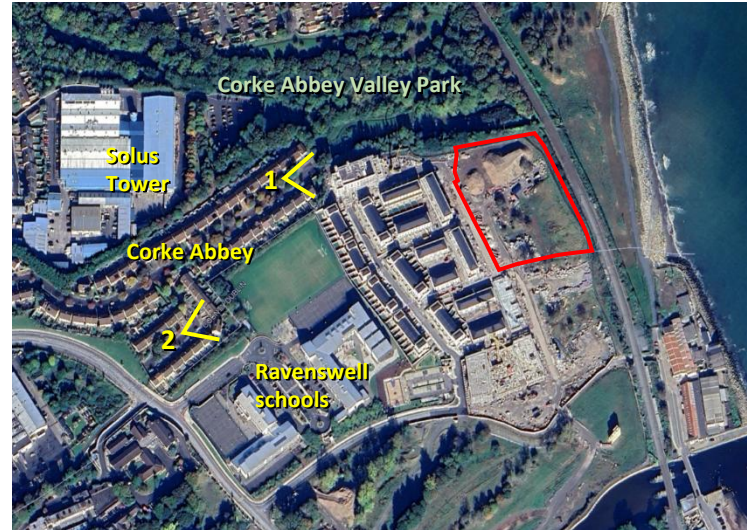


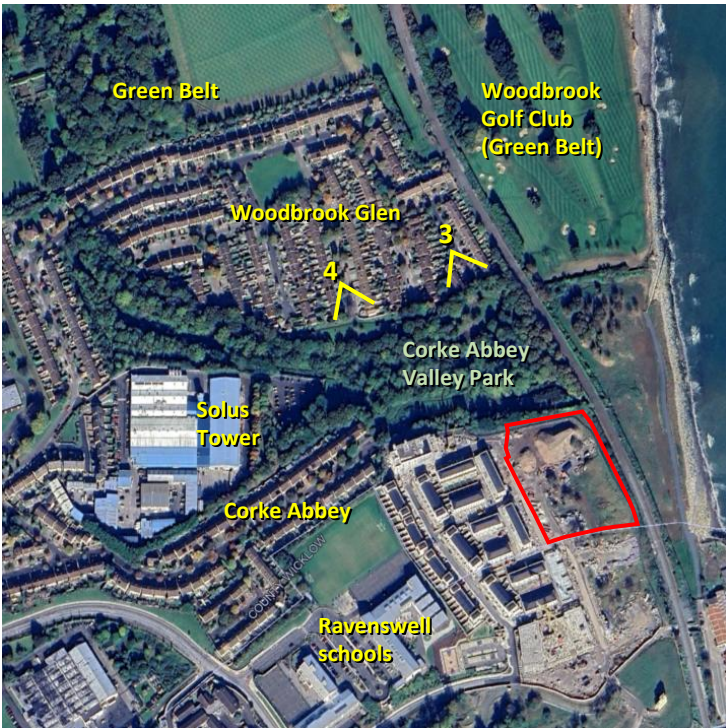
Table 2: Assessment of Visual Effects

No.	Viewpoint Location	Viewpoint Sensitivity	Commentary	Magnitude of Change	Significance of Effects
Views from the nearest residential receptors					
01	Corke Abbey estate – nearest houses	Medium	<p>Existing/Baseline View and Viewpoint Sensitivity</p> <ul style="list-style-type: none"> The viewpoint represents the nearest existing houses to the site, at the eastern end of the Corke Abbey estate. The easternmost house on the street is in the foreground to the right. The houses on the street orientate north-south (fronts to the north, back gardens to the south). Their ‘principal views’ are thus to the north and south, and not east towards the site. Ahead at the end of the street is a pedestrian entrance to Corke Abbey Valley Park. The trees in the park are a key feature of the summer view. The winter view shows the deciduous trees out of leaf and vegetation removed from the Phase 1A site, opening the view towards the site. The winter baseline view shows the 4-storey Block C in the north west corner of the Phase 1A site, overlooking the park. The building steps down to three storeys towards Corke Abbey and there is sufficient separation distance and retained vegetation to avoid significant visual impact on the nearest houses. The context of the Corke Abbey estate is urban. Adjacent to the south is the Ravenswell schools campus. The Solus Tower industrial estate is to the north and to the west beyond the Ravenswell distributor road is a supermarket and light industrial complex. The Phase 1A development has strengthened the urban character - in line with planning policy for the area. In this mixed and evolving urban context there is capacity for change. <p>Proposed View and Magnitude of Change</p> <ul style="list-style-type: none"> The proposed Block A, c. 175m distant, would be hidden from view by Block C in the foreground. <p>Significance of Effect</p> <ul style="list-style-type: none"> <u>No effect.</u> 	None	No effect



No.	Viewpoint Location	Viewpoint Sensitivity	Commentary	Magnitude of Change	Significance of Effects
02	Corke Abbey estate – further houses	Medium	<p>Existing/Baseline View and Viewpoint Sensitivity</p> <ul style="list-style-type: none"> The viewpoint represents the western part of the Corke Abbey estate, c. 300m from the site. The houses in the foreground largely block the view east towards the site, although the gaps between the houses afford glimpses of the surrounding landscape. One of the Ravenswell school buildings is visible through one of these gaps (to the right). The estate’s context is urban, with the Ravenswell schools adjacent to the south, the Solus Tower industrial estate to the north and a supermarket and light industrial complex to the west across the Ravenswell distributor road. In this mixed urban context there is capacity for change. <p>Proposed View and Magnitude of Change</p> <ul style="list-style-type: none"> In winter, the proposed Block A2 (c. 300m distant) would be visible in the distance through a gap between the foreground houses. It would have approximately the same degree of prominence as the school building in the existing view. This would amount to a low magnitude of change, and in summer the building would be entirely screened by vegetation. <p>Significance of Effect</p> <ul style="list-style-type: none"> <u>Slight neutral</u>. The development would neither improve nor disimprove visual amenity at this location. 	Low	Slight neutral


No.	Viewpoint Location	Viewpoint Sensitivity	Commentary	Magnitude of Change	Significance of Effects
Views from the nearest residential receptors					
03	The Green, Woodbrook Glen estate	Medium	<p>Existing/Baseline View and Viewpoint Sensitivity</p> <ul style="list-style-type: none"> The viewpoint represents the nearest houses to the site in Woodbrook Glen. Woodbrook Glen is part of the Bray urban area, enclosed by a Green Belt to the north and east. Corke Abbey Valley Park separates the estate from the urban area to the south and contributes to the estate's high level of landscape/visual amenity. <u>Although surrounded by green space, Woodbrook Glen is nonetheless an urban housing estate and as such there is some tolerance for urban development in its context.</u> The alignment of The Green frames a view towards Corke Abbey Valley Park at the end of the street. Beyond the 150m-wide woodland park is the site, Sea Gardens and the urban area of Bray. In the winter view Bray Head can be discerned in the distance through the bare tree canopy. In the winter baseline view the permitted Block A can be seen between the foreground trees, beyond the park. <u>The building is a minor intrusion in the view (and in spring and summer it would be screened), but it has the effect of bringing the urban area closer to Woodbrook Glen, urbanising its context.</u> This is not inappropriate in the location. <p>Proposed View and Magnitude of Change</p> <ul style="list-style-type: none"> In summer the proposed Block A would be largely screened and would have no significant effect on the view or visual amenity. 	Medium	Moderate neutral



No.	Viewpoint Location	Viewpoint Sensitivity	Commentary	Magnitude of Change	Significance of Effects
			<ul style="list-style-type: none"> In winter the building would be visible in the middle distance (150m+) beyond the park, framed by the foreground houses and trees and partially filtered by the tree canopy of the park. The increased prominence of the taller building would constitute a medium magnitude of change. Since more of the proposed building (than the permitted building) would be visible, the quality of its architecture would be appreciable. <p>Significance of Effect</p> <ul style="list-style-type: none"> <u>Moderate neutral</u>. The introduction of a building of contemporary urban typology and scale to the view, albeit at a distance of over 150m, would change the landscape context of Woodbrook Glen, reinforcing its urban location/context, bringing the expanding town centre closer to the estate. The change is not inappropriate (since the former Golf Club lands are designated for expansion of the town centre), and the increased prominence of the building would be counterbalanced by its attractive architecture. The residents of The Green would continue to enjoy a high level of landscape and visual amenity. It is important to note that the houses on The Green are aligned east-west (perpendicular to the street). The principal views from the houses (the views from the front and rear windows and gardens) are therefore to the east or west, and not south towards the site. The impact described above would be experienced in the public realm of the street only, and not in the houses themselves. It is also important to note that the assessment of View 04 below shows that only a part of Woodbrook Glen (The Green, shaded orange right) would experience any significant impact. The majority of the estate would be unaffected. 		Moderate neutral




No.	Viewpoint Location	Viewpoint Sensitivity	Commentary	Magnitude of Change	Significance of Effects
Views from the nearest residential receptors					
04	The Lawn, Woodbrook Glen estate	Medium	<p><i>Existing/Baseline View and Viewpoint Sensitivity</i></p> <ul style="list-style-type: none"> The Lawn is two blocks to the west of The Green (viewpoint 3) in Woodbrook Glen. Similar to The Green, the alignment of The Lawn frames a view south towards Corke Abbey Valley Park and beyond the park Sea Gardens and the main urban area of Bray. In the winter view the newly constructed Block D in Sea Gardens Phase 1a can be seen through the trees of the park. The permitted Block A is to the left of the field of view, screened by the houses in the foreground. <p><i>Proposed View and Magnitude of Change</i></p> <ul style="list-style-type: none"> The proposed Block A, despite its increase in height, would remain screened by the foreground houses. <p><i>Significance of Effect</i></p> <ul style="list-style-type: none"> <u>No effect.</u> 	None	No effect


No.	Viewpoint Location	Viewpoint Sensitivity	Commentary	Magnitude of Change	Significance of Effects
Views from Dublin Road, Castle Street and Fran O'Toole Bridge					
05	Dublin Road	Low	<p>Existing/Baseline View and Viewpoint Sensitivity</p> <ul style="list-style-type: none"> The Dublin Road passes 650m to the west of the site, giving access to Bray from the north. Before the road approaches the bridge over the Dargle in the town centre, it passes a supermarket where a view is afforded towards the site. The supermarket (a large-footprint, low, unsightly building set well back from the road) is to the left of an access road and cycle path leading to Ravenswell. A hedge and tree line on the boundary block the view south towards the town centre. In the baseline view the top of Block A can just be discerned on the distant skyline. Its protrusion is not sufficient for the building to be recognised/identified. It has no significant visual impact, negative or positive. As a visual receptor, the busy road traversing an urban area characterised by a mix of uses and plot and building typologies, is not sensitive to change.  <p>Proposed View and Magnitude of Change</p> <ul style="list-style-type: none"> The two vertical volumes, Blocks A1 and A2, are framed in the view, punctuating the distant skyline. At a distance of 650m they would not be prominent, but would catch the eye due to their vertical form and contemporary architecture. This would amount to a low-medium magnitude of change - with the development notable mainly due to its divergence from the existing building typologies in the townscape. <p>Significance of Effect</p> <ul style="list-style-type: none"> <u>Slight positive</u>. The development would cause a shift in character towards a more contemporary urban condition. The tall buildings would indicate a place of importance - in this case the Sea Gardens quarter and the coastline - thereby improving legibility. There would be no harm to any valued element or characteristic of the view. 	Low-Medium	Slight positive

No.	Viewpoint Location	Viewpoint Sensitivity	Commentary	Magnitude of Change	Significance of Effects
06	Fran O'Toole Bridge, Main Street	Medium	<p>Existing/Baseline View and Viewpoint Sensitivity</p> <ul style="list-style-type: none"> The bridge was historically the centre of Bray (see Figure 6 above). It remains an important element of the urban structure, providing the connection between Main Street and the planned town centre expansion onto the former Bray Golf Club lands. The bridge provides a panoramic view of the Sea Gardens frontage to the Dargle River. The river and the remaining golf course trees provide visual amenity, but the view can be considered underwhelming for a river corridor in the centre of a town of Bray's status. Castle Street and the roofs of Dwyer Park are visible to the left. Ravenswell Primary School is in the distance beyond the golf club lands. To the east along the river is the railway bridge and beyond that the roofs of the industrial buildings by the harbour. In the baseline view Block B is a notable addition in the distance, stepping up towards the east (towards the coast). Block C is just discernible between the golf course trees. <u>Block A can't be seen</u>. The permitted development initiates change but further development is needed to realise the planned high density town centre quarter. The sensitivity classification must take account of the fact that (a) the lands across the river have for decades been designated for expansion of the town centre, and (b) that change has begun. There are valued elements in the view but there is considerable capacity for change. <p>Proposed View and Magnitude of Change</p> <ul style="list-style-type: none"> The two vertical volumes, Blocks A1 and A2, would protrude above the golf course tree line in the distance to the left of Block B. At this distance (c. 675m) <u>they would not be prominent but would combine with Block B to form a row of contemporary tall buildings – a distinct new character area - facing the sea</u>. This would amount to a low magnitude of change. <p>Significance of Effect</p> <ul style="list-style-type: none"> <u>Slight positive</u>. The development would complement Block B, forming a distinct new character area of contemporary, high density development on the north side of the Dargle River, facing the sea. <p>Cumulative View</p> <ul style="list-style-type: none"> Sea Gardens Phase 2 would transform the view, introducing a cluster of retail and F&B buildings along the river, a neighbourhood of houses and duplex terraces, and to the right a 10 storey hotel and the landmark Block E. Block E is intended to give Sea Gardens a strong identity as a contemporary high density quarter - part of the metropolitan city-region - and to give the quarter a presence in the townscape of Bray. The proposed Block A would complement Sea Gardens Phase 2, forming a distinct cluster of taller buildings facing the sea to the east, contributing to a varied but logical collective built form across the quarter. 	Low	Slight positive

No.	Viewpoint Location	Viewpoint Sensitivity	Commentary	Magnitude of Change	Significance of Effects
07	Entrance to Sea Gardens from Fran O'Toole Bridge/Castle Street	Medium	<p>Existing/Baseline View and Viewpoint Sensitivity</p> <ul style="list-style-type: none"> The view is taken from the Dargle River viewing platform just off Fran O'Toole Bridge. This is the pedestrian entrance to the future Sea Gardens quarter from the existing town centre. In the baseline view Block B is visible in the distance fronting the railway. The building appears isolated and would benefit from further development to improve its integration in the townscape. The lands north of the river have been designated for expansion of the town centre for several cycles of the Wicklow County Development Plan, and the area is now in a disturbed/transitional condition. There are valued elements in the view but there is considerable capacity for change. <p>Proposed View and Magnitude of Change</p> <ul style="list-style-type: none"> Block A2 would protrude above the golf course tree line in the distance to the left of Block B. At this distance it would not be prominent but it would complement Block B in forming a row of tall buildings along the coastline, facing the sea. The magnitude of change would be low. <p>Significance of Effect</p> <ul style="list-style-type: none"> <u>Slight neutral</u>. The development would complement Block B but would cause no significant change in the character or quality of the view. <p>Cumulative View</p> <ul style="list-style-type: none"> Sea Gardens Phase 2 would transform the view, with the retail and F&B buildings of Block G in the foreground and the landmark Block E in the distance facing the harbour and Bray Promenade. Block A would be hidden from view. 	Low	Slight neutral

No.	Viewpoint Location	Viewpoint Sensitivity	Commentary	Magnitude of Change	Significance of Effects
Views from Seymour Road and Quinsborough Road					
08	Seymour Road, northern end	Medium	<p>Existing/Baseline View and Viewpoint Sensitivity</p> <ul style="list-style-type: none"> The view from the northern end of Seymour Road is framed by terraced houses to the left and the boundary wall of the Carlisle Grounds football stadium to the right. Across Seapoint Road ahead, the land falls steeply into the Dargle valley. The former Bray Golf Club lands are 250m distant on the far side of the river (with Block A at the far end, 500m from the viewpoint). The baseline/permitted view shows that the permitted Phase 1 development would not be visible. <p>Proposed View and Magnitude of Change</p> <ul style="list-style-type: none"> The proposed Block A, despite its increase in height, would remain screened from view. <p>Significance of Effect</p> <ul style="list-style-type: none"> <u>No effect.</u> 	None	No effect
09	Seymour Road at Quinsborough Road junction	Medium	<p>Existing/Baseline View and Viewpoint Sensitivity</p> <ul style="list-style-type: none"> The view is taken from Prince of Wales Terrace, one of the grand Victorian terraces that gives Quinsborough Road its particularly strong character. Another Victorian building, Drumcairn Terrace, is to the left across the wide, tree-lined street. To the right is the boundary wall of the Carlisle Grounds, the town centre football stadium. One block to the east is Bray train station, and Main Street is three blocks to the west. These uses and buildings give this part of Bray a strong urban character. The baseline/permitted view shows part of Sea Gardens Phase 1 framed in the view. Block B is nearest and its vertically accented volume catches the eye. Block A to the rear is discernible but inconspicuous. The Victorian buildings in the foreground are valued features, but the stadium reduces visual amenity and - along with the permitted Phase 1 - contributes to an urban character that can tolerate change. <p>Proposed View and Magnitude of Change</p> <ul style="list-style-type: none"> The increase in height of Block A, rising behind and to the side of Block B, would increase its prominence in the Sea Gardens cluster (although at 650m distance it would remain a minor element of the view – hence the low magnitude of change classification). <p>Significance of Effect</p> <ul style="list-style-type: none"> <u>Slight positive.</u> The stepped form/height and complementary architecture of the two buildings would result in a more visually pleasing composition – with no negative effect on the valued foreground elements. <p>Cumulative View</p> <ul style="list-style-type: none"> Block E of Sea Gardens Phase 2, the intended landmark of the new quarter, would screen Block A from view. 	Low	Slight positive

No.	Viewpoint Location	Viewpoint Sensitivity	Commentary	Magnitude of Change	Significance of Effects
Views from Bray Harbour					
09	Bray Harbour South Wall	Medium	<p><i>Existing/Baseline View and Viewpoint Sensitivity</i></p> <ul style="list-style-type: none"> The view is taken from the harbour wall, looking back across the harbour towards the shoreline. The railway line and Harbour Road can be seen crossing the Dargle River where it enters the harbour. To the left of the bridge is a beach and Bray Sailing Club, with the large concrete tanks of Bray Pumping Station to their rear. To the right is a small harbour industrial zone. Further to the right, above the shoreline, is Woodbrook Golf Club. The Wicklow Mountains form an undulating horizon, with the peak of Carrickgollogan prominent. The mountains and water lend visual amenity to the view, and the built elements are interesting - but some are unsightly/untidy. This is in contrast to the view 90 degrees to the left, which is the view along the Promenade to Bray Head on the far side of the Victorian seafront. <u>The baseline view shows the permitted Blocks A and B to the rear of the harbour industrial buildings. The buildings are primarily horizontal in form (apart from a modest accent volume in Block B) and present four relatively broad elevations to the coastline.</u> Block C is also visible. This initiates a significant shift in character towards a contemporary urban condition around the harbour. Any view from or of the harbour in a coastal town is an important view. However, in this view there is capacity for change due to (a) the unsightly/untidy quality of some of the built elements, (b) the change in character initiated by Phase 1, and (c) the higher visual amenity of the view south (along the promenade) and east (to sea) from this same position. 	Medium	<p>Moderate negative*</p> <p>* A similar change to Block B would render the cumulative effect positive</p>

No.	Viewpoint Location	Viewpoint Sensitivity	Commentary	Magnitude of Change	Significance of Effects
			<p><i>Proposed View and Magnitude of Change</i></p> <ul style="list-style-type: none"> The proposed Block A contrasts with the permitted Block A (and Block B) by adopting vertical forms separated by wide gaps, resulting in a taller but more permeable built frontage to the coast. The proposed building is more prominent but does no harm to any valued feature or characteristic of the landscape/view. The view is illustrative of the favourable context for height provided by the site's coastal location. The magnitude of change would be medium. This reflects the increase in prominence of Block A but more importantly the change from a horizontal form to vertical. <p><i>Significance of Effect</i></p> <ul style="list-style-type: none"> <u>Moderate negative*</u>. The change to Block A would cause an imbalance with Block B (as permitted). It is not the height of Block A that causes the negative impact, but rather the variance in form and height between Blocks A and B (which were conceived as a pair of complementary blocks). <p>* If a similar change were made to Block B (as is envisaged by the applicant), the two buildings would be complementary and the cumulative effect would be positive.</p> <p><i>Cumulative View</i></p> <ul style="list-style-type: none"> Block E is a significant addition to the view. <u>Its form is complementary to the proposed Block A and it therefore provides favourable context for Block A (and vice versa)</u>. In the cumulative view Block B (as permitted, not as shown below) appears squat and impermeable compared to Blocks A and E. If Block B were to adopt a similar form to the amended Block A, then the three coastal buildings would form a coherent cluster responding to and maximising the benefits of the coastal location – as shown below. There would be no loss or compromise of any valued feature or characteristic of the view. 		<p>Moderate negative*</p> <p>* A similar change to Block B would render the cumulative effect positive</p>

No.	Viewpoint Location	Viewpoint Sensitivity	Commentary	Magnitude of Change	Significance of Effects
11	Harbour Road Bridge over Dargle River mouth	Low	<p>Existing/Baseline View and Viewpoint Sensitivity</p> <ul style="list-style-type: none"> Harbour Road is an important future connection between Bray town centre, the railway station, the Promenade, the harbour area and the developing Sea Gardens quarter. The road currently gives access to a small industrial complex on the north side of the harbour. These buildings are visible to the right across the bridge. The broad expanse of the harbour is to the right. To the left of the road bridge is the railway bridge, passing over the Dargle before it enters the harbour. The bridge and the railway embankment hide the former Golf Club lands from view. The landscape in view is untidy, but to the right are the harbour and the sea, which draw the viewer's attention and provide visual interest and amenity. The baseline view shows the permitted Block B inside the railway line north of the river, overlooking the coastline. Block A is behind Block B. A part of Block C is visible to the left of Block B. <u>These buildings initiate the transformation of the former golf club lands into a contemporary town centre quarter, but further development is needed to realise the vision for the area.</u> There is a high capacity for change in the landscape/view. <p>Proposed View and Magnitude of Change</p> <ul style="list-style-type: none"> The proposed Block A protrudes marginally above the roofline of Block B. The magnitude of change is negligible. <p>Significance of Effect</p> <ul style="list-style-type: none"> <u>Not significant neutral.</u> The development would cause no significant change to the character or quality of the view. <p>Cumulative View</p> <ul style="list-style-type: none"> Sea Gardens Phase 2 would transform the view, with the landmark Block E prominent, the tall, slender building turned to face the harbour and Bray Promenade. The hotel is also visible, and along with Blocks A and B, the hotel and Block E form a substantial cluster of contemporary development – a distinct urban core with an appreciable architectural identity - addressing the coastline and the sea. The importance of the Dargle River and the harbour in providing a spatial buffer between Sea Gardens and the historic town centre and waterfront is evident in this view. 	Negligible	Not significant neutral

No.	Viewpoint Location	Viewpoint Sensitivity	Commentary	Magnitude of Change	Significance of Effects
Views from Bray Promenade					
12	Strand Road, North end of Bray Promenade	Medium-High	<p><i>Existing/Baseline View and Viewpoint Sensitivity</i></p> <ul style="list-style-type: none"> The Victorian 'Martello Terrace' encloses the Promenade at its northern end. To the left, just visible on a low promontory is the top of the Martello tower, converted for residential use. The western end of Harbour Road can be seen through the gap, with the masts of sailing boats rising behind the roof of the Harbour Bar. The baseline view shows that the permitted Sea Gardens Phase 1 development will not be visible. Martello Terrace screens the buildings from view. This is an attractive view featuring several historic buildings. Views of and from the Promenade are highly valued, but they are not unchanging (for example the five storey Strand View apartments/mixed use scheme recently constructed fronting the Promenade). Additionally, while the historic houses are of architectural interest and form attractive compositions, most people's attention when walking along the Promenade is focussed on the sea to the east. <p><i>Proposed View and Magnitude of Change</i></p> <ul style="list-style-type: none"> The proposed Block A would remain hidden behind Martello Terrace (well below its roofline). <p><i>Significance of Effect</i></p> <ul style="list-style-type: none"> No effect. <p><i>Cumulative View</i></p> <ul style="list-style-type: none"> The tops of Block E and the hotel would protrude just above the roofline of Martello Terrace and the Harbour Bar in the middle distance. The intrusion in the view is minor, but the building typologies and scale are clearly of contemporary urban character, marking the presence of the new quarter beyond the promenade and the harbour. The existing, valued elements of the view - the sea, the strand, the Promenade open space and historic architecture - would all remain, and remain dominant in the view. The new development would add another element of visual interest peripheral to the principal elements but nonetheless causing a notable shift in Bray's character. 	None	No effect

No.	Viewpoint Location	Viewpoint Sensitivity	Commentary	Magnitude of Change	Significance of Effects
13	Bray Promenade, middle section	Medium-High	<p>Existing/Baseline View and Viewpoint Sensitivity</p> <ul style="list-style-type: none"> This is a signature view of Bray. To the right is the sea and the wide beach. The harbour wall can be seen projecting into the sea in the distance. In the foreground is the wide footpath and parallel green space forming the Promenade, framed to the left by a variety of two to 3/4 storey terraced buildings - mostly Victorian. The Martello Terrace closes the vista at the end of the Promenade. <u>The combination of seascape, green open space and historic architecture (visibly responding to the coastline) generates a high level of visual amenity and defines a distinct character area within the townscape.</u> In the baseline view Blocks A and B are visible in the distance above and behind the Martello Terrace roofline. Block B protrudes sufficiently to be identifiable as a modern multi-storey building, but it is well removed from the Promenade character area and has no negative effects. It is simply a (minor) new element in the complex urban composition. (There are other modern buildings along the seafront.) This is an attractive view featuring numerous topographical and architectural assets. The baseline view shows, however, that there is some capacity for change that does not intrude in the Promenade area itself or obscure any of the valued features. <p>Proposed View and Magnitude of Change</p> <ul style="list-style-type: none"> The increased height of Block A would increase its prominence over Block B, but the buildings would remain a minor, distant element of the view with little impact on the Promenade character area. <p>Significance of Effect</p> <ul style="list-style-type: none"> <u>Slight neutral.</u> The development would have no significant effect on the composition or character of the view (the two buildings would remain a minor distant element), or on the visual amenity experienced on the Promenade. <p>Cumulative View</p> <ul style="list-style-type: none"> Block E would protrude above the roofline of the Victorian terrace at the end of the Promenade, the tall building turned towards the Promenade. Due to its height it would catch the eye, and this is the intention of the landmark building – to mark the new quarter in the townscape. Block E would combine with Blocks A and B to form a more prominent cluster of contemporary urban character, but the separation distance between them avoids excessive massing. <u>The existing valued elements of the view - the seascape, the promenade and the Victorian buildings - would all remain, undiminished by the development, which would add a new element of visual interest, causing a notable shift in Bray's character but no loss of visual amenity.</u> 	Low	Slight neutral

No.	Viewpoint Location	Viewpoint Sensitivity	Commentary	Magnitude of Change	Significance of Effects
Views from Bray Head					
14	Bray Head, cliff walk viewing point	Medium-High	<p>Existing/Baseline View and Viewpoint Sensitivity</p> <ul style="list-style-type: none"> The view is taken from a viewing point on the lower northern slope of Bray Head, overlooking the town's seafront. The main elements of the view are the sea, the broad beach, the strip of urban development behind the seafront, and the mountains rising in the distance inland. Together these elements generate Bray's distinctive character and a high level of visual amenity. There is a complexity to the urban area, as is typical of a town of Bray's size and maturity. The variety of building typologies, scale, architecture, materials and colours generate a highly textured landscape, which contrasts with the simplicity of the seascape and the mountains. In the baseline view Blocks A and B are visible at the far end of the Bray urban area, set back from the coastline behind the harbour. <u>The buildings have a horizontal form and do not break the distant horizon line.</u> Due to its spatial extent and complexity there is capacity in the urban area to accommodate change, although there are few vertical forms (apart from the church tower, antennae and the temporary presence of the cranes). <p>Proposed View and Magnitude of Change</p> <ul style="list-style-type: none"> The amended Block A would break the skyline, giving it some prominence in the urban area - and the wider view - despite the building's distance from the viewer. (The church tower to the left in the view has a similar presence.) Although the change to the overall composition would be minor (a low magnitude of change), it would draw the eye. <p>Significance of Effect</p> <ul style="list-style-type: none"> <u>Slight positive.</u> The visibility/prominence of a building in the urban landscape does not equate to negative impact. The development in this case represents a new phase in the evolution of Bray. It is a new building typology - high density housing with vertical form, as encouraged by the policy of compact growth. A degree of prominence in the urban area is unavoidable. The location of the new quarter at the northern end of the town, outside of the historic Promenade character area, fronting the coastline, appears logical. <u>The zoned green belt beyond the site will ensure that the building reads as a bookend to the town, an appropriately positioned punctuation in the urban area.</u> The prominence given to the building by its height adds interest to view; it does no harm to the composition and in no way reduces visual amenity. <p>Cumulative View</p> <ul style="list-style-type: none"> The taller form of Block E (and to lesser extent the hotel) would strengthen the contemporary/21st century character of the new quarter and increase its prominence in the urban area. The effect should not be 	Low	Slight positive

No.	Viewpoint Location	Viewpoint Sensitivity	Commentary	Magnitude of Change	Significance of Effects
			assumed to be negative. Higher density development characterised by vertical form is an appropriate form of development in the 21 st century. The development represents the next phase of Bray's evolution as part of the metropolitan city-region. <u>The other main elements of the view (the seascape and the mountains) would remain co-dominant in the view and the view would retain its overall composition, character and high level of visual amenity.</u>		
15	Bray Head, summit	Medium	<p>Existing/Baseline View and Viewpoint Sensitivity</p> <ul style="list-style-type: none"> The summit provides a panoramic view over Bray, revealing the full extent of the town and the variety of character areas that result from its natural topography and development history. In the baseline view Blocks A, B and C are visible towards the northern edge of the urban area but seen from above they are less prominent than at Viewpoint 13. Due to its spatial extent, complexity and variety of character there is considerable capacity in the urban area to accommodate change. <p>Proposed View and Magnitude of Change</p> <ul style="list-style-type: none"> The increased height of Block A would constitute a negligible magnitude of change. The building would remain a minor element of the view. <p>Significance of Effect</p> <ul style="list-style-type: none"> <u>Not significant neutral.</u> In the broad panorama of seascape, townscape and mountains the development would have no significant effect on the composition and character of the view, and no effect on visual amenity. <p>Cumulative View</p> <ul style="list-style-type: none"> The larger and taller forms of Block E and the hotel would strengthen the contemporary/21st century character of the new quarter and increase its prominence in the urban area. Seen in the wider context of Bray, it would be comfortably accommodated, its main effect being to add visual interest, with no negative effect on any other part of the town. The other main elements of the view (the seascape, wooded hills and mountains) would remain co-dominant in the view and the view would retain its overall composition, character and high level of visual amenity. 	Negligible	Slight neutral

6.0 Landscape Impact Assessment

6.1 Landscape Sensitivity of the Receiving Environment

The landscape sensitivity of the receiving environment can be classified 'low-medium'¹.

The site is located in a landscape in process of transformation into a contemporary urban quarter. The former Golf Club lands are of a scale that allows for the development of a new character area separate from the historic town centre and its Victorian assets and areas. Block A is located in the north east corner of the Golf Club lands, furthest from the historic town centre but within walking distance.

At the local level, the site has few sensitive receptors (landscape elements, areas or characteristics) in its immediate environs:

- The railway line passes to the east of the site. Beyond the railway is a strip of zoned open space above Back Strand beach. The open space is a former landfill, which has been covered and is now being developed as public open space with a coastal pedestrian and cycle path providing seascape views. East of this space are the beach and the sea.
- To the north of the site is Corke Abbey Valley Park, a 150m wide park covered in dense woodland. Beyond the park is the Woodbrook Glen housing estate. The estate is buffered from the site by the park. Alongside the housing estate is Woodbrook Golf Club, which extends north along the coastline.

The site thus has frontage to the coast and sea to the east and to a large, wooded open space to the north. Both of these landscape types are recognised as providing favourable context for building height. Additionally, there are no sensitive receptors (e.g. houses or cultural heritage features) in close proximity in either direction.

- To the west of the site is the first phase of the Sea Gardens quarter, currently under construction, comprised of 2-3 storey terraced houses and duplexes, a small apartment block (4 storeys) beside the park to the north and a larger mixed use block (6 storeys) to the south facing the Sea Gardens Phase 2 site. As a contemporary mixed density neighbourhood with a variety of housing typologies and building heights, the Phase 1 development is of relatively low sensitivity to change of the type proposed. Compared to Bray's earlier, traditional inner and outer suburbs, this area has a higher tolerance for contemporary multi-storey development.

West of Sea Gardens Phase 1 is the Ravenswell school campus and the Corke Abbey housing estate. Both are buffered from the site by the Phase 1 development now nearing completion.

- To the south of the site and Block B, also fronting the railway and the coast and extending inland to the Castle Street at the Fran O'Toole Bridge, is the Sea Gardens Phase 2 site. A planning application for a large, mixed use, mixed density development - the core of a new town centre quarter - has been lodged for this site. The buildings range from a cluster of riverside retail and F&B pavilions to 2-3 storey

¹ **Medium landscape 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 principal management objective may be to consolidate landscape character or facilitate appropriate, necessary change.

Low landscape sensitivity definition: Areas where the landscape has few valued elements, features or characteristics and the character is weak. The character is such that it has capacity for change; where development would make no significant change or could make a positive change. Such landscapes are generally unrecognised in policy and the principal management objective may be to facilitate change through development, repair, restoration or enhancement.

townhouses and duplex blocks, a four storey mixed use building, a 10 storey hotel and a 15 storey landmark apartment building (Block E). The Sea Gardens Phase 2 site is not sensitive to development of the type proposed at Block A. The two proposed developments would provide mutually favourable context for each other.

In summary, the site has no sensitive landscape or visual receptors in any direction in its immediate environs, and the surrounding landscape provides favourable context for taller development. The site is well buffered – by separation distance, vegetation (Corke Abbey Valley Park) and other similar development (Sea Gardens Phases 1A and 2) – from any sensitive receptors such as existing housing. There are few views from the existing public realm in which the proposed development could be seen from close-up.

These favourable landscape conditions coupled with the site's access to retail and services, schools, employment, the town centre, public transport and open space translate into opportunity for achieving density through building height.

Furthermore, at the macro level, the combination of the Bray's development history and its natural topographical features have resulted in a townscape of diverse character and appreciable strength of character. Although of relatively compact form, Bray has the feel of a larger town or even a small city. This gives it capacity to accommodate change without loss of existing character.

6.2 Magnitude of Landscape Change

The magnitude of landscape change which would result from the proposed development is 'low'². This classification is based on the following:

- (a) The proposed development is a change to an already permitted building. The building's location and footprint would not change; only its form and height would be altered;
- (b) The site/building is located in a large area in process of transformative change, from a former golf course into a contemporary town centre quarter with its own distinct character;
- (c) The development would have relatively limited visual impact – as indicated by the magnitude of visual change classifications in Table 3 below. The majority of views would experience no change or a negligible or low magnitude of change³. This is due mainly to the site's location in the north east corner of the former Bray Golf Club lands, well removed from all existing areas of public realm – therefore well removed from potential visual receptors.

² **Definition of medium magnitude of change:** '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 – the context being the former Golf Club lands, the emerging Sea Gardens quarter. Such development results in minor change to the character of the landscape.' – refer to Section 2.2, Appendix 1).

³ It should be noted that the baseline against which the proposal is assessed is the permitted Block A. The magnitude of change classification therefore refers to the change that would result from the proposed increase in height. Even if the magnitude of change were measured against the undeveloped site, the magnitude of change would remain relatively low due the site's remoteness - in visual terms. The site is unusual in being both (a) proximal to the town centre, public transport etc. and (b) visually remote from existing public realm.

Table 3: Summary of Visual Effects Assessment

No.	Viewpoint Location	Viewpoint Sensitivity	Magnitude of Change	Significance of Effects
Views from the nearest residential receptors				
01	Corke Abbey estate – nearest houses	Medium	None	No effect
02	Corke Abbey estate – further houses	Medium	Low	Slight neutral
Views from the nearest residential receptors				
03	The Green, Woodbrook Glen estate	Medium	Medium	Moderate neutral
04	The Lawn, Woodbrook Glen estate	Medium	None	No effect
Views from Dublin Road, Castle Street and Fran O’Toole Bridge				
05	Dublin Road	Low	Low-Medium	Slight positive
06	Fran O’Toole Bridge, Main Street	Medium	Low	Slight positive
07	Entrance to Sea Gardens from Fran O’Toole Bridge/Castle Street	Medium	Low	Slight neutral
Seymour Road and Quinsborough Road				
08	Seymour Road, northern end	Medium	None	No effect
09	Seymour Road at Quinsborough Road junction	Medium	Low	Slight positive
Views from Bray Harbour				
10	Bray Harbour South Wall	Medium	Medium	Moderate negative*
11	Harbour Road Bridge over Dargle River mouth	Low	Negligible	Not significant neutral
Views from Bray Promenade				
12	Strand Road, North end of Bray Promenade	Medium-High	None	No effect
13	Bray Promenade, middle section	Medium-High	Low	Slight neutral
Views from Bray Head				
14	Bray Head, cliff walk viewing point	Medium-High	Low	Slight positive
15	Bray Head, summit	Medium	Negligible	Slight neutral

* If a similar change were made to Block B (as is envisaged by the applicant), the two buildings would be complementary and the cumulative effect would be positive.

6.3 Significance and Quality of Landscape Impact - Conclusions

Based on the magnitude of landscape change and the sensitivity of the receiving environment, **the significance of the landscape effects is classified as ‘slight’** (EPA definition: *‘An effect which causes noticeable changes in the character of the environment without affecting its sensitivities’*).

This classification is supported by the findings of the visual impact assessment (summarised in Table 3 above), which concluded that most views would experience *no effect*, *not significant* effect, or effects of *slight significance*, with outcomes that are neutral or, in some cases, positive.

The generally low significance of the landscape and visual effects is a product of:

- The site's location in a planned/emerging mixed use, mixed density town centre quarter (which provides favourable context for the development type);
- The site's location in the most visually remote part of this quarter (while still benefitting from the highly accessible urban location);
- Site characteristics that support increased building height, specifically the coastal frontage to the east and the presence of Corke Abbey Valley Park – a substantial woodland buffer – to the north;
- The absence of sensitive receptors of landscape or visual change in close proximity to the site.

For a small part of the receiving environment - The Green in Woodbrook Glen (Viewpoint 03) - a visual impact of *moderate significance* was identified, though the effect is classified as *neutral*. The Green lies to the north of the site, beyond Corke Abbey Valley Park. In winter views from The Green, the taller building (over 150m distant on the far side of the park) would be more prominent than the permitted Block A. It would have the effect of *further* urbanising the context of Woodbrook Glen. The visibility of development of contemporary urban character in the estate's proximity (on lands designated for expansion of the town centre) should not be considered inappropriate. Were the development to be permitted, The Green would retain an enviable level of landscape and visual amenity, along with the advantages of its accessible urban location. In addition:

- (a) Only a small part of Woodbrook Glen (The Green) would experience any change;
- (b) The impact would be mitigated by the 150m woodland park that lies between the site and the housing estate, functioning as a landscape/visual buffer. During the summer months, the taller Block A would be almost entirely screened by the trees in the park. It is only in the winter months that the building would be visible, though it would remain filtered in the view by the bare canopy of the park.

One potentially negative visual effect was identified. This is the view from the south wall of Bray Harbour (Viewpoint 10). The negative effect would not result from the increased height of Block A, but rather from the difference in form between the amended Block A, which has a vertical form, and Block B, which is horizontal (apart from a modest accent volume). If Block B were amended to match the form of Block A the buildings would be complementary and their cumulative effect would be positive. The view would then benefit from the greater permeability between the seascape and the built form of the new quarter. The two buildings would also create favourable context for Block E (Phase 2). View 10 illustrates that the coastal landscape can accommodate the additional height on Block A (and Block B) with no sense of excessive scale or enclosure.

The view from the middle section of Bray Promenade (Viewpoint 13) is important. This is a signature view of Bray, comprising the seascape, the promenade and the Victorian buildings fronting the promenade. These combine to form one of Bray's most valued character areas, with a high level of visual amenity. The proposed increase in height of Block A would be noticeable, but would have no significant effect on the composition or character of views from the promenade. Blocks A and B would remain a minor, distant element of the view, outside of the promenade character area and in no way affecting its visual amenity. It is important to recognise the scale and strength of character of the Promenade. It is 1.4km long, with the sea to the east, the mostly Victorian seafront buildings providing enclosure to the west, and the massive form of Bray Head to the south. It is a large, well defined area in a town of considerable scale, diversity and maturity of character. The Promenade and the townscape of Bray as a whole can withstand the addition of new areas and forms of development without loss of existing valued character.

The views from Bray Head (Viewpoints 14, 15) support this conclusion. In these panoramic views from elevated vantage points, the town's scale, diversity and strength of character are evident. In these views, the taller Block A would be more prominent, but its only real effect would be to add an element of visual interest to the already complex urban portion of the landscape. The other main elements of the view - the seascape, Bray's rural

hinterland and the mountains - would remain co-dominant in the view and the view would retain its overall composition, character and high level of visual amenity.

In conclusion, the key questions for this assessment were (1) whether the proposed change in form and increase in height of Block A would cause significant landscape or visual impacts, and (2) whether the more vertical and permeable built form of the proposal is more suitable for the site (and the wider Sea Gardens coastal frontage) than the horizontal forms of Blocks A and B as permitted. The assessment found that the proposal would cause no significant negative landscape or visual impacts. Overall, the proposal represents a considered response to the site's local and wider landscape contexts.

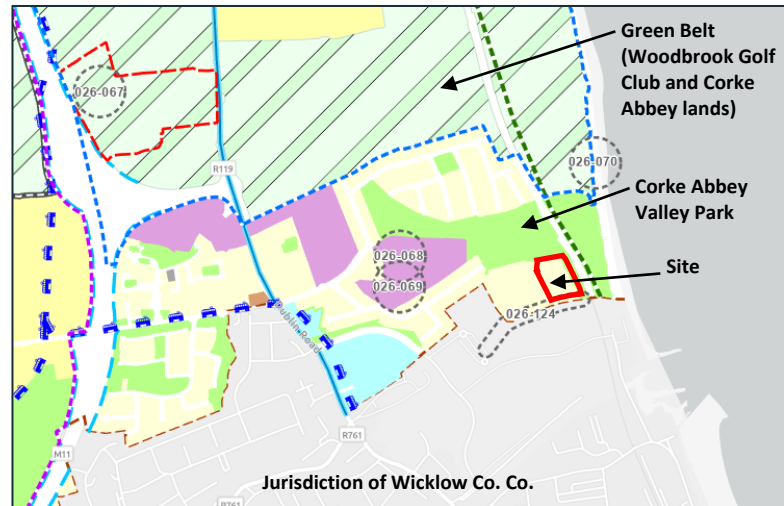
APPENDIX 1 POLICY RELEVANT TO THE ASSESSMENT

1.1 Dun Laoghaire Rathdown County Development Plan 2022-2028

1.1.1 Land Use Zoning

The majority of the site is zoned A “To provide residential development and improve residential amenity while protecting the existing residential amenities”. Other items of note on the zoning map include the following:

- Open Space zoning (Objective F) of Corke Abbey Valley Park to the north of the site;
- Economic Development and Employment zoning (Objective E) nearby to the west (Solus Tower business park, Comm-scope factory and technology innovation centre, and undeveloped lands);
- Major Town Centre zoning also just to the west of the site (Lidl supermarket);
- Green Belt Zoning of Woodbrook Golf Club and the Corke Abbey lands to the north.



The site is thus well located in relation to retail facilities, employment and public open space in the DLRC jurisdiction. It has equally good access to the Castle Street/Little Bray shopping centre, Bray town centre and the Promenade, Bray DART station (and the future Luas), the Ravenswell schools, etc. The principle of sustainability demands that the residential land use of such a well located site be maximised.

1.1.2 Creation of a Compact and Connected County

Table 1.4 of the DLRCDP sets out Five Strategic County Outcomes of the Plan, including the following:

“Creation of a Compact and Connected County: One of the best ways to transition to a climate resilient County is to consolidate development within the existing urban footprint thus making best use of land. Sustainable planning policy has long been underpinned by the matching of land use and transport policies so that denser development takes place close to good quality public transport options and supporting services. This will allow those living, working and visiting the County easy access to amenities and services by way of high-quality public transport and the softer modes of walking and cycling.” [emphasis added]

1.1.3 Residential Density and Building Height

Policy Objective PHP18: “It is a Policy Objective to:

- Promote compact urban growth through the consolidation and re-intensification of infill/brownfield sites.
- Encourage higher residential densities provided that proposals provide for high quality design and ensure a balance between the protection of existing residential amenities and the established character of the surrounding area, with the need to provide for high quality sustainable residential development.” (emphasis added)

Citing the 'Sustainable Residential Development in Urban Areas' guidelines and the accompanying 'Urban Design Manual', the DLRCDP states (p.81):

"As a general rule the minimum default density for new residential developments in the County (excluding lands on zoning Objectives 'GB', 'G' and 'B') shall be 35 units per hectare (net density)... This density may not be appropriate in all instances but should be applied particularly in relation to 'greenfield' sites or larger 'A' zoned areas. Higher density schemes should offer an exemplary quality of life for existing and future residents in terms of design and amenity." [emphasis added]

Policy Objective BHS 1- Increased Height:

It is a policy objective to support the consideration of increased heights and also to consider taller buildings where appropriate in the Major Town Centres of Dún Laoghaire and Dundrum, the District Centres of Nutgrove, Stillorgan, Blackrock, and Cornelscourt, within the Sandyford UFP area, UCD and in suitable areas well served by public transport links (i.e. within 1000 metre/10 minute walk band of LUAS stop, DART Stations or Core/Quality Bus Corridor, 500 metre/5 minute walk band of Bus Priority Route) provided that proposals ensure a balance between the reasonable protection of existing amenities and environmental sensitivities, protection of residential amenity and the established character of the area...

Having regard to the Building Height Guidelines and more specifically in order to apply SPPR 3 there may be instances where an argument can be made for increased height and/or taller buildings in the areas mentioned above. In those instances, any such proposals must be assessed in accordance with the performance based criteria set out in table 5.1 which is contained in section 5. The onus will be on the applicant to demonstrate compliance with the criteria."

The site is suitable for consideration increased height according to the above criteria, specifically access to a DART station (and a future Luas stop).

1.1.5 Constraints to Higher Density (Development Plan p.81-)

Policy Objective PHP20: *"Protection of Existing Residential Amenity: It is a Policy Objective to ensure the residential amenity of existing homes in the Built Up Area is protected where they are adjacent to proposed higher density and greater height infill developments."*

- *"On all developments with a units per hectare net density greater than 50, the applicant must provide an assessment of how the density, scale, size and proposed building form does not represent over development of the site. The assessment must address how the transition from low density to a higher density scheme is achieved without it being overbearing, intrusive and without negatively impacting on the amenity value of existing dwellings particularly with regard to the proximity of the structures proposed. The assessment should demonstrate how the proposal respects the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring uses.*
- *On all developments with height proposals greater than 4 storeys the applicant should provide a height compliance report indicating how the proposal conforms to the relevant Building Height Performance Based Criteria "At District/Neighbourhood/Street level" as set out in Table 5.1 in Appendix 5.*
- *On sites abutting low density residential development (less than 35 units per hectare) and where the proposed development is four storeys or more, an obvious buffer must exist from the rear garden boundary lines of existing private dwellings.*
- *Where a proposal involves building heights of four storeys or more, a step back design should be considered so as to respect the existing built heights." [emphasis added]*

1.1.7 Views and Prospects (Section 8.4.5)

“DLR contains many sites and vantage points from which scenic views over areas of great natural beauty, local landmarks, historic landscapes, adjoining Counties, and the City of Dublin may be obtained. In addition, the County also contains important prospects i.e. prominent landscapes or areas of special amenity value, or special interest which are widely visible from the surrounding area. Specific Views and Prospects for protection have been identified in the Plan and are considered when assessing planning applications.”

Policy Objective GIB6: *“Views and Prospects: It is a Policy Objective to preserve, protect and encourage the enjoyment of views and prospects of special amenity value or special interests, and to prevent development, which would block or otherwise interfere with Views and/or Prospects.”*

There are no Views or Prospects in proximity to the site or potentially significantly affected by development on the site.

1.2 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 are available.

National Policy Objective 20: *“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, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.”*

The NPF specifically targets infill/brownfield lands for higher density development:

“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...”

As an infill site in a well-serviced urban area (walking distance from the town centre, retail of all scales, employment opportunities and education facilities, the DART, bus and future Luas services, etc.), the site represents an important opportunity to achieve compact growth.

1.3 Urban Development & Building Height Guidelines

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:

“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.”*

APPENDIX 2 LANDSCAPE/TOWNSCAPE & VISUAL IMPACT ASSESSMENT METHODOLOGY

The LVIA methodology is informed by the *Guidelines for Landscape and Visual Impact Assessment*, 3rd edition 2013 (hereafter referred to as the GLVIA) and the EPA *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’ 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 Landscape/Townscape Effects Assessment

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

2.1 Landscape/Townscape Sensitivity

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

Table 1 *Categories of Landscape/Townscape Sensitivity*

Sensitivity	Description
Very High	Areas where the landscape exhibits very strong, positive character with valued elements, features and characteristics that combine to give an experience of unity, richness and harmony. The landscape character is such that its capacity to accommodate change in the form of development is very low. These attributes are recognised in landscape policy or designations as being of national or international value and the 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

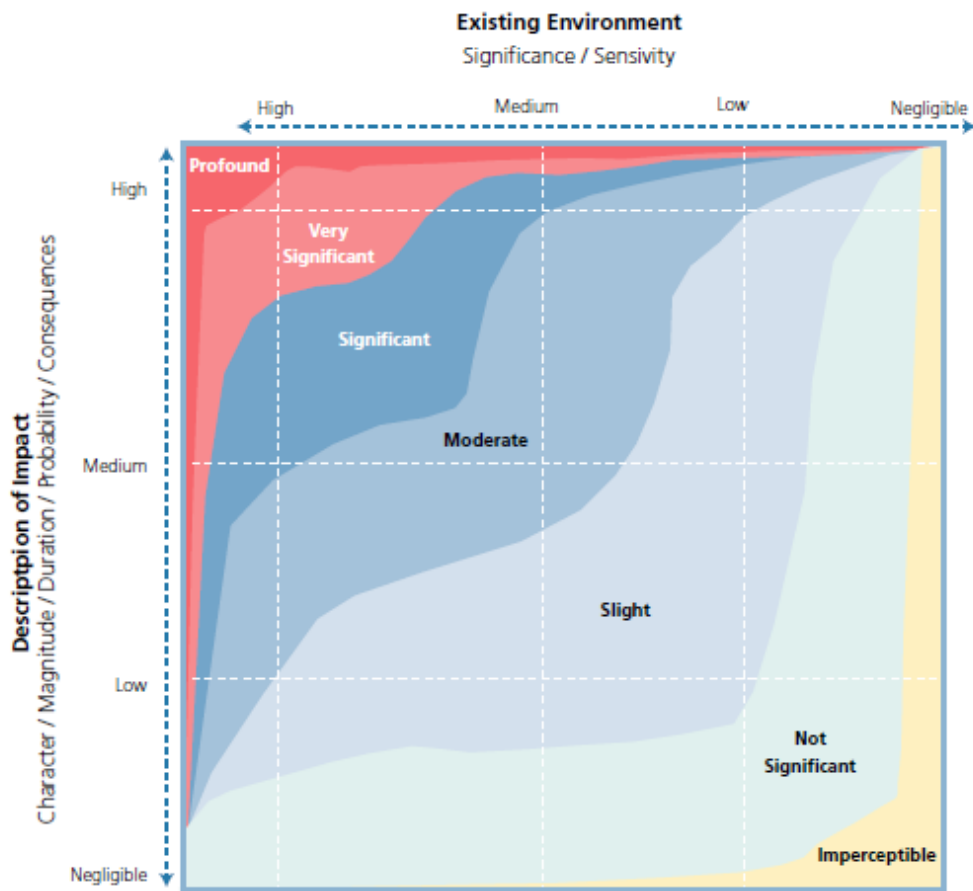
To classify the significance of effects the magnitude of change is measured against the sensitivity of the landscape/townscape using Table 3 and Figure 1 as a guide. The significance classification matrix (Table 3) is derived from the EPA's Guidelines on the Information to be Contained in Environmental Impact Assessment Reports, 2017 (specifically Figure 3.4 of the Guidelines – see Figure 1 below). In addition to this guidance the assessor uses professional judgement informed by their expertise, experience and common sense to arrive at a classification of significance that is reasonable and justifiable.

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 3.4 of the EPA's Guidelines on the Information to be Contained in Environmental Impact Assessment Reports, 2022)



The impact significance classifications are taken from the EPA 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.

