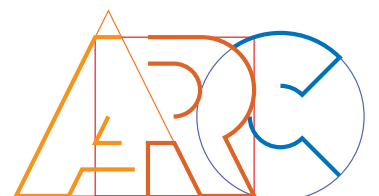




PROPOSED LARGE-SCALE RESIDENTIAL DEVELOPMENT OF BLOCKS B1 & C
AT 42A PARKGATE STREET, DUBLIN 8
VISUAL IMPACT ASSESSMENT

November 2024



Arc Consultants have been commissioned by the applicant, Ruirside Developments Ltd, to prepare this Visual Impact Assessment (ViA) to accompany a planning application for a Large-scale Residential Development (LRD) at Block B1 and Block C located at No. 42A Parkgate Street, Dublin 8.

Summary Description of the Proposed Development

Proposed Large-scale Residential Development comprising mixed use residential, community and commercial redevelopment, accommodated in 2no. blocks (Block B1 and Block C) ranging in height from 8 to 13 storeys with basement and undercroft, and including: 316no. apartments (178no. 1-bed units and 138no. 2-bed units) with private balconies/terraces; co-working/community/cultural space available for public hire; ground level retail. And all associated and ancillary demolition, conservation, landscaping and site development works including bicycle parking; car parking; public open space; communal open space; 2no. new pedestrian site entrances at Parkgate Street, connecting to proposed public plaza and the proposed riverside amenity walkway; 1no. new vehicular access via Parkgate Street to surface areas at western edge of the site. All at No. 42A Parkgate Street, Dublin 8 (Protected Structures on site).

Receiving Environment

The site of the proposed development is located in an historic area of the City, and there are important locations in the surroundings that are both historic and play a role in shaping the present character of the area. These locations include; the River Liffey both east and west of the development site, the Phoenix Park and features within the Park, Collins Barracks, the Guinness Brewery, Heuston Station, Dr Steeven's Hospital (HSE), and the Royal Hospital Kilmanham. There is likely to be visual interaction between each of these historic locations and the proposed new development, and objectives of the Dublin City Development Plan 2022-2028 call for development in the Heuston and Environs Strategic Development and Regeneration Area, SDRA 7, to play a role in reshaping the character of the area.

In order to understand the significance of likely visual interactions between the proposed development and each of the historic areas listed above, it is important first to understand the significance of these historic locations in themselves, and how they contribute to existing urban form and character. What these places are like now is not how they always were, and how they are now perceived is not how they might have been perceived in the past, or were intended to be perceived. Understanding the role these places played in the Dublin of the past enriches our understanding of their present contribution to the City, and how it might be appropriate for new development to interact with them.

The Phoenix Park and the Royal Hospital Kilmanham came into being in the 17th century. Collins Barracks, Dr Steeven's Hospital and the Guinness Brewery are all from the 18th century. Mapping evidence shows that the River Liffey had no crossings close to the development site until well into the 19th century, and until the 19th century the quay walls along the river did not extend as far west as they do now. Heuston Station, originally Kingsbridge, is mid 19th century. The development site itself was part of open ground on the north bank of the River, the Long Meadows, until the Phoenix Ironworks were founded on the site in 1808.

There are many written references to these historic locations, modern references and references from the past. Extracts from some of these references are reproduced below so as to provide insight into these historic places, their development and their significance. Several extracts from one particular early 19th century book are quoted below This is Warburton Whitelaw and Walsh's History of the City of Dublin, published in 1818. This large reference book is particularly useful because it was published just a few years after the first buildings of the Phoenix Ironworks were erected on the development site, and provides a contemporary account of Dublin at that time. This book is not merely a history but also, as detailed on the title page, contains descriptions of the then City's 'Present Extent, Public Buildings, Schools, Institutions, Etc.', in 1818. Other reference books and sources are also cited below.

The Phoenix Park

In the medieval period lands now associated with the Royal Hospital Kilmanham and part of the lands north across the River Liffey that are now within the Phoenix Park were in the possession of the Knights Hospitallers of St. John of Jerusalem. A footnote in Warburton Whitelaw and Walsh's History of the City of Dublin states:

A priory dedicated to John the Baptist was founded on or near the site of the ancient abbey of Kilmaignend, about the year 1174, for Knights Templars, by Richard Earl of Pembroke, the famous Strongbow. On the dissolution of that order in 1312, their possessions of every kind were conferred on the Knights of St. John of Jerusalem.

With the Suppression of the Monasteries in the 1530s, these lands became the property of the Crown. According to Weston St John Joyce in his book, *The Neighbourhood of Dublin*, first published 1912. These lands together with additional lands north of the River were ceded to Sir Richard Sutton in 1611 in exchange for certain lands in Cornwall. Sutton later sold the lands to Sir Edward Fisher, who built a house he called 'The Phoenix' on an elevated site, later occupied by the Magazine Fort. In 1618, the Crown reacquired the lands from Sir Edward Fisher. The Crown then went on to purchase adjacent lands so as to assemble lands for a Viceregal demesne and deer park. In the 1660s, sufficient lands having been assembled, it was decided to build a wall around the main part of the lands north of the River to enclose the deer park, which became the Phoenix Park. The Crown still held lands outside the wall, lands on the north side of the Liffey between the Park and the River and extensive lands south of the River.

In 1745, Philip Dormer Stanhope, later Earl of Chesterfield was appointed Viceroy, a post he held for less than 2 years. However during his short time as Viceroy he, according to Weston St John Joyce:

ornamentally planted and laid it out the Park, constructed the Main Road, and erected the Phoenix column; besides opening the greater portion of the Park to the public.

The Main Road through the Park as laid out by Lord Chesterfield is not the current Chesterfield Avenue. Its current alignment, which dates from the mid 19th century was part of recommendations made by the great architect and urban designer Decimus Burton, who played a major role in the design of some of London's great parks.

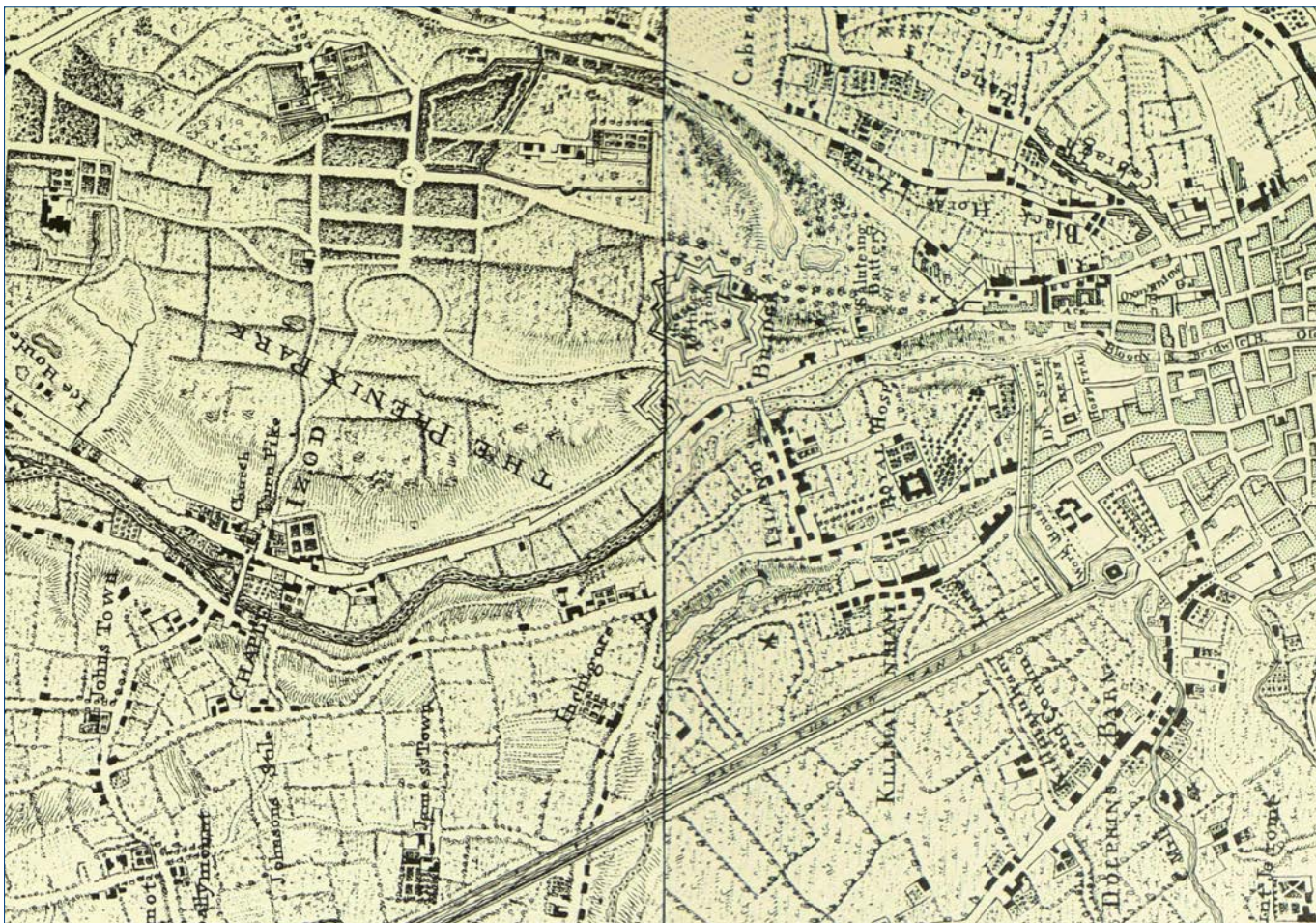
It is important to point out that the Phoenix park was a deer park and demesne, outside the city of Dublin, and does not appear to have been designed to have a relationship with the urban form of Dublin. In 1660, when the Phoenix Park was enclosed, its surroundings were rural not urban. This is clearly shown on the First Edition Ordnance map of 1837. In 1818 Warburton Whitelaw and Walsh describe the view from the Park as follows:

The exterior views from the Park are grand and beautiful. In the fore ground the river Liffey meanders through rich meadows, until it flows beneath the magnificent arch of Sarah's-bridge. The city itself terminates the horizon on the east. In front is a rich landscape highly embellished with country seats, through which the Grand Canal passes, marked in its course by fine rows of elms; and beyond all, the soft contour of the Wicklow mountains forms a suitable frame to the picture.

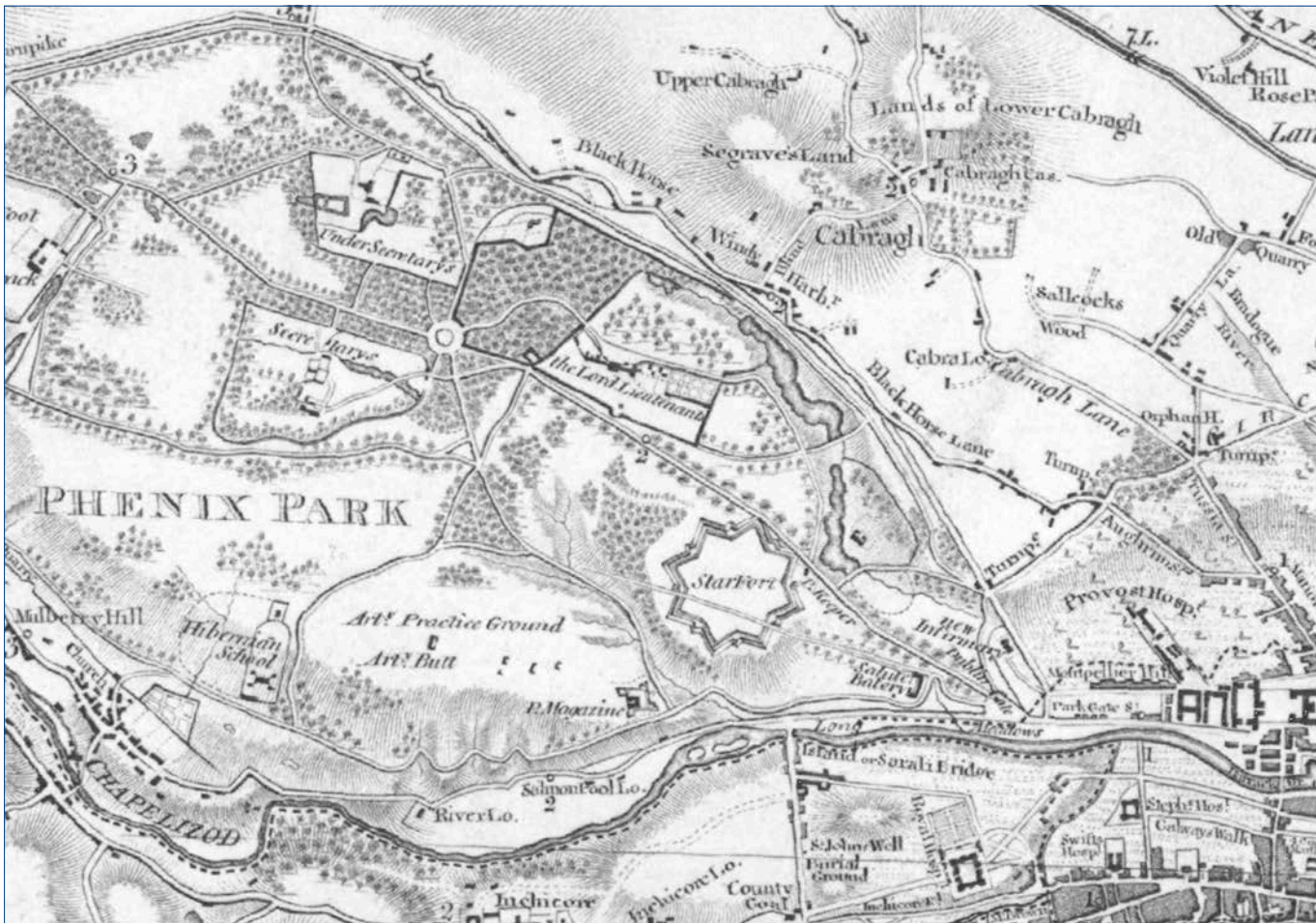
The city is seen on the horizon, not in the foreground. Even now, views from the Park towards the City are limited. There are pictorial views from the Magazine Fort towards Dublin from the late 18th and early 19th century, but these views are now obscured by mature tree planting within the Park. Chesterfield Avenue, which has two slightly different alignments, seems to point in a general way towards the City, but it is not oriented towards any significant monument or building in the City. From each of the Avenue's two alignments the view to the City is terminated by structures in the Guinness Brewery. But these structures were not there when the Avenue was laid out, and Guinness have made regular changes to what is seen from the Avenue in order to meet the Brewery's needs.

The Phoenix Park, the residence, demesne and deer park of the Viceroy, was set up as part of the apparatus of the British Crown in Ireland. It was a focus of state and military establishments and institutions, both



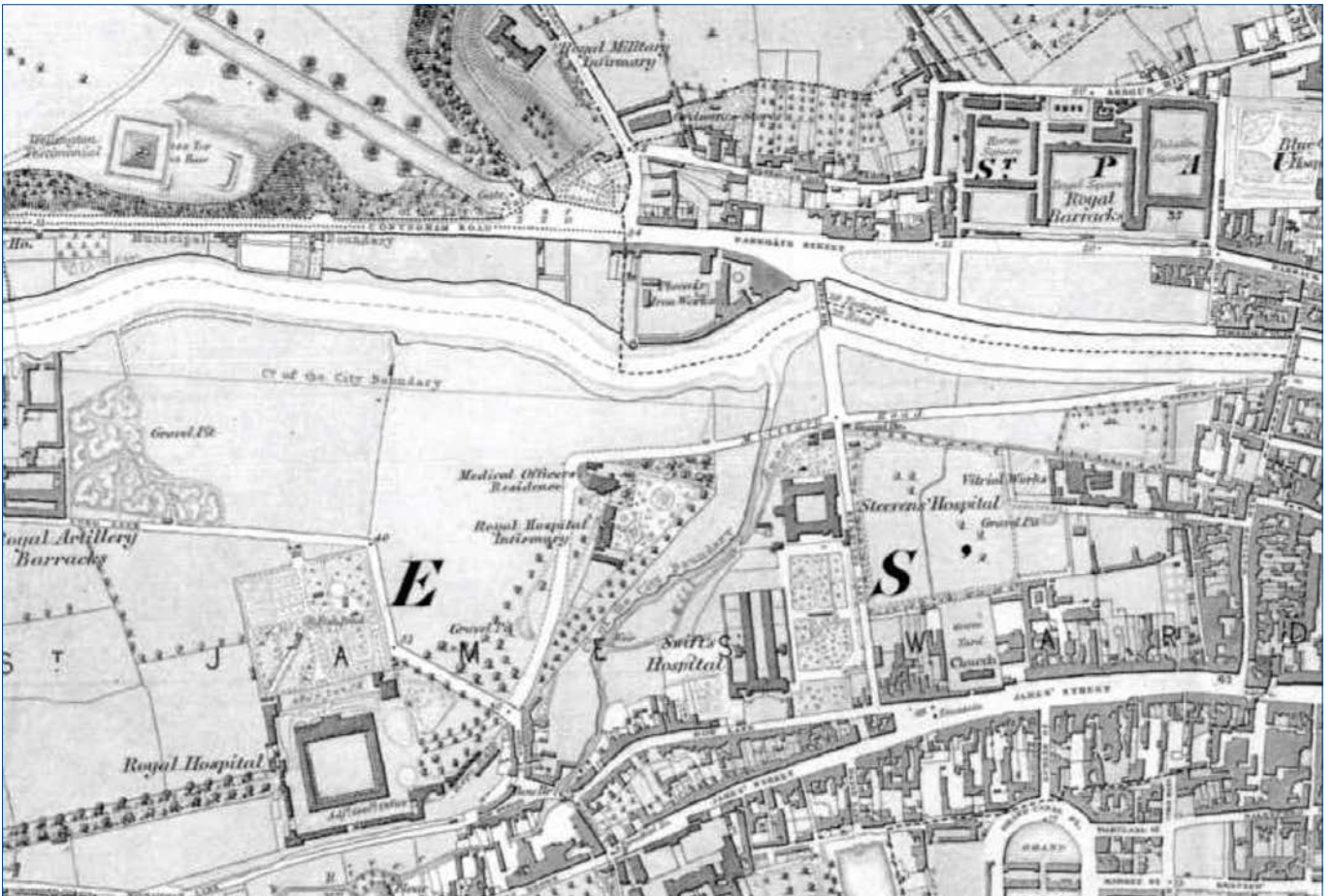


Extract from John Rocque's map of the County of Dublin, 1760, showing the layout of the Phoenix Park following the improvements introduced by the Earl of Chesterfield in the late 1740s. The Star Fort proposed by the Earl of Wharton in 1710, never finished, is seen near the east end of the Park

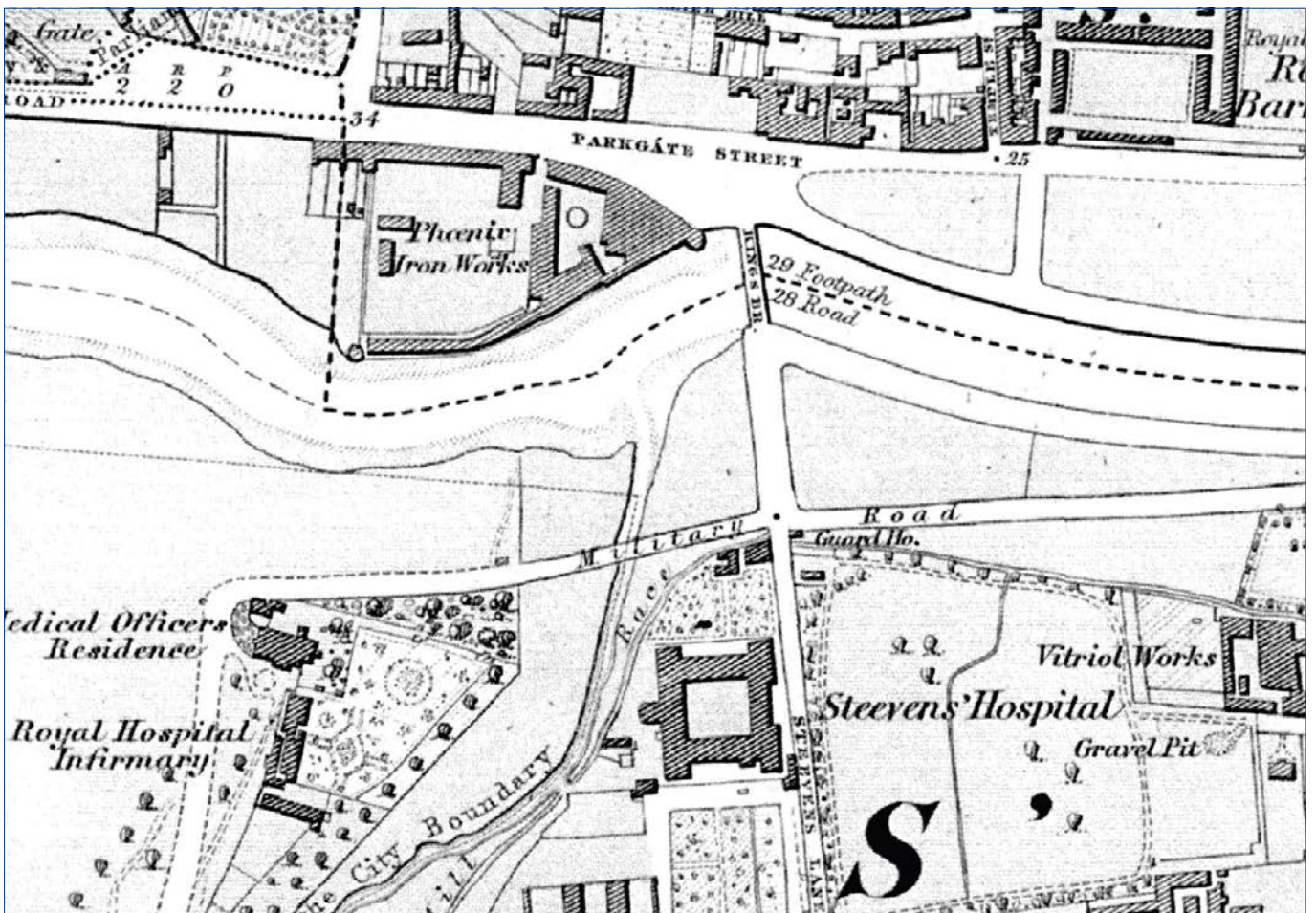


Extract from Taylor's map of 1816, showing the state residences to the north of the Park and a line of military establishments along the south side including the Hibernian Military School, an Artillery Practice Ground, the Magazine Fort, the Salute Battery and the Infirmary. (SDCC)





Extract from the First Edition Ordnance map of 1837, showing the expanse of open land north of the Royal Hospital Kilmanham between it and the River Liffey, stretching from Watling Street at the east to the Artillery Barracks at Island Bridge at the west. The confluence of the Camac with the Liffey is shown where Heuston Station now stands.



Detail from the First Edition Ordnance map of 1837 showing the Richmond Guard Tower, the gateway to the Royal Hospital at the river end of Watling Street. The map also shows no evidence of the Guinness Brewery between James's Street and the River.

within the park and in the surrounding area. In the park there were the Viceregal Lodge, the Chief Secretary's Lodge the Under Secretary's Lodge, Mountjoy Barracks - Ordnance, the Magazine Fort, the Constabulary Barracks, the Royal Military Infirmary, the Hibernian Military School and the Wellington Monument, originally referred to as the Wellington Testimonial, or Trophy. There was even a star fort in the middle of the Park, part constructed but never finished, a bastion as a place of refuge in the event of invasion or insurrection. Outside the Park were the Royal Barracks, the Royal Artillery Barracks, and the Royal Hospital - for old soldiers.

Warburton Whitelaw and Walsh describe Barrack Bridge, crossing the Liffey well east of the Phoenix Park, which was rebuilt in 1859 as Victoria & Albert Bridge and is now renamed as Rory O'More Bridge:

The bridge was first constructed of wood in 1671, and in consequence of an affray on it, in which four persons lost their lives, was called Bloody-bridge. Being afterwards built of stone, and situated not far from the barracks, it has been since named BARRACK-BRIDGE. It is a plain structure of four semi-circular arches, but at the south end, there has been lately erected a grand Gothic gateway leading to the Royal Hospital of Kilmainham

This gateway, named on the First Edition Ordnance map as the Richmond Guard Tower, is shown on that map leading to a road called Military Road that ran west from Barrack Bridge, crossing lands now occupied by part of the Guinness Brewery, on to the line of St John's Road West and then to a wide expanse of open land entirely surrounded by military establishments on the south side of the Liffey. This military arena extended north across the River to include the Royal Barracks, the Royal Military Infirmary and the Magazine Fort. On high ground at the centre of this military panorama there was gun battery, the Salute Battery, where salutes were fired at times of celebration. This was the location eventually chosen for the Wellington Testimonial, a focus at the centre of a military world. Warburton Whitelaw and Walsh speak of the Salute Battery as follows:

The Salute Battery, situated on the highest ground in the Park. It mounts twelve pieces of cannon, twelve pounders, which are fired on rejoicing days; but as such are not likely to occur as often as formerly, its site has been given by the Board of Ordnance to the Wellington Committee, for the erection of the Grand Trophy

The John Rocque's maps of 1756 and 1760, Taylor's map of 1816, Duncan's map of 1821 and the First Edition Ordnance map of 1837 all confirm the enormity of the military complex surrounding the site of the Wellington Monument at the time of its construction. Some of the military buildings have retained their names and purposes; others have changed. The Royal Military Infirmary is now the Department of Defence, the Royal Barracks is now Collins Barracks; the Artillery Barracks is now the residential development called Clancy Quay; the Hibernian Military School is St Mary's Hospital.

The Wellington Monument

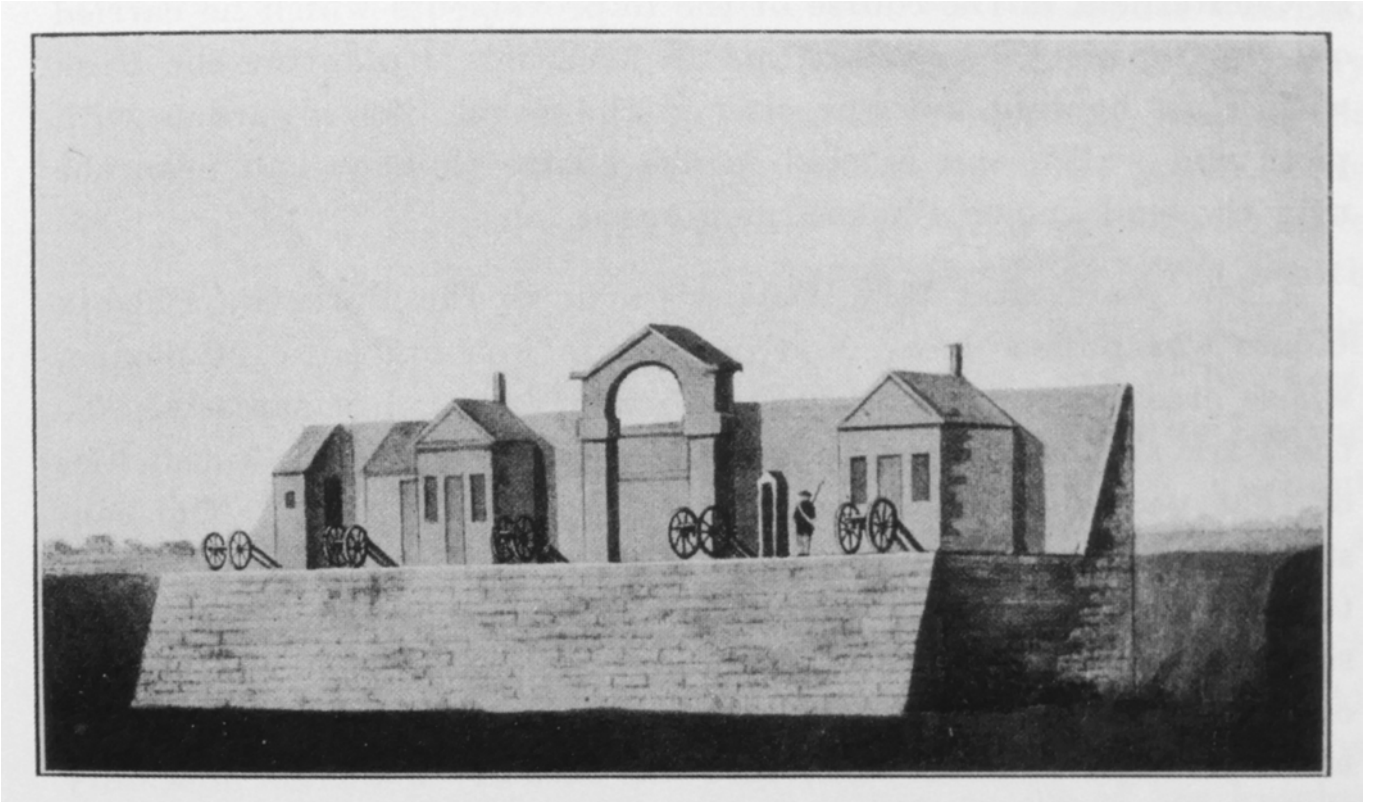
What is now referred to as the Wellington Monument was initially called the Wellington Testimonial or Trophy. There was a competition for the design of the monument. The Dictionary of Irish Architects lists 10 of the entrants including George Papworth. The winning design was by Sir Robert Smirke. The foundation stone was laid on the 18th of June 1817, the anniversary of the Battle of Waterloo. The Wellington Testimonial was not popular, and aspects of the design had to be abandoned. The original design included an equestrian statue of the Duke on a plinth standing to the side of the monument. The monument took many years to build and was not finally completed until the 1860s

Commentary on the design monument is found in Warburton Whitelaw and Walsh's History of the City of Dublin, published just a year after the foundation stone was laid. Parts of the commentary by Warburton Whitelaw and Walsh, quoted below, are in the present tense. The commentary is on the design not the actual monument, since construction had only just begun:

THE WELLINGTON TROPHY, OR, "TESTIMONIAL."

Before offering a remark, let the reader judge from a just and exact description of the chosen model, (of which the





The Salute Battery in 1795 as illustrated in Francis Elrington Ball's 'History of the County of Dublin, Part 4', 1906. After proposed sites in the City had been rejected by residents, the Board of Ordinance offered a site for the Wellington Testimonial behind the Salute Battery.



Extract from Duncan's map of 1820 showing the location of the Wellington Testimonial beside the Salute Battery surrounded by military establishments: Three Barracks, The Magazine, the Royal hospital, the Royal Infirmary and the War Secretary's house. (SDCC)

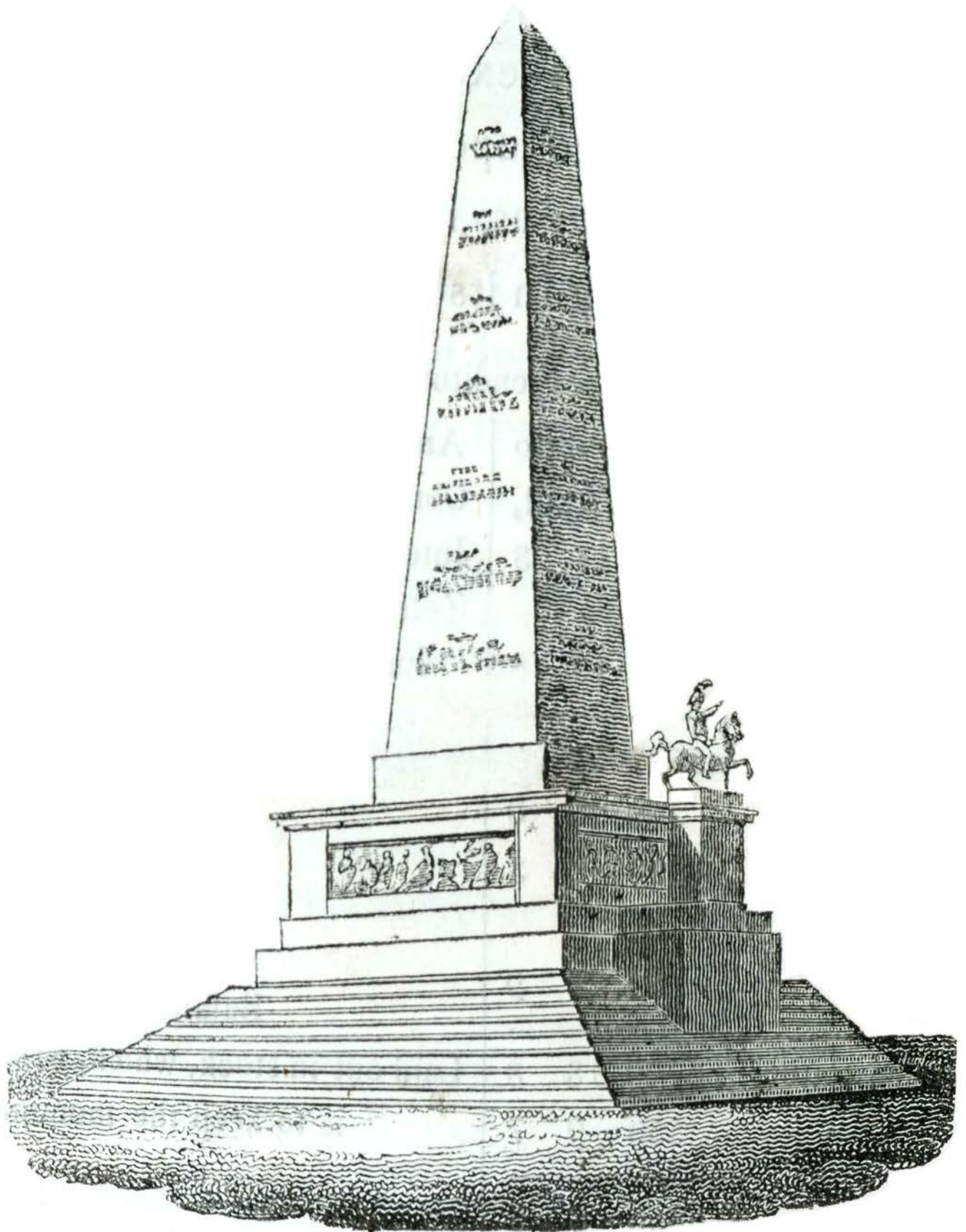


Illustration of the Wellington Testimonial from Warburton, Whitelaw & Walsh's 'History of the City of Dublin', published in 1818, a year after the foundation stone for the monument was laid. The monument was not completed until the 1860s.

annexed vignette is a correct figure), how far it is likely to produce the effect and promote the design intended.

On the summit platform of a flight of steps, of an ascent so steep and a construction so uncouth, that they seem made to prohibit instead of to invite the spectator to ascend them, a pedestal is erected of the simplest square form, in the die of which, on the four sides, are as many pannels, having figures in basso-relievo emblematic of the principal victories won by the Duke. Before the centre of what is intended for the principal front is a narrow pedestal insulated, and resting partly on the steps and partly on the platform. This pedestal supports an equestrian statue of the hero. From the platform, a massive obelisk rises, truncated and of thick and heavy proportions. On the four façades of the obelisk are inscribed the names of all the victories gained by the Duke of Wellington, from his first career in India to the battle of Waterloo. The whole structure is to be of plain mountain granite, without any other decoration whatever.

...

The figure, simple as it is, betrays a great poverty of invention. The model seems to have been borrowed from those little obelisks made of spar, the common ornaments of chimney pieces, which the monument in question resembles in everything but size and polish. But the obelisk form is not the only objection to the Wellington Testimonial. Its base, composed of an inclined plane of inconvenient steps, is abrupt and unsightly. The pedestal, with the basso-relievos, though the least exceptionable part, resembles a huge tomb-stone, to which a minor pedestal is attached, like an excrescence, on which is placed the Equestrian Statue, that contrives to conceal the figures sculptured on the front entablature, whilst the shaft of the obelisk is remarkably clumsy. Judging therefore from the model, the tout ensemble produces an effect singularly heavy, bald, and frigid.

This monument was proposed to be erected in the middle of Stephen's Green, or of Merion-square, but the inhabitants seeing that its inelegant form, and lumpish shape, making its huge unadorned base equal in magnitude to the highest house, refused to give it admission. Upon this rejection, the site of the Salute Battery in the Phoenix Park has been given for its erection, and this change of place is fortunate.

It is to be noted, therefore, that the Wellington Monument was located in the Phoenix Park as an afterthought, on a site behind the Salute Battery. There does not appear to be any evidence for the location of the Monument having been part of any intended or designed relationship with the City.

John D'Alton writing 20 years later in his book the History of the County of Dublin, published in 1838, doesn't differ greatly:

The Wellington testimonial next engages attention an ill-proportioned structure, of plain unornamented mountain granite. On the summit platform of a flight of steep steps, a simple square pedestal is erected, designed to present pannels at the sides, commemorating the Duke's achievements, but they have never been put up. In front of this pedestal is a much smaller pediment, resting partly on the steps, and partly on the main platform, and which was intended to support an equestrian statue of his Grace, also unaccomplished. From the main platform a massive obelisk rises truncated, and of thick and heavy proportions.

It would appear that the 'pannels' referred to by D'Alton were eventually put up in the 1860s.

The Royal Infirmary

The Royal Military Infirmary, now the Department of Defence is at the edge of the Phoenix Park on Infirmary Road, behind and just north of the Criminal Courts of Justice. The design of the building is credited to James Gandon, who designed the Custom House and the Four Courts. Warburton Whitelaw and Walsh's account of the building begins as follows:

ROYAL MILITARY INFIRMARY.

The Royal Military Infirmary is a well built fabric of Portland stone. Its front consists of a centre surmounted by an handsome cupola and clock, and two returning wings 90 feet in depth. The whole extends 170 feet, exhibiting a façade by no means inelegant in itself, and adding a striking feature to the surrounding beautiful scenery.



It is delightfully situated on a high ground in the south-east angle of the Phœnix Park, commanding extensive and uninterrupted prospects over the Park, and a fine country; which lavishly displays a great variety of land richly embellished with wood and water, assisted with various works of art: thus deriving all the advantage that can be desired from a free and salubrious air. Over against this building to the south, on an equally elevated situation, stands the Old Soldier's Asylum at Kilmainham. Between the two buildings, at the bottom of a valley, runs the river Liffey, whose pleasing winding's for a considerable extent enriches the beauty of the scene; to which Sarah's Bridge, consisting of one elegant and light arch, some short distance up the river, contributes not a little.

Warburton Whitelaw and Walsh Credit William Gibson with the design of the Infirmary and do not mention Gandon. However, it would appear that both Gandon and Gibson played a part in its design.

The Magazine Fort

The building of the Magazine Fort was ordered by the Duke of Dorset in 1734 with the intention of it being a 'retreat from disturbance', Christine Casey identifies John Corneille as the designer, and notes that additional buildings within the fort were constructed in 1801 to the design of Francis Johnston. Warburton Whitelaw and Walsh's description is as follows:

The Powder Magazine, erected in 1738. This is a regular square fort, with demi-bastions at the angles, a dry ditch, and drawbridge; in the centre are the magazines for ammunition, well secured against accidental fire, and bomb proof, in evidence of which no casualty has happened since their construction. The fort occupies two acres and thirty-three perches of ground, and is fortified by ten twenty-four pounders : as a further security, and to contain barracks for troops, which before were drawn from Chapel-izod, an additional triangular work was constructed in 1801.

Warburton Whitelaw and Walsh and several other authors note that when Johnathan Swift saw the Magazine Fort while visiting the Phoenix Park, he was moved to pen the following lines:

*Behold a proof of Irish sense,
Here Irish wit is seen,
When nothing's left that's worth defence,
We build a magazine*

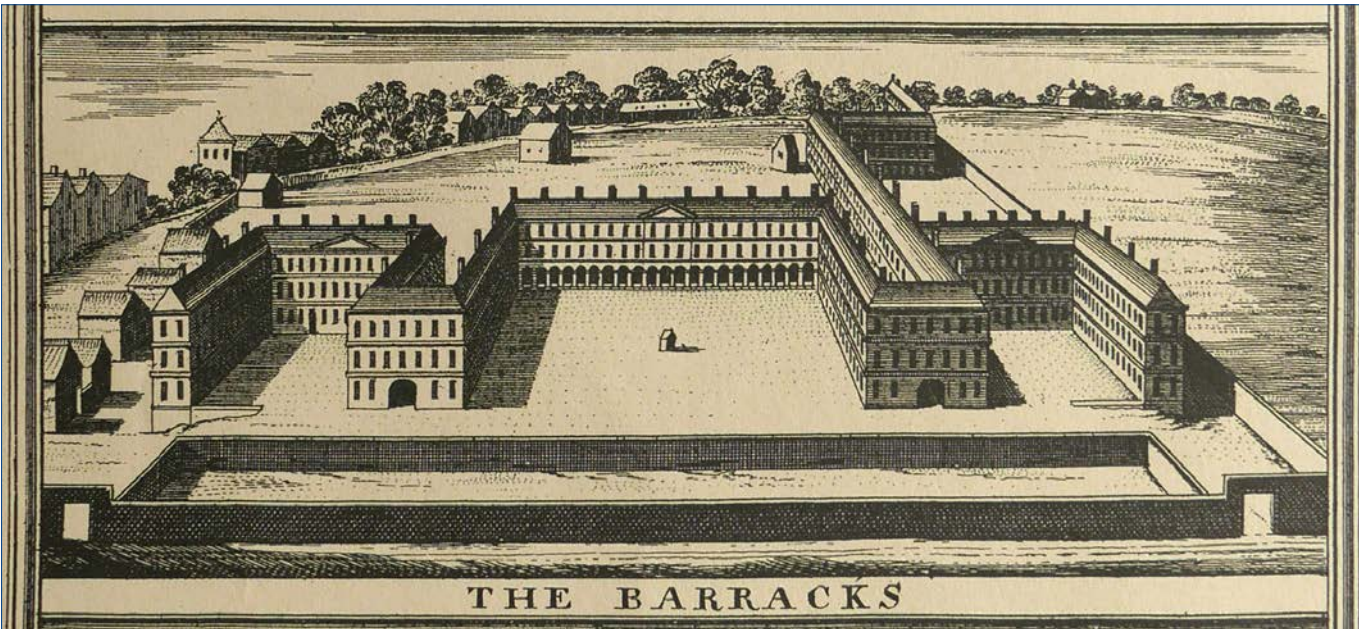
The Royal Barracks

The Royal Barracks, now Collins Barracks, was built in the beginning of the 18th Century. Christine Casey in *The Buildings of Ireland: Dublin*, published in 2005 begins here description of the buildings:

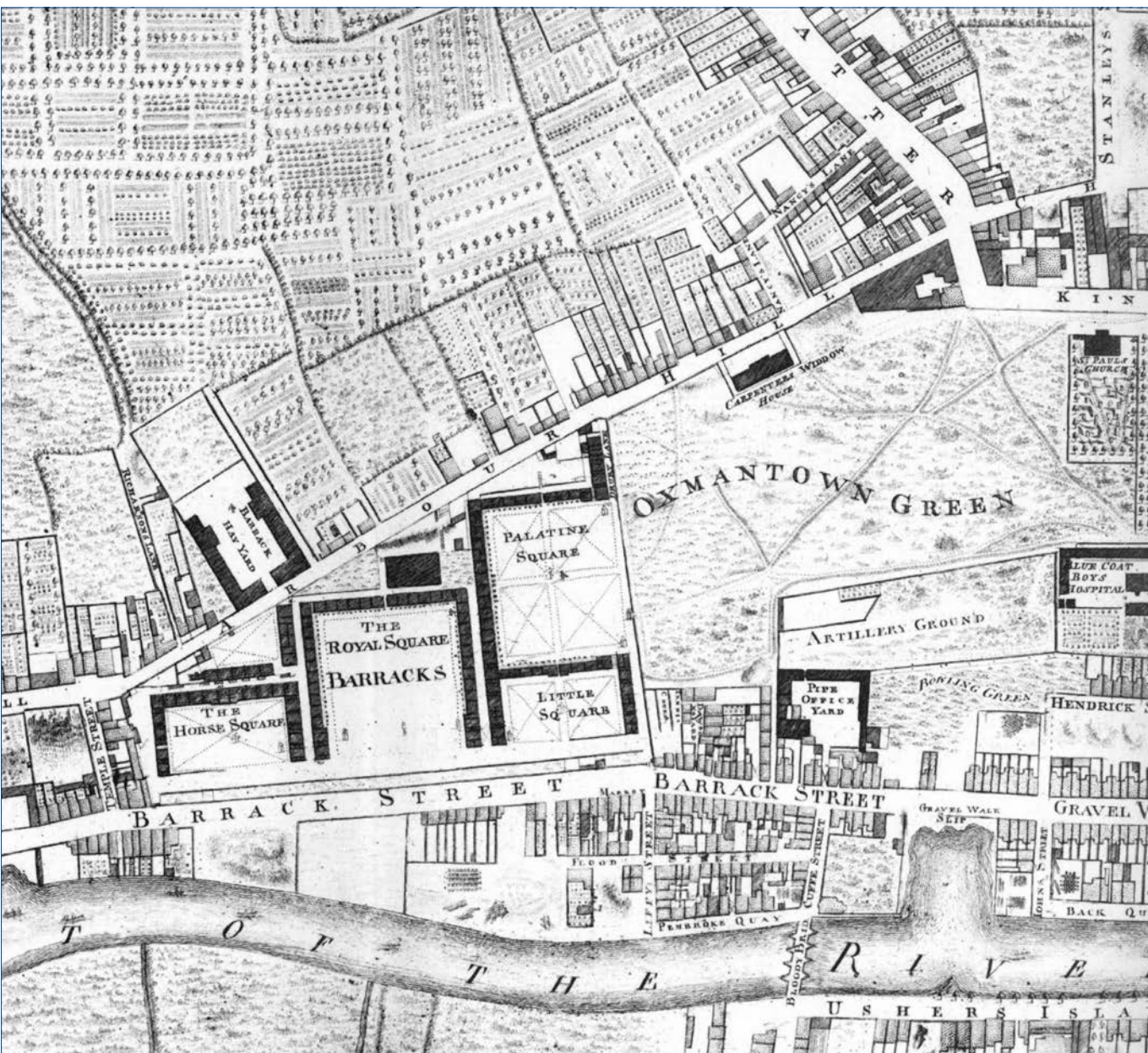
By virtue of their site and scale, the former Royal Barracks rank among the city's most conspicuous c18 buildings. Large-scale residential barracks were a thoroughly new building type, pioneered by the Irish establishment in the wake of the Williamite wars and funded by a tax on tobacco and beer. The Dublin barracks, the first and grandest of their kind in Europe, were instigated by the 2nd Duke of Ormonde who had acquired the site. The Surveyor General, Thomas Burgh, prepared plans; building was ongoing in 1706 and payments for completion were made in 1709–10. The original front comprised three three-sided squares open to the river, together constituting a monumental composition some 1,000 ft (304.8 metres) wide. The smallest and most westerly of the three was Horse Square, which accommodated stabling for 150 horses below housing for cavalry officers and men. At the centre was the largest, Royal Square, and to the east, later Brunswick, Square, both of which housed infantry officers and men. Behind Brunswick Square was the larger Palatine Square, which remained open to the east until the construction of a fourth range in the 1760s.

It appears that the Royal Barracks was originally simply called the Barracks, probably because, as Christine Casey points out, barracks were a new concept. In 1818 Warburton Whitelaw and Walsh provide the following description:





An Illustration of the Barracks, later the Royal Barracks, from Charles Brooking's Map of Dublin of 1728



Extract from John Rocque's map of the City of Dublin of 1756, showing the Barracks. Arbour Hill is seen running from the south west to the north east across the back of the Barracks. The Blue Coat School is seen at the edge of the map to the right. Bloody Bridge is shown at the present location of Rory O'More Bridge, and there are no quays along the River west of Liffey Street West.



BARRACKS.

The city of Dublin has to boast of the most noble erections of this kind perhaps in Europe, whether considered in reference to salubrity of situation extent of building, or excellence of architecture. These barracks were erected in 1706, at the expence of the crown ; they stand at the western extremity of the city, on an airy and elevated eminence which overhangs the Liffy, and commands an extensive view of the town and the country contiguous to the river. They consist of several squares, three of which are built only on three sides, leaving the fourth open to the fine view and wholesome breeze. In the rere of these is the Palatine square, which forms a very noble quadrangle; it is built of hewn granite, and ornamented with a cornice and pediments at the opposite sides; at the western extremity is the horse barrack. The whole is capable of containing four battalions of foot and one of horse, or about 5000 men.

Other 19th century commentators put the capacity of the Royal Barracks at closer to 2000 men. There appears the have been regular outbreaks of disease among the men billeted at the Royal Barracks, and that as a result of this problem, the central square, Royal Square, was demolished in the latter part of the 19th century, thereby removing the core of the original grand composition. Where the great central square once stood is now a car park.

Dr Steeven's Hospital

Dr Steeven's Hospital, which now houses the headquarters of the Health Service Executive, was also designed by Thomas Burgh, architect of the Royal Barracks and was built only a few years later. Warburton Whitelaw and Walsh provide the following outline:

DR. STEEVENS'S HOSPITAL.

Dr. Richard Steevens, a physician of Dublin in 1710, bequeathed his real estate, situate in the county of Westmeath and King's County, and set for lives, renewable for ever, at the yearly rent of £604..4..0. to his sister, Grisilda Steevens, during her life, and after her decease vested it in trustees, for the purpose of erecting and endowing an hospital near Dublin, for the relief and maintenance of curable poor persons, and to be called Steevens's Hospital.

Mrs. Steevens becoming possessed of the estate, was extremely desirous to see her brother's intention executed, and with a disinterestedness truly Christian, soon after his death purchased ground for the purpose, situate near the southern bank of the Liffey, to the north-eastward of the Royal Hospital, on which she commenced the present spacious edifice in 1720.

The Royal Hospital Kilmanham

The building of the Royal Hospital Kilmanham was begun in 1680 on lands that were once belonging to the Knights Templar and later the Knights Hospitallers of St. John of Jerusalem. The founding of the The Royal Hospital Kilmanham is amply described by Warburton Whitelaw and Walsh:

ROYAL HOSPITAL KILMAINHAM

Ireland having enjoyed many years of peace during the reign of Charles II, the army, living without action, produced in about twenty years many old soldiers, who, unfit for service, ignorant from long disuse, of any arts or trades, and incapable of hard labour, must have perished, if dismissed without any provision: to make some competent provision was, therefore, an object of humanity, and the plan of founding an hospital for this purpose, seems to have originated with Arthur Earl of Granard, marshal-general of the army in Ireland, in or about the year 1675, who probably conceived the idea from that noble establishment, the Hospital of Invalids founded by Lewis XIV. at Paris. The Earl of Essex, then Lord Lieutenant, took some preparatory steps towards furthering the plan, but being removed from the government, nothing further was done till the arrival of the Duke of Ormond in the year 1677

The foundation stone of this edifice was laid by his grace the Duke of Ormond, on the 29th of April, 1680, and the



second by Francis Earl of Longford, master-general of the ordnance. The foundation-stone is the lowermost in the north-west quoin of the north-west flanker, and bears his Grace's name, and day of the month, and year when laid. The foundations are on a dry, firm, ponderous clay, mixed with gravel ; and the work was carried on with such expedition, that on the 25th of March 1684, as many invalids as were objects for the institution, were received and accommodated with every necessary.

The chapel was completed in 1687 and the tower, to a design by Thomas Burgh, in 1705. Warburton Whitelaw and Walsh, writing in 1818 describe the façades of the south, east and west ranges as being of brick. It is unfortunate that the brick on these façades is no longer exposed.

As has been mentioned above, there was an entrance gateway to the Royal Hospital at the south bank of the River Liffey a considerable distance to the east, at the foot of Watling Street, at Barrack Bridge, now Rory O'More Bridge. The road from the gateway, as shown on the 1837 First Edition Ordnance map, was called Military Road, and ran west from the gateway across lands now part of the Guinness Brewery, onto the line of St John's Road West, before turning south as the curving section of road that leads up to the present gate of the Royal Hospital, and which is still called Military Road. It appears from the 1837 Ordnance map that the Royal Hospital commanded lands down to the River Liffey all the way from Watling Street west as far as the Artillery Barracks at Island Bridge, now the residential development of Clancy Quay.

Kingsbridge Station

Kingsbridge Station was the Dublin terminus of the Great Southern & Western Railway, regarded as the premier railway company of Ireland. The first line built by the Great Southern & Western Railway was from Dublin to Carlow. The engineer was Sir John Macneill and the contractor was William Dargan. Both Dargan and Macneill were very experienced and had worked with the great British engineer Thomas Telford.

The line to Carlow involved 70 miles of railway, ten stations, including those at Sallins, Newbridge, Kildare, Athy and Carlow and dozens of bridges. Work began in January 1845 and the railway opened on the 4th of August 1846, just over 18 months later, an extraordinary feat. John Macneill designed the passenger sheds at Kingsbridge. A notable feature of Kingsbridge Station is that it sits on top of the confluence of the Camac River with the Liffey and that the Liffey was wider, with its southern bank further to the south, before the Camac was culverted and the station built over it. The location of the culverted river appears to be under the concourse behind the terminal building and east of the platforms.

The commission for the design of the terminal building at Kingsbridge was awarded to an English architect, Sancton Wood after a competition in 1845. Sancton Wood was the unanimous choice of the London committee of the Great Southern & Western Railway Company. The Dublin committee had favoured an entry by John Skipton Mulvany. Whereas the passenger sheds were in place by the opening of the railway in August 1846, the main terminal building was not completed for some time, and is marked on the 1847 Ordnance map as 'Unfinished'.

Both Dargan and Macneill made fortunes through their work on the railway and through investment in railway shares. The Great Industrial Exhibition was held on Leinster Lawn in Dublin 1853. It lasted from the 12th of May to the 31st of October, Queen Victoria accompanied by the Prince Consort and the Prince of Wales, paid an official visit on the 29th of August. The Queen also visited Dargan at his home at Mount Anville. William Dargan personally paid for most of the cost of the Great Exhibition, and in thanks for his generosity the National Gallery was dedicated in his honour.

The Guinness Brewery

The Guinness Brewery was founded in 1759 at James's Gate at the west end of the city. There were already a number of breweries and distilleries in that part of the City. Arthur Guinness, Son & Co., Ltd., published a History and Guide to St. James's Gate Brewery in 1935. That guide describes the establishment of the Guinness Brewery as follows:

Documents preserved in the Public Registry of Deeds, Dublin, record that in the year 1693 Alderman Sir Mark Rainsford had a brewhouse at St. James's Gate where "beer and fine ales" were made. In November, 1715, Rainsford apparently went out of business, as he then granted a lease of the premises for 99 years to Paul Espinasse. The Espinasse family carried on the brewing business for some 45 years, when for some unknown reason the lease fell out, and on the 31st December, 1759, the premises were demised by Mark Rainsford, Esq., of Portarlington (Sir Mark Rainsford's son) to Arthur Guinness, of the City of Dublin, Merchant, for 9,000 years, to be held "in as ample and beneficial a manner as the same were formerly held by Paul Espinasse or John Espinasse "at a rent of £45 per annum".

The 1935 guide goes on to describe aspects of the Brewery at that time:

The area covered by the Brewery has very naturally increased with the course of years, and the four acres which were the extent of the estate in 1760 have now, by the absorption of adjoining properties, been increased to over sixty

The number of persons employed in the Brewery, including staff, tradesmen and labour, is nearly 3,500. The tradesmen alone number about 500, as all repairs to machinery and plant are executed by the Company's engineering staff, and a large proportion of the casks in which the stout is sent into trade is manufactured in the Brewery Cooperage.



View in 1935 of the Cooperage yard which was located near the River at the north west of the Guinness lands. This view looks north east towards the River across the yard and stacks of barrels. The Royal Barracks, now Collins Barracks, is seen in the distance to the right.



Relevant Statutory Provisions

Chapter 13 of the Dublin City Development Plan 2022-2028 is entitled *Strategic Development Regeneration Areas (SDRAs)* and this chapter sets out development plan policy in regard to these areas. The introduction to Chapter 13 includes the following:

17 SDRAs have been identified and are set out in the table below and are also identified on Map K. It is considered that these areas are capable of delivering significant quantities of homes and employment for the city. The active land management measures and approach referred to under the core strategy will be pursued in the development and delivery of the SDRAs. Table 13.1 sets out the 17 SDRAs, their estimated capacity and key supporting infrastructure.

For each SDRAs, a series of guiding principles are set out and indicated on an accompanying plan. It should be noted that in some instances, SDRAs are also governed by an adopted Local Area Plan or SDZ Planning Scheme. The guiding principles for these SDRAs should be read in conjunction with the zoning objectives and principles and other objectives and policies of the plan.

The guiding principles plans are not intended to be prescriptive, but seek to set out an overall strategy for each site in terms of the appropriate form and scale of development, key routes and permeability, open space etc. Some flexibility in the interpretation of the guiding principles maps will be applied where the applicant can demonstrate that the overall intent of the guiding principles has been incorporated and considered and that an appropriate development response for the site has been developed.

The overall site of the proposed development of Block B1 and Block C is within **SDRA 7 – Heuston and Environs**, and the permitted developments on the overall site, consisting of the approved Blocks B1 and C, the approved Blocks B2 and A and all associated approved development works, ABP-306569-20, aligns with the objectives set out for SDRA 7. The proposed development that is the subject of this Visual Impact Assessment (VIA) involves the replacement of the permitted Blocks B1 and C with two revised blocks that are very similar to the permitted blocks in terms scale, mass, height, appearance and purpose. So it is reasonable to conclude that the development proposed under the current subject application is also consistent with the objectives of SDRA 7.

Relevant Extracts from SDRA 7

Under the heading *Urban Structure* the following are the most relevant guiding principles of SDRA 7:

- *To develop a new urban gateway character area focused on the transport node of Heuston Station with world class public transport interchange facilities; vibrant economic activities; a high-quality destination to live, work and socialise in; a public realm and architectural approach of exceptional high standard; and a gateway to major historic, cultural and recreational attractions of Dublin City.*
- *To ensure the application of best practice urban and Transport Orientated Development design principles to achieve:*
 - o *Enhanced infrastructure to encourage active mobility interfacing with the various public transport modes at Heuston.*
 - o *A coherent and legible urban structure within major development sites.*
 - o *A prioritisation on the provision of public space.*
 - o *A successful interconnection between development sites and the adjacent urban structure.*
- *To recognise and enhance the role that civic and historic buildings play in the identity and legibility of the Heuston area.*
- *To provide greater accessibility to the areas of large public open space as well as creating additional smaller scale parks and civic squares, throughout the SDRA, that are attractive, multi-functional, safe, welcoming and accessible to local residents, workers and visitors.*

- To recognise the acute barriers to connectivity created by a natural features, physical infrastructure and large landbanks of industrial or institutional lands and seek to reduce the impact of these obstacles to movement and connectivity, where appropriate.

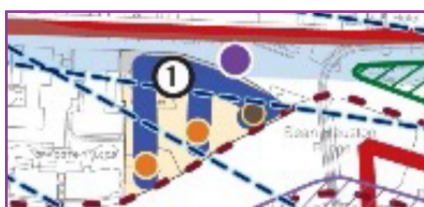
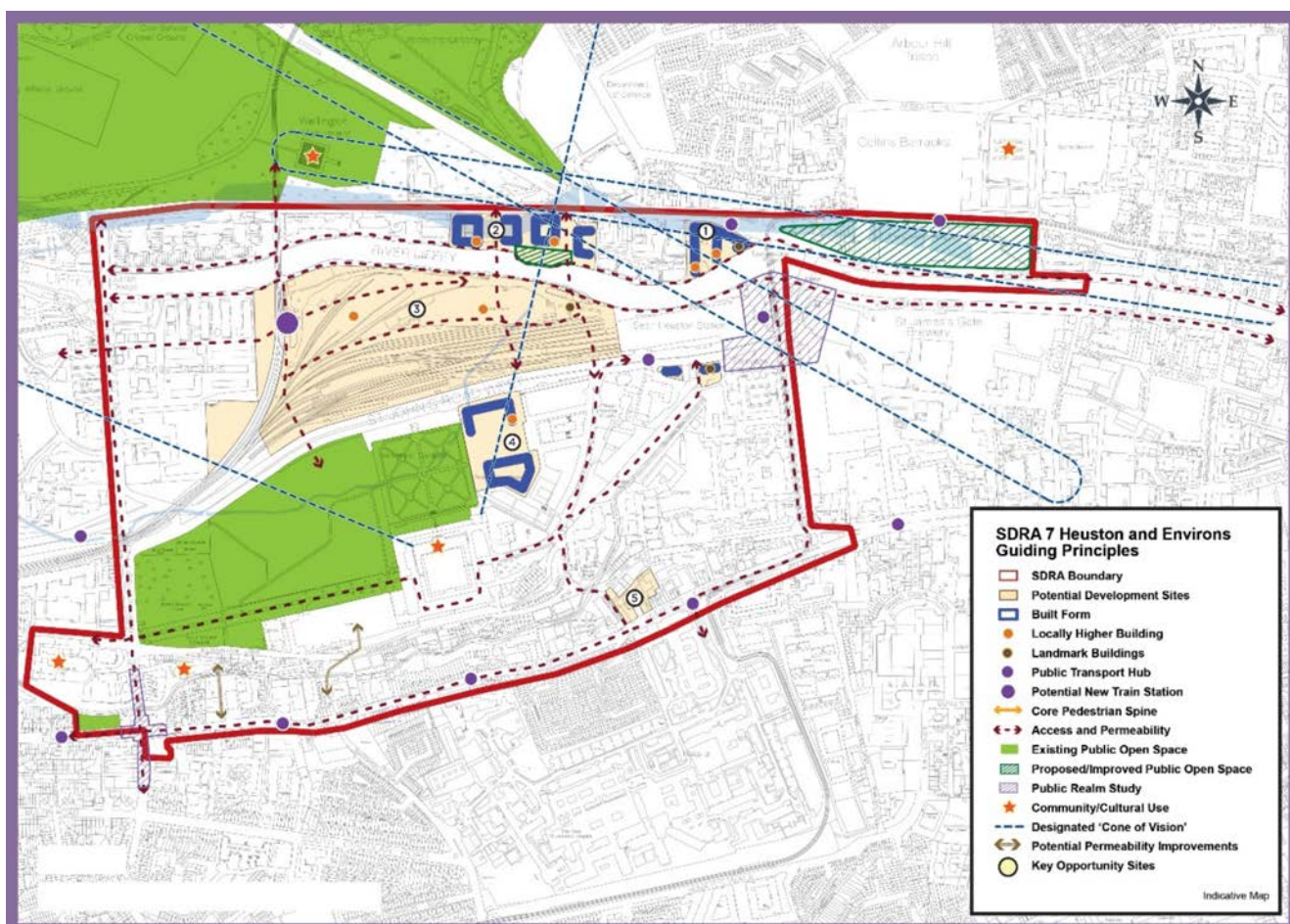
The text of SDRA 7 provides *Guiding Principles for Key Opportunity Sites*. The guiding principles for the subject site are as set out below. The text refers to the site as ‘Hickeys’, but the Hickey fabric company is no longer the occupant of the site.



1 - Hickeys

Development on this site should provide active frontage to Parkgate Street with active non-residential landuse along this frontage. A riverside walkway should be provided and public access to the river should be allowed at all hours of the day.

Heights should be 6-8 storeys on this site while locally higher buildings could be located to the rear of the site at the identified locations. The site is suitable for the accommodation of a landmark building in the order of 30 storeys at its eastern end subject to the quality of the design and considerations being in accordance with Appendix 3 of the development plan

The Guiding Principle are also illustrated on *Figure 13-10* of the Dublin City Development Plan 2022-2028: *SDRA 7: Heuston and Environs*, below:



Enlarged extract from the SDRA 7 map showing the subject site with symbols for A Landmark Building  And Locally Higher Buildings 

The site of the proposed development falls within a red line hatched Conservation Area that runs along the River Liffey corridor and extends into the Phoenix Park. Chapter 11 of the Dublin City Development Plan 2022-2028 sets out the following policies in relation to Conservation Areas:

BHA9: Conservation Areas

It is the Policy of Dublin City Council:

To protect the special interest and character of all Dublin's Conservation Areas – identified under Z8, Z2 zoning objectives and denoted by red line conservation hatching on the zoning maps. Development within or affecting a Conservation Area must contribute positively to its character and distinctiveness and take opportunities to protect and enhance the character and appearance of the area and its setting, wherever possible.

Enhancement opportunities may include:

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

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

BHA10: Demolition in a Conservation Area

There is a presumption against the demolition or substantial loss of a structure that positively contributes to the character of a Conservation Area, except in exceptional circumstances where such loss would also contribute to a significant public benefit.

In Chapter 15 of the Development Plan, **Development Standards**, at Section 15.15.2.2 **Conservation Areas**, the following standards are set out for development in conservation areas:

- Respect the existing setting and character of the surrounding area.*
- Be cognisant and/or complementary to the existing scale, building height and massing of the surrounding context.*
- Protect the amenities of the surrounding properties and spaces.*
- Provide for an assessment of the visual impact of the development in the surrounding context.*
- Ensure materials and finishes are in keeping with the existing built environment.*
- Positively contribute to the existing streetscape Retain historic trees also as these all add to the special character of an ACA, where they exist.*

In addition to policies relating to Conservation Areas, there are a number of other policies that may have some relevance to the proposed development:

BHA11: Rehabilitation and Reuse of Existing Older Buildings

(a) To retain, where appropriate, and encourage the rehabilitation and suitable adaptive reuse of existing older buildings/structures/features, which make a positive contribution to the character and appearance of the area



and streetscape in preference to their demolition and redevelopment.

2. (b) Encourage the retention and/or reinstatement of original fabric of our historic building stock such as windows, doors, roof coverings, shopfronts (including signage and associated features), pub fronts and other significant features.
3. (c) Ensure that appropriate materials are used to carry out any repairs to the historic fabric.

As has been noted above, there are 4 protected structures on the site. These are proposed to be retained as part of the development. Chapter 11 of the Development Plan includes the following policies in relation to protected structures:

BHA2: Development of Protected Structures

It is the Policy of Dublin City Council: That development will conserve and enhance Protected Structures and their curtilage and will:

- (a) *Ensure that any development proposals to Protected Structures, their curtilage and setting shall have regard to the 'Architectural Heritage Protection Guidelines for Planning Authorities' 2011 published by the Department of Culture, Heritage and the Gaeltacht.*
- (b) *Protect Structures included on the RPS from any works that would negatively impact their special character and appearance.*
- (c) *Ensure that works are carried out under supervision of a suitably qualified person with expertise in architectural conservation.*
- (d) *Ensure that any development, modification, alteration, or extension affecting a Protected Structure and/or its setting is sensitively sited and designed, and is appropriate in terms of the proposed scale, mass, height, density, layout and materials.*
- (e) *Ensure that the form and structural integrity of the Protected Structure is retained in any redevelopment and ensure that new development does not adversely impact the curtilage or the special character of the Protected Structure.*
- (f) *Respect the historic fabric and the special interest of the interior, including its plan form, hierarchy of spaces, structure and architectural detail, fixtures and fittings and materials.*
- (g) *Ensure that new and adapted uses are compatible with the architectural character and special interest(s) of the Protected Structure.*
- (h) *Protect and retain important elements of built heritage including historic gardens, stone walls, entrance gates and piers and any other associated curtilage features.*
- (i) *Ensure historic landscapes, gardens and trees (in good condition) associated with Protected Structures are protected from inappropriate development.*
- (j) *Have regard to ecological considerations for example, protection of species such as bats.*

BHA3: Loss of Protected Structures

That the City Council will resist the total or substantial loss of Protected Structures in all but exceptional circumstances:

Other relevant policies in the Chapter 11 of the Development Plan include:

BHA5: Demolition of Regional Rated Building on NIAH

That there is a presumption against the demolition or substantial loss of any building or other structure assigned a 'Regional' rating or higher by the National Inventory of Architectural Heritage (NIAH), unless it is clearly justified in a written conservation assessment that the building has no special interest and is not suitable for addition to the City Council's Record of Protected Structures (RPS); having regard to the provisions of Section 51, Part IV of

the Planning and Development Act, 2000 (as amended) and the Architectural Heritage Protection Guidelines for Planning Authorities (2011)

BHA6: Buildings on Historic Maps

That there will be a presumption against the demolition or substantial loss of any building or other structure which appears on historic maps up to and including the Ordnance Survey of Dublin City, 1847. A conservation report shall be submitted with the application and there will be a presumption against the demolition or substantial loss of the building or structure, unless demonstrated in the submitted conservation report that it has little or no special interest or merit having regard to the provisions of the Architectural Heritage Protection Guidelines for Planning Authorities (2011)

There are three NIAH records related to structures on the subject site. These relate to the Gateway onto Parkgate Street, the River Wall and the former Georgian house. It is proposed to carry out restoration and other works to the first two, but the house is proposed to be demolished. As is shown on the historic mapping included above, most of the structures on the site post date the 1847 Ordnance map. Parts of the structures proposed to be demolished appear to be remnants of structures dating from the first 20 years of the 19th century and appear to have been associated with the Royal Phoenix Ironworks.

The Architectural Heritage Protection Guidelines

The *Architectural Heritage Protection Guidelines for Planning Authorities (2011)* set out comprehensive advice in relation to conservation and the management of the historic built environment. However, the Guidelines clearly advocate a balanced approach. For example, while the Guidelines state “*historic structures are a unique resource. Once lost, they cannot be replaced. If their special qualities are degraded, these can rarely be recaptured.*” (Section 7.2.1), the Guidelines also clarify that “*entry into the Record of Protected Structures does not mean that a structure is forever frozen in time. Good conservation practice allows a structure to evolve and adapt to meet changing needs while retaining its particular significance.*” (Section 7.2.2).

The Guidelines advocate strongly for ensuring that historic buildings are kept in active use as a mechanism for ensuring conservation of buildings of architectural heritage value, as set out at Section 7.3:

It is generally recognised that the best method of conserving a historic building is to keep it in active use. Where a structure is of great rarity or quality, every effort should be made to find a solution which will allow it to be adapted to a new use without unacceptable damage to its character and special interest. Usually the original use for which a structure was built will be the most appropriate, and to maintain that use will involve the least disruption to its character. While a degree of compromise will be required in adapting a protected structure to meet the requirements of modern living, it is important that the special interest of the structure is not unnecessarily affected. Where a change of use is approved, every effort should be made to minimise change to, and loss of, significant fabric and the special interest of the structure should not be compromised.

Section 7.7, is relevant to the subject application as it promotes minimum intervention with buildings of architectural heritage value:

7.7.2 In granting planning permission, a planning authority should be satisfied that works are necessary, whether these be repair works to the fabric of the building or adaptations to the structure to allow it to perform a new or enhanced function. Over-restoration of historic buildings can be detrimental to their character and value. Old buildings both charm and inform for the very reason that they are old. Bulging or leaning walls, unevenness and bowing are not necessarily imperfections to be ironed out but are evidence of the building’s antiquity. Such evidence of a patina of age is irreplaceable and should be preserved where possible with appropriate professional advice.

7.8.2 In order to appreciate the integrity of a structure, it is important to respect the contribution of different stages of its historical development. Concentration on whether or not various parts of a building are 'original' can obscure the fact that later alterations and additions may also contribute to the special interest of the structure. Of course there may be alterations or additions which have not contributed to the special interest of the building, and which may in fact have damaged it.

7.9.2 Many historic structures date from a time when the majority of building materials were wrought by hand. These materials have a variety and vitality that cannot be matched by machine-made materials. Tooling and chisel marks on stonework, undulations in blown-glass panes, and adze marks on timber elements supply a wealth of irreplaceable information about the people and the times that produced these structures. Also, through time, a structure and its components acquire a patina of age that cannot be replicated. The unnecessary replacement of historic fabric, no matter how carefully the work is carried out, will have an adverse effect on the character of a building or monument, seriously diminish its authenticity and will significantly reduce its value as a source of historical information. Replacing original or earlier elements of a building with modern replicas only serves to falsify the historical evidence of the building.

Section 13.1 comments on the determining the curtilage of a protected structure:

13.1.1 By definition, a protected structure includes the land lying within the curtilage of the protected structure and other structures within that curtilage and their interiors. The notion of curtilage is not defined by legislation, but for the purposes of these guidelines it can be taken to be the parcel of land immediately associated with that structure and which is (or was) in use for the purposes of the structure. It should be noted that the meaning of 'curtilage' is influenced by other legal considerations besides protection of the architectural heritage and may be revised in accordance with emerging case law...

13.1.3 It should be noted that the definition of curtilage does not work in reverse – a stable building may be within the curtilage of the main house which it was built to serve but the main house cannot be described as being within the curtilage of the stable building. It should also be noted where a protected structure is an element of a structure, it may, or may not, have a curtilage depending on the degree to which it could in its own right be considered to be a structure. For example, a re-used doorway affixed to a later structure could not be said to have a curtilage."

The statutory context identified above has been taken into account in the assessment of impacts, in so far as this statutory context relates to visual impact.

Assessment of Visual Effects • Methodology

This section describes the likely significant visual effects of the proposed development on the environment surrounding the application site in relation to a proposed development on former industrial lands at Parkgate Street, Dublin.

The European Landscape Convention defines landscape as follows:

'Landscape' means an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors;

Visual Impact Assessment, often referred to as Landscape and Visual Impact Assessment assesses the extent to which the existence of a proposed development might change how a surrounding area might be 'perceived by people' visually.

The preparation of this visual impact assessment has had regard to the Guidelines on the Information to be Contained in Environmental Impact Assessment Reports prepared by the Environmental Protection Agency. It is noted that the EPA Guidelines, in categorising the extent of environmental impact, uses the

term 'effects' in place of 'impacts'. This Visual Impact Assessment follows the Guidelines and uses the term 'effects'. Though the terms are interchangeable, the word 'effect' has a less negative connotation than the word 'impact'.

The EPA Guidelines are statutory guidelines prepared under the provisions of the EPA Act 1992 (as amended). The purpose of a visual impact assessment is, taken together with the full range of other documents lodged as part of a planning application, to assist in informing the decision making process.

Assessment of visual effects, has three main parts:

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

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

Visibility

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

- Whether a development will be visible or not
- Where visible how much of any view a development will occupy; and
- Whether or not a proposed development is the focus of a view

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

In 2019 and 2020, when development on the subject site was first proposed by the current owners, a desktop mapping analysis was carried out to identify locations surrounding the application site, which would be representative of locations from which views of the proposed development are likely. Mapping analysis was followed by on-site analysis, visiting locations considered to be to be ones from where there was a potential for the development to be visible. Photomontages from chosen representative viewpoints have been prepared by Model Works, and these photomontages provide a useful guide as to the extent and nature of potential visibility, having regard to the three criteria set out above.

Characteristics of the Receiving Environment • Sensitivity and Visual Capacity

The historic character of the receiving environment and the repeated changes to that character have been set out in some detail in the early pages of this assessment report. It is noted that the visibility of proposed development is mediated by the physical geometry of the receiving environment, including the pattern and form of the existing built environment and the landform and vegetation of the existing natural environment These are among the factors that determine the visual capacity of a receiving environment to

absorb development. Among other characteristics are the visual character and uniformity of the receiving environment, its historical or cultural value and the extent of past change that has occurred.

Centre city environments or dockland settings, where there are structures of a diverse character and a wide range of scales, are likely to have a high visual capacity to absorb development. It is noted in this regard that the objectives of the Dublin City Council Development Plan under SDRA 7 actively seek a diversity of scale for the Heuston and Environment area, and for the subject site in particular.

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

The proposed Blocks B1 and C will be larger in scale than their immediate neighbours and their existence will bring about a substantial change in the immediate environment. However, the proposed development involves the replacement of the permitted Blocks B1 and C - permitted by An Bord Pleanála in 2020, ABP-306569-20 - with two revised blocks that are very similar to the permitted blocks in terms scale, mass, height, appearance and purpose. It is very unlikely, therefore, that the existence of the revised Blocks B1 and C will give rise to visual effects that would differ in extent or character to those likely to arise from the existence of the permitted blocks.

Extent and Nature of Visual Effects

The categorising of the extent potential of visual effects in this Visual Impact Assessment (VIA) utilises the terminology set out in the *Table 3.4: Descriptions of Effects* contained in the *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports* prepared by the Environmental Protection Agency.

The extent and nature of visual effects depend on the extent of change likely to result from the existence of a proposed development. This is usually a matter of objective fact, related to characteristics such as bulk, height, form, colour, materials, proportion, etc.; but they are also susceptible to subjective judgement on the part of observers

The perceived character of the visual effects: positive, negative or neutral, may depend on how well a development is received by the public, and on the perceived contribution of the development to the built environment or to the needs of society. The character of visual effects, and even the duration of visual effects, is very dependent on the attitude of the viewer. If a viewer is opposed to a new building for reasons other than visual, that viewer is likely to see the building in a negative light, no matter how visually positive the building might be.

In assessing the significance of visual impacts of the proposed development, ARC had regard to the sensitivity of visual receptors, which is explained in the UK Landscape Institute and Institute of Environmental Management & Assessment's *Guidelines for Landscape and Visual Impact Assessment* as follows:

'6.31 It is important to remember at the outset that visual receptors are all people. Each visual receptor, meaning the particular person or group of people likely to be affected at a specific viewpoint, should be assessed in terms of both their susceptibility to change in views and visual amenity and also the value attached to particular views.'

Susceptibility of visual receptors to change

6.32 The susceptibility of different visual receptors to changes in views and visual amenity is mainly a function of:

- the occupation or activity of people experiencing the view at particular locations; and
- the extent to which their attention or interest may therefore be focused on the views and the visual amenity they experience at particular locations.

6.33 The visual receptors most susceptible to change are generally likely to include:

- residents at home...;
- people, whether residents or visitors, who are engaged in outdoor recreation, including use of public rights of way, whose attention or interest is likely to be focused on the landscape and on particular views;
- visitors to heritage assets, or to other attractions, where views of the surroundings are an important contributor to the experience;
- communities where views contribute to the landscape setting enjoyed by residents in the area.

Travellers on road, rail or other transport routes tend to fall into an intermediate category of moderate susceptibility to change. Where travel involves recognised scenic routes awareness of views is likely to be particularly high.

6.34 Visual receptors likely to be less sensitive to change include:

- people engaged in outdoor sport or recreation which does not involve or depend upon appreciation of views of the landscape;
- people at their place of work whose attention may be focused on their work or activity, not on their surroundings, and where the setting is not important to the quality of working life (although there may on occasion be cases where views are an important contributor to the setting and to the quality of working life)."

Definition Of Visual Impacts

The assessment of visual impacts on landscape and on the built environment had regard to the *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports* prepared by the Environmental Protection Agency (2022), and to Directive 2011/92/EU (as amended by Directive 2014/52/EU) on the assessment of the likely effects of certain public and private projects on the environment.

The list of definitions given below is taken from *Table 3.4: Descriptions of Effects* contained in the Guidelines prepared by the Environmental Protection Agency. Some comment is also given below on what these definitions might imply in the case of visual impact or landscape and visual impact. The definitions from the EPA document are in italics.

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

Not Significant: *An effect which causes noticeable changes in the character of the environment but without significant consequences.* The definition implies that the development would be visible, capable of detection and of being noticed by an observer who is actively looking for the development with the purpose of assessing the extent of its visibility and visual effects.

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

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

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

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

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

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

Assessment of Potential Visual Effects

The scale of the proposed development and its prominent location in the city will mean that its existence is likely to result in substantial changes in the visual character of the immediate area surrounding the development and less substantial changes in the visual character of areas of the city at some remove from the site of the proposed development.

As has been noted above An Bord Pleanála granted permission in 2020 for earlier versions of Blocks B1 and C, ABP-306569-20. This planning permission still applies to the subject site. The current application is for a new Large-scale Residential Development comprising mixed use residential, community and commercial redevelopment, accommodated in revised Block B1 and Block C and all associated works. The current application proposes the replacement of the permitted blocks with two revised blocks that are very similar to the permitted blocks in terms scale, mass, height, appearance and purpose. Therefore, the likely visual effects associated with the proposed Blocks B1 and C are likely to be very similar to the visual effects associated with the permitted blocks.

It is also noted that An Bord Pleanála granted permission in October 2021 Block A, a 30 storey residential tower at the east end of the subject site, ABP-310567-21. This is an 8 year permission, and it runs until October 2029.

In carrying out this assessment of visual effects, the assessment has considered:

- What would be the likely extent of visual effects if Blocks B1 and C were not built at all ?
- What is the comparative extent of visual effects between Blocks B1 and C as permitted and Blocks B1 and C as proposed ?

To assist in illustrating these scenarios Model Works have prepared three versions of photomontages from chosen representative locations:

1. The scene with no development on the site
2. The scene with the permitted blocks B1 and C and the permitted Block A, the residential tower
3. The scene with the proposed blocks B1 and C and the permitted Block A, the residential tower

It will be noted that the permitted residential tower is the dominant feature in all the views. Blocks B1 and C are substantial buildings in their own right, but the stand alone visual effects likely to arise from their existence would be limited to locations close to these two block and by themselves they are not likely to give rise to material visual effects at a distance. The main view locations chosen to be included in this assessment are ones from which Blocks B1 and C are substantial elements of the view. A small number of view locations from which the permitted residential tower is the dominant element and Blocks B1 and C are either not visible or are only barely visible are included simply to demonstrate this fact.

In line with the terminology of the EPA Guidelines, this report assesses potential visual effects as 'moderate' where the development is consistent with existing and emerging trends, even where changes resulting from the existence of the development will be large or substantive.

The chosen view locations are representative, and are not an exhaustive list of location from which the proposed development may be visible. There will, of course, other locations, even locations close to the proposed development, from which it will not be visible. The locations of the **19** chosen representative views are tabled and described below, together with the extent of potential visual effect as observed from each location.

The character of visual effects, positive negative or neutral, will depend on the response of the individual observer. The development is intended to have a positive role on providing legibility in the City in response to policies expressed in the Dublin City Development Plan 2022-2028 and to SDRA 7 of that Plan specifically..

Context of Visual Effects

In the City, where there is considerable activity at street level, attention tends to be focused as street level. As a result, the capacity of busy city locations, particularly locations within the retail core of the city or at transport hubs, to absorb visual change at upper levels is high. However, for the purposes of this report, a conservative approach to assessment is taken and the impact is assessed on the assumption that the viewer will focus on the development as a whole, including the upper floors of the building. Dublin, like any capital city, has seen considerable changes over recent times, and the area surrounding the application site has undergone a process of very significant and continuous change since over the last 300 years.

Extent of Visual Effects

The table below sets out the likely visual effects arising from the existence of Blocks B1 and C. It is ARC's assessment that there is no material difference in the extent of visual effects between the Blocks B1 and C as permitted and Blocks B1 and C as proposed. The extent of visual effects arising from the existence of Block A, the residential tower is not assessed and is not represented in the table or the view descriptions that follow the table.

Table 1: Table of Potential Visual Effects of Blocks B1 and C • Both as Permitted and as Proposed

View	Location	Potential Visual Effects of Blocks B1 & C only
1	From Victoria Quay at Rory O'More Bridge	Slight to Moderate
2	From Benburb Street at the Aisling Hotel	Slight to Moderate
3	From Parkgate Street at the junction with Infirmery Road	Moderate
4	From Conyngham Road at the entrance to Phoenix Park	Moderate
5	From the south end for Frank Sherwin Bridge	Moderate
6	From Heuston Station Road	Moderate
7	From St John's Road West at Heuston Station	None
8	From St John's Road West at the junction with Military Road	Moderate
9	From the Royal Hospital Kilmanham	None to slight
10	From the south end of Steeven's Lane	Slight to Moderate
11	From Collins Barracks	Slight
12	From the Croppies Acre	Slight
13	From Con Colbert Road	Imperceptible to Slight
14	From Sarah Bridge	Imperceptible to Slight

View by View Description

View 1: From Victoria Quay at Rory O'More Bridge

This view looks west along the River Liffey from Victoria Quay at Rory O'More Bridge towards Frank Sherwin Bridge. Wolfe Tone Quay is seen to the right of the view lined with trees. The Croppies Acre and part of Collins Barracks can be glimpsed behind these trees. Part of the Wellington Monument can be seen emerging from the trees near the centre of the view. Part of the wall of the subject site can be seen in the middle distance behind the parapets of Frank Sherwin Bridge and Sean Heuston Bridge. The lands of Guinness Brewery run along Victoria Quay on the left of the view. Heuston Station is concealed behind trees on Victoria Quay. Buildings that from part of Heuston South Quarter are seen to the left beyond the Guinness Lands

In this views as proposed, the permitted and proposed Blocks B1 and C are seen as quite substantial buildings in the centre of the view behind the retained Riverside Wall and River buildings on the site. Some observers are likely to regard the existence of Block B1 and C as resulting in significant change from this view location, However, having regard to existing and emerging trends for development in the areas, the potential extent of visual effect from this location is assessed as 'slight' to 'moderate'.

View 2: From Benburb Street at the Aisling Hotel

This view is quite close the site of the proposed development and looks west towards the site of the proposed development from outside the entrance to the Aisling Hotel. In this views as proposed, the permitted and proposed Blocks B1 and C are seen curving away to the right. The existence of the proposed development will result in a change of scale on the subject site, which is now occupied by low buildings. It will also introduce large buildings on the south side of the east end of Parkgate Street, where there is now only a mute grey wall some one-and-a-half storeys in height. Despite the extent to which the proposed development is likely to be seen in this view and to change the character of the view, having regard to existing and emerging trends for development in the area, the potential extent of visual effect from this location is assessed as 'slight' to 'moderate'.

View 3: From Parkgate Street at the junction with Infirmary Road

This view looks east along Parkgate Street from its junction with Infirmary Road, outside the Criminal Courts of Justice. In this view, the proposed development is seen to the right of centre, beyond the four storey commercial development of Parkgate Place. The closest parts of the proposed development are the residential elements at its western end. This view is quite close to the site of the proposed development and the proposed development will be seen as a major element in the centre of the view, and the focus of the view. Despite the extent to which the proposed development is likely to be seen in this view and the likelihood that many observers will regard the new development as a significant change, having regard to existing and emerging trends for development in the area, the likely extent of visual effect from this location is assessed as ‘moderate’.

View 4: From Conyngham Road at the entrance to Phoenix Park

This view is a little further back from the development than View 3, above, and looks east along Conyngham Road / Parkgate Street. In the view as proposed, the proposed development will be seen as a substantial element in the centre of the view, although the largest element in the view is the Criminal Courts of Justice, seen to the left. The proposed development will be seen in the middle distance. Despite the extent to which the proposed development is likely to be seen in this view and the likelihood that observers may regard the new development as a significant change, having regard to existing and emerging trends for development, the potential extent of visual effect from this location is assessed as ‘moderate’.

View 5: From the south end for Frank Sherwin Bridge

This view looks west from the south end of Frank Sherwin Bridge. In the view part of Heuston station is seen to the right and Heuston Bridge, which now carries the Luas and was formerly ‘Kingsbridge’ is seen on the left. In this views as proposed, the permitted and proposed Blocks B1 and C are seen as very substantial buildings in the centre of the view behind the retained Riverside Wall and River buildings on the site. Some observers are likely to regard the existence of Block B1 and C as resulting in significant change from this view location, However, having regard to existing and emerging trends for development in the areas, the potential extent of visual effect from this location is assessed as ‘slight’ to ‘moderate’.

View 6: From Heuston Station Road

This view looks north east along the River Liffey from an internal road that runs along the south side of the River within the lands of Heuston Station. The main terminal building of Heuston Station is seen to the extreme right of the view. The five storey Parkgate Place apartments take up the left hand side of the view, seen across the River. In this view as proposed, the western residential block of the proposed development (Block C) is seen rising immediately behind the Parkgate Place apartments. The proposed development will be a major element in the view, and a central focus. Given that the proposed development is seen in the immediate context of extensive modern development, the likely extent of visual effect from this location is assessed as ‘moderate’.

View 7: From St John’s Road West at Heuston Station

This view looks north across the front of the main historic station building at Heuston Station and across the concourse in front of the station, a transport interchange with a Luas Stop and bus stops as well as being the forecourt of the Station. The Riverside Stone Wall on the subject site can be seen in the centre of the view across the River. In the view as proposed, the permitted and proposed Blocks B1 and C are not visible being hidden from view by Sancton Wood’s 1940s classical terminal building for the Great Southern and Western Railway. The opening up of views from the station forecourt north across River and into the new public space at the south eastern end of the proposed development, have the potential to create a new and very distinctive set of urban spaces. Given that the permitted and proposed Blocks B1 and C will not be visible the potential extent of visual effects from this location is assessed as ‘none’.

View 8: From St John's Road West at the junction with Military Road

This view looks north east across St John's Road West towards the train sheds at Heuston Station. The historic terminal building at Heuston Station is seen to the far right in the middle distance. The Criminal Courts of Justice are seen to the left. In this view, the proposed development will be seen behind the train sheds at Heuston Station, as a cluster of buildings in the middle of the view. The proposed development is a moderately substantial element in the view, but the Criminal Courts of Justice, over to the left are more visually prominent. Having regard to existing and emerging trends for development in the area, the potential extent of visual effect from this location is assessed as 'moderate'.

View 9: From the Royal Hospital Kilmanham

There is no potential for the proposed development to be visible from this location as it is likely to be concealed behind the intervening development at Heuston South Quarter. The proposed development may be visible from some parts of the formal garden of the Royal Hospital, but, where visible, the potential visual effect will be diminished by Heuston South Quarter in the foreground. The potential extent of visual effect from this location is assessed as ranging from none to 'slight' (where just visible).

View 10: From the south end of Steeven's Lane

This view looks north down Steeven's Lane towards Heuston Station. The concourse in front of Heuston Station is seen in the middle distance at the bottom of Steeven's Lane, with buildings on Parkgate Street and above at Montpelier are seen beyond. The roof of Dr Steeven's Hospital is seen to the left of centre behind trees. To the left again, the top of the criminal Courts of Justice can be seen behind a gate pier of St Patricks Hospital. In this view as proposed, the upper parts of the permitted and proposed Blocks B1 and C can be seen to the left behind the roof of the former Dr Steeven's Hospital. Having regard to existing and emerging trends for development in the area, the potential extent of visual effect from this location is assessed as 'slight' to 'moderate'.

View 11: From Collins Barracks

This view looks west from the south side of the open square and raised promenade in front of the entrance the main central square of the Museum at Collins Barracks. In the view the blank east wall of the Aisling Hotel is seen along the promenade past part of one wing of the Museum, which is seen to the right and which is the dominant element in the view. Part of the front façade of Heuston Station is seen over to the left. In this view as proposed, the permitted and proposed Blocks B1 and C will be seen to the left of centre. They will be clearly visible but relatively modest elements in the view, and will not be the focus of the view. Visibility of the proposed development from the Collins Barracks complex is likely to be intermittent. For example, from a little to the right of this view location, the proposed development would no longer be visible, and from some of the main external spaces of Collins Barracks the proposed development will not be visible. The potential extent of visual effect from this location is assessed as 'slight'.

View 12: From the Croppies Acre

This view looks west along the open space of the Croppies Acre. In this view as proposed, the permitted and proposed Blocks B1 and C will be seen in the centre of the view. The proposed development will be a minor element in the view. Having regard to existing and emerging trends for development in the area, the potential extent of visual effects from this location is assessed as 'slight'.

View 13: From Con Colbert Road

This view looks east along the central reservation of Con Colbert Road towards its junction with the South Circular Road and St John's Road West. Buildings that form part of the development at Clancy Quay, are seen to the left. The top of the Wellington Monument is seen over to the far left. In this view as proposed, the permitted and proposed Blocks B1 and C will be seen just off centre of the view in part concealed by one of the Clancy Quay buildings and planting. The potential extent of visual effect from this location is assessed as 'imperceptible' to 'slight'.

Under the objectives of SDRA 7, in addition to the subject site, which is north of the River, there are several sites to the south of the River Liffey identified for development. These include Iarnród Éireann lands along the south side of the River, OPW lands beside Dr Steeven's Hospital and south of Heuston Station and the undeveloped parts of Heuston South Quarter. The first two are identified in SDRA7 as being suitable for buildings over 50 metres in height. Development on any of these lands will be visible from this view location, particularly development over 50 metres in height. It is likely, therefore, that the western approach to the City along Con Colbert Road will change substantially in character, becoming a new western legible western gateway to the City.

View 14: From Sarah Bridge

This view looks east along the River Liffey from Sarah Bridge, otherwise known as Islandbridge. In the view, modern residential developments are seen along both sides of the River. The top of the Wellington Monument is seen over to the left. In this view as proposed, the permitted and proposed Blocks B1 and C will be barely visible in the distance at the centre of the view. The potential extent of visual effect from this location is assessed as 'imperceptible' in summer conditions with trees in leaf and 'imperceptible' to 'slight' in winter.

Conclusion

The assessments above set out the likely visual effects arising from the existence of Blocks B1 and C. It is ARC's assessment that, the external expression of Blocks B1 and C as proposed is very similar to the external expression of Blocks B1 and C as permitted, and that there is no material difference in the extent of likely visual effects between the Blocks B1 and C as permitted and Blocks B1 and C as proposed. The assessments and table above, therefore, assess the visual effects of the existence of Blocks B1 and C both as permitted and as proposed.

The extent of visual effects arising from the existence of Block A, the residential tower is not assessed and is not represented in the table or the view descriptions above.

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W. H. Hastings FRIAI • November 2024

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