

Townscape and Visual Impact Assessment

Proposed Large Scale Residential Development at “Carlisle”, 52-54 Kimmage Road West, Dublin 12

Prepared by Model Works Ltd for

1 Terenure Land Ltd

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WORKS**

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1.0 Introduction

This townscape and visual impact assessment (TVIA) report assesses the potential impacts of a proposed large-scale residential development (LRD) at the Carlisle site, Kimmage. The TVIA should be read in conjunction with the Verified Photomontage document prepared by Visual Lab, provided under separate cover.

1.1 Development Description

The proposed Large Scale Residential Development will consist of 145 no. apartments (70 no. 1 bed and 75 no. 2 bed apartments) within 5 no. blocks (with blocks 4 and 5 linked throughout), ranging in height up to 5 storeys. All residential units have associated private balconies/terraces to the north/ south/ east/ west elevations. The proposal will also include provision of a creche, cultural/ community space along with 89 no. car parking spaces, 465 no. bicycle parking spaces and 6 no. motorcycle parking spaces located at undercroft and surface level. Vehicular/pedestrian/cyclist access is provided off Kimmage Road West via the existing road which currently serves the Ben Dunne Gym. All associated site development works, public open spaces, podium and ground level communal open space, landscaping, boundary treatments, plant and waste management areas, and services provision (including ESB substations) will be provided. Upgrades to the Uisce Eireann network along Kimmage Road West are also accommodated.

1.2 Townscape and Visual Impact Assessment Methodology

The TVIA 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 methodology is described in detail in Appendix 1 of this report. The GLVIA requires that the effects on views/visual amenity be assessed separately from the effects on the landscape (or 'townscape'¹ in urban areas), although the topics are linked:

- Visual impact assessment is concerned with changes that arise in the composition of available views², the response of people to those changes and the overall effects on the area's visual amenity. The effects on 14 no. representative viewpoints in the receiving environment are assessed in Chapter 5, informed by verified photomontages (provided under separate cover).
- Townscape impact assessment is concerned with the effects of a proposed development on the *character and value* of the townscape as an environmental, cultural and economic resource. The potential townscape effects of the proposed development are assessed in Chapter 6.

1.2.1 Author Credentials

The TVIA 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/TVIA. In the last number of years he has prepared LVIA/TVIA reports and EIAR chapters for the following projects among others:

¹ The European Landscape Convention defines landscape as "*an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors*". The word 'townscape' is used to describe the landscape in urban areas. The GLVIA defines townscape as "*the landscape within the built-up area, including the buildings, the relationships between them, the different types of urban spaces, including green spaces and the relationship between buildings and open spaces*". Since the subject site is within the urban area the word townscape is used in this report.

² The GLVIA emphasises that assessment should focus on views from publicly accessible places such as public roads, footpaths and public open spaces. Paragraph 6.17 of the GLVIA states: "*The emphasis in assessing visual effects should be on public visual amenity, although it may sometimes be appropriate to consider private views, especially where the change would be particularly severe or affect a large number of people*".

- Project Montrose LRD, former RTE lands, Donnybrook, Dublin;
- Prussia Street LRD, Stoneybatter, 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.

1.3 Study Area / Zone of Influence

To inform the TVIA, a zone of theoretical visibility (ZTV) mapping exercise was carried out for the proposed development using Vu.City³. ZTV mapping involves placing a 3D model of the proposed development into a model of the city, and identifying the areas from which the development would be visible, taking account of the surrounding built form⁴. The colour shaded areas on Figure 1 show the proposed development's ZTV. This is the study area for the TVIA. Section 2.3 below identifies the main townscape elements and character areas within this zone (the key 'townscape receptors'), and the selection of viewpoints for the visual effects assessment in Chapter 5 addresses these areas (see Figure 17).

Figure 1: Zone of theoretical visibility (or Zone of Influence) of the proposed development



³ <https://www.vu.city/cities/dublin>.

⁴ Vegetation is not taken into account when plotting the ZTV. In reality, the visual screening provided by vegetation can be significant, reducing the area from which a development would be visible. This is the case with the subject site, which benefits particularly from belts of evergreen trees along its north and west boundaries.

2.0 The Receiving Environment

2.1 The Site

The site is located adjacent to the Ben Dunne Carlisle Gym off Kimmage Road West in Kimmage, Dublin 12. The site is an L shaped land parcel covered in grass, with lines of trees inside its north and west boundaries. The site is accessed by the gym access road, which leads from Kimmage Road West to the south. The site is fenced off from the gym access road and parking area by a palisade fence.

The application site boundary includes the existing gym access road and a stretch of Kimmage Road West, extending some 850m to the west of the site, to its junction with Whitehall Road West and St Agnes Road. This is to allow for upgrades to the Irish Water network. For the remainder of this report, 'the site' refers to the main residential development area, i.e. the L shaped land parcel beside the Carlisle Gym.

Figure 2a,b: The site and immediate environs



Photo 1: Bird's eye view of the Carlisle Gym and the site

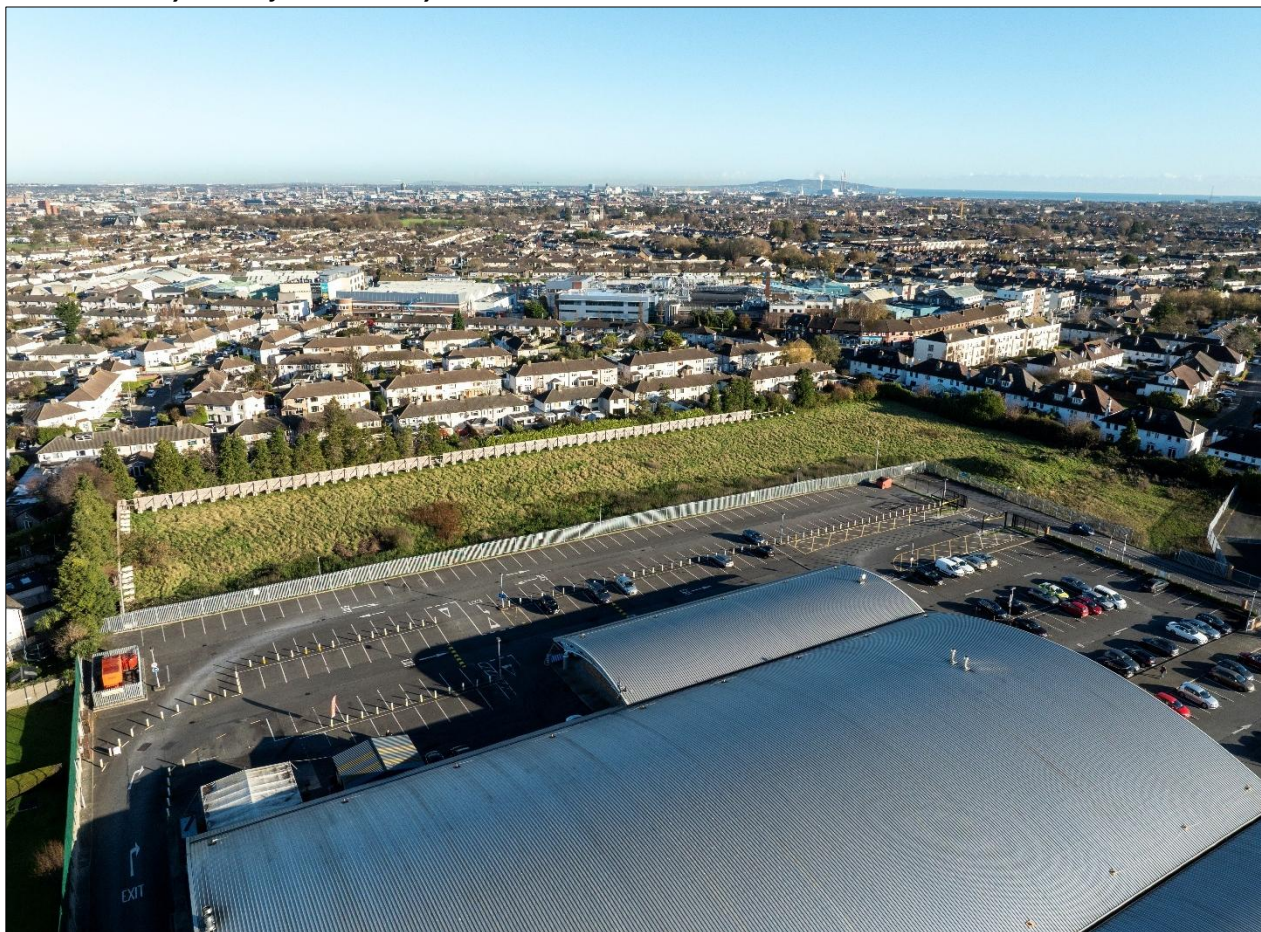


Photo 2: The Carlisle Gym access road with the site ahead and to the right behind the fence. The building in the foreground is the former cricket clubhouse



Photo 3: A view north west across the site showing the trees inside the north and west boundaries, with the houses on Captain's Road visible beyond the site

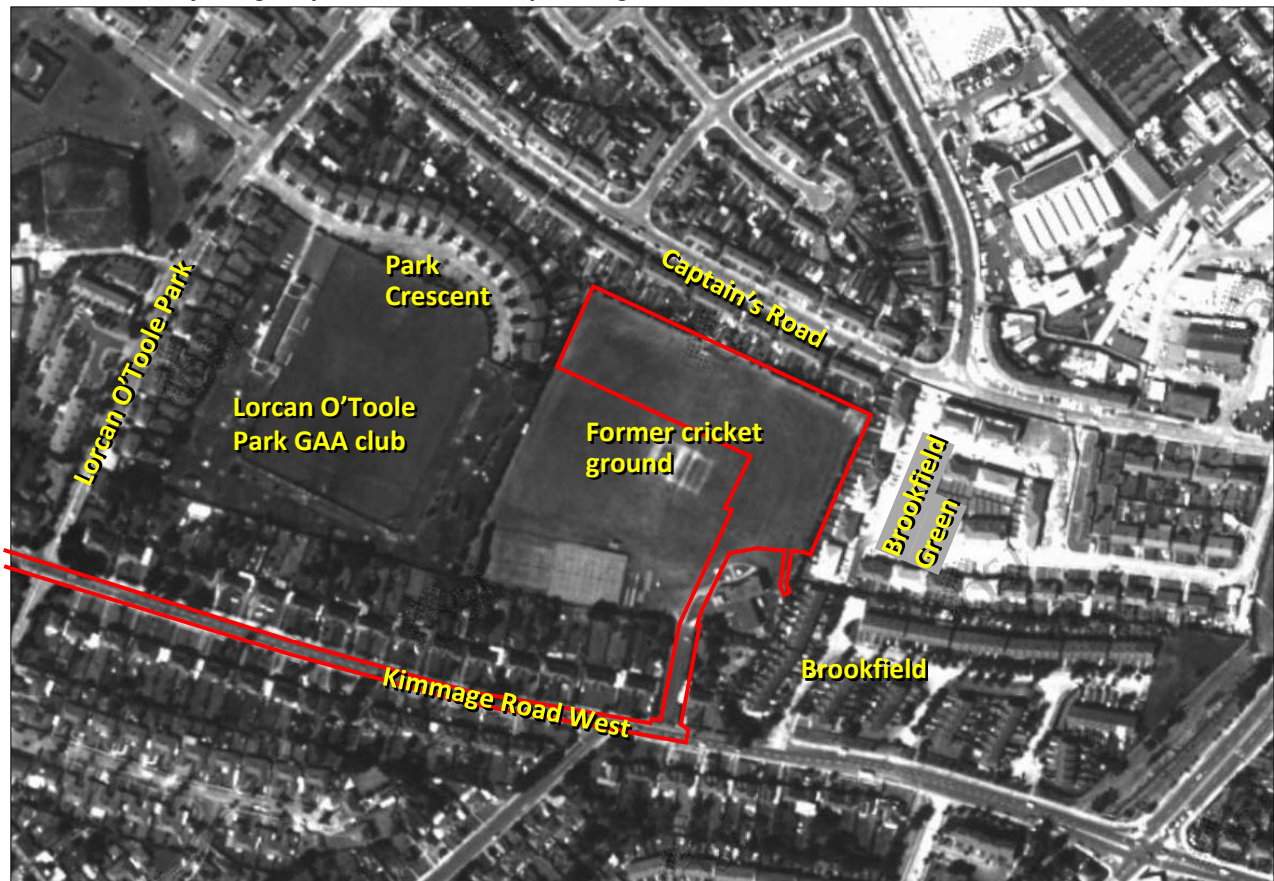


Photo 4: A view east across the site, with the houses of Brookfield Green visible beyond the far boundary



Prior to the construction of the Carlisle Gym in the early 2000s, the site was part of the Kimmage Cricket Club grounds. The cricket club and neighbouring Lorcan O'Toole Park GAA club together occupied the central area of a large city block defined by Kimmage Road West to the south, Captain's Road to the north, Lorcan O'Toole Park to the west, and Brookfield to the east. The former cricket clubhouse remains adjacent to the site, beside the access road (see Photo 2). After the construction of the gym the clubhouse was briefly used as an art gallery.

Figure 3: Aerial photograph from 1980 showing the Kimmage Cricket Club and Lorcan O'Toole Park GAA club occupying the central area of a large city block surrounded by housing

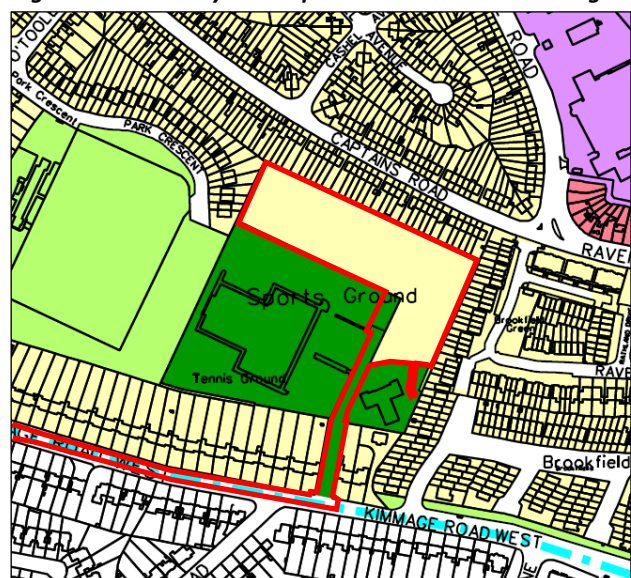


2.1.1 Land Use Zoning

The site is zoned Z1 Sustainable Residential Neighbourhoods: "To protect, provide and improve residential amenities".

The DCDP states: *"The vision for residential development in the city is one where a wide range of high quality accommodation is available within sustainable communities, where residents are within easy reach of open space and amenities as well as facilities such as shops, education, leisure and community services. The objective is to ensure that adequate public transport, in conjunction with enhanced pedestrian and cycling infrastructure, provides such residential communities good access to employment, the city centre and the key urban villages in order to align with the principles of the 15-minute city."*

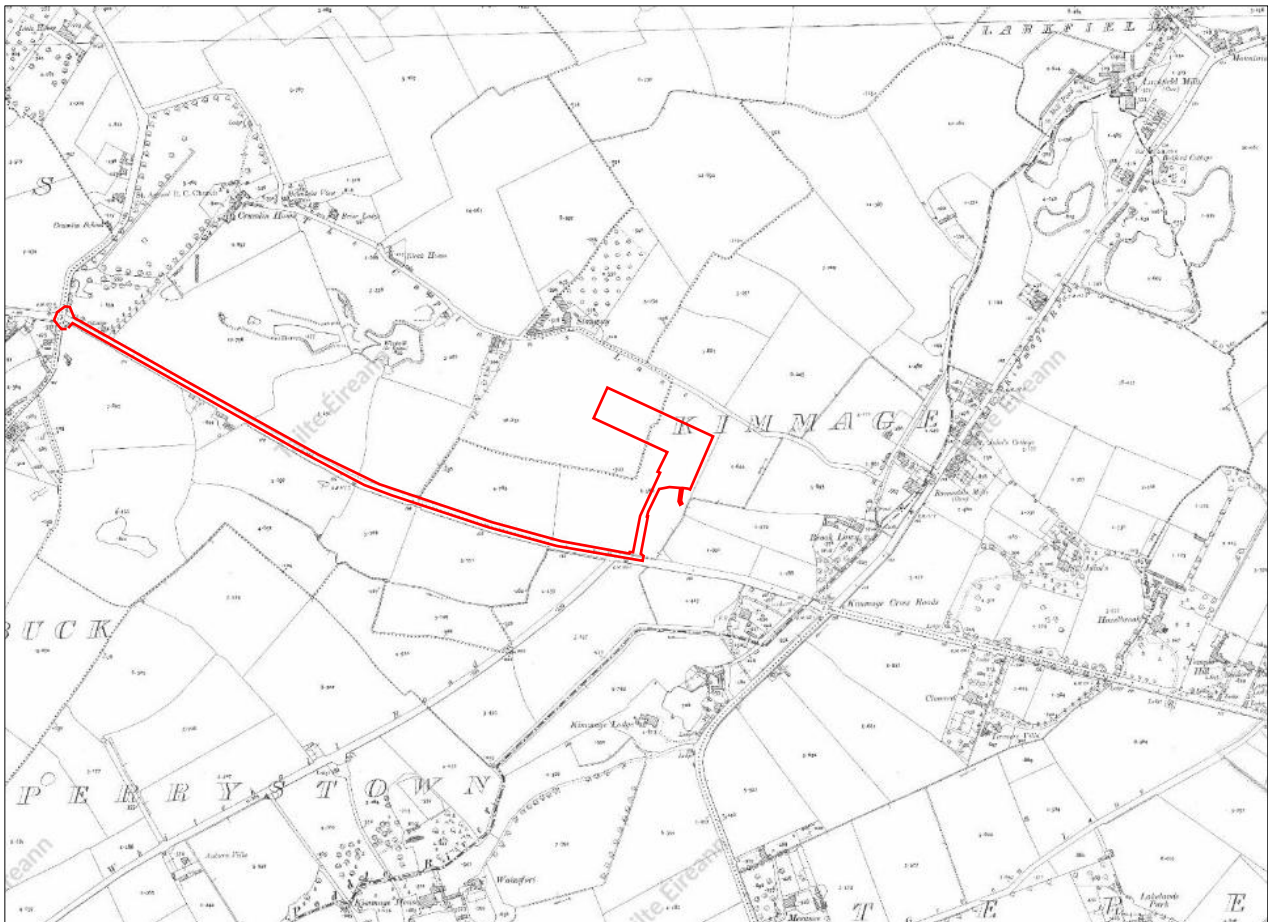
Figure 4: Dublin City Development Plan Land Use Zoning



2.2 Surrounding Townscape Character

The Ordnance Survey 25 inch map from the early 20th century shows that the Kimmage area remained predominantly rural at the time, although the beginning of urbanisation was evident in several terraces of houses along Kimmage Road, in between the earlier big houses. A notable characteristic of the area was its industrial use. There were several flour and paper mills along the Poddle River, and a number of quarries.

Figure 5b: Ordnance Survey 25 inch map



Over the course of the 20th century Kimmage was transformed by urban development (see Figure 6 overleaf). In the 1930s and 1940s a number of Dublin Corporation housing estates were built, followed by private infill residential developments. The area retained an element of industrial use, with the Crumlin Business Centre and KCR Industrial Estate off Cashel Road and Ravensdale Park to the north east of the site.

There is thus a history of diversity and juxtapositions in land use and development typologies in the area. The construction of the Carlisle Gym contributed further to this mixed character and the trend has continued into the 21st century with the introduction of higher density housing. This initially took the form of small developments replacing commercial/industrial premises (for example Ravensdale Court east of the site on Ravensdale Park). There have also been larger developments in the area, such as Captain's Place off Captain's Road and Stannaway Road to the north, on a similar backland site to the subject site.

Figure 6 shows that in addition to the mix of development described above, the townscape around the site is characterised by extensive open space. Lorcan O'Toole Park GAA Club lies adjacent to the west. Stannaway Park is a short distance further west (250m from the site), and Poddle Park a similar distance to the east.

Figure 6: The site's wider receiving environment, showing a predominance of 20th century suburban housing but also commercial/industrial development, anomalies such as the Carlisle Gym and some higher density housing, resulting in a mixed townscape character



2.3 Potential Receptors of Townscape and Visual Change

The main potential receptors of townscape and visual change in the receiving environment are as follows:

- **Carlisle Gym**
- **Kimmage Road West to the south**
- **Brookfield and Brookfield Green residential neighbourhood to the east**
- **Ravensdale Park and the neighbourhood centre to the north east**
- **Captain's Road and Cashel Avenue residential neighbourhood to the north**
- **Park Crescent residential neighbourhood to the west**
- **Lorcan O'Toole Park GAA Club to the west**

2.3.1 Carlisle Gym

The area/receptor most exposed to the proposed development is the Carlisle Gym (see Figure 7b overleaf). The gym is a large-footprint but low building with a distinctive shallow-arched roof (see Photos 1 and 5). The building is surrounded by extensive parking areas with palisade fencing around the boundaries. The gym premises has a utilitarian character and can be described as unsightly. People attending the gym generally go directly indoors on arrival and pay little attention to the surrounding townscape. The gym as an element of the townscape, and gym users as visual receptors, are of low sensitivity to townscape and visual change.

Photo 5: The Carlisle Gym adjacent to the site



2.3.2 Kimmage Road West

Although Kimmage Road West provides access to the site, the ZTV (Figure 7b) shows that – due to its separation distance from the proposed buildings and the screening effect of the existing houses on the north side of the road – the development would be visible from only a short stretch of the road, at the junction of the access road to the gym and the subject site. As potential receptors of townscape and visual change, roads and road users in urban areas such as this are of low-medium sensitivity to change. They are exposed to a variety of developments in the

urban environment, and thus are tolerant of change. In this case, the existing view along the gym access road is not an attractive view (see Photo 6 overleaf). There is potential to accommodate change with no loss of valued townscape character or visual amenity.

Figures 7a,b: Key potential receptors of townscape and visual change, and the proposed development's zone of theoretical visibility

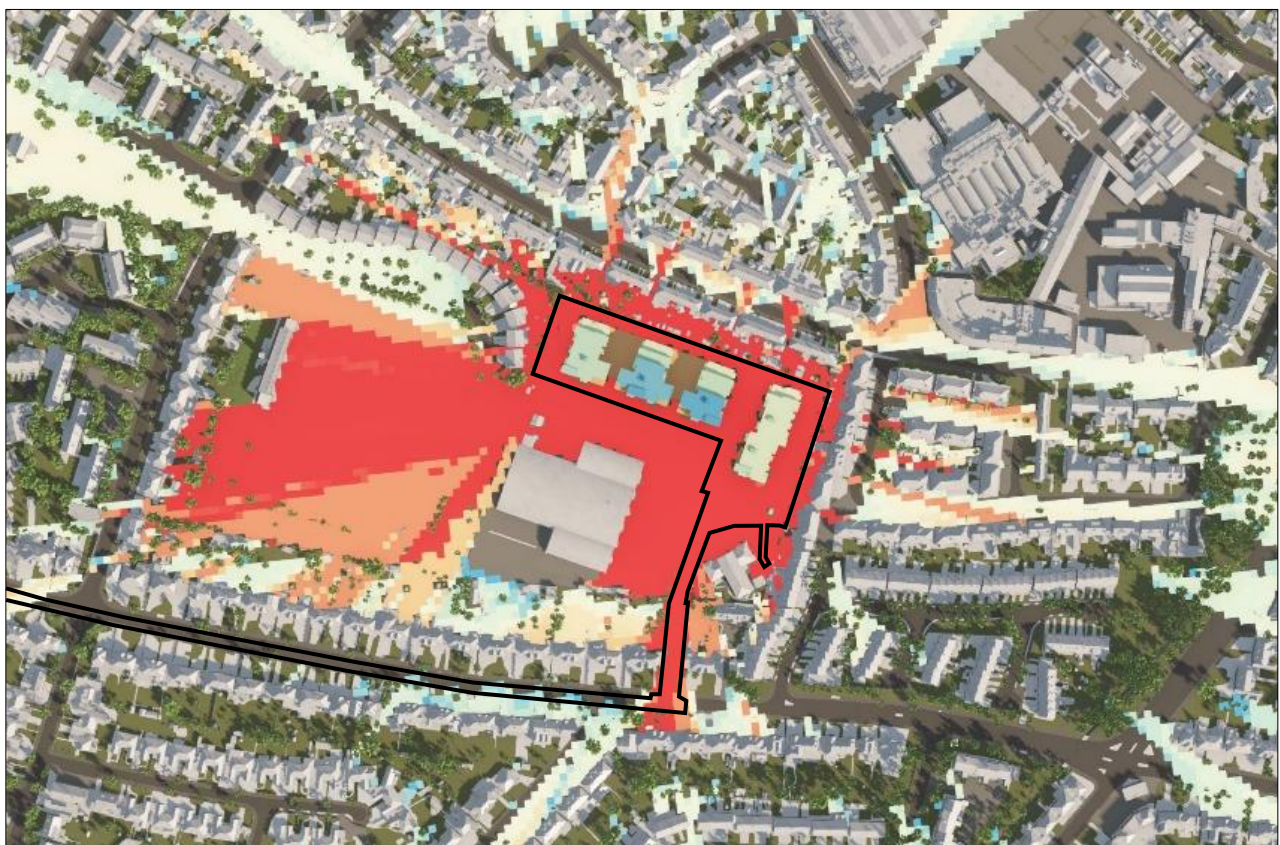


Photo 6: The view along the Carlisle Gym access road, towards the site, from Kimmage Road West



The houses on the north side of Kimmage Road West (two of which are shown in Photo 6) have views towards the site from their rear windows and gardens, although they are some distance from the site (the nearest houses on Kimmage Road West are approximately 150m from the nearest proposed building).

2.3.3 Brookfield and Brookfield Green

Brookfield and Brookfield Green are two mid- to late 20th century residential estates east of the site. Brookfield, to the south east, is comprised of terraced, two storey brick houses (see Photo 7). The westernmost terrace backs onto the former cricket clubhouse just south of the site. The terraced houses, narrow streets and mature street trees in Brookfield generate a high degree of visual enclosure, which limits the estate's exposure to the site.

Brookfield Green directly to the east of the site is comprised of large, semi-detached houses, terraced houses and three storey apartment buildings (see Photos 8 and 9). There is thus some diversity in form, scale and architecture in the estate. The westernmost row of houses (Photo 8) back onto the site and have views towards the site from their rear windows and gardens.

Photo 7: The view towards the site from Brookfield



Photo 8: The western row of houses in Brookfield Green, which back onto the site's east boundary



Photo 9: A view west towards the site from Brookfield Green showing the variety of building typologies in the estate – terraced houses, three storey apartments and semi-detached houses



Photo 10: A view north from Brookfield Green showing the houses and apartments, and in the middle distance a complex of industrial buildings on Cashel Road



2.3.4 Ravensdale Park and the Neighbourhood Centre

Ravensdale Park is an example of the mixed and changing townscape character of Kimmage. The roadside portion of the KCR Business Park (c. 175m to the east of the site) has been redeveloped, with the introduction of terraced three storey townhouses and a four storey apartment block. These are located opposite a row of cottages and beside the neighbourhood centre that extends around the corner onto Cashel Road.

Photo 11: The four storey apartments on Ravensdale Park opposite a row of cottages



2.3.5 Captain's Road and Cashel Avenue

To the north of the site, extending to Cashel Road and the Kimmage industrial zone, is an area of mid-20th century Dublin Corporation housing. Captain's Road runs parallel to the site's northern boundary. The road is lined by terraced two storey houses (see Photo 12) with deep back gardens. The houses on the south side of the road back onto the site. Currently, the landscape to the rear of the houses includes the site and the large, low form of the Carlisle Gym surrounded by extensive parking areas.

Photo 12: Captain's Road to the north of the site. The rear gardens of the houses to the right back onto the site boundary



Photo 13: Park Crescent opposite the entrance to Lorcan O'Toole Park GAA Club to the west of the site



2.3.6 Park Crescent

Immediately to the west of the site, also to the rear of the houses fronting Captain's Road, is an infill residential estate, Park Crescent. This is a cul-de-sac street lined on its north side by houses that face the Lorcan O'Toole Park GAA Club to the south. Due to the curved alignment of the street in combination with the trees in the crescent open space (see Photo 13), the majority of the estate has limited exposure to the site. However, the easternmost houses at the end of the street back onto the site's west boundary.

Photo 14: The houses towards the eastern end of Park Crescent closest to the site



2.3.7 Lorcan O'Toole Park GAA Club

Lorcan O'Toole Park GAA Club to the south west of the site includes a clubhouse and grandstand, a full size pitch, and a pitch and putt course surrounding the GAA facilities. As a large urban open space, in which users are focussed on their activity more so than their surroundings, the club is a relatively low sensitivity receptor.

Photo 15: A view towards the site from Lorcan O'Toole Park, with the Carlisle Gym and the houses of Park Crescent visible beyond the open space



3.0 Relevant Policy

3.1 National Policy

3.1.1 National Planning Framework

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

Compact growth policy encourages higher density - and therefore taller - development in urban areas where supporting infrastructure and services are available. National Policy Objective 11 of the NPF states: *"In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth."*

The NPF states further: *"To enable brownfield development, planning policies and standards need to be flexible, focusing on design led and performance-based outcomes... Although sometimes necessary to safeguard against poor quality design, planning standards should be flexibly applied in response to well-designed development proposals that can achieve urban infill and brownfield development objectives in settlements of all sizes"*.

3.1.2 Urban Development & Building Height Guidelines

The Guidelines state: *"Implementation of the National Planning Framework requires increased density, scale and height of development in our town and city cores...*

"to meet the needs of a growing population without growing our urban areas outwards requires more focus in planning policy and implementation terms on reusing previously developed 'brownfield' land, building up urban infill sites... and either reusing or redeveloping existing sites and buildings that may not be in the optimal usage or format taking into account contemporary and future requirements..."

In Section 3.2 of the Guidelines 'development management criteria' are set out to guide the evaluation of development proposals for buildings taller than the prevailing heights in the area: *"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 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...
- 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."

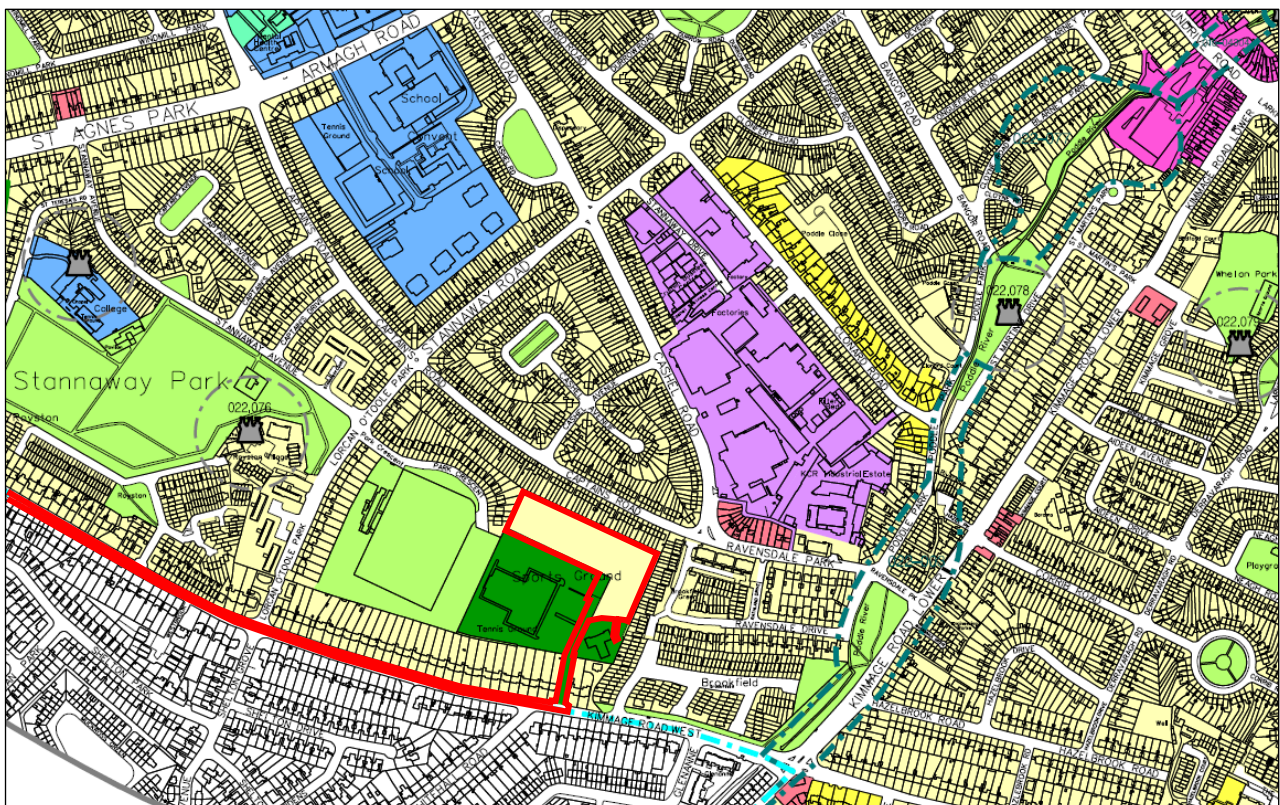
The national policy above is quoted as it has implications for the composition and appearance of urban areas. The policy encourages taller buildings than heretofore, especially on sites not in 'optimal usage or format'. This applies to the site, which is a left-over piece of a former sports ground, no longer in use. Its current condition/use is unsustainable. National policy puts a responsibility on all parties - including the land owner and planning authorities - to seek to optimise the land use yield from such sites in the interest of sustainable development.

3.2 Dublin City Development Plan 2022-2028 (DCDP)

3.2.1 Land Use Zoning

The site is zoned Z1 Sustainable Residential Neighbourhoods: "To protect, provide and improve residential amenities". The DCDP states: "The vision for residential development in the city is one where a wide range of high quality accommodation is available within sustainable communities, where residents are within easy reach of open space and amenities as well as facilities such as shops, education, leisure and community services...

Figure 8: Dublin City Development Plan Land Use Zoning



“The objective is to ensure that adequate public transport, in conjunction with enhanced pedestrian and cycling infrastructure, provides such residential communities good access to employment, the city centre and the key urban villages in order to align with the principles of the 15-minute city.”

Also of note on the zoning map are the following:

- Three areas of Z3 Neighbourhood Centre zoning within walking distance of the site;
- Three areas of Z9 Amenity/Open Space Lands/Green Network zoning within walking distance of the site (Stannaway Park, Lorcan O'Toole Park GAA club, Poddle Park);
- A large area of Z6 Employment/Enterprise zoning on Cashel Road within walking distance of the site;
- The Z10 Inner Suburban and Inner City Sustainable Mixed -Uses zoning of the Carlisle Gym;
- An absence of sensitivities such as Conservation Areas, Architectural Conservation Areas or protected structures in the vicinity of the site.

3.2.2 Urban Consolidation and Density

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

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

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

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

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

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

3.2.3 Urban Design and Architecture

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

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

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

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

3.2.4 Building Height and Appendix 3: 'Achieving Sustainable Compact Growth - Policy for Density and Building Height in the City'

Section 4.5.4 of the DCDP 2022 states: *"Aligned with the principle of greater densification, will be the requirement to consider greater height in appropriate locations. It is important to note however, that higher density does not necessarily equate to high rise buildings and plot ratio and site coverage all contribute to the density of a particular built form. Appropriate higher density schemes can often be achieved by using mid-rise typologies and key to the success of such development is high quality design and place-making.."*

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

"The City Council remains committed to the need to protect and enhance conservation areas, Architectural Conservation Areas and the historic core of the city...

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

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

"The main determining factor in considering appropriate heights is the need to create exemplar urban development with attractive streets, spaces and public areas that integrate successfully with the surrounding area. The key factors that will determine height will be the impact on adjacent residential amenities, the proportions of the building in relation to the street, the creation of appropriate enclosure and surveillance, the provision of active ground floor uses and a legible, permeable and sustainable layout... At a European level, best practice examples indicate that appropriate density and layouts that create appropriate street scale and enclosure are achieved with mid-rise typologies of buildings 4 to 8 storeys in height..."

3.2.5 Overlooking and Overbearance

Section 15.9.8 of the DCDP 2022 states: *"'Overbearance' in a planning context is the extent to which a development impacts upon the outlook of the main habitable room in a home or the garden, yard or private open space service a home. In established residential developments, any significant changes to established context must be considered. Relocation or reduction in building bulk and height may be considered as measures to ameliorate overbearance".*

4.0 Proposed Development

The proposal is described in detail in the Architectural and Landscape Design Statements and drawings accompanying the planning application. The following aspects of the proposal are most relevant to the TVIA.

4.1 Layout

The proposed layout is determined by a combination of the site's shape and the objective to avoid excessive impacts on the amenities of the neighbouring houses to the north, east and west:

- The five buildings are arranged in an L-shape, with Blocks 1-4 in a row parallel to the long northern boundary, and Blocks 4 and 5 forming an articulated linear building inside the east boundary.
- The four buildings are separated by north-south aligned access and open space corridors. The north-south alignment maximises sunlight penetration to the apartments and the open spaces between the buildings.
- The orthogonal layout also simplifies pedestrian and vehicular access to the scheme.

Figure 10: Concept diagram illustrating the principles of the proposal



The buildings are set back from the north, east and west site boundaries to maintain sufficient separation distance from the neighbouring houses:

- The vehicular access road leading to under deck parking runs inside the northern boundary. This separates Blocks 1-4 from the boundary shared with the houses of Captain's Road to the north (these houses have deep back gardens).
- Communal open spaces are located inside the east and west boundaries - to separate Block 1 from the houses of Park Crescent to the west, and Blocks 4/5 from the houses of Brookfield Green to the east.

The main public open space is located alongside the Carlisle access road, at the entrance to the scheme and opposite the gym entrance. This is the part of the site most visible and most easily accessed from the public realm. The public open space is co-located with the community/cultural space in the ground floor of Block 5, to form a community hub at the entrance.

4.2 Built Form and Height

The buildings range from three to five storeys in height, with the height adjusted to respond to the surrounding conditions/sensitivities:

- Block 1 to the rear of the houses on Park Crescent is four storeys tall, stepping down to three storeys towards its northern end to the rear of the Captain's Road houses.
- Blocks 2 and 3 in the central portion of the site are five storeys, stepping down to four then three storeys towards the north, to the rear of the Captain's Road houses. The stepping is intended to ensure no excessive loss of sunlight to the neighbouring houses and gardens, and to avoid overbearance in the rear views from the houses.
- Blocks 4 and 5 to the rear of the houses on Brookfield Green are four storeys, with Block 4 also stepping down to three at its northern end to the rear of the Captain's Road houses.
- Lateral wings are added to Blocks 1, 2 and 3, part-enclosing the courtyards between the buildings, and forming a coherent built frontage to the Carlisle Gym.

Figure 11: Built form and height – response to context

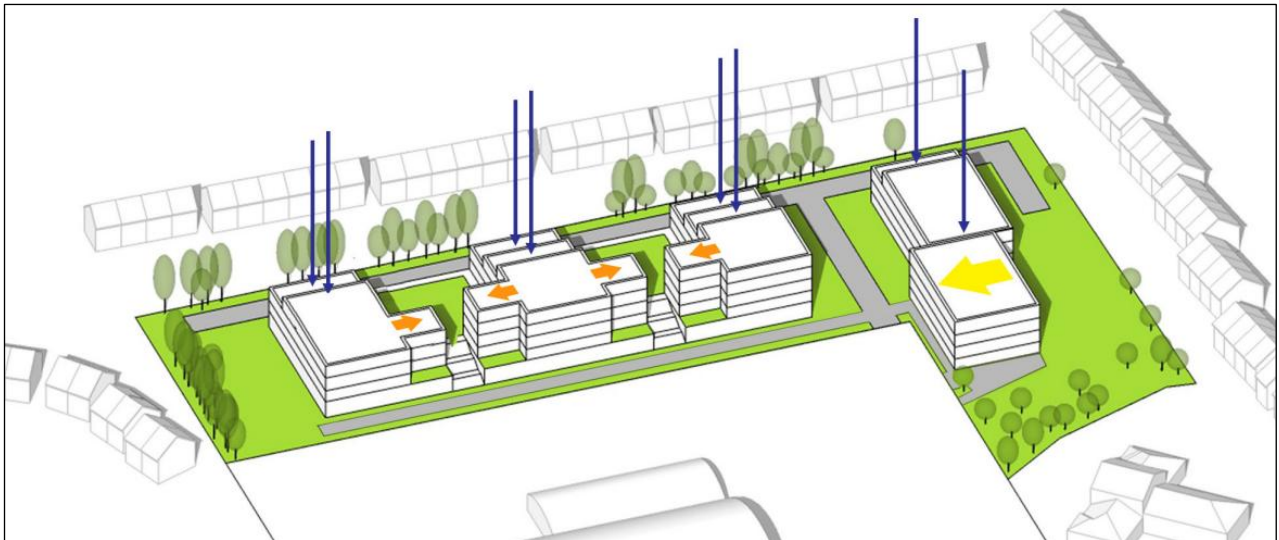


Figure 12: West elevation of Block 1 showing the steps down in height towards the northern end of the building – to minimise visual and daylight/sunlight impacts on the neighbouring houses to the north



a fine texture. This is intended to allow the buildings – which are of contemporary urban typology and scale - to integrate into a townscape in part characterised by buildings of smaller scale (with exceptions such as the gym and some of the nearby industrial buildings).

Figure 13: Aerial view showing the high degree of articulation of the built form and facades, reducing the perceived massing and giving the buildings a texture suitable for the townscape context



Figure 14: CGI of the Block 2 elevation facing the Carlisle Gym, showing the articulation of the façade by steps in building line and parapet height, columns of windows and projecting balconies, and variations in brick colour



4.4 Landscape Proposals

A key element of the proposed development is the retention of the trees inside the north and west site boundaries. These tall, evergreen trees provide ready made visual screening for a proportion of the potentially most affected visual receptors – the houses of Captain’s Road to the north and Park Crescent to the west. Additional trees are proposed to supplement these tree lines where gaps currently exist.

The two communal open spaces inside the east and west boundaries, the public open space beside the entrance, and the linear pedestrian space inside the southern boundary all include scattered trees or tree lines. The large number of trees are intended to have a screening and softening effect on the new built form. The courtyards on the parking decks between Blocks 1, 2 and 3 are also green spaces with scattered small trees and shrubs, and all of the buildings have extensive greens for additional ecosystem services.

Figure 15: Landscape masterplan



Figure 16: CGI view showing the public open space fronted by Block 5 (with community/cultural use in the ground floor providing active frontage to the park) and the south elevations of Blocks 1-3 facing the Carlisle Gym



5.0 Visual Impact Assessment

14 no. representative viewpoints were selected for detailed visual impact assessment informed by verified photomontages. The viewpoints represent the main receptors of potential townscape and visual change identified in Section 2.3 above. (To allow for comparison, the same viewpoints that were used for the 2022 SHD application were used for this assessment. Three additional views (Nos. 02, 07, 11 on the map below) were added following production of the ZTV, for a more comprehensive assessment.)

Figure 17: Viewpoints for visual impact assessment





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




In accordance with the GLVIA, the assessment focusses on the impacts on the public realm/publicly accessible views. Additional commentary is provided on the effects on private houses/views where relevant.



The assessment should be read in conjunction with the verified photomontages prepared by Visual Lab, provided under separate cover.



Note: The baseline photographs for the photomontages were taken in November 2024, when the deciduous trees had lost their leaves. The photomontages thus present the 'worst case scenario' as regards screening by spring/summer foliage.




Table 1: Visual effects assessment

No	Viewpoint Location	Existing View	Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
01	Kimmage Road West at Carlisle entrance	<ul style="list-style-type: none"> The entrance to the Carlisle Gym and the site is flanked by large houses, which frame the view along the access road towards the site. To the rear of the houses, along the road, only the lights of the gym parking area (and not the building) can be seen behind the roadside wall and railing. <u>The road appears to lead nowhere, the area appears vacant, and the townscape incomplete.</u> Viewpoint sensitivity: Medium: Kimmage Road West is an attractive street lined by handsome houses in mature gardens. However, the view at this point - the Carlisle entrance - has capacity for change. It could benefit from a focal point and improved townscape structure and legibility. 	Medium	<ul style="list-style-type: none"> Blocks 2, 3 and 5 are visible in the distance, with Blocks 3 and 5 separated by a corridor of space aligned with the access road. The buildings are positioned parallel to the row of houses and the road in the foreground. There is an appreciable logic/responsiveness-to-context in their positioning. The facades are articulated by recessed and expressed elements, variations in brick colour, and generously sized windows and balconies. This articulation reduces the perceived massing, integrating the buildings into the existing townscape. The buildings represent a new development typology (high density residential), and thus change the townscape character, but at this distance (c. 180m from the road and 150m to the rear of the houses) they appear appropriately scaled and cause no sense of excessive built/visual enclosure. Magnitude of change: Medium. Significance of impact: Moderate positive: <ul style="list-style-type: none"> The development occupies a conspicuous gap in the townscape, improving the balance between built form and the space dedicated to cars, strengthening the urban structure. The townscape character is changed, but the change is not inappropriate for the location and the resulting view is a pleasing composition of old and new typologies and architecture – all of high design and material quality. 	Medium	Moderate positive
02	Carlisle access road	<ul style="list-style-type: none"> This is the view experienced by people arriving at the Carlisle Gym. The access road is enclosed by unsightly fences and there are no buildings* addressing the road, which terminates at the site boundary ahead (with a turn in to the car park just before that). * The building in the foreground to the right is the former clubhouse, once in use as a gallery, which survives from the Carlisle Cricket Club.  <ul style="list-style-type: none"> To the left behind the wall and railing is the gym car park, behind which is broad, low arch-roofed building. The roofs of the houses of Brookfield Green can be seen to the right, and of Captain's Road ahead beyond the site. Viewpoint sensitivity: Low: The overall impression in this view is of a vacant urban backland plot. There is an absence of urban structure and character, and limited visual amenity. 	Low	<ul style="list-style-type: none"> Blocks 3 and 5 are prominent additions to the view – the space between them aligned with the access road, and the two buildings forming a gateway to the neighbourhood. The forms and facades of the buildings are articulated by recesses and steps in building line, projecting balconies, the windows, and variations in material. The articulation reduces their perceived massing, giving the built form a texture that allows the buildings to integrate comfortably into the townscape despite their larger scale. Between the former clubhouse to the right and Block 5 is the main public open space. This reveals the separation distance of Block 5 from the Brookfield Green houses. In the near corner of Block 5 is the community/cultural space, providing active frontage to the open space and combining with the open space to form a community hub.  <ul style="list-style-type: none"> The removal of the fencing on the site boundary and the changes to the access road (widened footpaths, new cycle lanes) give the road a more urban appearance. Magnitude of change: High. Significance of impact: Moderate positive: The development occupies an unsightly backland space in the townscape, introducing buildings and open space of design and material quality, strengthening the urban structure and causing a shift in character towards a contemporary urban condition. 	High	Moderate positive

No	Viewpoint Location	Existing View	Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
03, 04	Kimmage Road West to SE and SW	<ul style="list-style-type: none"> These views were included in the previous TVIA (for the SHD) to test the visibility of the proposal from Kimmage Road West to east and west of Viewpoint 1. Viewpoint sensitivity: Medium: 	Medium	<ul style="list-style-type: none"> Magnitude of change: None. Significance of impact: No effect. 	None	No effect
05	Brookfield	<ul style="list-style-type: none"> This view is taken from a central position in Brookfield, looking north west towards the site. The view shows the high degree of visual enclosure in Brookfield, generated by the terraced houses on relatively narrow streets with mature street trees. The houses in view back onto the former Carlisle Cricket Club clubhouse, which was converted into a gallery when the gym was built.  <ul style="list-style-type: none"> Viewpoint sensitivity: Medium-High: As a residential receptor, Brookfield is of high sensitivity to townscape/visual change. However, given (a) the urban location, (b) the change that has already taken place on the Carlisle lands (construction of the gym, conversion of the clubhouse) and (c) the site's RA zoning, there is some tolerance for change. 	Medium-High	<ul style="list-style-type: none"> The proposed development would not be visible from the communal/public realm of Brookfield (the image below shows the outline of the proposed buildings in red, compared to the previous SHD application buildings in magenta).  <ul style="list-style-type: none"> Magnitude of change (to the public realm in Brookfield): None. Significance of impact: No effect: Effect on the nearest houses: The development would be visible from the rear windows and gardens of the western row of houses (although the gardens are relatively small and enclosed, restricting visibility of the surroundings). The proposed buildings would be peripheral to the views, and c. 50m from the nearest Brookfield house with the proposed main open space between them. The proposed trees in that space would provide screening (in addition to the existing vegetation in the Brookfield gardens). 	None	No effect
06	Brookfield Green, View A	<ul style="list-style-type: none"> This view is taken from the road beside the central green, looking west towards the site. The view shows some of the western row of houses that back onto the site. The houses have views of the estate green to the front, and the site beside the Carlisle gym and parking area to their rear.  <ul style="list-style-type: none"> Viewpoint sensitivity: Medium-High: As a residential receptor, Brookfield Green is of high sensitivity to change. However, given (a) the urban location, (b) the change that has already taken place on the Carlisle lands (the gym) and (c) the site's RA zoning, there is some tolerance for change. 	Medium-High	<ul style="list-style-type: none"> A part of the four storey Block 4/5 is visible in a valley between the roofs of the Brookfield Green houses. Magnitude of change (to the public realm in Brookfield Green): Low. Significance of impact: Slight neutral. The majority of Brookfield Green (including all of the communal/public realm) would experience limited impact, with only small parts of Block 4/5 visible, causing a slight change in townscape character and no effect on visual amenity. It is not unusual, nor inappropriate in the urban area, for higher density developments to be visible from neighbouring lower density areas. Brookfield Green itself includes three-storey apartment buildings, and the nearby industrial zone on Cashel Road is visible from part of the estate (see Photos 9, 10 above). Effect on the nearest houses: The four storey Block 4/5 would be a prominent addition to views from the rear windows of the houses that back onto the site. (Like the neighbouring Brookfield houses, the gardens of these houses in Brookfield Green are relatively small and enclosed by walls and boundary vegetation, which limits visibility of the surrounding landscape.) To mitigate visual impact on rear views from the houses, Block 4/5 is limited to four storeys in height and set back from the boundary behind a corridor of open space with a perimeter tree line for screening, and the building is of high design and material quality. 	Low	Slight neutral

No	Viewpoint Location	Existing View	Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
07	Brookfield Green, View B	<ul style="list-style-type: none"> This view illustrates the variety of house/buildings types already represented in Brookfield Green, with terraced houses to the left, three storey apartments to the right, and 2/3 storey semi-detached houses at the end of the street (backing onto the site). Viewpoint sensitivity: Medium-High: As a residential receptor, Brookfield Green is of high sensitivity to townscape/visual change. However, given (a) the urban location, (b) the change that has already taken place on the Carlisle lands (the gym) and (c) the site's RA zoning, there is some tolerance for change. 	Medium-High	<ul style="list-style-type: none"> Block 4 protrudes marginally above the roofs of the houses at the end of the street. Magnitude of change: Low. Significance of impact: Slight neutral: The development would cause no significant change in townscape character, and no reduction in visual amenity. 	Low	Slight neutral
08	Ravensdale Park	<ul style="list-style-type: none"> The view along Ravensdale Park illustrates the varied and changing character of the site's townscape context. The street is fronted by a mix of one and two storey 20th century houses, three storey 20th century apartments, and 21st century three storey townhouses and four storey apartments. In addition to the residential buildings, the shops/neighbourhood centre at the corner of Cashel Road can also be seen. Viewpoint sensitivity: Medium: The diversity of development typologies on the street generates capacity for change. 	Medium	<ul style="list-style-type: none"> The proposed buildings protrude marginally above the existing roofline in the distance along the street. In the already diverse street elevation this amounts to a low magnitude of change. Magnitude of change: Low. Significance of impact: Not significant neutral: The development would cause no significant change in townscape character and no reduction in visual amenity. 	Low	Not significant neutral
09	Neighbourhood centre, corner of Ravensdale Park, Captain's Road and Cashel Road	<ul style="list-style-type: none"> This view is taken from outside a convenience store in the neighbourhood centre that turns the corner from Ravensdale Park onto Cashel Road. The Cashel Road industrial area is directly behind this viewpoint. To the left across the junction is a three storey apartment building in Brookfield Green. At the centre of the view (behind the wall) are the Brookfield Green houses that back onto the site. To the right are a pair of former Dublin Corporation houses turning the corner from Captain's Road onto Cashel Road. Viewpoint sensitivity: Medium: The view is taken from a neighbourhood centre adjacent to an industrial area, and there are a variety of residential buildings in view. The combination of urban location/context and diversity in built form and architecture creates capacity to accommodate change. 	Medium	<ul style="list-style-type: none"> Parts of Blocks 3 and 4 are visible to the rear of the Brookfield Green houses and the houses along Captain's Hill to the right. Magnitude of change: Low. Significance of impact: Slight neutral: The development would have limited visual presence and would cause only a minor (not inappropriate) shift in townscape character, with no effect on visual amenity. 	Low	Slight neutral
10	Captain's Road	<ul style="list-style-type: none"> Captain's Road is lined on both sides by terraced two storey houses. The houses to the right of the street back onto the site's long northern boundary. The houses have relatively long, south facing back gardens. Views from the rear windows of the houses currently take in the site in its unused/greenfield condition with the broad, low form of the Carlisle Gym and extensive parking area beyond the site. Inside part of the site boundary there are rows of tall, evergreen trees, which screen the site from view.  <ul style="list-style-type: none"> Viewpoint sensitivity: Medium-High: As a residential receptor, Captain's Hill is of high sensitivity to townscape/visual change. However, given (a) the urban location, (b) the change that has already taken place on the Carlisle lands (construction of the gym) and (c) the site's RA zoning, there is some tolerance for change. 	Medium-High	<ul style="list-style-type: none"> A small part of Block 2 is visible in a valley between the roofs of the Captain's Road terraces (and the buildings would be visible in the gaps between the terraces). The image below shows the outline of the proposed development in red, compared to the previous SHD application in magenta. The reduction in height of the LRD from the SHD proposal is quite significant in this view, taking the buildings out of sight for much of the road.  <ul style="list-style-type: none"> Magnitude of change (to the public road): Low. Significance of impact: Slight neutral. The majority of Captains Road, and the houses on the north side of the road, would experience limited impact, causing only a slight in townscape character and no loss of visual amenity. Effect on the nearest houses: The houses on the south side of the road would have views of the development from their rear windows and gardens, with Blocks 1-4 in a row to their 	Low	Slight neutral

No	Viewpoint Location	Existing View	Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
				rear. To avoid excessive visual enclosure or overbearance, (a) Blocks 1-4 are set back from the boundary behind a corridor of space (containing the access road), (b) the buildings are separated by corridors of open space (creating a permeable built frontage), and (c) the buildings step down to three storeys towards the boundary (from four or five storeys within the site, further from the houses. The existing trees inside the site boundary are retained and supplemented with new trees to soften the presence of the buildings. Architectural design measures are taken to reduce the massing and add texture to the facades, to integrate the buildings into the townscape.		
11	Cashel Avenue	<ul style="list-style-type: none"> This view is taken from Cashel Avenue a block to the north of its junction with Captain's Road. The viewpoint was included to assess the impact on the wider residential neighbourhood to the north of the site, beyond Captain's Road. (A further block to the north is Cashel Road and the Kimmage industrial area. The industrial buildings are visible from this location, in the opposite direction to the subject site.) Cashel Avenue is lined by terraced two storey houses on both sides, generating a relatively high degree of visual enclosure. Viewpoint sensitivity: Medium: The viewpoint represents the wider neighbourhood (as opposed to the most visually exposed houses such as Viewpoint 10). In the urban location in which different uses and building types already feature in views, there is some capacity for change. 	Medium	<ul style="list-style-type: none"> Parts of the proposed Blocks 1 and 2 protrude above the houses' roofline, in the middle distance. (In summer Block 1 would be screened from view by a tree in the foreground.) Magnitude of change: Low. Significance of impact: Slight neutral: The development would have limited visual presence and would cause only a minor (and not inappropriate) shift in townscape character, with no effect on visual amenity. 	Low	Slight neutral
12	Junction of Captain's Road and Stannaway Road	<ul style="list-style-type: none"> The street/townscape in view is typical of the low density, mid-century development that until recently characterised the Kimmage and Crumlin areas. As elsewhere in the city, change is taking place. Directly behind this viewpoint, on a former backland site similar to the subject site, is the Captain's Place apartment development. Developments such as these are introducing a high density residential element to the land use mix, transforming former low-rise suburban areas into more dense and diverse urban townscapes. The motivation for the change is sustainable use of urban land and services (e.g. public transport). This has implications for townscape character and views, including juxtapositions of new taller building typologies with the traditional house typology, and the intrusion of taller buildings into views from the public and private realms. Such change is an unavoidable outcome of compact growth policy.  <ul style="list-style-type: none"> Viewpoint sensitivity: Medium: In the urban location in which different uses and building typologies already feature, there is some capacity to accommodate change. 	Medium	<ul style="list-style-type: none"> The proposed Blocks 1-3 protrude marginally above the roofline of the houses along Captain's Road, in the middle distance. (In summer they would be screened by the street trees.) The image below shows the outline of the proposed development in red, compared to the previous SHD application in magenta. The reduction in height is significant in this view, reducing the proposal's impact considerably.  <ul style="list-style-type: none"> Magnitude of change: Low. Significance of impact: Not significant neutral: The development would have limited visual presence and would cause only a minor (and not inappropriate) shift in townscape character, with no effect on visual amenity. 	Low	Not significant neutral

No	Viewpoint Location	Existing View	Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
13	Park Crescent	<ul style="list-style-type: none"> Park Crescent is a late 20th century infill housing development. The a cul-de-sac street is lined on its north side by houses facing the crescent and Lorcan O'Toole Park GAA Club to the south. Due to the curved alignment of the street and the trees in the crescent, the majority of the estate has limited exposure to the site. However, the easternmost houses at the end of the street back onto the site's west boundary. These are the houses in view in View 13. There is a row of tall, evergreen trees inside the site boundary, to the rear of the houses. These trees (which would be retained as part of the development) provide screening for the houses.  <ul style="list-style-type: none"> Viewpoint sensitivity: Medium-High: As a residential receptor, Park Crescent is of high sensitivity to townscape/visual change. However, given (a) the urban location, (b) the change that has already taken place on the Carlisle lands (the gym) and (c) the site's RA zoning, there is some tolerance for change. 	Medium-High	<ul style="list-style-type: none"> The development would be barely discernible from Park Crescent generally, and would cause no change in townscape character or loss of visual amenity. The image below shows the outline of the proposed development in red, compared to the previous SHD application in magenta. The reduction in height of the proposed Block 1 is significant in this view, taking the building out of sight from the street.  <ul style="list-style-type: none"> Magnitude of change (to the public realm in Park Crescent): Negligible. Significance of impact: Not significant neutral: Park Crescent as a whole would experience no significant change in townscape character and no effect on visual amenity. Effect on the nearest houses: The houses at the eastern end of the street would have views of the development from their rear windows and gardens. To avoid excessive visual enclosure or overbearance, (a) Block 1 is set back from the boundary behind an open space, (b) the building is limited to four storeys in height (stepping down to three at its northern end), (c) the existing trees inside the site boundary would be retained, and (d) additional trees are proposed in the open space. Architectural design measures are also taken to reduce the massing and add texture to the facades, to integrate the building into the townscape. 	Negligible	Not significant neutral

No	Viewpoint Location	Existing View	Sensitivity	Proposed View	Magnitude of Change	Significance of Effects
14	Lorcan O'Toole Park GAA Club	<ul style="list-style-type: none">Lorcan O'Toole Park includes a clubhouse and grandstand, a full size GAA pitch, and a pitch and putt course surrounding the GAA facilities. This is a view from the grandstand side of the pitch towards the site.The houses of Park Crescent are visible to the left beyond the pitch, and the distinctive broad, low arched form of the Carlisle Gym is directly ahead. In the distance, some of the taller structures in the Kimmage industrial area on Cashel Road can be seen.Viewpoint sensitivity: Low: As a large urban open space in which users are focussed on their activity more than the surroundings, the GAA club is a relatively low sensitivity receptor.	Low	<ul style="list-style-type: none">Blocks 1, 2 and 3 are a prominent addition to the view, beyond the GAA grounds, to the rear of the Park Crescent houses and to the side of Carlisle Gym.The step down from five to four storeys, from Block 2 to Block 1 to the rear of the Park Crescent houses, is evident in this view.The view shows the successful articulation of the form and facades, which breaks down the massing and gives the buildings a fine texture. This allows them to integrate comfortably into the townscape.Magnitude of change: Medium.Significance of impact: Moderate neutral: Despite their relatively large scale, the buildings would take their place comfortably in the townscape due to (a) the abundance of open space in the view, (b) the large form of the gym building (which provides favourable context and a counterbalance to the taller buildings), and (c) the considered design of the buildings. The change in townscape character and view composition is not inappropriate in this location, and there would be no reduction in visual amenity.	Medium	Moderate neutral

6.0 Townscape Impact Assessment and Conclusions

6.1 Townscape Sensitivity

The townscape sensitivity⁵ of the receiving environment can be classified ‘medium’ (definition: *Areas where the landscape has certain valued elements, features or characteristics but where the character is mixed or not particularly strong, or has evidence of alteration, degradation or erosion of elements and characteristics. The landscape character is such that there is some capacity for change. These areas may be recognised in landscape policy at local or county level and the principal management objective may be to consolidate landscape character or facilitate appropriate, necessary change).*

The medium sensitivity classification reflects the following:

- **The site is a substantial, serviced but unused backland land parcel in the urban area.** It is well served by public transport, local retail and services, public open space and other facilities (e.g. schools) within walking distance. It is also close to an employment zone. These factors are recognised in the site’s Z1 zoning (Sustainable Residential Neighbourhoods). The site is thus designated for development, for residential use, and a degree of associated townscape change has been deemed acceptable in principle by DCC.

The DCDP states: *“The vision for residential development in the city is one where a wide range of high quality accommodation is available within sustainable communities, where residents are within easy reach of open space and amenities as well as facilities such as shops, education, leisure and community services. The objective is to ensure that adequate public transport, in conjunction with enhanced pedestrian and cycling infrastructure, provides such residential communities good access to employment, the city centre and the key urban villages in order to align with the principles of the 15-minute city.”*

- The townscape surrounding the site developed in the mid 20th century, and initially was characterised by low density housing with a central industrial zone (Crumlin Business Centre and KCR Industrial Estate on Cashel Road). Since the turn of the 20th century there has been a shift in character, with the introduction of higher density housing in places, for example the Ravensdale Court development (replacing a former commercial/industrial premises) and Captain’s Place (on a similar backland site to the site). The Carlisle Gym contributes further to the area’s now **mixed density, mixed use, urban townscape character. There is precedent for diversity and juxtapositions in land use, building typologies, scale and architecture in the area.**
- The site forms part of the central area of a large city block, which originally was occupied by cricket and GAA clubs with a surrounding fringe of residential development. The cricket grounds have been largely redeveloped with the construction of the Carlisle Gym, leaving the site unused. The gym is a large-footprint building in a vast hard standing area. **With the fenced-off site beside the gym, this part of the townscape (the central part of the block) appears unfinished and disconnected from the surrounding townscape.** It is also a factor that, with the gym parking area and the neighbouring GAA club, there remains a large amount of open space at the centre of the block. This space (especially where currently unused) can accommodate built form.

⁵ The GLVIA states that landscape sensitivity should be classified with consideration of ‘the particular project or development that is being proposed’ and ‘the location in question’. Sensitivity is determined by two factors:

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

- The factors above point to a townscape with some capacity to accommodate change without undue loss of valued character or visual amenity. However, the site is surrounded on three sides by houses, which back onto the site boundary. **Due to their proximity to the site and the fact that the site lies in view from their rear windows and gardens, these local residential receptors are sensitive to change.**
- There are no other townscape sensitivities (e.g. cultural or natural heritage sites or protected views) in the vicinity and potentially affected by the proposed development.

Taking the above factors into account, the townscape sensitivity can be classified 'medium'.

6.2 Magnitude of Townscape Change

The magnitude of townscape change which would result from the proposed development can be classified 'medium' (definition: *Change that is moderate in extent, resulting in partial loss or alteration to key elements, features or characteristics of the landscape, and/or introduction of elements that may be prominent but not necessarily substantially uncharacteristic in the context. Such development results in change to the character of the landscape*).

The medium magnitude of change classification reflects the following:

- The development would change the character of its immediate townscape context by introducing a high density residential typology (up to five storeys tall) to the backland centre of its large city block. Currently, the residential buildings on the block are predominantly two to three storey houses, with a number of three storey apartment buildings in Brookfield Green.
- Due to (a) its location on a backland plot, (b) its related separation distance from much of the surrounding public realm, and (c) its relatively modest height (for a contemporary apartment scheme), **the proposed development would have limited visual presence in the surrounding townscape**. This is clearly illustrated by the ZTV map (Figure 7b above), which shows that significant visual effects would be confined to the block on which the site is located – particularly the centre of the block (Carlisle Gym and Lorcan O'Toole Park GAA grounds) and the rear gardens and elevations of the houses around the perimeter of the block. The limited geographical extent of potential townscape and visual effects is also confirmed by the visual impact assessment, the results of which are summarised below.

Table 2: Summary of visual effects assessment

No.	Viewpoint Location	Viewpoint Sensitivity	Magnitude of Change	Significance of Effects
01	Kimmage Road West at Carlisle entrance	Medium	Medium	Moderate positive
02	Carlisle access road	Low	High	Moderate positive
03	Kimmage Road West to South East	Medium	None	No effect
04	Kimmage Road West to South West	Medium	None	No effect
05	Brookfield	Medium-High	None	No effect
06	Brookfield Green, View A	Medium-High	Low	Slight neutral
07	Brookfield Green, View B	Medium-High	Low	Slight neutral

No.	Viewpoint Location	Viewpoint Sensitivity	Magnitude of Change	Significance of Effects
08	Ravensdale Park	Medium	Low	Not significant neutral
09	Neighbourhood centre, Cashel Road	Medium	Low	Slight neutral
10	Captain's Road	Medium-High	Low	Slight neutral
11	Cashel Avenue	Medium	Low	Slight neutral
12	Junction of Captain's Road and Stannaway Road	Medium	Low	Not significant neutral
13	Park Crescent	Medium-High	Negligible	Not significant neutral
14	Lorcan O'Toole Park GAA Club	Low	Medium	Moderate neutral

- The table above shows that:
 - **The proposed development would enhance the townscape character and condition of the Carlisle area (as illustrated by Viewpoints 01, 02).** The gym, particularly the extensive surface parking area, is unsightly, and in this space the townscape feels incomplete, underutilised, and isolated from the surroundings. The proposed development would make more sustainable use of this area, strengthen its urban structure and townscape character, and improve its integration with the surrounding townscape.
- The neighbouring houses on Captain's Road to the north, Brookfield Green to the east and Park Crescent to the west, which back onto the site, would experience a higher magnitude of change in views from their rear gardens and windows than the public realm of those streets/estates. Their rear views would change with any development on the Z1-zoned (Sustainable Residential Neighbourhoods) site. Conscious of this potential impact, mitigation measures are embedded in the proposal, including the retention and supplementary planting of trees inside the site boundary, the buildings stepping down in height towards the boundaries, and a high degree of articulation of the built form and facades (to reduce the perceived massing). The buildings would not be unsightly, but they would change the outlook and cause a some increase in visual enclosure. There would be a shift in townscape character of the houses' context - towards a more contemporary urban condition (mixed density, mixed use, etc.).

6.3 Significance and Quality of Townscape Impact

Measuring⁶ the magnitude of change (medium) against the sensitivity of the receiving environment (medium), **the significance of the townscape impact is classified 'moderate'** (EPA definition of moderate significance: *"An effect that alters the character of the environment in a manner that is consistent with existing and emerging baseline trends"*).

This assessment result is reasonable. The development would unquestionably alter the character of its immediate environment, but the change is consistent with the established trend in Kimmage and other similar previously low density neighbourhoods throughout the city. Compact growth through infill and increased building height (as encouraged by national policy) cannot take place without townscape and visual impacts.

⁶ See Appendix 1, Section 2.3 and Table 3.

6.4 Conclusions

This assessment has found that, on balance, the proposed development can be considered a neutral to positive intervention in the townscape. **For a development of its scale, it would affect a relatively confined area**, and in that area there is capacity to accommodate change (due to (a) the current condition of the Carlisle lands, occupied by the gym and the unused site, and (b) the established trend of similar change in the wider area). The development would strengthen the urban character and place-identity of the Carlisle area, and elevate the quality of the built environment locally (due to the development's high quality of design and materials). The change is appropriate in this location, and would contribute to realising the DCDP vision for Sustainable Residential Neighbourhoods and a 15 minute city.

APPENDIX 1 LANDSCAPE/TOWNSCAPE & VISUAL IMPACT ASSESSMENT METHODOLOGY

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

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

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

1.0 Key Principles of the GLVIA

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

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

1.2 Assessment of Both Landscape/Townscape and Visual Effects

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

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

2.0 Townscape Effects Assessment

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

2.1 Landscape/Townscape Sensitivity

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

Table 1 Categories of Landscape/Townscape Sensitivity

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

2.2 Magnitude of Landscape/Townscape Change

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

Table 2 Categories of Landscape/Townscape Change

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

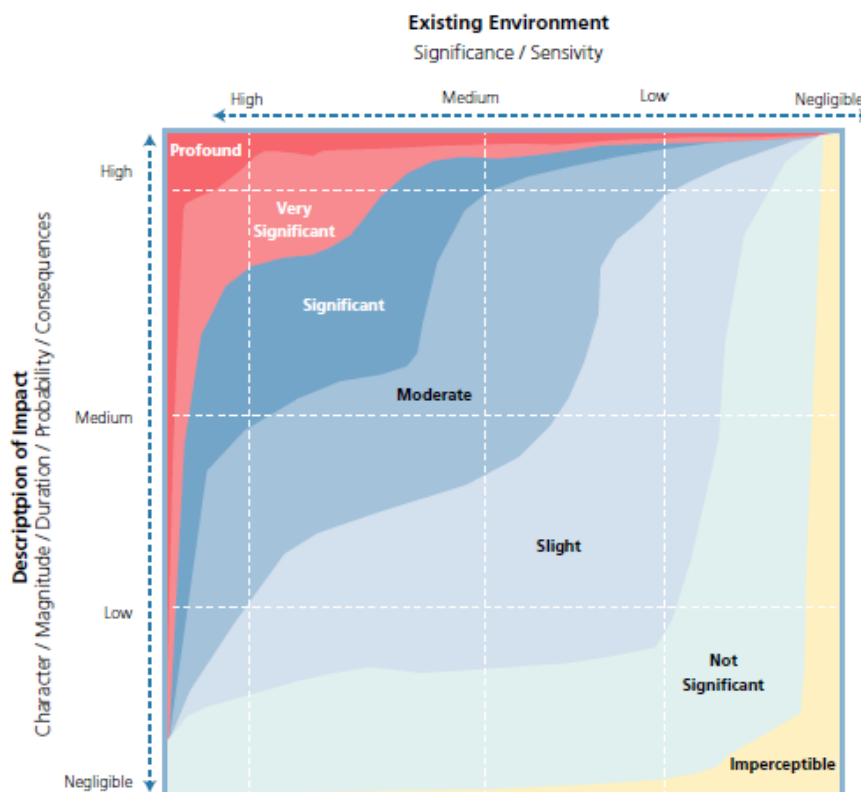
2.3 Significance of Landscape/Townscape Effects

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

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

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

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



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

Table 4 EPA definitions of environmental impact classifications

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

3.0 Visual Effects Assessment

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

3.1 Sensitivity of the Viewpoint/Visual Receptor

Viewpoint sensitivity is a function of two main considerations:

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

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

Table 5 Categories of Viewpoint Sensitivity

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

3.2 Magnitude of Change to the View

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

Table 6 Categories of Visual Change

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

3.3 Significance of Visual Effects

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

4.0 Quality of Effects

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

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

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