

Townscape and Visual Impact
Assessment

**Proposed Large Scale Residential Development at Hill
Street, Dundalk**

Prepared by Model Works Ltd for

Zirbac DLK Ltd

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WORKS**

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1.0 Introduction

This report assesses the potential townscape and visual impacts of a proposed Large-scale Residential Development at Hill Street, Dundalk, Co. Louth.

1.1 Development Description

The proposed large scale residential development (LRD) at Hill Street, Dundalk will consist of 194 no. apartments and childcare facility in 8no. distinctive blocks (A to H) ranging in height from part one storey to five storeys in height across the site together with all associated public, communal and private open space, car parking, cycle parking and site services.

In order to preserve the integrity of the existing cycle-track and the open section of the River Blackwater that run north-south broadly through the centre of the site, two separate vehicular accesses are proposed to serve the development. The first vehicular access will be a new access onto Dublin Road / Hill Street and will serve 75 no. dwellings. The second vehicular access is the existing access road onto Dublin Road at Mourne View Hall which will provide access to 119no. apartments.

Site development works will include regrading of the site to increase site levels and the provision of an overflow area for the Blackwater River.

1.2 Townscape and Visual Impact Assessment Methodology

The assessment was carried out with reference to the Landscape Institute *Guidelines for Landscape and Visual Impact Assessment 2013 (GLVIA)*, the Institute's Information Note *Townscape Character Assessment 2017*, and the EPA *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports 2022*.

The assessment methodology, including explanation of the criteria and terms used, is provided in Appendix 1. The assessment was carried out by Richard Butler MILI MIPI of Model Works Ltd.

The European Landscape Convention defines landscape as *“an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors”*. The word ‘townscape’ is used 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.

The GLVIA requires that the effects on views and visual amenity be assessed separately from the effects on the landscape/townscape, although the topics are linked:

- Visual impact assessment is concerned with changes that arise in the composition of available views, the response of people to those changes and the overall effects on the area's visual amenity. The effects on 10 no. representative viewpoints in the receiving environment are assessed in Section 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 effects on the townscape are assessed in Chapter 6.

2.0 The Site and Receiving Environment

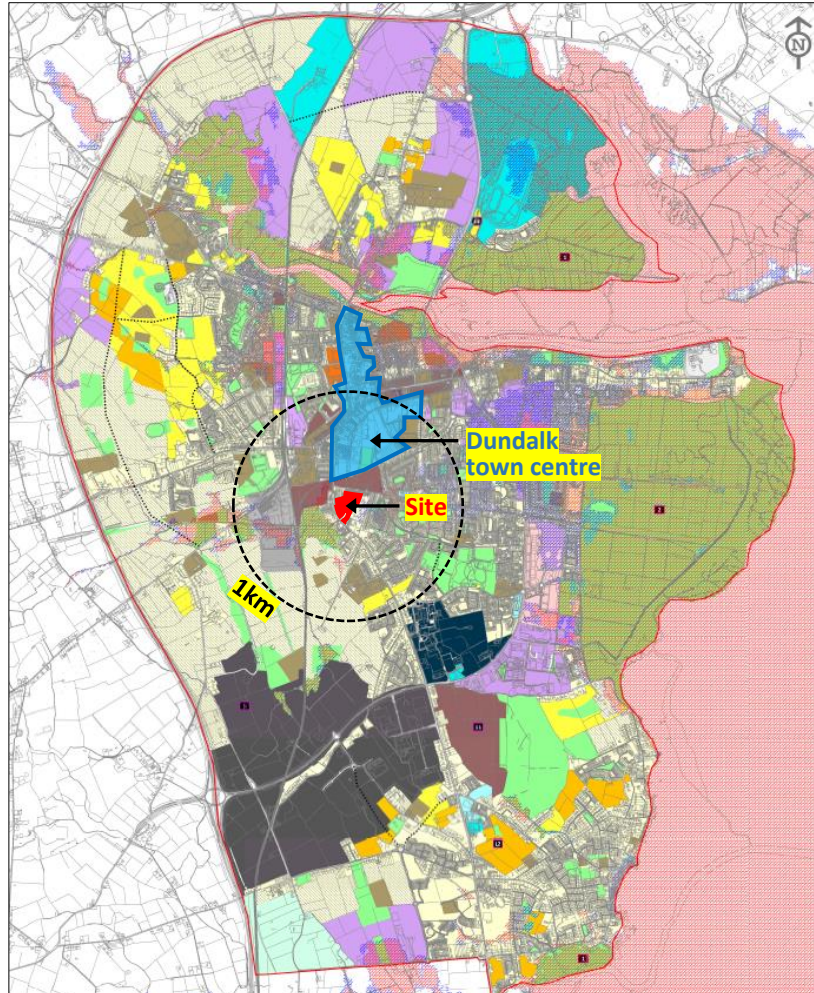
2.1 Site Location

The site is located on Hill Street/Dublin Road just to the south of the urban core of Dundalk, well within the town's urban footprint (see Figure 1). Being centrally located, the site is within 1km (therefore walking distance) from:

- Market Square, the historic town centre (the 'town centre' zoning extends to within 200m from the site);
- Dundalk railway station;
- Retail facilities including Tesco Extra (200m from site), Lidl (125m) and Marshes shopping centre (c. 750m);
- A number of schools including Louth Mixed National School and Dundalk Grammar School;
- Dundalk Institute of Technology;
- Louth County Hospital;
- Various open space and sports facilities, including GAA and soccer clubs;
- Townparks and Brewery Business Parks and various other places of employment.

The site thus benefits from a high level of access to the full range of urban amenities and services, and is zoned for residential use to take advantage of this location.

Figure 1: Site location on the Louth County Development Plan 2021-2027 zoning map for Dundalk



In the Louth County Development Plan 2021-2027 (LCDP) - in accordance with the National Planning Framework and the Eastern and Midland Regional Spatial and Economic Strategy (RSES) - Dundalk is classified as a **Regional Growth Centre**. The town is thus intended to *“support the direction of significant population and economic growth to ensure these centres reach sufficient scale, to serve as economic drivers for the Region and implement effective regional development”* (LCDP, p.2-8).

The subject site, as a large, residential-zoned land parcel within Dundalk's existing urban footprint, within walking distance from the town centre, has the potential to make a significant contribution to achieving the town's sustainable compact growth objective. The proposed development seeks to realise this potential with a medium density development (63 dwellings per hectare) comprised of duplex blocks and apartment buildings up to five storeys tall.

This development typology has implications for the townscape character of the receiving environment and the composition of views in the area. This report assesses the significance of those changes.

2.2 The Site

The site is an irregularly shaped greenfield land parcel of 3.05 ha (see Figure 2 below). While the majority of the site can be defined as 'backland' (located to the rear of a strip of urban roadside development), it has c. 110m frontage to Hill Street to the west (see Photo 1). Avenue Road passes just to the north.

The site is accessed via an existing road leading from Hill Street/Dublin Road to the Mourne View Hall apartments (see Photo 2), which are located at the centre of the backland area, adjacent to the site.

As indicated by the street name, Hill Street, the site is situated on a rise. The western part of the lands is most elevated, and the topography falls to the east. The elevation gives the site environs panoramic views east over the urban area towards the coast and the distant Mourne Mountains.

The site is disturbed in places, but is mostly covered in rough grassland and scrub. This contrasts with the urban elements in the landscape (the buildings and streets), giving the area a somewhat unkempt or incomplete appearance (refer to Photos 1 and 2, and Section 2.3 below). The notable landscape features on the site include:

- A canalised stretch of the Blackwater River, which runs in a narrow channel from a culvert at the centre of the site, along part of the west boundary, before turning east to run along the north boundary (to the rear of the houses fronting Avenue Road);
- A pedestrian and cycle route/greenway, which runs across the site, connecting Hill Street and Avenue Road (Photo 3).

Figure 2: The site and immediate environs



Photo 1: The site frontage to Hill Street, showing the unkempt grassland and scrub



Photo 2: A view of the Mourne View Hall apartments, with the site to the left of the road



Photo 3: A view from the north west corner of the site, along the existing greenway



2.3 Historic Development of the Site Environs

The Ordnance Survey 25 Inch map (surveyed 1897-1913 – Figure 3) shows that Hill Street and Avenue Road are long established elements of Dundalk’s urban structure. The map shows a small satellite urban area at their junction, south of the main urban area and a branch of the Great Northern Railway (since removed, with a road built on its alignment). Both streets were lined by houses of urban typology/character - terraced red brick houses or bungalows. In the corner to the south east of the junction, behind Richmond House, was a lane lined by small artisans’ cottages – Gosling’s Terrace. These cottages remain alongside the site’s north west boundary.

When the southward suburban expansion of Dundalk took place in the 20th century, this leapfrogged the site, resulting in a gap in the townscape. This can be clearly seen in the aerial photograph, Figure 4, below. There is a distinct area - which includes Hill, Street, Avenue Road, Mourne View and the site – that is diverse in character and somewhat lacking in coherence. The prospect of the site’s development creates the potential to consolidate this area and improve its integration into the wider townscape, which has evolved while the site lay unused.

Figure 3: OS 25 Inch map (early 20th century), showing the seed of an urban area at the junction of Hill Street and Avenue Road, to the south of the main urban area of Dundalk

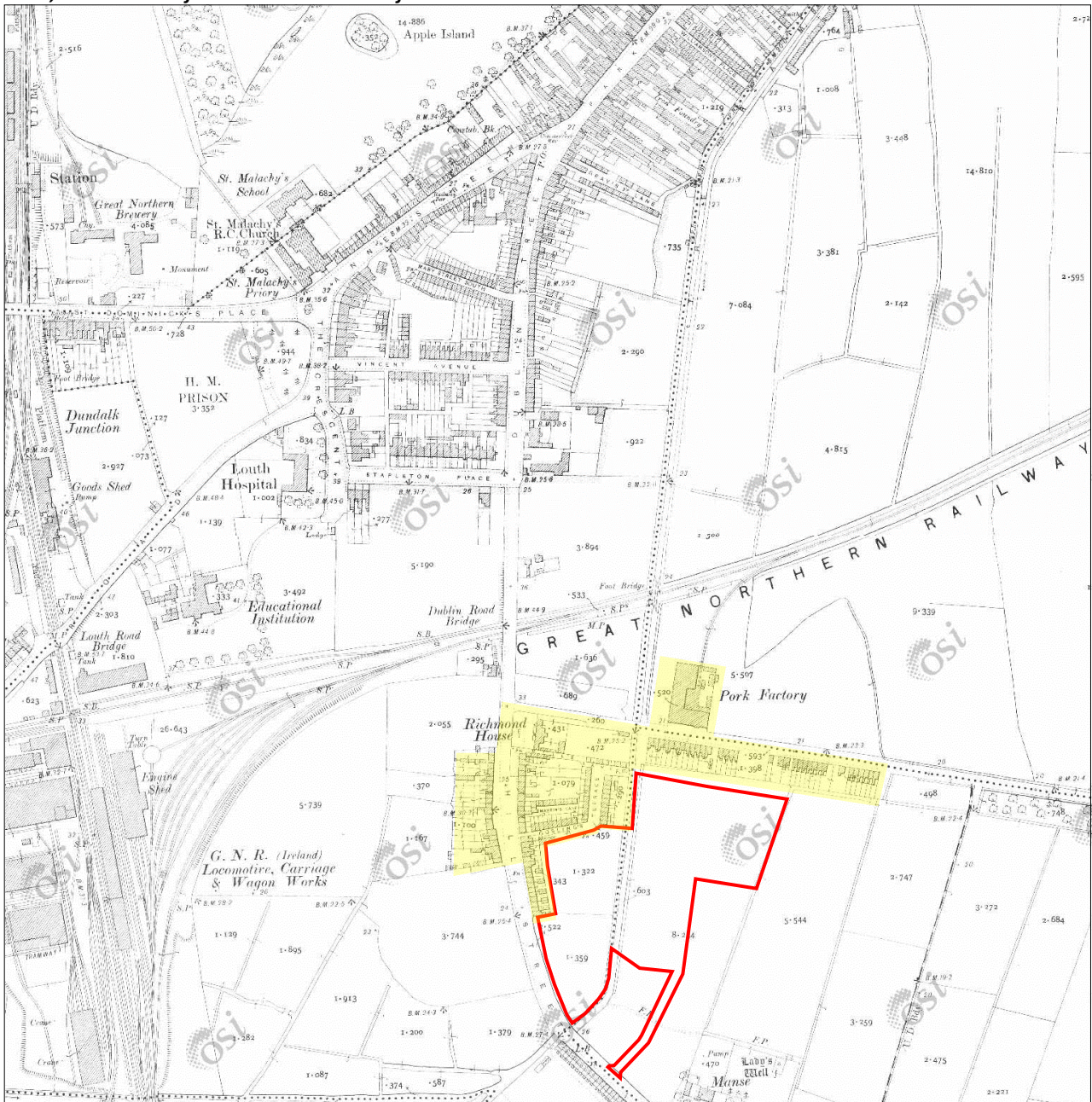


Figure 4: Townscape character of the receiving environment



2.4 Townscape Character of the Receiving Environment

- Figure 4 shows that the southward suburban expansion of Dundalk leapfrogged the historic satellite urban area at the junction of Hill Street and Avenue Road (see Figure 3) and the subject site.
- The site now forms part of an area of indistinct character, comprised of the following diverse elements:
 - Hill Street, Avenue Road and their junction;
 - An early core of urban-typology housing along these roads;
 - A large area of unused land (of which the site is part) to the rear of the housing along Avenue Road and Hill Street;
 - Mid-20th century estates west of Hill Street (Hughes Park and Ladywell Square);
 - A small cluster of light industrial premises (now disused) at the entrance to Mourne View;
 - The Mourne View Hall apartment development in the centre of these lands, isolated from the surrounding townscape.
- To the east of this area is a large area of 20th century suburban character (shaded yellow on Figure 4) - characterised by estates of terraced and semi-detached houses and a fragmented open space network.
- To the north of Avenue Road and west of Hill Street is an area zoned 'mixed use' (shaded brown). This area includes the Lidl supermarket, a large ESB facility, and extensive unused lands to the west between Hill Street and the railway line.
- North of this mixed use zoned area is another area (shaded blue on Figure 4) of mixed use - although predominantly retail - which forms part of the 'town centre' zoning.
- To the west of Hill Street, between the the Hughes Park and Ladywell Square estates and the railway line is a large area of 'Open Space' zoning.

In summary, the townscape of the receiving environment - including the site's immediate environs - is of mixed character, lacking in coherence, and in places appearing incomplete and even unsightly due to the high proportion of unused land.

2.5 Key Receptors of Potential Townscape and Visual Change

2.5.1 Hill Street/Dublin Road West of the Site

The Dublin Road – becoming Hill Street as it passes by the site –was historically the main southern route of entry to/exit from Dundalk. It remains an important thoroughfare in the urban structure, linking the town centre to (a) Dundalk’s extensive southern suburbs, (b) Louth County Hospital, (c) Dundalk Institute of Technology, (d) the N52 Inner Relief Road, and (e) Dundalk Science and Technology Park and Xerox Technology Park.

The townscape character along the road varies along its length, depending on the nature of the adjacent development. Travelling north towards the town centre, for a stretch before arriving at the site the road corridor is leafy suburban in character. Where the road arrives at Mourne View (the southern extent of the site), the character and visual amenity of the road corridor deteriorate. A disused petrol station and light industrial premises are unsightly; the Mourne View Hall apartments appear isolated in the landscape; the site in its unused, unkempt condition gives the townscape an incomplete appearance. This is particularly unfortunate as this is the final approach to the gateway to Dundalk town centre.

As Hill Street passes the site, approaching the junction with Avenue Road, the road corridor becomes more urban in character (owing to the red brick terraced houses fronting the street) – although at the junction itself and as the road rises to cross the former railway line, further unused lands add to the incomplete appearance of the townscape.

There is considerable capacity for change to the Hill Street corridor, to consolidate the urban character on the approach to the town centre.

Photo 4: The site frontage to Hill Street, showing its contribution to the mixed character and ‘unfinished’ appearance of the townscape. A disused petrol station beside the site, and the isolated position of the Mourne View Hall apartments contributes further to this character



2.5.2 Houses including Hughes Park and Ladywell Square estates along Hill Street

As well as being a key thoroughfare in the townscape, Hill Street is a residential street, lined by houses on both sides. The houses on the east side of the street back onto the subject site and thus have direct views of the site from their rear windows and gardens. The houses across the street, and in the two estates on the west side of the street, have views towards the site from their domestic environs.

Photo 5: A view towards the site from Hughes Park, showing the end of the terrace that backs onto the site on the east side of Hill Street, and the Mourne View Hall apartments in the distance, appearing isolated surrounded by the undeveloped site



These residential receptors are more sensitive to change in their environs but could also benefit from sensitive development on the site, to consolidate the urban character of the neighbourhood.

2.5.3 Gosling's Terrace

Gosling's Terrace is a small neighbourhood of terraced bungalows positioned in the corner between Hill Street and Avenue Road. One of the two terraces faces the site across the narrow road (Gosling's Terrace – see Photo 6), and the other terrace backs onto the site with the existing greenway running behind the houses.

Although the houses are small in stature, they are an urban typology and they would not be out of place in a more built-up environment. Therefore, there is some capacity to accommodate sensitive change in the Gosling's Terrace area.

Photo 6: The terraced bungalows of Gosling's Terrace facing the site across the narrow road



Photo 7: The greenway running from Avenue Road across the site, to the rear of the Gosling's Terrace houses (ahead to the right – the garden wall to the left is a house fronting Avenue Road)



2.5.4 Avenue Road

Like Hill Street, Avenue Road is a long-standing element of Dundalk's townscape, predating the 20th century suburban expansion of the town (see Figure 3 above). The street is lined on its south side by terraced red brick two storey houses, which give the street a distinctly urban character. These houses back onto the site.

It appears that, at the time of construction of Avenue Street and the houses, a more rapid expansion of Dundalk's urban area was possibly envisaged, and that Avenue Street would be incorporated into the town centre. This did not transpire, and for a period street appeared somewhat out of character with some of the suburban housing and retail developments in its environs.

This is changing however, with the recent construction of the Avenue Road Centre (Photo 9) and the ongoing construction of a mixed use development of distinctly urban typology and character at the corner of Avenue Road and Hill Street (Figure 5 overleaf).

Photo 8: The view east along Avenue Road showing the terraced houses that back onto the site's north boundary. The greenway enters the site from Avenue Road beside the end-of-terrace house



Photo 9: The urbanising and modernising effect of the Avenue Road Centre on the street and the local townscape



Photo 10: A view along Avenue Road towards the Hill Street junction, showing a five storey mixed use development under construction, causing a significant shift in townscape character towards a more contemporary urban condition



2.5.5 Mourne View Hall

Mourne View Hall is an apartment development built in the middle of the large unused parcel of land (of which the site is a part) in the corner between Dublin Road/Hill Street and Avenue Road (see Figure 4 above). Surrounded by scrubby grassland, the building appears isolated and out of place, and this exacerbates its modest design and material quality. As a receptor, Mourne View Hall is not sensitive to townscape and visual change of the nature proposed. It could only benefit from development that integrates it into the townscape, reduces its feeling of isolation and reduces its own visibility from the surroundings.

Photo 11: The view along the access road to Mourne View Hall. The disturbed area to the left is the site of a former light industrial premises, now demolished



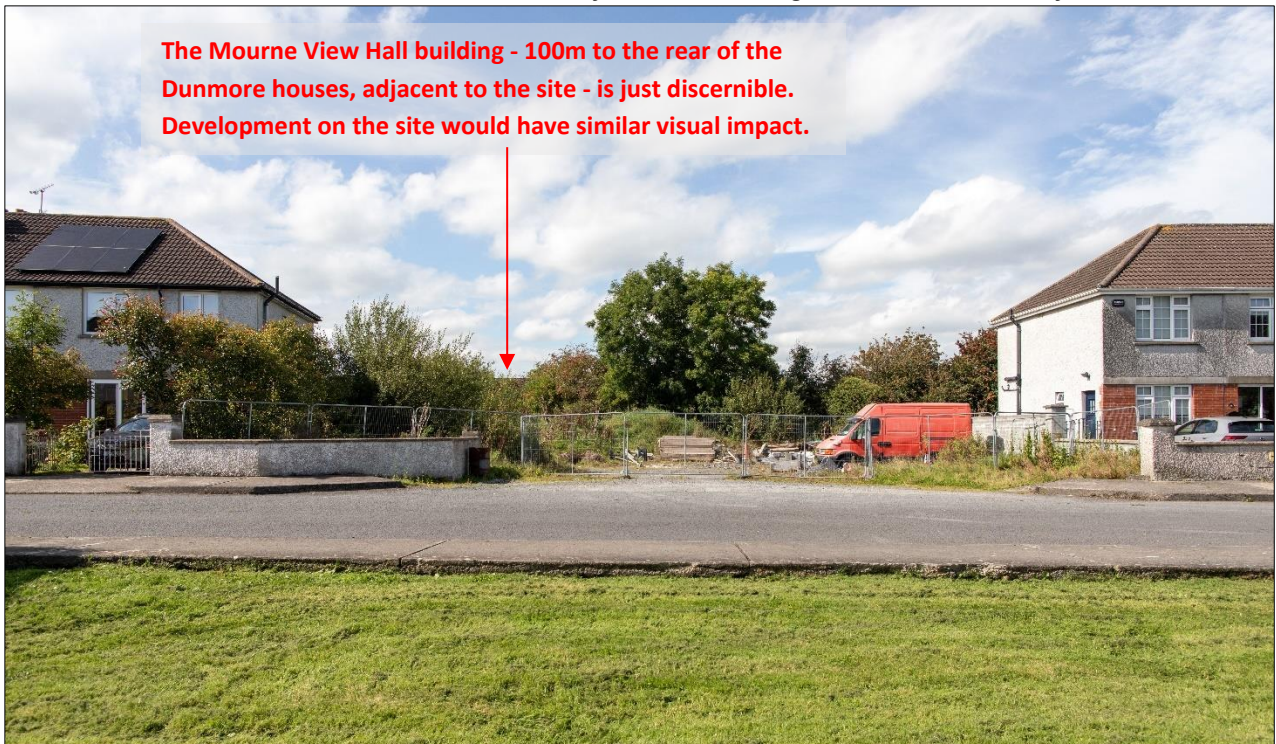
Photo 12: A view from the rear boundary of the houses fronting Avenue Road, showing the relationship between the houses and the Mourne View Hall apartments, which appear isolated and out of place



The areas described in Section 2.5.1-2.5.5 above are the main potential receptors of change on the site. The assessment of visual and townscape effects in Sections 5 and 6 below focuses on these areas.

To the east of the site is an extensive suburban area, with Dunmore the nearest street to the site (see Figure 4). The houses on the west side of the street are over 100m from the site, and separated from it by an area of unused, scrubby land (similar in condition to the site). This area between the site and Dunmore would buffer the Dunmore neighbourhood from any significant townscape or visual effects from the proposed development.

Photo 13: A view between two houses on the west side of Dunmore, the neighbourhood to the east of the site



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."

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* higher density development typologies, and taller buildings than heretofore, especially on sites not in 'optimal usage or format'. 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.

3.1.3 Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities

The *Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities* (2024) sets out policy and guidance in relation to the planning and development of urban and rural settlements with a focus on residential development and the creation of compact sustainable settlements.

The Guidelines state: *"The NPF targets for infill and brownfield development recognise that there is significant capacity within all settlements to accommodate a growing economy and a growing population and to enhance placemaking and restore nature and biodiversity...*

"To achieve compact growth, it will also be necessary to increase the scale of new buildings in all parts of our cities and towns, with highest densities at the most central and accessible urban locations, particularly in city centres and close to public transport nodes and interchanges. It will also be necessary to adapt the scale and form of development to the receiving environment and to ensure a proportionate response. Higher densities and taller buildings that exceed the traditional scale will be encouraged in the most central and accessible parts of our cities and large towns, particularly in large regeneration areas, and subject to the protection of historic fabric, character, amenity, natural heritage, biodiversity and environmental quality. Mid-rise medium density housing will have a critical role to play outside of the urban cores at accessible and intermediate locations in particular, in combination with traditional housing. This approach will provide greater diversity in housing stock at all locations and support a critical mass of population that will make services, including public transport, more viable."

Dundalk falls into the settlement category 'Regional Growth Centre'. The Guidelines state: *"The strategy for the Regional Growth Centres is to support consolidation within and close to the existing built-up footprint".*

"The key priorities for the growth of Regional Growth Centres in order of priority are to:

- (a) plan for an integrated and connected settlement overall, avoiding the displacement of development generated by economic drivers in the Regional Growth Centre to smaller towns and villages and rural areas in the hinterland,*
- (b) strengthen town centres,*
- (c) protect, restore and enhance historic fabric, character, amenity, natural heritage, biodiversity and environmental quality,*
- (d) realise opportunities for adaptation and reuse of existing buildings and for backland, brownfield and infill development, and*
- (e) deliver brownfield and infill development at scale at suitable strategic and sustainable development locations within the existing built up footprint of the town, and*

(f) deliver sequential and sustainable urban extension at suitable locations that are closest to the urban core and are integrated into, or can be integrated into, the existing built up footprint of the settlement.

Table 3.4 of the Guidelines outlines residential density ranges for Regional Growth Centres, with ranges provided for the following area types: 'Centre and Urban Neighbourhood' and 'Suburban/Urban Extension'. **The subject site can be categorised 'Centre and Urban Neighbourhood'** which is defined in the Guidelines as follows:

*"The centre and urban neighbourhoods category includes: (i) the town centre and immediately surrounding neighbourhoods and (ii) strategic and sustainable development locations that are within the existing built-up footprint. It is a policy and objective of these Guidelines that **residential densities in the range 50-150 dph (net) shall generally be applied in centres and urban neighbourhoods.**"*

The Guidelines note that the density ranges should be considered and refined based on considerations of proximity and accessibility to services and local character and amenity of the area. The Guidelines state:

*"While considerations of centrality and accessibility will have a significant bearing on density, **it is also necessary to ensure that the quantum and scale of development at all locations can integrate successfully into the receiving environment. New development should respond to the receiving environment in a positive way and should not result in a significant negative impact on character (including historic character), amenity or the natural environment.***

- (a) **The evaluation of impact on local character should focus on the defining characteristics of an area, including for example, the prevailing scale and mass of buildings, urban grain and architectural language, any particular sensitivities and the capacity of the area for change.** While it is not necessary to replicate the scale and mass of existing buildings, as most urban areas have significant capacity to accommodate change, it will be necessary to respond in a positive and proportionate way to the receiving context through site responsive design.*
- (b) Historic environments (built and landscape heritage) can be particularly sensitive to change. It is a recommendation of these Guidelines that a Built Heritage Character Assessment inform the preparation of statutory development plans that relate to historic environments...*
- (c) Evaluation of impact on the environment and on protected habitats and species must be considered under the requirements of the Environmental Impact Assessment and Habitats Directives. Development proposals should seek to protect and enhance important natural features (habitats and species) and should avoid the degradation of ecosystems...*
- (d) **It will be necessary to consider the impact of a proposed development on the amenities of residential properties that are in close proximity to a development site.** The key considerations should include privacy, daylight and sunlight, and microclimate. These considerations are addressed in more detail in Chapter 5 Development Standards.*
- (e) In all settlements, it will be important to ensure that water supply and wastewater networks (including treatment works) can service any new development.*

In considering impact on character and amenity as part of the assessment of a planning application, it will be important to detail the evaluation process and to draw clear and reasoned conclusions in relation to the nature and extent of potential impacts. It may not be possible in all cases to mitigate against negative impacts on character (including historic character) and amenity. In such cases, the significance of impact will need to be determined and where it is intended to grant permission for a development justified by reasoned conclusions.

Specialist technical assessments and computer-generated visual aids can assist in the evaluation of more complex development proposals and in particular, where a proposal deviates from the established scale, mass or character or is situated in a sensitive context. In order to consider larger proposals in an integrated and informed way, an

Urban Design Statement that addresses the proposal from an architectural and urban design perspective should form part of the required documentation. Refer to Appendix C for thresholds.

This LVIA report and the accompanying photomontages are intended to satisfy the above requirements of the Guidelines.

3.2 Louth County Development Plan 2021-2027 (LCDP)

3.2.1 Land Use Zoning

The site is zoned **A1 Existing Residential**, for which the following guidance is given:

"The objective for this zoning is to conserve and enhance the quality and character of established residential communities and protect their amenities...

"Infill developments... will be considered where they are appropriate to the character and pattern of development in the area and do not significantly affect the amenities of surrounding properties."

There are no protected structures on or adjacent to the site, nor any Architectural Conservation Areas in the vicinity. The nearest cultural heritage site is the Ladywell Shrine (protected structure) to the south east of the site (blue dot symbol on Figure 6). There is no potential for the proposed development to significantly affect that site, although the development would change the character of the shrine's townscape context.

There are no natural heritage designations/protections on or in the vicinity of the site, although there is a 'Trees and Woodland of Special Amenity Value' symbol on adjacent undeveloped land to the east of the site, behind the houses of Dunmore.

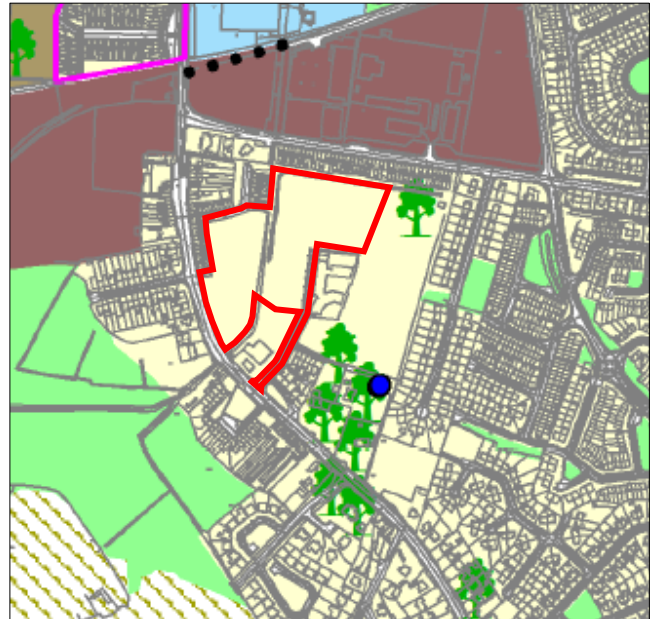
3.2.2 Dundalk – Residential Development

Section 2.14.5 of the LCDP LAP states: *"Residential development will focus on the delivery of high quality designed buildings and spaces that can meet the housing needs of all members of the community, regardless of age or ability, and provide connectivity and permeability between existing and future neighbourhood areas. In order to achieve compact growth higher density developments will be required, particularly on centrally located lands or lands well connected to the town centre."*

3.2.3 Compact Growth

Section 2.6.6 of the LCDP states: *"An overriding objective of both the NPF and the RSES is the need to achieve ambitious targets for compact growth in urban areas. Louth is required to deliver at least 30% of all new homes within existing built up footprints (NPO 3c). Achieving this target can be realised through urban regeneration and infill/brownfield site development, which will contribute to sequential, sustainable and compact growth, revitalisation of existing settlements of all scales and transition to a low carbon, climate resilient society..."*

Figure 6: Louth County Development Plan 2021-2027 – Dundalk Composite Map



“This compact growth will be delivered in central locations of these settlements and along key transport corridors on lands zoned for town centre, residential, or mixed uses.”

3.2.4 Sustainable Neighbourhoods and Communities

Section 3.6 of the LCDP states: “As we strive to create more compact settlements and facilitate population growth in a consolidated urban environment, it is critical that such growth provides for the creation of sustainable, healthier neighbourhoods and communities. This can be achieved by:

- Connecting residential, employment, commercial and recreational areas with footpaths, cycle paths and public transport;
- Promoting wellbeing and an active lifestyle in the local community;
- Engagement with the local community and promoting sustainable practices such as energy and water conservation and waste reduction;
- Promoting social integration that supports the creation of mixed tenure communities where there is an appropriate mix of housing to meet the needs of the entire community; and
- Creating safe, accessible neighbourhoods that encourage more social interaction and outdoor activities.”

“This Plan... will promote healthy living by encouraging compact growth and the development of infill and brownfield sites in preference to edge of centre greenfield locations, and promote quality residential developments with a suitable mix of housing in proximity to local services and community and recreational facilities.”

3.2.5 Densities

Section 3.11 of the LCDP states: “As part of the strategy of securing more compact growth and consolidating development in central locations there will be a greater focus on delivering developments at a higher density.

Such an approach would make more effective use of land, would increase the critical mass of population in the urban core of settlements and maximise the return on infrastructure investment.

Depending on the built form of a development, different densities can be achieved. This can include apartment developments in courtyards or single/multiple blocks, terraces consisting of standard housing or apartments and duplex units, and detached and semi-detached units.

When identifying the potential density of a site, consideration must be given to the surrounding context and how the development would relate to the existing built form and character of its location.”

Policy Objective HOU 15: **“To promote development that facilitates a higher, sustainable density that supports compact growth and the consolidation of urban areas, which will be appropriate to the local context and enhance the local environment in which it is located.”**

3.2.6 Building Height

Section 3.12 of the LCDP states: “In the right location higher buildings can raise the profile of an area, signal change, support regeneration and create local employment opportunities.

National and Regional policy supports compact growth and consolidating and strengthening the existing built up areas of settlements. It is envisaged that this will be achieved by increasing the building height and density of residential development in urban settlements.

The traditional height of buildings in Louth consists of low rise buildings. In the town centre areas of Drogheda and Dundalk buildings are generally 2-3 storeys high. However, in recent years, a number of taller buildings have been developed for commercial and residential uses.

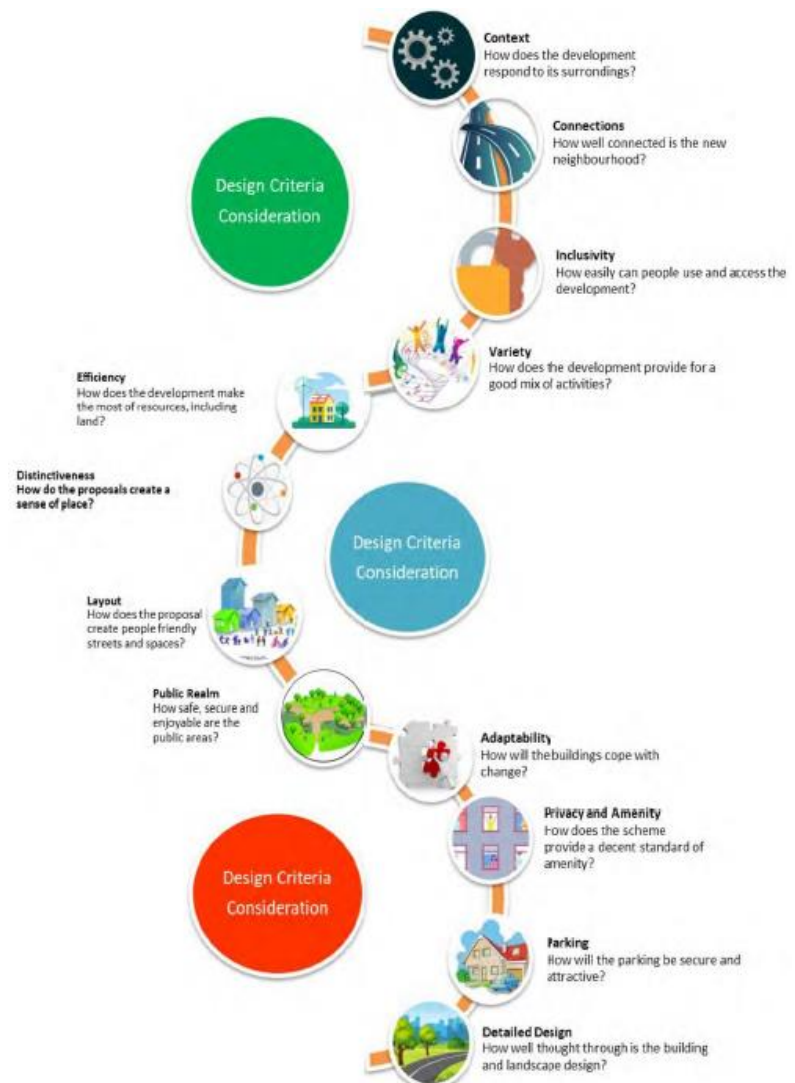
This Plan will support increased building heights particularly in Drogheda and Dundalk, signifying their importance as regional growth centres.

When identifying a potential location for higher buildings the following principles and criteria shall be taken into account:

- **Location:** Higher buildings will normally be located in central areas of towns close to public transport, in strategic locations at the entrance to towns or on strategic lands on the approach road to the town centre. The local area shall have the social and physical infrastructure to accommodate the increased levels of activity.
- **Strengthened Legibility:** Higher buildings shall be a positive landmark in the streetscape and shall respect and respond to the character of the area.
- **Strengthen the Sense of Place:** Higher buildings have an important role in shaping the perceptions of an area. If they are poorly designed or located in the wrong area they can create a negative image for an area.
- **Promote Quality Design:** Higher buildings must make a positive and lasting contribution to their location.
- **Protect and Enhance the Existing Streetscape and Heritage:** It is important that higher buildings do not disrupt or negatively impact on the historic areas of towns or intrude on important views. They should only be located in places that would enhance the character of an area.”

3.2.7 Principles for Quality Design and Layout

The LCDP refers to the national guidance documents *Sustainable Residential Development in Urban Areas Guidelines* and accompanying *Urban Design Manual – A Best Practice Guide* (2009) for guidance with respect to residential development design.



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 are the aspects of the proposal most relevant to the TVIA.

4.1 Layout and Building Height

The proposed arrangement of built form, circulation and open space has resulted from a protracted design process and consultation with Louth Co. Co. The key considerations that informed the layout include the alignment of (a) Hill Street to the west, (a) Gosling's Terrace to the north west, (c) the canalised section of the Blackwater River on the site, (d) the greenway across the site, and (e) the existing access road to Mourne View Hall.

The layout and building heights were also adjusted in consideration of the potential impacts on the existing houses of Hill Street to the west, Gosling's Terrace to the north west, Avenue Road to the north, and the apartments of Mourne View Hall to the east.

- **Block H.** Block H is a combined apartment and duplex building located in the south west corner of the site (the corner formed between Hill Street and the greenway). A four storey apartment building is proposed fronting Hill Street and turning the corner onto the site, thus providing frontage to both Hill Street and the greenway. A three storey duplex element extends from the apartment block alongside the greenway.

The V-shaped floorplan of Block H also creates a courtyard inside the entrance to the site from Hill Street. This is intended to contribute (along with the four storey contemporary building fronting the street – to place-making at the entrance.

- **Blocks E, F, G.** These are three storey duplex terraces aligned perpendicular to Hill Street, behind and to the side of the existing houses fronting Hill Street. The arrangement of Blocks E, F and G perpendicular to the street (and to the existing terrace) is intended to ensure permeability of the new built form to the rear of the houses. (A building parallel to the existing terrace would result in greater built/visual enclosure to the rear of the houses.)

At three storeys, these buildings are modest in height by modern standards (for mid to higher density development), and would function as a scale transition between the existing houses to the west and north, and the apartment blocks of the development.

Figure 6: Proposed layout



Figure 6 above shows that the combined area of Blocks E, F, G and H represents a rational and efficient use of the site area between Hill Street and the greenway. The arrangement of the buildings and circulation clearly responds to and complements the existing urban grain, and promotes east-west permeability (physical and visual) while also achieving built frontage to Hill Street and the greenway.

Figure 7: 3D view of the proposed development



- **Blocks A, B, C.** These are three apartment blocks in the central part of the site, east of the greenway and west of the Mourne View Hall access road. The three blocks are arranged in a kinked line, the angles used to create spaces on both the west and east sides of the buildings.

To the east, spaces are formed in front of Mourne View Hall (see Figure 7) and beside a large open space in the north east part of the site. To the west, two spaces are formed alongside the canalised Blackwater River and the parallel greenway (see Figure 9 overleaf).

Blocks A and B are five storeys tall. This takes advantage of their central position on the site, furthest from the smaller scale existing houses to the west (Hill Street), north west (Gosling's Terrace) and north (Avenue Road).

Block C in the northern part of the site is closer to Gosling's Terrace and Avenue Road. This building is four storeys, and steps down further towards its northern end (closer to the neighbouring houses - see Figure 10).

Figure 8: Proposed arrangement of height, responding to the scale of the surrounding development



- **Block D.** Block D is positioned in the eastern part of the site, to the north of Mourne View Hall. Its positioning complements the unusual floorplan of Mourne View Hall, with the intention of integrating the existing building into the expanded and evolved townscape. This intent can be seen in Figures 7 and 8 above. Block D is four storeys tall. This is one storey taller than Mourne View Hall. But can be considered modest for a modern urban apartment development.

Figure 9: CGI showing the kinked alignment of Blocks B and C to the right, forming an open space alongside the Blackwater River and the greenway, and the end of a duplex terrace to the left



Figure 10: CGI showing Block C stepping down in height towards its northern end to the rear of the Avenue Road houses



4.2 Architectural Treatment

The following description of the design approach and materials palette is taken from the Architectural Design Statement by Douglas Wallace Architects:

“The palette of finishes and materials draws on the best examples from past and present. Brick and render are used as the principal finishes to the elevations. Standing seam metal cladding is used on top floor of the apartment blocks, roofs of the duplex apartments and to further emphasize corner units. Mix of clay brick and textured render is a predominant wall material in the historic wall treatment in the neighbourhood. Pigmento Blue zinc echoes the colour of the traditional slate roofs in the local area. Brick and metal façade cladding used in conjunction with reconstituted stone and coloured render give visual interest, texture and variation to the elevational composition.”

The approach to materials adopted is to break down the greater mass through the use of complementary 3-dimensional massings to create varied and pleasing elevations. The undulating fronts of the balconies create a dynamic composition, and the angled walls of the ground floors of the end units in the apartment blocks and duplex units create visual guides around amenity spaces.

Slanted and set back walls of the top floors of duplex terraces together with the low pitch roof clad in metal reduce the visual impact of a 3-storey building, while the end units with flat roofs and parapet walls create visual dominants. All flat roofs of the apartment blocks and end units of the terraces are design as green roofs to reduce the rate of stormwater runoff and to reduce the urban heat island effect creating in the long term a pleasant local microclimate.”

Figure 11: CGI showing the proposed entrance to the new neighbourhood from Hill Street, with BloH providing built frontage to the street and forming a courtyard space inside the entrance. The varied use of materials divides the massing into smaller visual units, reducing the buildings' perceived scale



4.3 Landscape Proposals

The key element of the landscape/public realm proposals

- **Blackwater River corridor.** It is proposed to make the canalised Blackwater River a key/signature feature of the neighbourhood's open space network, with wetland planting on its banks and open spaces and seating areas positioned alongside the river to maximise its amenity value (see Figures 9 and 10 above).

- **Wetland area.** Another notable element of the landscape proposals is the wetland area in the north east part of the site, to the rear of the neighbouring houses fronting Avenue Road. This is a large detention basin - which could be used as amenity/play space when dry - surrounded by wetland planting and trees (see Figure 12).

Figure 12: The wetland area, with Block D to the left and Blocks B and C ahead on the far side of the space



- **Communal open spaces.** The positioning of Blocks A, B and C, and the floorplan of Block H, create communal open spaces alongside the circulation network and overlooked by the buildings. These spaces feature lawn or play surfaces, borders of ornamental or wetland planting, and a large number of trees.
- **Homezones.** Some of the roads (giving access to Blocks C, E and F) are designed as shared surfaces/homezones, prioritising pedestrian movement and safety.

Figure 13: Proposed circulation routes

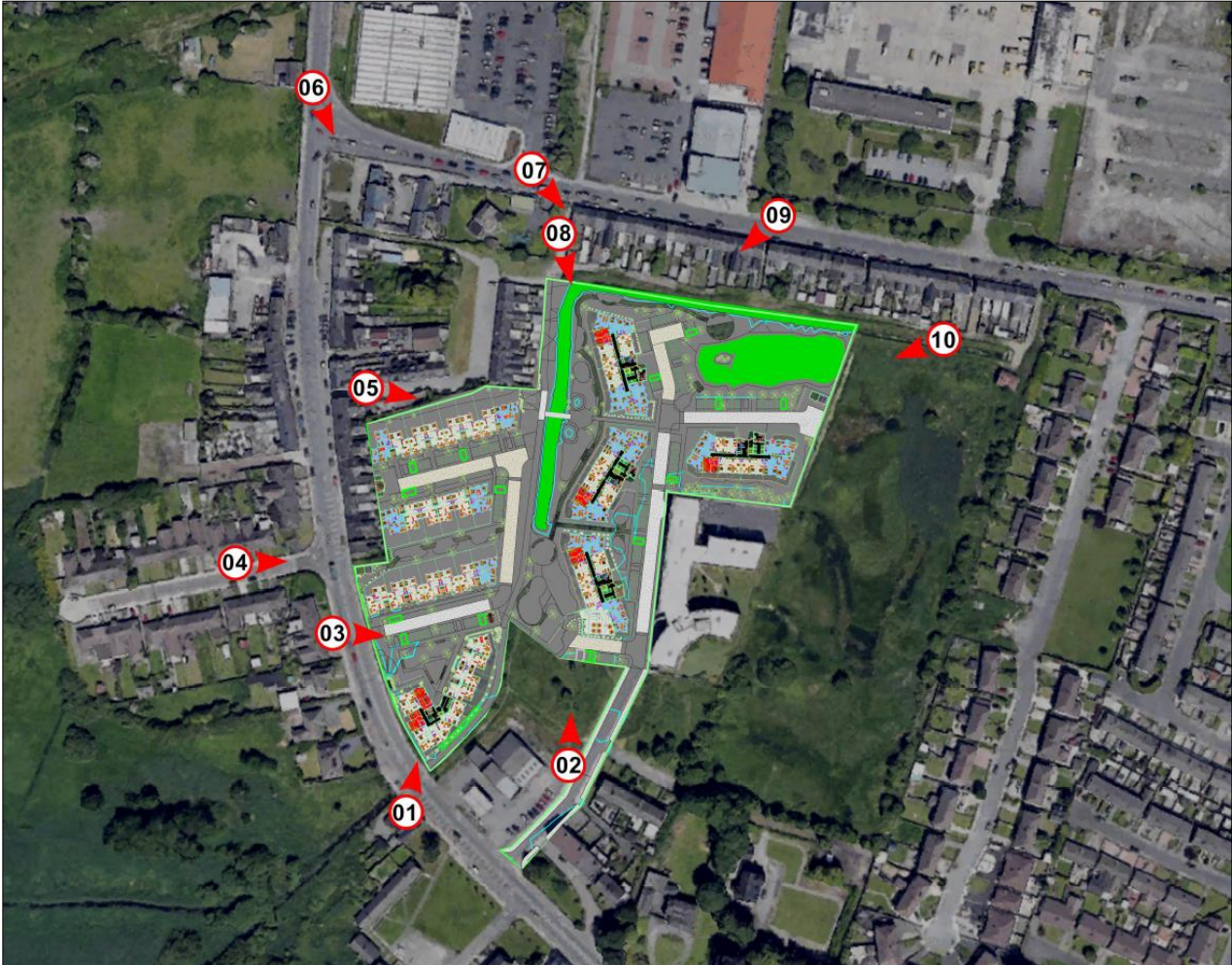


One of the features of the proposed development is its permeability and connectivity to the surrounding urban grain. In addition to the existing Mourne View road entering the site from Hill Street, another new vehicular entrance is proposed (between Blocks G and H), and a pedestrian entrance is proposed between Blocks F and G (entering the site beside the existing terrace of houses fronting Hill Street). These entrances would complement the existing greenway that crosses the site, linking Hill Street and Avenue Road.

5.0 Visual Effects Assessment

10 no. representative viewpoints (Figure 14) were selected for visual effects assessment informed by verified photomontages. The viewpoints were selected to represent the key receptors in the receiving environment (refer to Section 2.5 above) and to provide visualisations of the proposal from a range of directions and distance from the site.

Figure 14: Viewpoints for visual impact assessment



The effects on the 10 no. viewpoints are individually assessed below. For the methodology, terms and criteria used in the assessment refer to Appendix 1. The assessment should be read in conjunction with the verified photomontages provided under separate cover.

5.1 Viewpoint 1 – Hill Street Approaching Site from South

Existing View:

- In the foreground to the right is a disused light industrial premises, which detracts from the quality of the streetscape. The greenway can be seen entering the site beside the vacant premises. While the greenway is a valuable addition to the townscape, it does not appear welcoming or safe - due to the undeveloped condition of the site and the related lack of surveillance.
- Although not unsightly, the vacant site contributes to an 'incomplete' and unkempt appearance of the landscape overall. There is little indication, in the foreground, of the street's imminent arrival in Dundalk town centre. A small part of the Mourne View Hall apartments can be seen beyond the site.

- Ahead along the road, the streetscape is increasingly urban in character, with red brick houses and shops on both sides of the street.
- **Viewpoint sensitivity: Low-Medium.** There are few valued elements or characteristics of the view. As a result there is a high capacity to accommodate change. Only the red brick buildings ahead beyond the site are of value. The townscape could benefit from improved streetscape enclosure/definition, improved quality of the built environment, and improvements in legibility, passive surveillance, etc.

Proposed Change:

- **Magnitude of change: High.** Block H is a prominent addition in the foreground, the building shaped to provide built frontage to both Hill Street and the greenway. The Hill Street elevation kinks along its length, responding to the curve of the street. The end of Block G is just visible in the distance beyond the site entrance. Block A is visible to the right, within the site, beyond an area of open space.

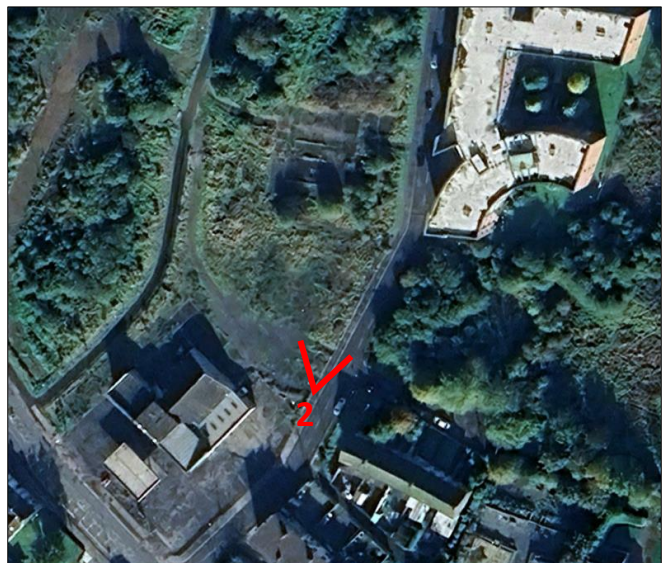
Significance of Effect:

- **Moderate positive.** The character of this stretch of Hill Street would be transformed by the addition of a building of contemporary urban typology, scale and architecture. The street would benefit from the built frontage, and there would be no sense of excessive enclosure. The greenway would benefit from similarly improved definition (by built form) and passive surveillance. There would be a considerable net improvement in the quality of the built environment, and in visual amenity as a result.

5.2 Viewpoint 2 – Mourne View Road/Terrace

Existing View:

- The view is taken from the road approaching Mourne View Hall, at the junction of Mourne View Terrace (a single terrace of houses facing Mourne View Hall across a patch of undeveloped land).
- Mourne View Hall is ahead to the right of the road. The three storey apartment building is not unsightly, but it is of modest quality. The surrounding scrubland makes the building seem isolated and the gives the landscape an unfinished appearance.
- **Viewpoint sensitivity: Low.** The view has no valued elements or characteristics. Even the green space is visibly disturbed and unkempt, limiting its visual amenity value. There is a high capacity to accommodate change.



Proposed Change:

- **Magnitude of change: High.** The five storey Block A is a prominent addition to the view, presenting its angled, narrow elevation to the entrance road, combining with Mourne View Hall to provide urban-type enclosure to the street. To the left of Block A is a small parkland area of lawn and play space, beds of ornamental planting, and trees. Further to the left are the ends of the duplex terraces. The building facades are highly articulated, with variations in material used to divide the massing into smaller visual units. The buildings are distinctive and attractive.

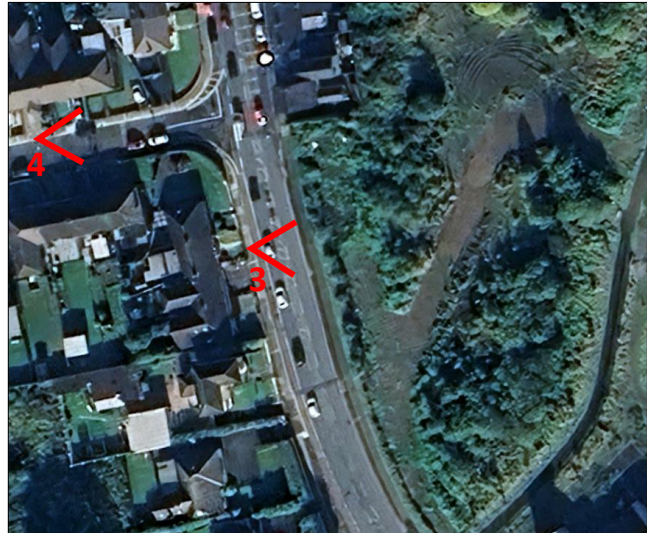
Significance of Effect:

- **Moderate positive.** In their positioning, typology and scale, the buildings would complement Mourne View Hall - defining a legible grain of streets and spaces. As well as providing structure to the landscape, the development would elevate the design and material quality of the built environment, substantially improving visual amenity.

5.3 Viewpoint 3 – Hill Street at Site Entrance

Existing View:

- The view is taken from the west side of Hill Street, looking east across the street towards the site. The vacant site is mostly hidden from view by the bank of scrubby vegetation on the roadside boundary. Mourne View Hall is visible in the distance beyond the site.
- **Viewpoint sensitivity: Medium.** The view has no valued elements or characteristics. It should be noted that this viewpoint is not in an outer-urban-edge location (which is the impression created by the view), but rather a position close to the centre of Dundalk (refer to Figure 1) on one of the town's main thoroughfares. There is a high capacity to accommodate change.
- However, the view also represents a row of houses across the street from the site, and these residential receptors raise the sensitivity of the viewpoint to medium.



Proposed Change:

- **Magnitude of change: Very High.** The view is transformed by the development. To the left is a three storey duplex terrace fronting the new road entering the site. To the right is Block H, providing built frontage to Hill Street, overlooking the entrance, and wrapping around a courtyard space to the right of the entrance road. In addition to circulation and parking, this space includes lawn and a play area, beds of ornamental planting, and trees. In the distance (beyond the greenway crossing the site) is Block A, rising to five storeys. There are two distinct building types – the apartments and duplex terraces. The facades of the buildings are articulated by large windows, projecting balconies, and variations in material.

Significance of Effect:

- **Significant positive.** The occupation of the vacant plot by a new residential neighbourhood would transform the view in a manner appropriate to the location. The arrangement of buildings, streets and space responds to the context (specifically to Hill Street and the greenway), creating a permeable and legible new neighbourhood. The buildings and public realm/landscaping are of appreciably high design and material quality, elevating the quality of the townscape overall.

5.4 Viewpoint 4 – Hughes Park

Existing View:

- Hughes Park is a single-street estate of one storey, red brick houses to the west of Hill Street. It is an attractive street, of urban character. In View 4, the houses on the far side of Hill Street (backing onto the site) can be seen, with a with an end of terrace, two storey ‘pop-up’ unit positioned opposite Hughes Park – a punctuation in the built form, responding to the junction and the house’s focal-point position.
- To the right of that house is the vacant site, covered in scrubby vegetation. The Mourne View Hall apartment building can be seen in the distance beyond the site.
- **Viewpoint sensitivity: Medium.** Hughes Street and the existing Hill Street red brick houses form an attractive character area, worthy of protection. This ends abruptly at the site boundary where there is clearly capacity for infill in the townscape/view.

Proposed Change:

- **Magnitude of change: Medium.** Block G is a prominent addition to the view, on the far side of Hill Street. The three storey terrace is positioned perpendicular to Hill Street (for physical and visual permeability of the built form), but the gable end is designed for street frontage. The architecture and materials are distinctly modern, deliberately in contrast to the neighbouring traditional red brick house. This view shows the separation distance maintained in respect of that house – with a new pedestrian entrance to the site provided between the old and new buildings. Parts of Blocks A and H are visible in the distance, giving depth/substance to the development.

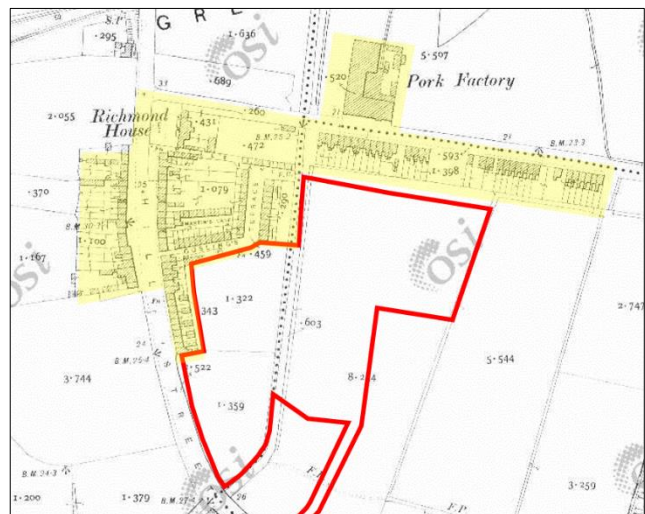
Significance of Effect:

- **Moderate positive.** The distinct character of Hughes Lane and the existing Hill Street houses would be retained and emphasised by the contrasting character of the new neighbourhood. Aspects of the proposal such as the new pedestrian entrance, the permeability of the built form, and the contemporary residential typologies, architecture and materials, would enhance the townscape in view.

5.5 Viewpoint 5 – Gosling’s Terrace

Existing View:

- Similar to Hughes Park, Gosling’s Terrace is a street/ neighbourhood of urban typology although the houses are particularly small in stature. At the time of its construction - like Avenue Road just to the north and Hill Street to the west – it appears that continued urbanisation of the area was anticipated (the area was a small satellite area of urban landscape at the outskirts of Dundalk), but the expected further urbanisation did not transpire. The small patch of urban character remained, somewhat isolated, while extensive 20th century suburban growth later took place to the east and south.

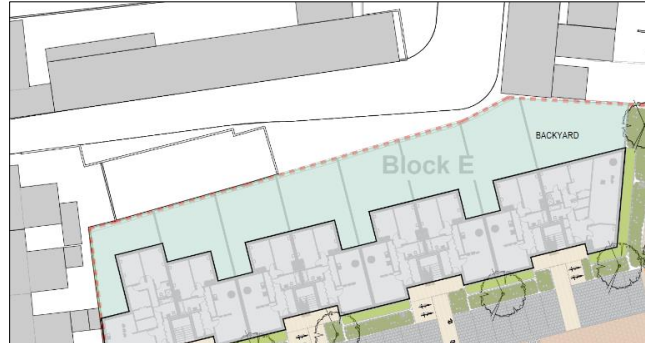


- Now, the Gosling’s Terrace houses look out at a vacant, overgrown plot across the narrow lane. The subject site is hidden from view by vegetation on the south side of the lane.

- **Viewpoint sensitivity: Medium.** As a residential receptor, Gosling’s Terrace is sensitive to change in its environs, and the greenery on the site does generate some visual amenity. However, there is also capacity for change, as the landscape in view across the lane appears abandoned/unkept. In the urban location, on lands zoned for residential use, this is not sustainable.

Proposed Change:

- **Magnitude of change: Medium.** Block E is a prominent addition to the view, aligned parallel with Gosling’s Terrace (the street and the houses) but set back behind a narrow plot across the street (external to the site). Therefore, there is a generous separation distance between the existing houses and the and the new building, and the step in scale (one storey to three storeys) does not appear excessive. There is no sense of excessive enclosure. Block E is designed as a double-fronted building. Therefore the north elevation in view is of equal design and material quality to the south elevation fronting the internal neighbourhood street.
- A small part of Block C is visible straight ahead behind the house at the end of the street. The step down in height towards the northern end of Block C avoids excessive intrusion.



Significance of Effect:

- **Moderate neutral.** The context of Gosling’s Terrace would be transformed by the development - with the occupation of the vacant site by a new residential estate. The change is entirely appropriate and was likely expected to occur at the time that Gosling’s Terrace was built. However, the loss of greenery from the view might be considered a loss of visual amenity, and therefore the effect is classified neutral.

5.6 Viewpoint 6 – Hill Street at Avenue Road Junction, Looking South

Existing View:

- This is a view from the road descending from a bridge over a former railway line. The elevation provides a panoramic view over the surrounding townscape.
- The townscape in view is of increasingly mixed character (see aerial photo right showing development under construction across the road, and Photo 10 above).
- Ahead along Hill Street are terraces of early 20th century houses, giving the street an urban character. Diagonally across the junction is Richmond House, of similar vintage to the Hill Street houses, with further houses to its rear.
- A part of Mourne View Hall can be seen in the distance.
- **Viewpoint sensitivity: Low-Medium.** This is a view from a key thoroughfare in Dundalk’s urban structure, not far from the town centre, with a variety of development in view (including a large multi-storey apartment development across the road). There is considerable capacity for change in the view.



Proposed Change:

- **Magnitude of change: Medium.** The apartment blocks B and C are visible between the houses to the left of Richmond House, with Block C visibly stepping down towards the houses. The top floor of a duplex terrace, Block E, is visible to the right of Richmond House, behind the Hill Street houses. None of the buildings is particularly prominent. They take their place comfortably in the townscape, filling a gap in the existing urban structure. The stepped/disaggregated form of Block C, complemented by variations in material (breaking the massing into smaller visual units), contributes to its easy integration into the townscape.

Significance of Effect:

- **Slight positive.** The development would take its place comfortably in the townscape, filling the gap that contributes to the currently weak/mixed character. The disaggregated form of Block C, complemented by variations in material (breaking the massing into smaller visual units), contributes to its easy integration into the townscape. There would be a strengthening of the urban character and legibility (by the creation of a new 'place' marked by the distinctive buildings), and no loss of any valued feature or characteristic of the view.

5.7 Viewpoint 7 – Avenue Road

Existing View:

- The view shows the distinctly urban typology of the Avenue Road houses (terraced, two storey, positioned close to the street with no front gardens), giving the street a strongly urban character with a high degree of visual enclosure - to the south.



- In contrast to the urban character of the street, the landscape to the south of the houses appears – and is – mostly vacant, although a small part of the Mourne View Hall building can be seen in the distance.
- It is not legible from this angle, but the greenway emerges from the site alongside the end of terrace house (a sign can be seen beside the house, as well as light standards indicating the greenway's alignment).
- **Viewpoint sensitivity: Low-Medium.** This is a view along a street of urban character, and one that is changing. Directly opposite the houses in view is the Avenue Road Centre (see Photo 9 above), and directly behind the viewpoint is a high density residential development currently under construction (Photo 10). There is thus plan-led change taking place in the townscape, and further change can be accommodated.

Proposed Change:

- **Magnitude of change: Low-Medium.** Blocks A, B and C are visible to the rear of the Avenue Road houses in the currently vacant area of the site. The buildings are not particularly tall, or prominent, and the nearest block steps down towards the houses. There is no sense of the development crowding or dominating the houses.

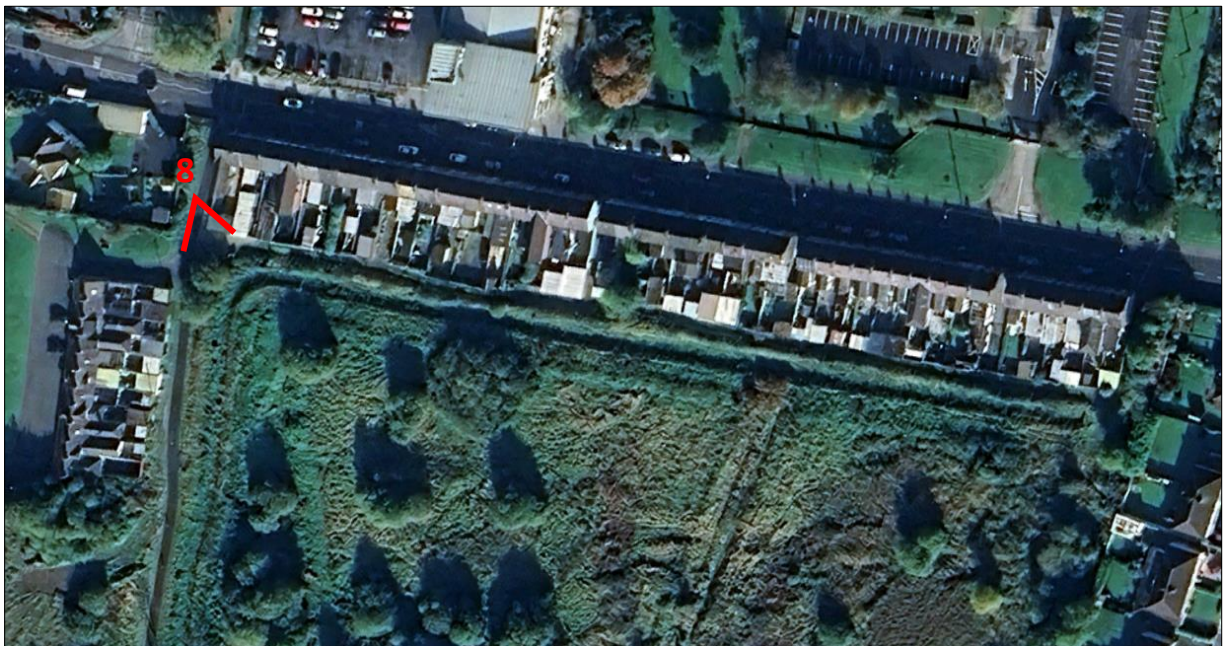
Significance of Effect:

- **Slight neutral.** The development would contribute to an ongoing shift in character along Avenue Road - towards a more contemporary urban condition. The view shows that there is sufficient separation distance between the houses and Block C, and that Block C is sufficiently modest in scale (four storeys, stepping down towards its northern end), to avoid any sense of the development crowding or dominating the houses. There would be no loss of any valued feature or characteristic of the view.

5.8 Viewpoint 8 – Greenway off Avenue Road

Existing View:

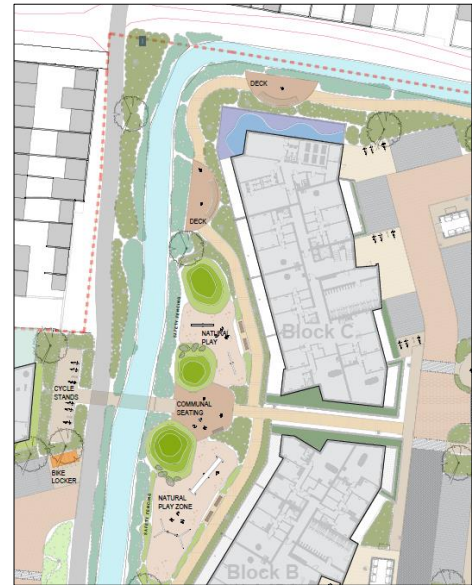
- This viewpoint was chosen to assess the impact on two receptors, (1) the users of the greenway and (2) the Avenue Road houses. The view is similar to the view that would be experienced from the back door or windows of the house beside the greenway (to the left in the view).



- Currently, the greenway passes behind the Avenue Road houses and Gosling's Terrace (to the right in the view), then through an area of scrubby grassland (the site) on the route to Hill Street. There is minimal passive surveillance of the greenway and this likely limits its usage.
- **Viewpoint sensitivity: Medium.** While the green open space of the site does generate some visual amenity, it is not designed or maintained as open space and its appearance is untidy. In the urban location, on lands zoned for residential use, there is capacity for change.

Proposed Change:

- **Magnitude of change: Medium.** Block C is visible over the rear boundary wall of the house. At four storeys, the building is not tall (for a contemporary urban development), and the setbacks of the upper floors at the northern end of the building are effective in avoiding excessive protrusion, visual enclosure or dominance.
- For users of the greenway, the view would be improved, with the greenway running alongside the Blackwater river flanked by strips of wetland planting, and a corridor of communal open space across the narrow river channel, overlooked by the new building.



Significance of Effect:

- **Moderate neutral/positive.** The effect on the rear outlook of the Avenue Road houses can be considered neutral – the green open space of the vacant site (which provides some visual amenity) being replaced by a development of a type suitable for the location, and of high design and material quality.
- The effects on users of the greenway would be positive. Not only would visual amenity be improved, the greenway would benefit from the passive surveillance and increased traffic/animation generated by the site's residential use.

5.9 Viewpoint 9 – Avenue Road

Existing View:

- This view was selected to assess whether the proposed development would protrude above the roofline of the Avenue Road houses in views from the street.



- **Viewpoint sensitivity: Low-Medium.** This is a view along a street of urban character, and one that is changing. Directly opposite the houses in view is the Avenue Road Centre (see Photo 9), a modern commercial building of three storeys. Towards the western end of the street, also in view from this location, is a high density residential development currently under construction. There is thus plan-led change taking place in the townscape, and further change can be accommodated.

Proposed Change:

- **Magnitude of change: Low.** The development is well below the roofline of the houses. Block D can be seen in the middle distance through the gap between the houses, but at this distance its visual presence is limited.

Significance of Effect:

- **Slight neutral.** The development would make a slight contribution to the ongoing shift in townscape character around Avenue Road - towards a more contemporary urban condition. There would be no loss of any valued feature or characteristic of the view.

5.10 Viewpoint 10 – Rear View from Avenue Road Houses

Existing View:

- This viewpoint was included to allow assessment of the potential effects on the rear views from the houses on Avenue Road. The gardens are all enclosed by high walls, which limit views of the site from the gardens and ground floor windows. However, the 1st floor windows of the houses afford views of the site over the garden walls.
- Currently, the vacant site is covered in scrub. The somewhat unsightly Mourne View Hall building is in the middle distance, appearing isolated in the otherwise undeveloped landscape.



- **Viewpoint sensitivity: Medium.** While the green space of the site does provide some visual amenity, it is not designed or maintained as open space and its appearance is untidy. In the urban location, on lands zoned for residential use, there is capacity for change.

Proposed Change:

- **Magnitude of change: Medium.** Blocks B, C and D are prominent additions to the view in the middle distance (this angle of view shows the ample separation distance between the new buildings and the houses). At four storeys, the buildings are not tall (for a contemporary urban development). The setbacks of the upper floors of Block C can be seen at its northern end, closest to the houses (to the right). The buildings are arranged around an open space (the wetland) in the near corner of the site.

Significance of Effect:

- **Moderate neutral.** The effect on the rear outlook of the Avenue Road houses would be neutral, the green open space of the vacant site (which provides some visual amenity) replaced by a development of a type suitable for the location, and of high design and material quality.

6.0 Townscape Effects Assessment

6.1 Townscape Sensitivity

The townscape sensitivity¹ of the receiving environment can be classified 'Low-Medium'.

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

Definition of medium sensitivity: *Areas where the landscape has certain valued elements, features or characteristics but where the character is mixed or not particularly strong, or has evidence of alteration, degradation or erosion of elements and characteristics. The landscape character is such that there is some capacity for change. These areas may be recognised in landscape policy at local or county level and the principle management objective may be to consolidate landscape character or facilitate appropriate, necessary change.*

The sensitivity classification reflects the following:

- Among the valued townscape elements in the receiving environment are the early 20th century houses on Hill Street, Avenue Road and Gosling's Terrace. These represent an historic period in Dundalk's development, and together they form a distinct local character area, which is of some value in the wider townscape.
- As residential receptors, these homes (and other more recently developed, one-off houses in the area) are sensitive to change in their environs.
- Other valued elements in the townscape include the canalised section of the Blackwater River on/ adjacent to the site, and the greenway that traverses the site between Hill Street and Avenue Road.
- **However, overall the townscape is of mixed or weak character, with evidence of ongoing alteration, and some areas appearing degraded.** Factors that contribute to this include:
 - The subject site, as part of a wider backland land parcel, remained (mostly) undeveloped through the 20th century. The expanding urban area leapfrogged this patch of undeveloped land, leaving a gap in the urban structure.
 - Where the site has frontage to Hill Street (c. 110m) there is a gap in the built frontage to the street, giving the street (and the wider townscape) an unfinished and sometimes unkempt appearance.
 - Certain plots/developments in the area, for example the disused light industrial premises beside the site entrance, detract from the character, quality and visual amenity of the townscape.
 - The Mourne View Hall development was a particularly unfortunate intervention in the townscape. The building is of modest architectural and material quality, but the more important factor is its

¹ The GLVIA states that landscape/townscape 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 townscape 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.

isolation in the townscape, being surrounded by the area of undeveloped land of which the site is a part. Mourne View Hall is a major contributor to the mixed/weak character of the townscape and the overall impression of the area being 'unfinished'.

- **This unfinished quality of the area can only be corrected by further development in the area to fill in and consolidate the townscape and counterbalance the weaknesses (such as Mourne View Hall and the vacant premises).**
- There are developments taking place on Avenue Road, such as the Avenue Road Centre and a large multi-storey residential/mixed use scheme at the corner of Hill Street, which are causing an important shift in character of the area, towards a more contemporary urban townscape. This is appropriate for the central location, close to the town centre, retail, schools, employment opportunities and public transport services.
- In summary, there is considerable capacity for change in the townscape (without loss of valued character or features), and in fact the townscape could benefit from change (to counteract some of the detracting characteristics and features). In addition to this, the site is zoned for residential use, and can be characterised as underutilised urban land and an infill opportunity. Hence the 'Low-Medium' sensitivity classification.

6.2 Magnitude of Townscape Change

The magnitude of landscape change which would result from the proposed development is 'Medium-High'.

Definition of medium magnitude of change: *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 (refer to Section 2.2, Appendix 1).*

Definition of high magnitude of change: *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.*

The magnitude of change classification reflects the following:

- At 3.05 ha the site is large, and the development - comprised of eight large buildings, circulation and a network of open space - is large (in spatial extent) for an infill development in the urban area.
- The development includes apartment buildings up to five storeys tall and duplex terraces of three storeys. These represent a contemporary high density urban residential development typology. This is not new to the area (Mourne View Hall and the SHD development under construction at the Avenue Road/Hill Street junction have already introduced higher density development to the townscape), but due to the scale of the site, the development would make a significant contribution to changing the townscape character.
- Although much of the site area can be characterised as 'backland', i.e. somewhat removed from the public realm, the site does have 110m of frontage to Hill Street - an important thoroughfare in Dundalk's urban structure – on an important approach to the town centre. The development would thus directly affect this key element of the townscape.
- The development would also directly affect neighbouring residential receptors on Hill Street, Gosling's Terrace, Avenue Road and Mourne View Hall, by introducing new buildings of contemporary urban typology, scale and architecture in their immediate vicinity (and views).

- The development would also directly affect the greenway that traverses the site, and the canalised section of the Blackwater River on the site. These are valued elements of the local green infrastructure network.
- In summary, the development would cause alteration to certain key elements of the townscape (e.g. Hill Street, the site's neighbouring residential receptors, the greenway and the Blackwater River), and, while not *initiating* a change in character, it would *contribute* to the change already underway in the area.

6.3 Conclusions - Significance and Quality of Townscape Effects

In summary, measuring (a) the sensitivity of the receiving environment (low-medium) against the magnitude of change (medium-high), **the overall significance of the townscape effects is predicted to be 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”.*

The more important classification (than significance) is the *quality* of the townscape effects, i.e. whether the proposed development would have a positive, neutral or negative effect on the townscape. **This assessment has found that the townscape effects would be overwhelmingly positive, for the following reasons:**

- The proposed buildings, streets and open spaces are positioned and aligned in direct response to the surrounding townscape. For example:
 - Block H is positioned to provide built frontage to Hill Street (and thus function as a gateway on the approach to the town centre) *and* to the greenway, thereby strengthening the definition and legibility of both these key elements of the townscape.
 - Blocks E, F and G are positioned and aligned to create a permeable built form between Hill Street and the centre of the site (as opposed to a solid wall of built form). As well as providing visual and physical permeability (in the form of two entrances from Hill Street), this minimises the visual effects on the houses fronting Hill Street, which back onto the site.
 - Block E, however, is aligned parallel with the terrace of bungalows on Gosling's Terrace. In that case, the new building is to the front of the existing houses (which is less impactful than being to the rear), and the separation distance is sufficient to avoid negative impacts.
 - Blocks A, B and C are positioned and aligned in response to the Blackwater River, the greenway and the Mourne View Hall Road. This response of the new built form to these elements will strengthen their position and status as spatial elements in the townscape.
 - The combination of Blocks A, B and D will embrace Mourne View Hall and thereby integrate it into the townscape.
 - Any significant effects on the houses of Avenue Road are avoided by (a) the positioning of the main open space (the 'wetland') in the north east corner of the site, (b) the alignment of Block C so that its narrow elevation faces the Avenue Road houses, and (c) the stepping down in height of Block C at its northern end.

The proposed layout thus responds to the existing townscape, and its net effect would be to strengthen the townscape, specifically the urban grain (the pattern of streets, blocks and open spaces).

- The building height also responds to the surrounding townscape. The greatest height (five storeys) is positioned in the east central part of the site, furthest from the existing houses to the north (Avenue Road, north west (Gosling's Terrace) and west (Hill Street). Blocks E, F and G, at three storeys, provide a transition in between the taller buildings and the smaller scale of the surrounding houses. This is a

rational response to the infill/densification opportunity presented by the site and the sensitivity of the neighbouring houses.

- The proposed development celebrates the two key green infrastructure assets on the site, the Blackwater River and the greenway. It does so by (a) retaining them, (b) using them as arranging elements of the open space and circulation networks (a series of new open spaces are positioned alongside the Blackwater and the greenway), and (c) enhancing them with soft and hard landscaping and seating to encourage use and appreciation (refer to Figures 9, 10).
- An important benefit of the proposed development would be the improved passive surveillance of the greenway. This would encourage use of the amenity, realising its full potential as a townscape asset.
- The design and material quality of the proposed development are of a high standard. The contemporary building typologies, architectural language and materials would ensure that the new neighbourhood is distinctive and recognisable, while the use of certain traditional materials (brick and render) would integrate it into the townscape.
- The design carefully employs variations in materials to break down the massing of the buildings into smaller visual units, to reduce and soften their visual presence. The photomontages and CGIs show this to be effective.
- The development is of sufficient scale and strength of architectural character to form a new neighbourhood/character area, which would complement the historic 'red brick and render' housing area of Hill Street, Gosling's Terrace and Avenue Road.
- Importantly, the development would also significantly reduce the existing negative effects of Mourne View Hall, by integrating that building into the expanded, diversified townscape.

For these reasons, the proposed development would have an overwhelmingly positive effect on the townscape. This assessment is borne out by the summary of the visual effects assessment below.

Table 2: Summary of visual effects assessment

No.	Viewpoint Location	Viewpoint Sensitivity	Magnitude of Change	Significance of Effects
01	Hill Street approaching site from south	Low-Medium	High	Moderate positive
02	Mourne View Road/Terrace	Low	High	Moderate positive
03	Hill Street at site entrance	Medium	Very High	Significant positive
04	Hughes Park	Medium	Medium	Moderate positive
05	Gosling's Terrace	Medium	Medium	Moderate neutral
06	Hill Street at Avenue Road Junction, looking south	Low-Medium	Medium	Slight positive
07	Avenue Road	Low-Medium	Low-Medium	Slight neutral
08	Greenway off Avenue Road	Medium	Medium	Moderate neutral/positive
09	Avenue Road	Low-Medium	Low	Slight neutral
10	Rear view from Avenue Road houses	Medium	Medium	Moderate neutral

End.

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

2.2 Magnitude of Landscape/Townscape Change

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

Table 2 Categories of Landscape/Townscape Change

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

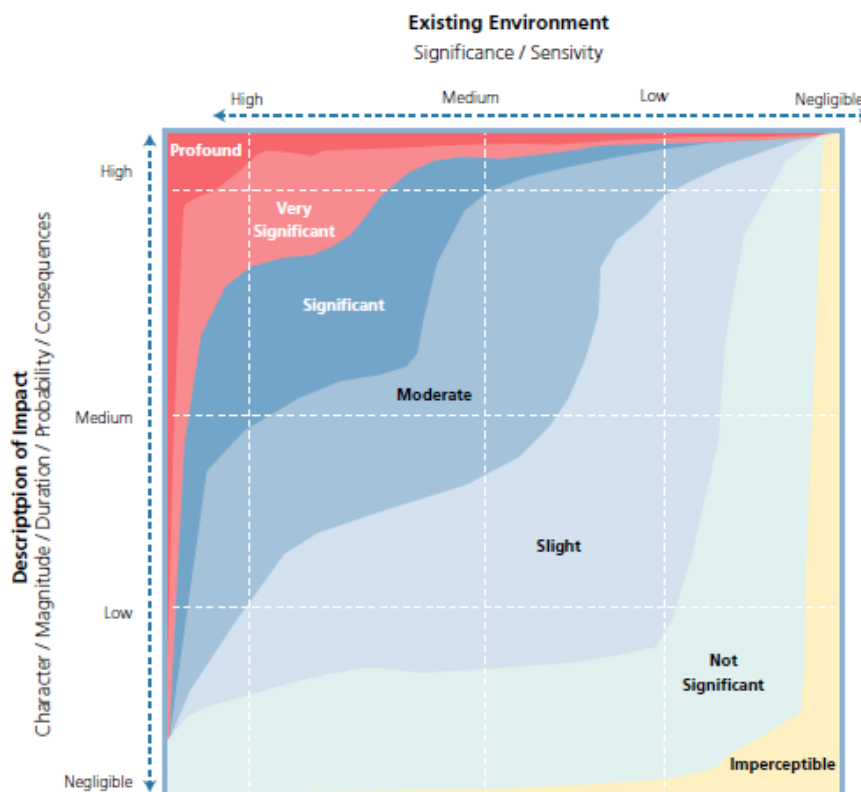
2.3 Significance of Landscape/Townscape Effects

To classify the significance of effects the magnitude of change is measured against the sensitivity of the landscape/townscape using Table 3 and Figure 1 as a guide. The significance classification matrix (Table 3) is derived from the EPA’s *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports*, 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.