

November 2021

LANDSCAPE/TOWNSCAPE & VISUAL IMPACT ASSESSMENT

1.0 INTRODUCTION

This Townscape and Visual impact Assessment report has been prepared in respect of the Orchard Gate Strategic Housing Development, Kennelsfort Road Upper, Cherry Orchard, Dublin. The site currently contains a low-rise industrial building and the proposed apartment development will be named Kennelsfort House. This report describes the townscape/visual context of the proposed development and assesses the likely impacts of the scheme on the receiving environment, in terms of both townscape character and visual amenity.

Landscape/townscape assessment relates to changes in the physical environment, brought about by a proposed development, which may alter its character. This requires a detailed analysis of the individual elements and characteristics of a landscape/townscape that go together to make up the overall character of that area. By understanding the aspects that contribute to this character it is possible to make judgements in relation to its quality (integrity) and to identify key sensitivities. This, in turn, provides a measure of the ability of the landscape/townscape in question to accommodate the type and scale of change associated with the proposed development, without causing unacceptable adverse changes to its character.

Visual Impact Assessment relates to changes in the composition of views as a result of changes to the landscape/townscape, how these are perceived and the effects on visual amenity. Such impacts are population-based, rather than resource-based, as in the case of landscape impacts.

1.1 STATEMENT OF AUTHORITY

This Landscape/Townscape and Visual Assessment report was prepared by Macro Works Ltd of Cherrywood Business Park, Loughlinstown, Dublin 18; a consultancy firm specialising in Landscape and Visual Assessment and associated maps and graphics. Relevant experience includes a vast range of infrastructural, industrial and commercial projects since 1999, including numerous residential mixed-used development projects.

1.2 DESCRIPTION OF THE PROPOSED DEVELOPMENT

The development is located at the former warehouse facility at units 64 and 65 ,Cherry Orchard Industrial Estate . The site presents a gateway location at the western junction of Kennelsfort Road Upper and Cherry Orchard Industrial Estate Road. This location represents the start of the lands zoned 'REGEN' continuing to the east. The proposal is for 144 no. 'build to sell' apartments and associated facilities with a mix of 72 no. one bedroom apartments and 72 no. 2 bedroom apartments. The development is set out in 4 no. five storey buildings enclosing a raised podium courtyard with the junction corner building having a 9 storey gateway feature element. On-site parking of 65 no. resident spaces is contained within a landscaped podium element with 2 no. on street care share spaces provided.

1.3 METHODOLOGY

Production of this Landscape/townscape and Visual Impact Assessment involved:

- A desktop study to establish an appropriate study area and relevant landscape and visual designations in the South Dublin Development Plan 2016-2022 and adjacent Dublin City Development Plan 2016-2022;
- Fieldwork to study the receiving environment;
- Assessment of the significance of the landscape impact of the proposed development as a function of landscape sensitivity weighed against the magnitude of the landscape impact;
- Assessment of the significance of the visual impact of the proposed development as a function of visual receptor sensitivity weighed against the magnitude of the visual impact.

This document uses methodology as prescribed in the Institute of Environmental Management and Assessment (IEMA) and landscape Institute (UK) 'Guidelines for Landscape and Visual Impact Assessment' (GLVIA-2013).

Although this is principally a 'townscape' assessment, it utilises the same outline methodology as would be employed for the more familiar Landscape and Visual Impact Assessment (LVIA) of developments in rural settings. The justification for this approach is provided below.

It is important to note that the Guidelines for Landscape and Visual Impact Assessment' (GLVIA-2013) follow the European Landscape Convention (ELC) definition of landscape: 'Landscape is an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors' (Council of Europe, 2000). Thus, GLVIA-2013 covers all landscapes from "high mountains and wild countryside to urban and fringe farmland (rural landscapes), marine and coastal landscapes (seascapes) and the landscapes of villages towns and cities (townscapes)" - whether protected or degraded.

In the case of this project, the study area is overwhelmingly that of an urban setting or 'townscape' and this is defined in GLVIA-2013 in the following manner (Section 2.7):

"'Townscape' refers to areas where the built environment is dominant. Villages, towns and cities often make important contributions as elements in wider-open landscapes but townscape means 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. There are important relationships with historic dimensions of landscape and townscape, since evidence of the way the villages, towns and cities change and develop over time contributes to their current form and character."

Whilst the scope of the TVIA will be comprehensive in relation to likely effects within the study area, there will be a particular focus on effects experienced by residents in Palmerstown Manor.

1.3.1 Landscape/townscape Impact Assessment Criteria

When assessing the potential impacts on the townscape resulting from a proposed development, the following criteria are considered:

- Landscape/townscape character, value and sensitivity;
- Magnitude of likely impacts;
- Significance of landscape effects.

The sensitivity of the townscape to change is the degree to which a particular setting can accommodate changes or new elements without unacceptable detrimental effects to its essential

characteristics. Landscape/townscape Value and Sensitivity is classified using the following criteria set out in **Table 1-1**.

Table 1-1: Landscape/Townscape Value and Sensitivity

Sensitivity	Description
Very High	Areas where the townscape character exhibits a very low capacity for change in the form of development. Examples of which are high value townscapes, protected at an international or national level (e.g. World Heritage Site), where the principal management objectives are likely to be protection of the existing character.
High	Areas where the townscape character exhibits a low capacity for change in the form of development. Examples of which are high value townscapes, protected at a national or regional level, where the principal management objectives are likely to be considered conservation of the existing character.
Medium	Areas where the townscape character exhibits some capacity and scope for development. Examples of which are townscapes, which have a designation of protection at a county level or at non-designated local level where there is evidence of local value and use.
Low	Areas where the townscape character exhibits a higher capacity for change from development. Typically, this would include lower value, non-designated townscapes that may also have some elements or features of recognisable quality, where management objectives include, enhancement, repair and restoration.
Negligible	Areas of townscape character that include derelict sites and degradation where there would be a reasonable capacity to embrace change or the capacity to include the development proposals. Management objectives in such areas could be focused on change, creation of townscape improvements and/or restoration.

The magnitude of a predicted landscape/townscape impact is a product of the scale, extent or degree of change that is likely to be experienced as a result of the proposed Development. The magnitude takes into account whether there is a direct physical impact resulting from the loss of landscape/townscape components and/or a change that extends beyond the immediate setting that may have an effect on the townscape character. **Table 1-2** refers.

Table 1-2: Magnitude of Landscape/Townscape Impacts

Sensitivity	Description
Very High	Change that would be large in extent and scale with the loss of critically important landscape elements and features, that may also involve the introduction of new uncharacteristic elements or features that contribute to an overall change of the townscape in terms of character, value and quality.
High	Change that would be more limited in extent and scale with the loss of important townscape elements and features, that may also involve the introduction of new uncharacteristic elements or features that contribute to an overall change of the townscape in terms of character, value and quality.
Medium	Changes that are modest in extent and scale involving the loss of landscape characteristics or elements that may also involve the introduction of new uncharacteristic elements or features that would lead to changes in landscape character, and quality.
Low	Changes affecting small areas of landscape character and quality, together with the loss of some less characteristic landscape elements or the addition of new features or elements.
Negligible	Changes affecting small or very restricted areas of landscape character. This may include the limited loss of some elements or the addition of some new features or elements that are characteristic of the existing landscape or are hardly perceivable.

The significance of a landscape/townscape impact is based on a balance between the sensitivity of the landscape receptor and the magnitude of the impact. The significance of landscape impacts is arrived at using the following graph set out in **Table 1-3**.

Table 1-3: Impact Significance Matrix

	Sensitivity of Receptor				
Scale/Magnitude	Very High	High	Medium	Low	Negligible
Very High	Profound	Profound- substantial	Substantial	Moderate	Minor
High	Profound- substantial	Substantial	Substantial- moderate	Moderate- slight	Slight- imperceptible
Medium	Substantial	Substantial- moderate	Moderate	Slight	Imperceptible
Low	Moderate	Moderate- slight	Slight	Slight- imperceptible	Imperceptible
Negligible	Slight	Slight- imperceptible	Imperceptible	Imperceptible	Imperceptible

Note: The significance matrix provides an indicative framework from which the significance of impact is derived. The significance judgement is ultimately determined by the assessor using professional judgement. Due to nuances within the constituent sensitivity and magnitude judgements, this may be up to one category higher or lower than indicated by the matrix. Judgements of Substantial (negative) and above are considered to be 'significant impacts' in EIA terms.

1.3.2 Visual Impact Assessment Criteria

As with the landscape/townscape impact, the visual impact of the proposed Development will be assessed as a function of sensitivity versus magnitude. In this instance the sensitivity of the visual receptor, weighed against the magnitude of the visual effect.

Sensitivity of Visual Receptors

Unlike landscape sensitivity, the sensitivity of visual receptors has an anthropocentric (human) basis. It considers factors such as the perceived quality and values associated with the view, the landscape/townscape context of the viewer, the likely activity they are engaged in and whether this heightens their awareness of the surrounding landscape. A list of the factors considered by the assessor in estimating the level of sensitivity for a particular visual receptor is outlined below to establish visual receptor sensitivity at each VRP:

Susceptibility of Receptors

In accordance with the Institute of Environmental Management and Assessment ("IEMA") Guidelines for Landscape and Visual Assessment (3rd edition 2013) visual receptors most susceptible to changes in views and visual amenity are:

"Residents at home;

- People, whether residents or visitors, who are engaged in outdoor recreation, including use of public rights of way, whose attention or interest is likely to be focussed on the landscape and on particular views;
- Visitors to heritage assets, or to other attractions, where views of the surroundings are an important contributor to the experience;
- Communities where views contribute to the landscape setting enjoyed by residents in the area;
- Travellers on road rail or other transport routes where such travel involves recognised scenic routes and awareness of views is likely to be heightened".

Visual receptors that are less susceptible to changes in views and visual amenity include;

- "People engaged in outdoor sport or recreation, which does not involve or depend upon appreciation of views of the landscape;
- People at their place of work whose attention may be focussed on their work or activity, not their surroundings and where the setting is not important to the quality of working life".

Recognised scenic value of the view (County Development Plan designations, guidebooks, touring maps, postcards etc). These represent a consensus in terms of which scenic views and routes within an area are strongly valued by the population because in the case of County Developments Plans, for example, a public consultation process is required;

Views from within highly sensitive townscape areas. These are likely to be in the form of Architectural Conservation Areas, which are incorporated within the Development Plan and therefore subject to the public consultation process. Viewers within such areas are likely to be highly attuned to the townscape around them;

Primary views from residential receptors. Even within a dynamic city context views from residential properties are an important consideration in respect of residential amenity;

Intensity of use, popularity. This relates to the number of viewers likely to experience a view on a regular basis and whether this is significant at a national or regional scale;

Viewer connection with the townscape. This considers whether or not receptors are likely to be highly attuned to views of the townscape i.e. commuters hurriedly driving on busy roads versus tourists focussed on the character and detail of the townscape;

Provision of vast, elevated panoramic views. This relates to the extent of the view on offer and the tendency for receptors to become more attuned to the surrounding landscape at locations that afford broad vistas;

Sense of remoteness and/or tranquillity. Receptors taking in a remote and tranquil scene, which is likely to be fairly static, are likely to be more receptive to changes in the view than those taking in the view of a busy street scene, for example;

Degree of perceived naturalness. Where a view is valued for the sense of naturalness of the surrounding landscape it is likely to be highly sensitive to visual intrusion by distinctly manmade features;

Presence of striking or noteworthy features. A view might be strongly valued because it contains a distinctive and memorable landscape / townscape feature such as a cathedral or castle;

Historical, cultural and / or spiritual significance. Such attributes may be evident or sensed by receptors at certain viewing locations, which may attract visitors for the purposes of contemplation or reflection heightening the sense of their surroundings;

Rarity or uniqueness of the view. This might include the noteworthy representativeness of a certain townscape type and considers whether the receptor could take in similar views anywhere in the broader region or the country;

Integrity of the townscape character. This looks at the condition and intactness of the townscape in view and whether the townscape pattern is a regular one of few strongly related components or an irregular one containing a variety of disparate components;

Sense of place. This considers whether there is special sense of wholeness and harmony at the viewing location;

Sense of awe. This considers whether the view inspires an overwhelming sense of scale or the power of nature.

Those locations which are deemed to satisfy many of the above criteria are likely to be of higher sensitivity. No relative importance is inferred by the order of listing. Overall sensitivity may be a result of a number of these factors or, alternatively, a strong association with one or two in particular.

1.3.3 Visual Impact Magnitude

The visual impact magnitude relates to the scale and nature of the visual change brought about by the proposal and this is reflected in the criteria contained in **Table 1.4** below.

Table 1.4: Magnitude of Visual Impacts

Criteria	Description
Very High	The proposal alters a large proportion or critical part of the available vista and is, without question, the most distinctive element. A high degree of visual change is generated, directly and strongly altering the visual amenity of the scene
High	The proposal alters a significant proportion or important part of the available vista and is one of the most noticeable elements. A considerable degree of visual change is generated that directly influences the visual amenity of the scene
Medium	The proposal represents a moderate alteration to the available vista, introducing a degree and quality of visual change that directly influences the visual amenity of the scene

Low	The proposal alters the available vista to a minor extent and may not be noticed by a casual observer and/or would not have a marked effect on the visual amenity of the scene
Negligible	The proposal would be barely discernible within the available vista and would have an immaterial effect on the visual amenity of the scene

1.3.4 Visual Impact Significance

As stated above, the significance of visual impacts is a function of visual receptor sensitivity and visual impact magnitude. This relationship is expressed in the same significance matrix and applies the same EPA definitions of significance as used earlier in respect of townscape impacts (**Table 1-3** refers).

1.3.5 Quality of Effects

In addition to assessing the significance of landscape/townscape effects and visual effects, EPA Guidance for EIAs requires that the quality of the effects is also determined. This could be negative/adverse, neutral, or positive/beneficial.

Whereas, the introduction of new built elements into countryside areas more often results in negative landscape and visual effects, in urban settings, development proposals are often replacing one built feature with another or developing 'brownfield' sites. The consequence for the townscape character and visual amenity is often beneficial, or may be a combination of positive effects and negative effects for different receptors. In the context of this assessment, the judgment of the quality of the effects is made in combination with the significance judgement for both landscape/townscape impacts and visual impacts e.g. Moderate / Positive or Moderate / Negative.

1.3.5 Extent of Study Area

It is anticipated that the proposed development is not likely to give rise to significant landscape/townscape or visual impacts beyond approximately 1km. As a result, a 1km-radius study area is used in this instance.





Figure 1.1 – Site and Central Study area looking northwards (Google Earth 3D)

1.4 THE RECEIVING ENVIRONMENT

The landscape/townscape baseline represents the existing context and is the scenario against which any changes to it, brought about by the proposed development, will be assessed. A description of the landscape/townscape context of the proposed site and wider study area is provided below. Although this description forms part of the landscape/townscape baseline, many of the elements identified also relate to visual receptors i.e. places from which viewers can potentially see the proposed Development. The visual resource will be described in greater detail in Section 1.9.

1.4.1 Baseline Environment

1.4.1.1 Immediate Site Context

The site in question is substantially occupied by an industrial warehouse building and associated car parking and circulation areas. It is not currently in use and is much graffitied, but it is not derelict. It occupies the north-western corner of the Cherry Orchard Industrial Estate and similarly broad low-rise industrial units occupy much of industrial estate to the southeast. The adjacent premises to the south, fronting the Kennelsfort Road, is a retail warehouse unit (Cawley's Furniture) with car parking to the front.

Immediately to the north of the site is a narrow commercial site occupied by two takeaway premises that also separate the site from Pobalscoil Iosolde (Palmerstown Community School), which is has an associate gymnasium and playing pitches.

On the opposite side of the Kennelsfort road to the west of the site are the residential housing estates of Palmers Road, Palmers Crescent and Palmertown Court. There is a large amenity

greenspace within the Palmers Road Estate that fronts onto Kennelsfort Road, which his otherwise enclosed by dwellings to the north, west and south.

1.4.1.2 Wider Study Area

The land use throughout the remaining northern parts of the study area is predominantly mid-low density residential in the form of housing estates containing semi-detached dwellings. However, Palmerstown shopping centre is around 300m north of the site and Woodfarm Cemetery is around 400m to the northwest.

There is also a number of residential housing estates in the southern half of the study area, but the main land uses include Cherrywood Hospital and Wheatfield prison. The eastern half of the study area is predominantly residential, but with notable open space parks.

The M50 motorway (the busiest road in the country) generates a major divide in the study area where it passes in a north – south direction through the outer western half around 600m from the site. It is in a section of 'cut' at this point and the Kennelsfort road passes over it. On the opposite side of the M50 is the sizeable Liffey Valley Shopping centre and a recreational facility with tennis courts and a pitch and putt golf course.



Figure 1.2 – Image showing the view towards the site across the residential open space at the entrance to Palmers Road



Figure 1.3 – View of adjacent industrial area to the south of the site (Cherry Orchard Industrial Estate)



Figure 1.4 – View of school and adjacent takeaway premises to the north of the site

1.5 PLANNING CONTEXT

The site lies just north of the jurisdictional boundary between the South Dublin and Dublin City planning authorities. Consequently, both Development Plans (DP) are relevant, but with the South Dublin DP being the main consideration in terms of the land use zoning of the site.

1.5.1 South County Dublin Development Plan (DP) 2016-2022

In the South County Dublin Development plan the Land use Zoning Maps (Map G) indicates that the site is contained within a an area for 'Regeneration' – "To facilitate enterprise and/or residential-led regeneration". The other land use zones in the vicinity (within South County Dublin) Relate to

'Enterprise and Employment' to the east of the Regen zoning and 'Residential' to the north and west. There is an area associated with the existing Palmerstown Shopping Centre a short distance to the north of the site that is zoned as 'District Centre'. It should also be noted that there is a preferred route for 'Long term High Capacity Public Transport' indicated along the Kennelsfort road around 200m to the south of the site at its nearest point.

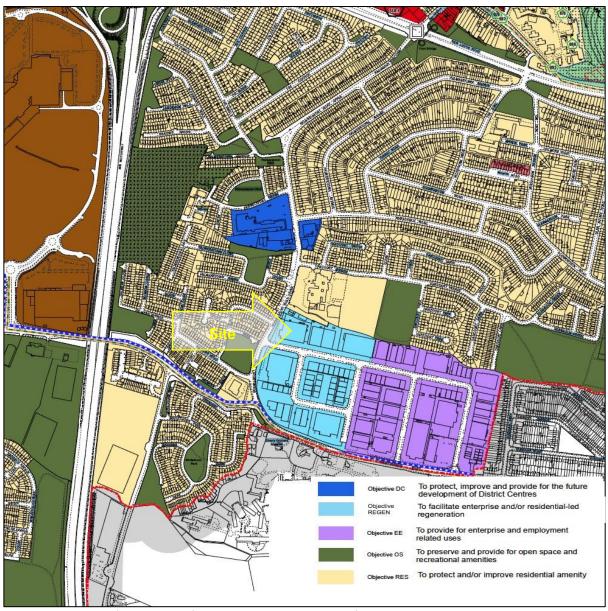


Figure 1.1 – Excerpt from Map 2 of the Land Use Zoning Maps of South County Dublin Development Plan

Underpinning the 'Regen' zoning which is a new zoning category under the current CDP, is the following statement under the heading 'Consolidation Areas within the Gateway";

The settlements of Palmerstown, Naas Road, Templeogue, Ballyroan, Ballyboden, Knocklyon, Firhouse, Ballycullen and parts of Greenhills, Walkinstown, Terenure and Rathfarnham have been identified as Consolidation Areas within the Dublin Gateway. These established areas are located to the east of the M50 and south of the River Dodder. They are suburban areas with established identities and communities with distinct heritage and character. These areas have a range of urban services such as transport, retail, medical and community facilities. Recent Census data identifies an

aging population and stagnant or falling populations, which presents a serious risk for the viability of services and facilities into the future".

The most relevant Core Strategy Objective relating to the 'Regen' zoning includes;

CS1 Objective 2: To promote and support regeneration of underutilised industrial areas in areas designated with Zoning Objective Regeneration 'REGEN' (to facilitate enterprise and/or residential led development).

The most relevant Housing Objective relating to the 'Regen' zoning includes;

H8 Objective 4: To support proposals for more intensive enterprise and/or residential led development within areas designated with Zoning Objective 'REGEN' (To facilitate enterprise and/or residential led regeneration), subject to appropriate design safeguards and based on traditional urban forms that adhere to urban design criteria.

In Chapter 11 Implementation of the South Dublin CDP it is set out that "Development in Regeneration zones will be assessed against the relevant criteria within the Urban Design Manual, the Design Manual for Urban Roads and Streets and/or the Retail Design Manual as appropriate. A Design Statement accompanying development proposals in Regeneration (REGEN) zones should also address the following criteria:

- Demonstrate a clear transition towards a more urban form of development and a traditional street network.
- Address connectivity and linkages in the area and demonstrate that the development of the site would not give rise to isolated piecemeal pockets of residential development that are disconnected from shops, amenities and/or other residences.
- Residential development should not be introduced at ground floor level adjacent to busy roads, and/or roads that are subject to significant movements by Heavy Goods Vehicles (HGVs).
- Given the transitional nature of Regeneration zones, precautions will be taken to ensure that the potential for noise pollution, air pollution or other nuisance from established industrial uses will not exceed acceptable environmental standards. The Planning Authority may seek a report from a suitably qualified person to identify and quantify sources of noise pollution, air pollution, or nuisance, assess the potential impacts on the proposed development and provide a series of recommendations to mitigate the impacts of any pollutants insofar as possible (e.g. orientation and layout of dwellings, positioning of openings and insulation).
- It may be necessary to consider improvements to the surrounding road and street network in conjunction with the Planning Authority, to calm traffic and improve pedestrian and cyclist access"

Designated Scenic Views and Prospects

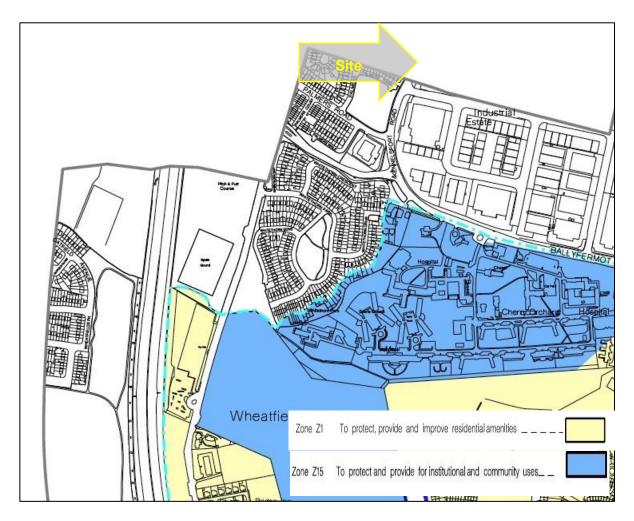
In terms of visual and scenic amenity, the South County Dublin Development Plan contains designated scenic routes, but none are relevant to the proposed study area.

South Dublin Landscape Character Assessment

A Landscape Character Assessment has been prepared for South Dublin and within this, the site and its surrounds are shown to be contained in Landscape Character Area (LCA) 5 – Suburban South Dublin. Unlike the rural and peri urban LCAs of South Dublin, LCA5 is identified as not having been assessed in detail and nor is there any particular sensitivities identified that might be relevant to the proposed development.

1.5.1 Dublin City Development Plan (DP) 2016-2022

In terms of land use zoning, the nearest relevant area within the Dublin City Council jurisdiction has an institutional and community use zoning associated with Cherrywood Hospital and Wheatfield Prison. It is not considered that the associated institutional zoning objectives are contrary or even particularly relevant to the proposed development given the physical and contextual separation.



Approach to Taller Buildings

Of particular relevance to the proposed development is the approach to taller buildings particularly how it might relate to surrounding low-rise development. Section 4.5.4.1 specifically deals with the 'Approach to Taller Buildings' and begins with the statement that:

"Dublin City Council acknowledges the intrinsic quality of Dublin as a low-rise city and considers that it should remain predominantly so. The vast majority of the city area is identified as not being suitable for mid-rise or taller buildings. The City Council remains committed to the need to protect conservation areas, architectural conservation areas and the historic core of the city. However, taller buildings can also play an important visual role and can make a positive contribution to the skyline of a city. Dublin City Council recognises the merit of taller buildings, including landmark buildings, in a very limited number of locations at a scale appropriate for Dublin."

Relevant Policy in relation to building height includes;

SC16: To recognise that Dublin City is fundamentally a low-rise city and that the intrinsic quality associated with this feature is protected whilst also recognising the potential and need for taller buildings in a limited number of locations subject to the provisions of a relevant LAP, SDZ or within the designated strategic development regeneration area (SDRA).

SC18: To promote a co-ordinated approach to the provision of tall buildings through local area plans, strategic development zones and the strategic development and regeneration areas principles, in order to prevent visual clutter or cumulative negative visual disruption of the skyline.

Designated Scenic Views and Prospects

Contained within Chapter 4 is a map illustrating views and prospects for protection. However, there are no designated views and prospects within the study area.

1.5.2 Urban Development and Building Heights – Guidelines for Planning Authorities (December 2018)

The Urban Development and Building Guidelines were adopted in December 2018 by the Minister for Housing, Planning and Local Government "to secure better and more compact forms of future development."

Policies stated within the UDBH guidelines that may be relevant to the proposed development are included below:

SPPR1: In accordance with Government policy to support increased building height in locations with good public transport accessibility, particularly town/city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.

SPPR 2: In driving general increases in building heights, planning authorities shall also ensure appropriate mixtures of uses, such as housing and commercial or employment development, are provided for in statutory plan policy. Mechanisms

such as block delivery sequencing in statutory plans² could be utilised to link the provision of new office and residential accommodation, thereby enabling urban redevelopment to proceed in a way that comprehensively meets contemporary economic and social needs, such as for housing, offices, social and community infrastructure, including leisure facilities.

Section 3.2 of the UDBH guidelines also lists development management criteria from the city/town scale to the site/building scale in which "the applicant shall demonstrate to the satisfaction of the Planning Authority/ An Bord Pleanála, the proposed development satisfies the following criteria..." Those criteria deemed relevant to this visual impact assessment and the proposed development are included below.

At the scale of the relevant city/town:

- 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.

1.6 Identification of Viewshed Reference Points as a Basis for Assessment

Viewshed Reference Points (VRP's) are the locations used to study the likely visual impacts associated with the proposed development. It is not warranted to include each and every location that provides a view as this would result in an unwieldy report and make it extremely difficult to draw out the key impacts arising from the proposed development. Instead, the selected viewpoints are intended to reflect a range of different receptor types, distances and angles. The visual impact of a proposed development is assessed using up to 6 categories of receptor type as listed below:

- Key Views from features of national or international importance;
- Designated Scenic Routes and Views;
- Local Community views;
- Centres of Population;
- Major Routes;
- Amenity and heritage features.

The Viewshed Reference Points selected in this instance are set out in Table 1.5 and shown on Figure 1.10 below.



Figure 1.10 – Viewpoint Selection Map (Source - Digital Dimensions)

Table 1-5 Outline Description of Selected Viewshed Reference Points (VRPs)

VRP No.	Location	Direction of view
VP1	Kennelsfort Road southwest of site	NE
VP2	Palmers Crescent opposite site	E
VP3	Entrance to Pobalscoil Iosolde (Palmerstown Community School)	S
VP4	Kennelsfort Road northwest of site	SE
VP5	Palmer Road	NE
VP6	Palmerstown Close	SE

1.7 Proposed Landscape and Visual Mitigation Measures

Other than those embedded elements of the design that respond to its immediate setting in combination with the objectives of the subject REGEN zoning, there are no specific townscape and visual mitigation measures considered necessary in this instance.

1.8 PREDICTED IMPACTS

1.8.1 Landscape/townscape Impacts

1.8.1.1 Landscape/townscape value and sensitivity

In accordance with Section 5.5 of the GLVIA-2013, a townscape character assessment requires a particular understanding of, among other criteria, "the context or setting of the urban area and its relationship to the wider landscape." In a city that has evolved over millennia, the study area is a relatively recent addition. Having been largely farmland until the 1950s, the first modern housing estate in the townland of Palmerstown was that of Red Cow Farm followed in successive decades by Woodfarm Acres and Palmerstown Manor, which lies adjacent to the west of the site (source - Wikipedia).

In terms of townscape character and associated values, the study area is typical of a peri-urban area where residential, industrial and commercial development have infilled and intensified over recent decades. Whilst there is clear delineation between the various residential, institutional with and industrial land use precincts, there is a less obvious order to its arrangement or little sense of hierarchy. Palmerstown Shopping Centre is an obvious community node, but otherwise both residential and industrial development tends to be low-rise and sprawling in nature with few hubs of higher, or even lower, intensity.

Generally, industrial and institutional uses are contained to the south and east of the site with the Palmerstown Community School and mid-low density residential uses to the north and west. The busy and bending Kennelsfort Road forms a strong perceptual divide through this area. In this regard, the site fronting Kennelsfort Road and positioned between industrial and residential uses lies at a transitional threshold in the townscape setting. This is also reflected in the REGEN zoning where is serves as the north-western corner the zoned lands.

This is not a study area containing architectural conservation zones, large treelined parklands or high-end commercial office developments. It is more a diverse city-edge neighbourhood, in which places of residence site side-by-side with places of work and major transport routes. Townscape values are likely to be more utilitarian than scenic or amenity based. Despite its peripheral location in respect of the wider Dublin City, it is a self-sustaining and well established neighbourhood rather than a commuter hub.

For the reason outline above, this diverse setting is deemed to have and **Medium-low** Townscape sensitivity with the trend being towards Medium in the residential northern and western portions of the study area and towards Low in the industrial and institutional southern and eastern areas.

1.8.1.2 Magnitude of Landscape/townscape effects

Demolition and Construction Phase

There will be permanent physical effects to the land cover of the site, which are not readily reversible. During the demolition and construction stage of the proposed development there will be intense construction-related activity within and around the site, including approach roads. This will include, but is not limited to:

- HGVs transporting materials to and from the site;
- Movement of heavy earth-moving machinery and tower cranes on-site;
- Temporary storage of excavated materials and construction materials on-site;
- Gradual emergence of the incomplete apartment complex, and associated works;
- Security hoarding and site lighting.

Whilst the physical impacts to the site's land cover will be permanent, and not readily reversible, the site is already a much-modified, industrial site that does not enrich the overall townscape character of the area. Construction stage impacts on landscape/townscape character will be 'short-term' (i.e. lasting 1-7 years), in accordance with the EPA definitions of impact duration. Furthermore, the context of this construction activity is within an industrial area where HGV movements are frequent and there will be no site access through residential estates.

There will be minor impacts on the character of the residential areas to the north and west due to the presence of tall tower cranes above the prevailing skyline and as the proposed buildings reach their full height. However, there is a minor fall in ground level towards the site and across the Kennelsfort road and in combination with site hoarding, much of the ground based clutter and activity of construction stage works will be out of view and perceptually contained within a long established industrial context.

On the basis of the reasons outlined above, the magnitude of the Short-term construction stage landscape/townscape impacts is deemed to be **Low**.

Operational Phase

Following the completion of the proposed works, landscape/townscape impacts will relate entirely to the development's impact on the character of the receiving landscape/townscape and whether this is positive or negative.

The most notable landscape/townscape impacts of the proposed development will result from the permanent presence of four apartment blocks of between 3 and 9 storeys rising prominently within the surrounding townscape fabric. Upon completion of construction, the proposed development will become the tallest multi-storey development in the locality, marking an escalation and intensification of that fabric within the study area. In the current baseline context of the low rise industrial / commercial area to the south and east of the site, the proposed development may appear somewhat ambiguous in terms of both scale and function. Nonetheless, the high quality architectural design and external finishes will help to lift the quality and integrity of the built fabric in this waning industrial area. This is also likely to be a transitional effect, which reduces over time as the incremental redevelopment of Cherry Orchard Industrial Estate aligns with the same REGEN zone policy objectives as the proposed development.

By contrast, within the context of the predominantly residential area to the north and west of the site, the proposed development is likely to read as a node / marker of a new higher intensity residential precinct, particularly the nine storey 'gateway' building. Rather than draw from the midlow density residential character of the north-western study area, the proposed development is likely to serve as a welcome and compatible variation to the current urban form, whilst adding a sense of rejuvenation to a long established living / working neighbourhood. Whilst it is of a noticeably greater scale and intensity than the two storey residential estates in the vicinity, which it is buffered from by the busy Kennelsfort Road corridor and the Palmerstown Community School. the proposed development represents a considered uplift in scale at an obvious interface between residential and commercial zones and will not serve to dwarf the built form of the established residential setting. Furthermore it is consistent with the objectives of the REGEN zoning and will be a key initial component that sets up the western gateway to this area of deliberate added intensity.

The scale balance between the tallest nine storey block and the nearest residential receptors directly across Kennelsfort Road Upper was carefully considered to avoid a sense of overbearing. Overlooking is considered less of a potential issue because these dwellings gable-on to Kennelsfort Road Upper. Aside from the physical separation distance between the proposed landmark building and the nearest dwellings, there is a perceptual separation reinforced by grass buffer strips, cycle and pedestrian paths, vehicle carriageways and a landscaped plaza incorporating tree planting, which serves as an apron to the building. The landmark building also has slender proportions and terraces down to its neighbouring counterparts, which have differing façade treatments to reduce the sense of scale and massing. All of these feature contribute to a perceived separation and scale transition between the nearest residential dwellings and the tallest element of the proposed development that avoids undue overbearance (see Figure 1.11).



Figure 1.11 – Extract from the project Design Statement illustrating transitional elements between the proposed landmark building and nearest residential dwellings across Kennelsfort Road Upper

In the context of the **Medium-low** sensitivity of the receiving townscape setting, the proposed development is considered, on balance, to generate a **Medium-low** magnitude of impact on townscape character.

1.8.1.3 Significance of Landscape/townscape effects

In summary, construction stage townscape impacts will be experienced in the form of clutter and intensity of movement of workers and machinery coupled with the constantly evolving, partially completed development. These are familiar and short term effects that will be perceptually contained within the hoarding of the construction site, despite being visible from further afield. The combination of a Medium-low townscape sensitivity judgement with a Low magnitude of townscape impact judgement is considered to result in a Slight significance of impact. This impact is deemed to be of a Negative quality and thus, the overall construction stage significance is **Slight/Negative**.

Once completed and operational the proposed development will be achieve what it has been designed to achieve – the initial western threshold piece of high quality / intensity residential development in the regeneration of the sprawling low-rise Cherry Orchard Industrial estate. Coupled with the Medium-low sensitivity judgement, the Medium low magnitude of impact is deemed to result in a Moderate-slight significance of impact. Unlike the negative construction stage effect, the operational stage effect is deemed to be of a Positive quality. The resulting significance of impact is therefore **Moderate-slight/Positive**.

1.9 VISUAL IMPACT ASSESSMENT

1.9.1 Visual Receptor Sensitivity

In this instance all of the viewpoints are located within relatively close proximity to each other and the site. Thus, the receptors being represented and the viewing scenarios are similar for most of them. In accordance with the factors described in section 1.3.2, those viewpoints that are wholly contained within residential enclaves (VP2, VP5 and VP6) are deemed to have Medium-low sensitivity on balance of the fact that they represent local residential receptors, but in the context of a busy urban environment that is not otherwise valued for scenic amenity. For those on (or close to) the busy Kennelsfort Road (VP1, VP3, VP4) where the viewing context is an diverse mix of residential, institutional commercial and industrial uses, visual receptor sensitivity is deemed to be Low.

1.9.2 Magnitude of Visual Effect

The assessment of visual impacts at each of the selected viewpoints is aided by photomontages of the proposed development. Photomontages are a 'photo-real' depiction of the scheme within the view, utilising a rendered three-dimensional model of the development, which has been georeferenced to allow accurate placement and scale. For each viewpoint, the following images have been produced:

- 1. Existing View
- 2. Montage View

Viewshed Reference Point		Viewing distance to site boundary	Direction of View
VP1	Kennelsfort Road southwest of site	65.5m	NE

Representative of:

- A major route
- Local Community views

Receptor Sensitivity Low

Existing View

This is a view from the Kennelsfort road that is located between the green amenity space associated with Palmerstown Manor housing estate (to the west) and the eastern edge of the Cherry Orchard Industrial Estate (to the east). The nearest unit within the industrial estate is a broad low-rise retail warehouse building used by Cawley's Furniture, which is typical of the built form within the remainder of the estate. Surrounding the residential green

in the opposite direction are well-kept semi-detached dwellings. In the northerly direction of the proposed development is the existing warehouse building contained within the site with a palisade fence to the front. Across the road are residential dwellings within the housing estate that gable-on to the Kennelsfort Road.

Visual Impact of proposed development

The proposed development will rise prominently on the righthand side of the Kennelsfort road in the fore-to-middle ground marking dramatic change to the scene. This comes in the basic form of visual enclosure and also in the context of substantially increased intensity of built development, which is of a residential nature in place of the heretofore industrial site.

The design and materials of the proposed apartment blocks are of a high quality that will lift the tired industrial context. This is a degree of scale disparity between the proposed apartment blocks and the opposing dwellings on the western side of Kennelsfort Road. However, the Kennelsfort Road itself and the setback of the proposed apartment blocks to form a broad and active apron to the road, serve as a physical and perceptual buffer between the existing and proposed residential forms. Any sense of overbearing is also lessened by the gable-on orientation of the existing dwellings as it is apparent that their visual amenity does not relate to the Kennelsfort road or views in that direction.

Given the considerable degree of visual change associated with the proposed development, the magnitude of visual impact is deemed to be High-medium.

Notwithstanding the already varied and eclectic nature of the land use and built form in the wider setting, the scale and nature of the proposed development appears slightly ambiguous against the current baseline context. Thus, the quality of the impact is deemed to be Neutral or Negative against the current baseline.

When considered as the pioneering gateway piece of development within the REGEN zoned lands associated with Cherry Orchard Industrial Park, the proposed development appears entirely appropriate and consistent with the relevant zoning objectives. In that more relevant future context, the equality of the impact is deemed to be Positive.

Summary

Based on the assessment criteria and matrices outlined at **Section 1.3** the significance of residual visual impact is summarised below.

	Visual Receptor Sensitivity	Visual Impact Magnitude	Significance / Quality of Visual Impact
9	Low	High-medium	Moderate-slight / Neutral-negative

Impact Significance (Current Baseline)

Impact Significance (Likely future 'Regen' scenario)

Low	High-medium	Moderate-slight / Positive

Viewshed Reference Point		Viewing distance to site boundary	Direction of View
VP2	Palmers Crescent opposite site	86.5m	Е

Representative of:

Local Community Views

Receptor Sensitivity

Medium low

Existing View

This is a channelled view along Palmers Crescent in an easterly direction where the view is enclosed on either side by semi-detached dwellings. The view broadens at the intersection of the Kennelsfort Road, beyond which a slight step-down in terrain reveals the long and low profile of an industrial warehouse building contained within the subject site. This building provides a moderate degree of short distance containment to the view.

Visual Impact of proposed development

This view is aligned with the proposed five storey apartment building that fronts the Kennelsfort Road in the north-western corner of the site as well as the terraced pedestrian entrance to the podium level of the site. The nine storey landmark / threshold building at the southwestern corner of the site is slightly peripheral to the main view alignment, but still stands as the most prominent of the proposed buildings. The proposed development will substantially alter the degree of containment / enclosure and the nature and intensity of built development within view representing marked visual change. However, the scale of change is balanced by the removal of a somewhat dilapidated and much graffitied industrial structure and its replacement with the high quality design and materials of the proposed apartment development. The active streetscape and broad pedestrian entrance to which, also provided a sense of permeability and life to the street frontage, thereby offsetting the considerably increased scale of the development.

Whilst the magnitude of visual impact is deemed to be High-medium, on balance of the factors outlined above, the quality of the effect is considered to be in the range of Neutral to Positive on balance of the increased intensity vs improved design.

Given that the site is the only aspect of the Cherry Orchard Industrial Estate that is readily visible from here, the impact will be the same for both the current baseline scenario and the future 'Regen' scenario.

Summary

Based on the assessment criteria and matrices outlined at **Section 1.3** the significance of residual visual impact is summarised below.

Impact Significance (Current Baseline) Impact Significance (Likely future 'Regen' scenario)

Visual Receptor Sensitivity	Visual Impact Magnitude	Significance / Quality of Visual Impact
Medium low	High-medium	Moderate / Neutral- Positive
Medium low	High-medium	Moderate / Neutral- Positive

Viewshed Reference Point				Viewing distance to site boundary	Direction of View	
VP3	Entrance to Community Scho	Pobalscoil ool)	Iosolde	(Palmerstown	172.3m	S

Representative of:

Local Community Views

Receptor Sensitivity M

Medium low

Existing View

This is a view from near the entrance to Palmerstown Community School looking across the front of the school and its car park. There is currently work taking place to extend the school to the west i.e. towards its Kennelsfort road frontage which is currently contained in a broad strip of grass and mature street trees. Otherwise the school consists of homogenous single storey brick clad / zinc roof buildings.

Visual Impact of proposed development

It is the nine storey landmark / gateway building that is most noticeable from here, rising above the foreground buildings and vegetation within the school. It occupies a modest proportion of the view, but does serve to provide some visual and contextual containment to the south. Indeed, it suggests a hub of increased activity and development intensity in that direction that differs from the surrounding mid-low density residential

context of 'semi-detached' housing estates. In this regard, the proposed development represents a richer sense of diversity in the surrounding built form, but coupled with a degree of complexity and a minor degree of ambiguity as to how it relates to the overall urban pattern of the area. Such legibility is likely to improve over time as other parts of the Regen zoned lands are developed creating a more consolidated and compressive high density residential quarter.

On balance the magnitude of visual impact is deemed to be Low and the quality of the impact is Neutral or even marginally Negative. The quality of impact is likely to be improved as further similar development takes place in the Regen lands and the proposed development forms part of a stronger and more consolidated node.

Summary

Based on the assessment criteria and matrices outlined at **Section 1.3** the significance of residual visual impact is summarised below.

Impact Significance (Current Baseline)

Impact Significance (Likely future 'Regen' scenario)

Visual Receptor Sensitivity	Visual Impact Magnitude	Significance / Quality of Visual Impact
Medium low	Low	Slight Neutral / Negative
Medium low	Low	Slight Neutral / Negative

Viewshed Reference Point		Viewing distance to site boundary	Direction of View
VP4	Kennelsfort Road northwest of site	52.5m	SE

Representative of:

- Major Route
- Local Community Views

Receptor Sensitivity Low

Existing View

This is a view along Kennelsfort Road to the southeast in the opposite direction, but at a similar distance from the site as VP1. Residential development from Palmerstown Manor estate gables-on to the Kennelsfort Road opposite the site, whereas adjacent to the viewpoint, the semi-

detached dwellings front onto the road. The view is framed to the east by mature trees that line the lawn to the front of Palmerstown Community School.

Visual Impact of proposed development

In a similar manner to VP1, albeit looking in the opposite direction along Kennelsfort Road, the proposed development presents with considerable bulk and massing. It will serve to enclose the eastern side of Kennelsfort Road where little enclosure currently exists. The intensity and scale of built development will increase markedly bringing about substantial visual change to this scene.

Due to comparative distance, the nearest 5 storey blocks share a similar profile with the tallest 9 storey block just beyond. Whilst the effect of the distinct 'gateway' building is diluted, there is a legible terracing-up in scale away from surrounding land uses. There is also a clear distinction between the apartment blocks due to the varied use of high-quality materials and tones as well as the generous avenues between the buildings. This helps to break up the massing of the development.

There is a degree of scale conflict between the nearest apartment block and the single storey takeaway establishments just to the fore, but all are contained within the 'Regen' zoned lands. The northern facades of the proposed buildings address the adjacent site (i.e. not blank walls) and despite the scale differential they do not appear overbearing in relation to the neighbouring site, which wholly addresses the Kennelsfort Road in any event.

Overall, the magnitude of visual change is deemed to be High-medium, but the quality of that effect is a weighed consideration of increased scale/intensity of high-quality residential development in place of dilapidated low-rise industrial development. On balance, the effect is deemed to be Positive, particularly because it accords with the current underlying zoning objectives.

Given that the site is the only aspect of the Cherry Orchard Industrial Estate that is readily visible from here, the impact will be the same for both the current baseline scenario and the future 'Regen' scenario

Summary

Based on the assessment criteria and matrices outlined at **Section 1.3** the significance of residual visual impact is summarised below.

Impact	Significance
(Current	Baseline)

Impact Significance

	Visual Receptor Sensitivity	Visual Impact Magnitude	Significance / Quality of Visual Impact
•	Low	High-medium	Moderate-slight / Positive
	Low	High-medium	Moderate-slight /

(Likely future		Positive
'Regen' scenario)		

Viewshed Reference Point		Viewing distance to site boundary	Direction of View
VP5	Palmers Road	144.6m	NE

Representative of:

Local Community Views

Receptor Sensitivity

Medium low

Existing View

This is a view across the amenity greenspace at the entrance to Palmerstown Manor Housing estate, which provides a good contextual representation of the land use matrix in the vicinity the site. That is, medium to low density residential within the estate and low rise industrial across the Kennelsfort Road to the east.

Visual Impact of proposed development

The proposed development rises prominently, but not in an overbearing manner to form a perceptual 'bookend' divide between the low rise residential and industrial quarters apparent within this view. The main visible feature of the development is the tallest 9 storey landmark / gateway building at its nearest south-western corner. Whilst this is considerably taller than surrounding development, that is one of the key design principles and it does not present as a bulky building. The adjacent 5 storey elements are more assimilated in terms of scale and partial screening within this view and help to provide a legible terracing up to the taller threshold building.

Whilst the scale and intensity of residential development is markedly increased within this scene, there is a welcome improvement to the quality of design and materials of the built form within the relevant quarter of the view. The residential visual amenity of those living within the foreground estate is not unduly compromised as it is generally introspective i.e. onto the amenity space.

Overall, the magnitude of visual impact is deemed to be Medium-low and of a Neutral or even Positive quality.

Summary

Based on the assessment criteria and matrices outlined at **Section 1.3** the significance of residual visual impact is summarised below.

	Visual Receptor Sensitivity	Visual Impact Magnitude	Significance / Quality of Visual Impact
Impact Significance (Current Baseline)	Medium-low	Medium-low	Moderate-slight Neutral / Positive
Impact Significance (Likely future 'Regen' scenario)	Medium-low	Medium-low	Moderate-slight Neutral / Positive

Viewshed Reference Point		Viewing distance to site boundary	Direction of View
VP6	Palmerstown Close	183.3m	SE

Representative of:

• Local Community Views

Receptor Sensitivity Medium low

Existing View

This view is comparable to VP5 in terms of distance and context — within a medium-low density housing estate looking across a communal green space. The main variation the absence of any industrial context as dwellings on the opposite side of the green space truncate the easterly view of urban fabric beyond. There is also an array of mature broadleaf trees just to the fore of the opposing dwellings that serve to soften the skyline and further enclose the scene.

Visual Impact of proposed development

The 5 storey buildings along the northern/western edge of the development will rise into view just above the houses on the opposite side of the green. The 9 storey threshold building rises more prominently, albeit veiled by intervening trees which are likely to present a substantial screen during summer months.

The effect of the proposed development rising into view is a balanced one in visual impact terms. It provides an increased level of containment to the south-easterly view and with it an increased scale and intensity of residential development. There is a visual suggestion of a substantial node of residential / commercial development (neighbourhood hub), which is not necessarily generated by the proposed development, but is likely to be as

part of the more comprehensive future development of surrounding Regen zoned lands. The increased scale and intensity of built form is also balanced by the quality of design and materials inherent in that built form.

Overall, the magnitude of visual impact is deemed to be Medium low. It is also considered that because it reads as a new development rising into view - rather than the replacement of unsightly industrial development, the quality of effect is Negative. Although, the legibility of the proposed development may be slightly improved by additional future development within the Regen zoned lands, the effect will be the same.

Summary

Based on the assessment criteria and matrices outlined at **Section 1.3** the significance of residual visual impact is summarised below.

	Visual Receptor Sensitivity	Visual Impact Magnitude	Significance / Quality of Visual Impact
Impact Significance (Current Baseline)	Medium low	Medium Low	Slight / Negative
Impact Significance (Likely future 'Regen' scenario)	Medium low	Medium Low	Slight / Negative

1.10 CONCLUSION

There will be townscape and visual impacts that are specific to the construction stage in the form of clutter and intensity of movement of workers and machinery coupled with the constantly evolving, partially completed development. These are familiar and short-term effects that are considered to result in Slight / Negative significance of effect.

Once operational the proposed development can be judged in terms of its permanent imprint on the townscape fabric of the receiving environs. In this regard it is considered to achieve the design intent of the initial western threshold piece of high quality / intensity residential development in the regeneration of the sprawling low-rise Cherry Orchard Industrial estate (Regen zoned lands). This design objective is likely to be further reinforced by future similar development in the surrounding area to meet the objectives of the Regen zoning. There is considered to be an appropriate scale transition and sense of separation between the tallest elements of the proposed development and the nearest low-rise residential areas across Kennelsfort Road Upper. The resulting significance of impact is therefore judged to be **Moderate-slight/Positive**.

Visual impacts were assessed at six viewpoints selected within the surrounding area to cover a range of viewing distances, viewing angles and visual receptor types. Those views representing residential enclaves were deemed to be of Medium-low sensitivity to visual change of the scale and nature

proposed, whilst those in more industrial / transport corridor influenced settings were deemed to be of Low sensitivity.

Given the considerable scale and nature of the visual change that will be brought about by the proposed development the magnitude (scale) of impact ranged between 'High-medium' and 'Low', but what is perhaps more important to consider is the quality of those impacts and whether the effect is a positive, neutral or negative one. This varied between the viewpoints and also for the same viewpoints when considered against the current baseline scenario and the future Regen developed lands scenario (both were assessed). For example, at VP1 the proposed development appears slightly ambiguous as a standalone apartment development within a current context of low rise residential and industrial development resulting in a Moderate-slight significance and Negative quality of impact. However, when considered as the first instalment of likely similar scale and nature of development to achieve the objectives of the underlying Regen zoning, it is deemed to be a positive contribution to the visual setting.

The trend amongst the other viewpoints is that when seen in a clear and comprehensible manner the proposed development makes a notable, but positive impact to the urban fabric and visual amenity of the area (VP2, VP4, VP5) and more so in the context of the likely future scenario. When seen rising into view above foreground vegetation and buildings, where the current industrial context does not influence the scene (VP3 and VP6), the proposed development simply adds to the scale and intensity of visible development and the design features and material quality have a lesser influence on the perception of the scheme. In both of these instances the impact is deemed to be of a Slight significance and Neutral / Negative quality.

1.11 OVERALL SIGNIFICANCE OF IMPACT

Overall, it is considered that the proposed Orchard Gate development is an appropriate contribution to both the existing and likely future built fabric of this urban area and it will not result in any significant / negative townscape or visual impacts.