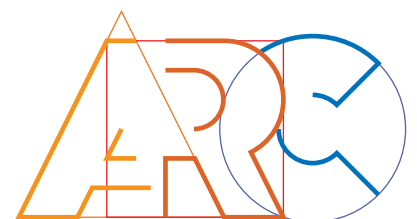




ASSESSMENT OF THE VISUAL IMPACT ON THE BUILT ENVIRONMENT

STRATEGIC HOUSING DEVELOPMENT AT GLENAMUCK ROAD NORTH, CARRICKMINES, DUBLIN 18

MARCH 2022





Introduction

ARC Architectural Consultants Ltd has been commissioned by the Applicant, Moran Park Homebuilders Ltd, to carry out an analysis of the visual impacts of the proposed Strategic Housing Development on lands at Glenamuck Road North, Carrickmines, Dublin 18.

Receiving Environment

The application site comprises a large vacant site on the eastern side of Glenamuck Road North. The site, which is located a short distance to the north of the Carrickmines Luas stop, is situated approximately 220 m to the south of the junction with Brighton Road and Brennanstown Road; and approximately 380 m north of the M50 Motorway. With the exception of the Carrickmines Croquet & Lawn Tennis Club, which opposes the site on the western side of Glenamuck Road North, the area is in largely residential use. Lands associated with existing two storey dwellings at 'Stafford Lodge' and 'Carricáil' adjoin the site to the south; while lands associated with 'Tullybeg' adjoin the site to the north. The site of 'Chigwell' adjoins the site to the northeast. 'Cloverdale' and 'Bridgefield' residences, part of Brennanstown Vale are located to the east of the site.

The application site sits approximately 300 m to the north of the former Carrickmines Castle, the earliest phase of which was believed to have been constructed during the thirteenth century. Carrickmines Castle was a key frontier fortification along what came to be known as The Pale, as described in Dun Laoghaire-Rathdown County Council's *Draft Carrickmines Castle Conservation Plan 2015 - 2025*:

"The fourteenth century was a period of decline for the Anglo-Normans. Poor harvests, famine, war, the arrival of the Black Death in the 1340s and increasing integration between the Anglo-Normans and the Gaelic Irish all contributed to the gradual reduction of the area under the effective control of the Crown. This area centred around Dublin and became known as the 'English Pale'. The term comes from the latin palus or stake (modern words include palisade and impaling) and was also used in places outside Ireland to denote areas of English control. The Act of Marches and Margheries of 1488 defined the limits of the Pale boundary as stretching from Dundalk to Ardee, Co. Louth, to Athboy and Laracor, Co. Meath, and from Kilcock to Harristown and Ballymore, Co. Wicklow and then skirting the foot of the Dublin-Wicklow mountains (a Gaelic Irish stronghold throughout the medieval period) to terminate on the coast at Dalkey.

The Pale boundary was defined by strategic fortifications such as Carrickmines along its length, and by stretches of palisaded earthen ramparts and ditches, fragments of which survive close to Carrickmines. The Pale boundary was not a continuous permanent fortified line of defence, but a flexible boundary which changed over time as lands were gained or lost from Crown control... Over three hundred medieval castles were built within the Pale, with the greatest density along the southern frontier at the foot of the Dublin-Wicklow mountains..."

The Draft Conservation Plan goes on to state, however, "Carrickmines was a frontier fortification long before the Pale boundary was conceived, and was incorporated as part of a series of fortified places linked by stretches of earthen ditches along the base of the Dublin mountains as the Pale defences took shape in this area. While the boundaries of the Pale elsewhere may have changed over time as lands were gained or lost, Carrickmines appears to have consistently remained a frontier stronghold throughout the medieval period. The site of Carrickmines Castle should therefore also be considered as part of a much larger network of fortified places which formed the Pale defences of Dublin."

The Draft Conservation Plan further notes that, throughout the medieval period, Carrickmines Castle also operated as a manor with archaeological excavation uncovering evidence of "a series of four medieval structures (probably houses, with one probable industrial building containing furnaces), a thirteenth-century horizontal water-mill and a pair of corn-drying kilns". This is also discussed by Francis Elrington Ball in *A History of the County of Dublin (Part First)* (1902), who notes that "The castle was garrisoned by a branch of the Walsh family, to which the lands of Carrickmines, or the Little Plain of Rocks, had been given, and its occupants combined in a remarkable degree the aptitude for martial and for agricultural pursuits necessary to make them successful

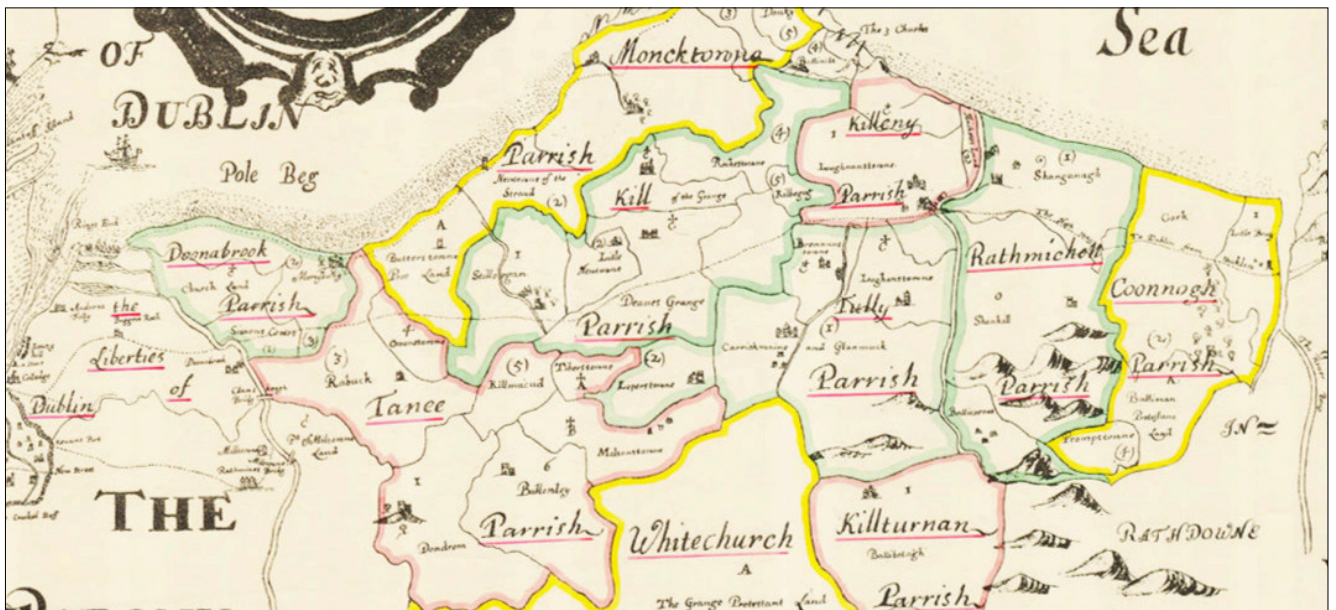
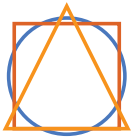


Figure 1: Extract from the Down Survey of Ireland (1656-58) showing "Carrickmair" and "Glanmuck" in "Tully Parish" (Source: The Down Survey Project, Trinity College Dublin)



Figure 2: Extract from the historic 6 inch first edition Ordnance Survey map (1829-1841) showing the area around the former Carrickmines Village. There is no development on the application site. (ARC OS Licence No. CYAL50210860. Ordnance Survey Ireland/Government of Ireland)

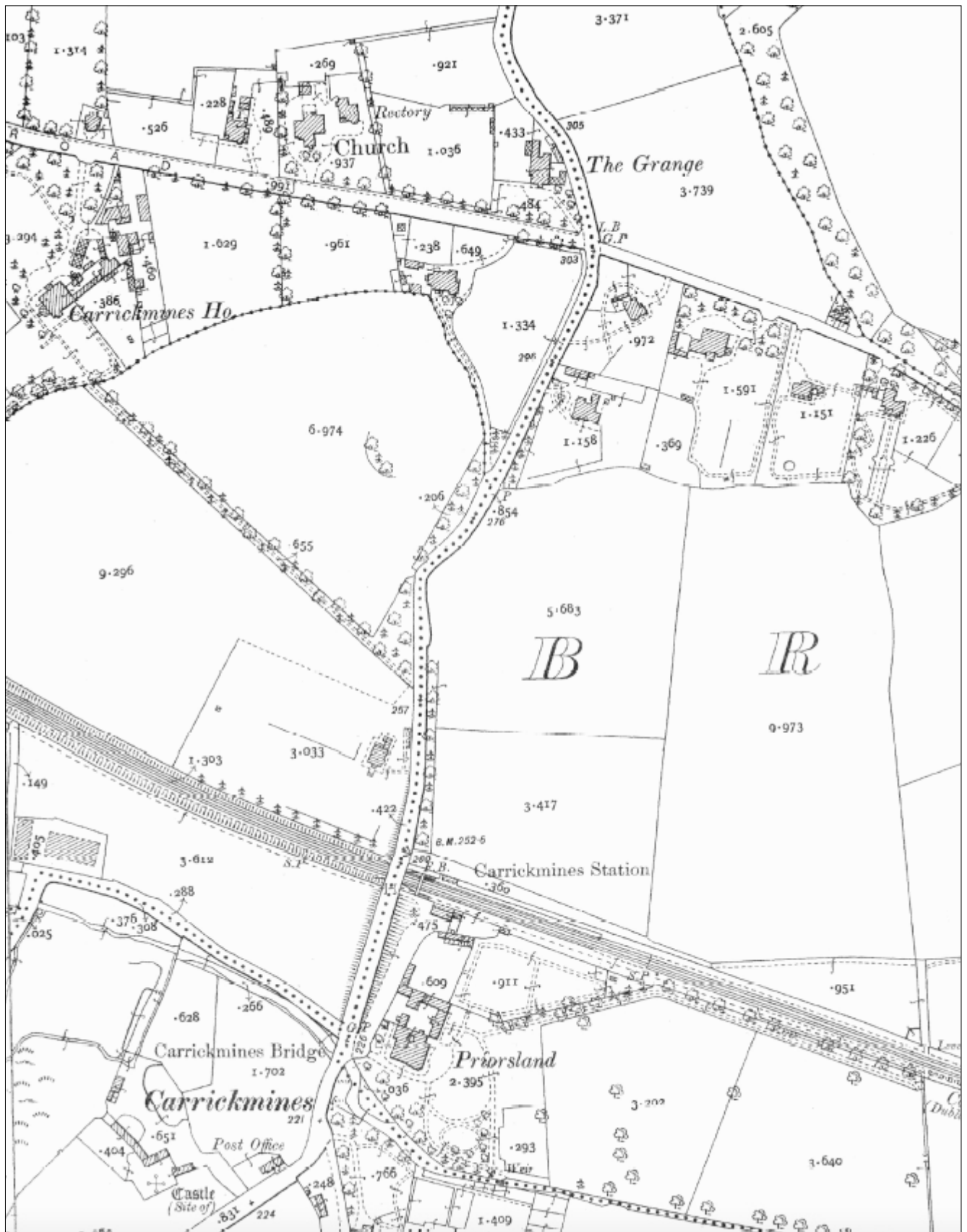
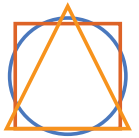


Figure 3: Extract from the historic first edition 25 inch Ordnance Survey map (1897-1913) showing the railway in place running underneath Glenamuck Road (ARCOS Licence No. CYAL50210860. Ordnance Survey Ireland/Government of Ireland). This map also shows the development of Brighton and Brennanstown Roads.



colonists...At the beginning of the seventeenth century, the Walshes were described as a large and ancient stock, and as men of note in the metropolitan county, which was then "rich and plenteous in corn and cattle, and inhabited by a people of stately port and garb." The Castle of Carrickmines was surrounded by an orchard and garden and, so far as was possible, its lands had been subjected to the plough."

In the Irish Confederate Wars, the Walsh family "threw themselves with ardour on the Irish side, and proved that they had become at least as Irish as the Irish themselves", according to Ball. Following the fall of the castle after the ill-fated Siege of Carrickmines on 26th-27th March 1642, Carrickmines Castle was, according to Ball, "blown up and levelled with the ground", although there is some controversy over the extent to which the castle was damaged after the Siege. The Draft Conservation Plan cites Margaret Murphy¹, who has stated that "The date of the Carrickmines buildings at the end of the siege is problematic .. it seems unlikely that, in the middle of a campaign, the soldiers would have had the time, or sufficient surplus gunpowder, to completely raze a castle". The Draft Conservation Plan goes on to explain that "Contemporary records note that Harcourt's soldiers subsequently 'blew up the castle with powder as a mark of terror to the rebels', castles were normally 'slighted' by destroying one or more walls of the castle to render it defenceless without extensive repairs".

Archaeological excavation has revealed a number of features likely to be associated with the Castle, including medieval walls, a farmhouse and a number of stone outbuildings, one of which incorporates a fragment of the medieval gatehouse. After the Siege of Carrickmines, the lands at and surrounding Carrickmines came to be used for agricultural purposes and the surviving portions of Carrickmines Castle were incorporated into farm buildings.

Over time, such was its reputation for its healthful atmosphere, the Carrickmines area came to be a retreat for invalids, as described by Ball: "In the middle of the eighteenth century the principal inhabitants of Carrickmines were Mr. Christopher Smalley and Mr. John Gravel. It was then acquiring a reputation as a health resort and, in the succeeding years, was much frequented by persons affected with pulmonary complaints, for whose accommodation lodgings were provided. Whey made from goats' milk was then the remedy recommended for consumption and kindred diseases; and the Dublin physicians, who, in the early part of the eighteenth century, sent their patients to the mountains of Mourne for the purpose of drinking it, found that, in addition to being more accessible, Carrickmines, where goats abounded, had an equally dry soil and more southern aspect."

Historic mapping appears to show the application site in agricultural use in the first half of the nineteenth century, with significant developments to the west of Glenamuck Road North at Meredith Lodge and another on the site of what is now known as 'Priorsland'. The historic 6 inch first edition Ordnance Survey map would seem to indicate a large dwelling with out buildings and landscaped garden at a development annotated as 'Carrickmines'. While the dwelling was replaced in the late nineteenth century (RPS Ref. 1746; Figure 6) and the site of the garden is now lands associated with the railway, it appears that the outbuildings on the site are those shown on the historic 6 inch first edition Ordnance Survey map.

In *Between the Mountains and the Sea*, Peter Pearson notes that "The residential district of Foxrock is of fairly recent origin, most of it having been built between 1860 and 1920. In the early nineteenth century this area, lying between Leopardstown, Cornelscourt and Galloping Green, was all farmland ... It was only after the completion of the Harcourt Street railway in the 1850s that proposals for the development of Foxrock got under way. A new station was opened in Foxrock in 1862 and another was added at Carrickmines soon after, which meant that residents could commute quickly in and out of the city." That the railway was a catalyst for the development of lands at Glenamuck Road North and nearby Brighton Road and Brennanstown Road is evident from the historic first edition 25 inch Ordnance Survey map (see Figure 3 above), which This shows the railway, Carrickmines Station and the Station House, which is now listed as a protected structure (RPS Ref. 1743; Figures 4 and 6). The map also shows the protected structures at The Grange (RPS Ref. 1695; Figure 7), Tullow Church (RPS Ref. 1693; Figure 8) and Tullow Church Rectory (RPS Ref. 1691;

¹ The Draft Carrickmines Castle Conservation Plan notes these comments as have being made by Dr Margaret Murphy in the 'Historical Background' section of Breen's 2012 *Report on the findings of the archaeological excavations at Carrickmines, Co. Dublin carried out under licenses 00E0525, 02EE1532 and Ministerial Directions. M50 South-eastern Motorway Scheme* by Valerie J. Keeley Ltd. prepared for Dun Laoghaire-Rathdown County Council and the National Roads Authority.

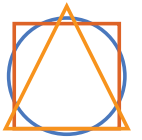


Figure 4: View of the former Carrickmines Railway Station House (RPS Ref. 1743; left) and the house and outoffices at Priorsland (RPS Ref. 1746) from the entrance to Carrickmines Luas Station



Figure 5: View of the front facade at Priorsland (RPS Ref. 1746) from Glenamuck Road North

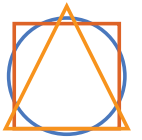


Figure 6: View of the former Carrickmines Railway Station House (RPS Ref. 1743; left) to the rear of outoffices at Priorsland (RPS Ref. 1746) from Glenamuck Road North



Figure 7: View of The Grange (RPS Ref. 1695) from Brighton Road

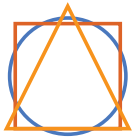


Figure 8: View of Tullow Church (RPS Ref. 1693) from Brighton Road. The Tullow Church Rectory (RPS Ref. 1691) is just visible through the trees to the right of the Church.



Figure 9: View of Tullow Church Rectory (RPS Ref. 1691) to the left of Tullow Church (RPS Ref. 1693) from Brighton Road

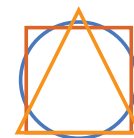


Figure 9) in existence at the turn of the twentieth century on Brighton Road to the north of the site, as well as one house to the north of the site on Glenamuck Road North, Hillside. The house at Hillside (NIAH Reg. No. 60260230) is listed in the National Inventory of Architectural Heritage and is described as follows:

Description

Detached four-bay single-storey house with dormer attic, extant 1909, on an L-shaped plan with two-bay single-storey double gabled projecting end bay. For sale, 1993. For sale, 2014. Sold, 2015. Set in landscaped grounds.

Appraisal

A house erected to a design by Richard Francis Caulfield Orpen (1863-1938) of South Frederick Street, Dublin (DIA), representing an integral component of the early twentieth-century domestic built heritage of south County Dublin with the architectural value of the composition, one showing the development of the so-called "Royal Exchange Estate" as 'a picturesque garden city [with] houses of the new type...designed by architects and well designed too' (The Irish Builder and Engineer 4th February 1911, 80; cf. 60230019; 60230038; 60230041; 60260177; 60260193; 60260195; 60260198; 60260199; 60260227), suggested by such attributes as the angular plan form; the diminishing in scale of the multipartite openings on each floor producing a graduated visual impression; and the high pitched roofline. Having been well maintained, the elementary form and massing survive intact together with substantial quantities of the original fabric, both to the exterior and to the interior where contemporary joinery; chimneypieces; and sleek plasterwork refinements, all highlight the artistic potential of a house having historic connections with John King Maconchy (1889-1958), one-time Vice President of the Association of Consulting Engineers of Ireland (Institution of Civil Engineers of Ireland 1912, 10); and his son Lieutenant Michael King Maconchy (1919-44) of the 2nd Battalion Irish Guards (cf. 60260180).

While constructed at a somewhat later date and not in evidence on the historic 6 inch first edition Ordnance Survey map (1897-1913), the National Inventory of Architectural Heritage also lists the house at Tullybeg (NIAH Reg. No. 60260231), which is located on the site immediately to the north of the application site. It is described as follows:

Description

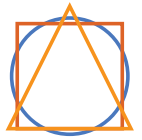
Detached three-bay two-storey flat-roofed house, extant 1937, on a square plan; two-bay two-storey side elevations. Sold, 2013. Flat roof behind parapet with concealed rainwater goods. Rendered walls with concrete coping to parapet. Central door opening. Square-headed door opening (first floor) with cantilevered balcony, and concealed dressings framing replacement glazed uPVC door having horizontal glazing bars. Square-headed window openings with concealed dressings framing replacement uPVC casement windows having horizontal glazing bars. Set in landscaped grounds.

Appraisal

A house representing an important component of the mid twentieth-century domestic built heritage of south County Dublin with the architectural value of the composition, a white-walled International Style house recalling contemporary houses in Knocksinna (see 60230066 - 60230073), confirmed by such attributes as the deliberate alignment maximising on scenic vistas overlooking rolling grounds with a mountainous backdrop in the distance; the compact "cubic" plan form; the uniform or near-uniform proportions of the openings on each floor with those openings showing replicated horizontal glazing patterns; and the parapeted flat roof.

While the Harcourt Street - Bray railway line closed on 31st December 1958, the line was reopened to service the Luas in 2010. The entrance to the Carrickmines Luas station (the station being below road level) is located a short distance to the south of the site.

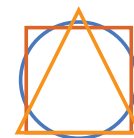
During the early twenty-first century, the Carrickmines area was subjected to major redevelopment and experienced a period of rapid and profound change, triggered by the development of the M50 South Eastern Motorway. Following occupation of



the Carrickmines Castle site by the 'Carrickmindes' group and numerous legal actions, work was completed on the motorway in 2005. The remains of Carrickmines Castle have been preserved *in situ*, but are largely inaccessible behind fencing on a roundabout at the southern end of Glenamuck Road North and behind a barrier, fencing and dense overgrowth between the M50 and Glenamuck Road.

Very considerable development has occurred on Glenamuck Road on the southern side of the M50 including Carrickmines Park commercial and retail development and a number of apartment and housing developments. It is notable that, in the same way that the Harcourt Street - Bray line was a catalyst for the development of the suburbs, the same has been true of the development of the Luas line from Harcourt Street to Sandyford, as subsequently extended from Sandyford to Brides Glen following a Railway Order that came into force in January 2007. There has been considerable development along the Luas line in line with local, regional and national planning policy, which seeks to encourage appropriate densification of development along key public transport corridors.

Planning permission was previously granted on the application site for a residential development of 2 no. three to four storey apartment blocks and 6 no. three storey houses, with all relevant associated development (DLRCC Reg. Ref. D16A/0260; ABP Ref. PL06D. 247822).

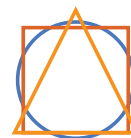


Statutory Context

There are no protected structures on or adjoining the application site and the application site is not located in an Architectural Conservation Area or a Candidate Architectural Conservation Area. There are no views or prospects over the application site identified for protection in the *Dun Laoghaire-Rathdown Development Plan 2016-2022*.

The site is located approximately 230 m from the eastern edge of the Foxrock Architectural Conservation Area. Other relevant designations include the following:

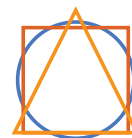
Sites and Monuments Record		
Ref No.	Location	Description
DU026-145----	Carrickmines Great	Rock art This is one of three small boulders containing cup-marks which were discovered during archaeological investigations on the route of the South-Eastern Motorway (Clinton 2002, 87; 2004, 131). Compiled by: Geraldine Stout and Padraig Clancy.
DU026-146----	Carrickmines Great	Rock art This is one of three small boulders containing cup-marks which were discovered during archaeological investigations on the route of the South-Eastern Motorway (Clinton 2002, 87; 2004, 131). Compiled by: Geraldine Stout and Padraig Clancy.
DU026-005001-	Carrickmines Great	Castle - unclassified The fragmentary remains of Carrickmines Castle have been incorporated into farm outbuildings. This is located in low-lying terrain off the Golden Ball-Carrickmines Road. The castle fragment comprises a section of wall (H 4m) built of randomly coursed blocks of granite. It contains a square-headed window under a round segmental arch at ground level. The documentary evidence indicates a castle in existence of Carrickmines from the 14th-century (Ball 1901, 195-203). This castle was apparently levelled following a battle in the 1641 rebellion. The fields SW of the castle are uneven with rock outcrop and a series of irregular ditches marked on the 1937 OS 6 inch map and interpreted as outer defences (pers. comm. Mr. Paddy Healy). These ditches create a number of raised sub-rectangular platforms (L c. 50m, Wth 30m). Monitoring of trial trenches adjacent to the castle in 1996 exposed a stone built drain of post-medieval date (Connolly 1997, 16-17). Excavations have since revealed a double fosse/double bank along the NW flank of the site. To the SE of the inner castle area is a stone-revetted fosse interpreted as part of the southern curtain wall. This enclosed an area of angular form and was connected to an earlier enclosure by a causeway. Two linear fosses identified c 60m to the S of the castle may represent some form of outer defence line. These contained Saintonge pottery which was made in the Saintonge region of France in the 13th and 14th centuries. Remains of a two-phase building were also exposed N of the castle area. Considerable quantities of late 13th/early 14th century pottery have been retrieved. Finds include an iron axehead, spindle whorls, leather shoes, rotary querns, iron keys, nails buckles and sundry implements. A cobbled surface a millpond, kiln and wells were also found on the site (Clinton 2002, 72, 2003, 85-7, 2004, 131). Compiled by: Geraldine Stout and Padraig Clancy. Revised upload on: 10 April 2018 References: 1. Ball, E.F. 1901 Loughlinstown and its history. Journal of the Royal Society of Antiquaries of Ireland 31, 68-84. 2. Connolly, A. 1997 Carrickmines Great. In I. Bennett (ed.), Excavations 1996: summary accounts of archaeological excavations in Ireland, 16-17. Bray: Wordwell. 3. Clinton, M. 2002 Clononey North. I. Bennett (ed.) Excavations 2000. Summary accounts of archaeological excavations in Ireland, 22-4, No. 63. Wordwell. Dublin



DU026-005002-	Carrickmines Great	<p>Bawn</p> <p>This site is located in low-lying terrain off the Golden Ball-Carrickmines Road. Excavations at Carrickmines castle have revealed a double fosse/double bank along the NW flank of the site. To the SE of the inner castle area is a stone-revetted fosse interpreted as part of the southern curtain wall. This enclosed an area of angular form and was connected to an earlier enclosure by a causeway. Two linear fosses identified c 60m to the S of the castle may represent some form of outer defence line. These contained Saintonge pottery which was made in the Saintonge region of France in the 13th and 14th centuries (Clinton 2002, 72; 2003, 85-7; 2004, 131). Compiled by: Geraldine Stout and Padraig Clancy. Revised upload on: 10 April 2018.</p> <p>References: 1. Clinton, M. 2002 Clomoney North. In I. Bennett (ed.) Excavations 2000. Summary accounts of archaeological excavations in Ireland, 22-4, No. 63. Wordwell. Dublin</p>
DU026-005003-	Carrickmines Great	<p>Fortification</p> <p>This site is located in low-lying terrain off the Golden Ball-Carrickmines Road. The fields SW of Carrickmines castle are uneven with rock outcrop and a series of irregular ditches marked on the 1937 OS 6 inch map and interpreted as outer defences (pers. comm. Mr. Paddy Healy). These ditches create a number of raised sub-rectangular platforms (L c. 50m, Wth 30m). Monitoring of trial trenches adjacent to the castle in 1996 exposed a stone built drain of post-medieval date (Connolly 1997, 16-17).</p> <p>Excavations have since revealed a double fosse /double bank along the NW flank of the site. To the SE of the inner castle area is a stone-revetted fosse interpreted as part of the southern curtain wall. This enclosed an area of angular form and was connected to an earlier enclosure by a causeway. Two linear fosses identified c 60m to the S of the castle may represent some form of outer defence line (Clinton 2002, 72, 2003, 85-7, 2004, 131). Compiled by: Geraldine Stout and Padraig Clancy Revised upload on: 10 April 2018</p> <p>References: 1. Clinton, M. 2002 Clomoney North. In I. Bennett (ed.) Excavations 2000. Summary accounts of archaeological excavations in Ireland, 22-4, No. 63. Wordwell. Dublin 2. Connolly, A. 1997 Carrickmines Great. In I. Bennett (ed.), Excavations 1996: summary accounts of archaeological excavations in Ireland, 16-17. Bray: Wordwell.</p>
DU026-005004-	Carrickmines Great	<p>Mill - unclassified</p> <p>This site is located in low-lying terrain off the Golden Ball-Carrickmines Road. A millrace runs from the site identified on the OS 1st edition map as 'site of an ancient mill' to the N of Carrickmines castle. Compiled by: Geraldine Stout and Padraig Clancy. Revised upload on: 10 April 2018.</p>
DU026-005005-	Carrickmines Great	<p>Castle - ringwork</p> <p>This site is located in low-lying terrain off the Golden Ball-Carrickmines Road. Excavations at Carrickmines castle in 2001 uncovered evidence for an earthen bank/fosse-defended enclosure which has been interpreted as an irregularly shaped ringwork castle (Clinton 2001, 87).</p> <p>References: 1. Clinton, M. 2001 The souterrains of Ireland. Bray: Wordwell.</p>
DU026-080001-	Brenanstown, Carrickmines Great	<p>Enclosure</p> <p>The OS Letters (1837) include sketches of the Brennanstown/Carrickmines Great area that show a series of enclosures to the S of site of an 'ancient mill'. This was located on a stream E of Carrickmines that runs into Glendruoid Glen. There is no visible trace of these enclosures. Compiled by: Geraldine Stout and Padraig Clancy.</p>
DU026-080002-	Brenanstown, Carrickmines Great	<p>Water mill - unclassified</p> <p>The 1836 OS 6-inch map shows the 'site of ancient mill' along a stream E of Carrickmines that runs into Glendruoid Glen. It is marked on the Down Survey (1655-6) map and the Civil survey (1654-6) states that there was a corn mill and tuck mill here (Simington 1945). The OS Letters include sketches of this area which show the foundations of a rectangular building and a feature marked 'Old Quern' (O'Flanagan 1927, 16). Paddy Healy has pinpointed the site as being within the wooded area of the Druid's Glen (Pers. comm. Rob Goodbody). Compiled by: Geraldine Stout and Padraig Clancy.</p>
DU026-115----	Ballyogan	<p>Linear earthwork</p> <p>Goodbody (1993) has identified an impressive section of linear earthwork, which may be part of the Pale Ditch. It is located on a valley floor at the foot of the Dublin Mountains. It runs on a line between Carrickmines Castle (DU026-005---) and Kilgobbin castle (DU025-017001-). It comprises a high, flat-topped bank (H 2.50m, Wth 2-3m) with contiguous ditches on both sides. The ditch on the northern side (Wth 2.4m, D 0.40m) is shallower than that on the southern side (Wth.3m, D 1m). There are thorns growing on the bank. Archaeological investigations in 1998 exposed a section through the base of the ditch (Wth 1.6m, D 1.2m), no finds were recovered (Reid, M 1999, 61 https://www.excavations.ie/report/1998/Dublin/0003377/). Compiled by: Geraldine Stout and Padraig Clancy. Revised upload on: 21 April 2018.</p> <p>References: 1. Goodbody, R. 1993 On the borders of the Pale. A history of Kilgobbin, stepaside and the Sandyford area. Bray: Pale Publishing.</p>



National Inventory of Architectural Heritage		
Ref No.	Location	Description
60260185	Brighton Road, Kerrytown, Dublin	Carrickmines House Date: 1855-1871 Original Use: House Rating: Regional
60260180	Brighton Road, Foxrock, Dublin	Tullow Church (Tullow) Date: 1860-1865 Original Use: Church/Chapel Rating: Regional
60260181	Brighton Road, Foxrock, Dublin	Tullow Church (Tullow) Date: 1885-1895 Original Use: Rectory/glebe/vicarage/curate's house Rating: Regional
60260183	Brighton Road, Claremont Road Originally Claremont Road, Kerrytown, Dublin	The Grange Date: 1844-1894 Original Use: House Rating: Regional
60260207	Claremont Road Originally Claremont Road, Kerrytown, Dublin	Date: 1881-1901 Original Use: Post box Rating: Regional
60260184	Brighton Road, Kerrytown, Dublin	Mountsandel Date: 1844-1909 Original Use: House Rating: Regional
60260225	Brennanstown Road Originally Brennanstown Road, Brennanstown, Dublin	Coolgreen Date: 1895-1905 Original Use: House Rating: Regional
60260227	Brennanstown Road Originally Brennanstown Road, Glenamuck Road, Brennanstown, Dublin	Ingleside Date: 1902-1909 Original Use: House Rating: Regional
60260230	Glenamuck Road, Brennanstown, Dublin	Hillside Date: 1902-1909 Original Use: House Rating: Regional
60260231	Glenamuck Road, Brennanstown, Dublin	Tullybeg Date: 1912-1937 Original Use: House Rating: Regional
60260232	Glenamuck Road, Brennanstown, Dublin	Carrickmines Railway Station Date: 1850-1855 Original Use: Railway Station Rating: Regional
60260233	Glenamuck Road, Brennanstown, Dublin	Carrickmines Railway Station Date: 1850-1909 Original Use: Water tower Rating: Regional
60260234	Glenamuck Road, Brennanstown, Dublin	Priorsland Date: 1844-1884 Original Use: House Rating: Regional
60260228	Glenamuck Road, Carrickmines Little, Dublin	Date: 1911-1937 Original Use: Water pump Rating: Regional
Dun Laoghaire-Rathdown County Development Plan 2016-2022 Record of Protected Structures		
RPS No.	Location	Description
1691	Brighton Road, Foxrock, Dublin 18	Tullow Church Rectory Rectory
1692	Brighton Road, Foxrock, Dublin 18	Tullow Church Church
1695	Brighton Road, Foxrock, Dublin 18	The Grange House
1743	Glenamuck Road, Carrickmines, Dublin 18	Station House (Former Carrickmines Railway Station) Railway Station (former) House
1746	Glenamuck Road, Carrickmines, Dublin 18	Priorsland House, Out Offices and Gates

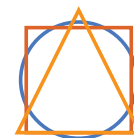


The Dun Laoghaire-Rathdown Development Plan 2016-2022 includes a Building Heights Strategy at Appendix 9, which states that in suburban areas such as the subject site, apartment developments of a height of 3-4 storeys may be permitted in appropriate locations such as “prominent corner sites, on large redevelopment sites or adjacent to key public transport nodes - providing they have no detrimental effect on existing character and residential amenity.”. However, the Building Heights Strategy goes on to state that: “This maximum height (3-4 storeys) for certain developments clearly cannot apply in every circumstance. There will be situations where a minor modification up or down in height could be considered. The factors that may allow for this are known as ‘Upward or Downward Modifiers’.” Section 4.8.1: Upward Modifiers provides that consideration may be given to allowing for height over and above the benchmark heights for development:

4.8.1 Upward Modifiers

Upward Modifiers where Upward Modifiers may apply where:

- a. The development would create urban design benefits, for example:
 - It would enclose main public or green spaces to their benefit,
 - It would enclose a main street or mark a major cross-roads and/or transport interchange to the benefit of the legibility, appearance or character of the area,
 - It would beneficially frame an important view.
- b. The development would provide major planning gain, such as:
 - Significant improvements to the public realm,
 - The provision or significant enhancement of a public transport interchange,
 - The provision of new or improved transport infrastructure.
- c. The development would have civic, social or cultural importance, for example:
 - It would provide new facilities or enhance existing facilities in such fields as culture, education, leisure or health,
 - It would provide or enhance public space or social facilities especially in areas where such facilities are deficient,
 - It would enable important cultural, historic or archaeological sites, landscape and natural features or trees to be retained and enhanced.
- d. The built environment or topography would permit higher development without damaging the appearance or character of the area, for example:
 - In an area where the location or scale of existing buildings would allow the recommended height to be exceeded with little or no demonstrable impact on its surroundings,
 - In a dip or hollow, behind a rise, or near a large tree screen, where the impact of a higher building would have little or no additional impact on its surroundings.
- e. A development would contribute to the promotion of higher densities in areas with exceptional public transport accessibility, whilst retaining and enhancing high quality residential environments. (Areas with exceptional public transport accessibility are defined as areas within a 500m walkband on either side of the Luas corridor, a 500m walkband around the DART stations, a 500m walkband on either side of the N11 and 100m walkband on either side of a QBC). Densities should be higher adjacent to these corridors and nodes and grade down towards neighbouring areas so that they are lower in close proximity to residential areas.
- f. The size of a site, e.g. 0.5ha or more, could set its own context for development and may have potential for greater building height away from boundaries with existing residential development. The overall positive benefits of a development proposal would need to be of such a significance as to clearly demonstrate to the satisfaction of the Planning Authority that additional height is justified. It will be necessary, therefore, for a development proposal to meet more than one ‘Upward Modifier’ criteria



In December 2018, the Department of Housing, Planning and Local Government published the *Urban Development and Building Heights Guidelines for Planning Authorities*, which sets out the following development management criteria:

"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

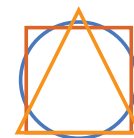
- The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape
- The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.
- 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 while being in line with the requirements of "The Planning System and Flood Risk Management – Guidelines for Planning Authorities" (2009).
- 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 *Design Manual for Urban Roads and Streets* (DMURS, 2013) is highly critical of frontage-free streets as, while this design approach was believed to reduce risk, it serves to increase speeding. DMURS states: "Frontage-free streets (such as distributor roads) are not recommended, as they can be unsafe for pedestrians (especially after dark) and can result in a hostile environment." Section 2.2.1 'Place' as Part of the Design Equation of DMURS provides as follows:

"Designers must broaden the scope of issues that are considered throughout the design process. Whilst the movement of traffic is still a key issue, there are several others, including the 'sense of place', which are of core significance to the creation of safe and more integrated street designs... The elements of place can be difficult to define as they often relate to the 'feel' of a particular area. More tangible elements of place can be measured and relate to connectivity, the quality of the built environment, how buildings and spaces interact with each other and the levels of pedestrian activity that occur. These tangible or quantifiable elements of a street highlight four interlinked characteristics that influence the sense of place within a street...:

Connectivity

*The creation of vibrant and active places requires pedestrian activity. This in turn requires **walkable street networks** that can be **easily navigated and are well connected**.*



Enclosure

*A sense of enclosure spatially defines streets and creates a more intimate and supervised environment. **A sense of enclosure is achieved by orientating buildings toward the street and placing them along its edge.** The use of street trees can also enhance the feeling of enclosure.*

Active Edge

*An active frontage enlivens the edge of the street creating a more interesting and engaging environment. An active frontage is achieved **with frequent entrances and openings** that ensure the street is overlooked and generate pedestrian activity as people come and go from buildings.” [Emphasis added.]*

The policies and objectives of the *Dun Laoghaire-Rathdown County Development Plan 2016-2022*, the *Urban Development and Building Heights Guidelines for Planning Authorities* and the *Design Manual for Urban Roads and Streets* are referenced here in the interests of completeness. However, in the interests of clarity, it should be noted that neither these guidelines, nor, indeed, any other planning policy guidelines (save those related to environmental impact assessment), were considered when classifying the magnitude and extent of potential visual impacts of the proposed development on the built environment.

Relevant Characteristics of the Proposed Development

The proposed development shall provide for the construction of (a) 118 no. residential apartment units in the form of 3 no. residential blocks of apartments ranging in height from 4 storeys and transitioning to 6-7 storeys overall.

The overall development proposal shall provide for the following:

- Block A (7 storeys) comprising 44 no. units (13 no. 1 bed units, 28 no. 2 bed units and 3 no. 3 bed units);
- Block B (6-7 storeys overall) comprising 38 no. units (11 no. 1 bed units, 26 no. 2 bed units and 1 no. 3 bed units); and
- Block C (6 storeys overall) comprising 36 units (10 no. 1 bed units; 22 no. 2 bed units and 4 no. 3 bed units);

Each new residential unit has an associated area of private open space in the form of balcony / terrace area and set back upper floor levels.

Open space (approx. 2,071 sqm) is provided by one major centrally located public open space (1158.4 sqm) between blocks A and B which include a play area of 63.2 sqm, two further communal open space areas are provided adjoining Blocks B (471.8 sqm) & Block C (440.8 sqm).

Communal Area located at the ground floor of Block B (approx. 161.3 sqm) comprising of a shared working space (35.6 sqm), meeting rooms (42.2 sqm.), a gym (36.6 sqm) and changing/tea stations (46.7 sqm) is also proposed.

2 no. basement level areas (approx. 2,340.9 sqm) are also proposed at lower ground / ground floor level of Blocks A, B (1,470.0 sqm) and C (834.9 sqm) and include car parking, bicycle parking, refuse storage areas, plant areas and ESB Substation which is located between Block B and C. A total of 103 no. car parking spaces (67 no. at basement level and 36 no. at surface level to include 17 no. electric power points and 5 no. accessible parking spaces) are proposed. In addition, 5 no. motorcycle parking spaces (3 no. at basement level A and B, and 2 no. at basement level C). A total of 280 no. bicycle parking spaces (254 no. at basement level and 26 no. at surface level) are also proposed. Proposals for vehicular and pedestrian access comprise via Glenamuck Road North and all associated upgrade works; The access point to the south (via Carrickil) is for pedestrians and cyclists only.

Associated site and infrastructural works including the provision for water services, foul and surface water drainage and connections; attenuation proposals; permeable paving; all landscaping works to include new tree and hedge planting; green roofs; boundary treatments; internal roads and footpaths; and electrical services.



Methodology

A survey of the potential visibility of the proposed development was carried out having regard to the contents of the *Dun Laoghaire-Rathdown Development Plan 2016-2022* (including in particular the location of key views and prospects, protected structures and conservation areas). A survey of the potential visibility of the proposed development was carried out by ARC in May 2021.

Before visiting the surrounding area, ARC carried out mapping analysis to identify locations surrounding the application site, which would be representative of the extent of visibility of the proposed development, including locations from which views of the proposed development were likely. Photomontages were prepared by Digital Dimensions from these view locations and these photomontages are submitted with this application. ARC had regard to those photomontages in the preparation of this Visual Impact Assessment.

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

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

Susceptibility of visual receptors to change

- 6.32 The susceptibility of different visual receptors to changes in views and visual amenity is mainly a function of:
- the occupation or activity of people experiencing the view at particular locations; and
 - the extent to which their attention or interest may therefore be focused on the views and the visual amenity they experience at particular locations.
- 6.33 The visual receptors most susceptible to change are generally likely to include:
- residents at home...;
 - people, whether residents or visitors, who are engaged in outdoor recreation, including use of public rights of way, whose attention or interest is likely to be focused on the landscape and on particular views;
 - visitors to heritage assets, or to other attractions, where views of the surroundings are an important contributor to the experience;
 - communities where views contribute to the landscape setting enjoyed by residents in the area.

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

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



Definition Of Visual Impacts On The Built Environment

The assessment of visual impacts on landscape and on the built environment had regard to the *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports* prepared by the Environmental Protection Agency (Draft of 2017), and to Directive 2011/92/EU (as amended by Directive 2014/52/EU) on the assessment of the likely effects of certain public and private projects on the environment.

The list of definitions given below is taken from *Table 3.3: Descriptions of Effects* contained in the *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports* prepared by the Environmental Protection Agency. Some comment is also given below on what these definitions might imply in the case of visual impact or landscape and visual impact. The definitions from the EPA document are in italics.

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

Not Significant: *An effect which causes noticeable² changes in the character of the environment but without significant consequences* (the footnote “2” to the word “noticeable” is: “for the purposes of planning consent procedures”). The definition implies that the development would be visible, capable of detection and of being noticed by an observer who is actively looking for the development with the purpose of assessing the extent of its visibility and visual effects.

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

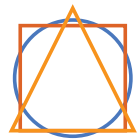
Moderate: *An effect that alters the character of the environment in a manner that is consistent with existing and emerging baseline trends.* In this case, a development must bring about a change in the visual character of the environment; and this change must be consistent with a pattern of change that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

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

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

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

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



permanently visible, the extent of visual impact associated with a building often diminishes with time as further development in the area takes place.

Potential Visual Impacts on the Built Environment

This section provides a description of the potential specific, direct and indirect impacts that the proposed development is likely to have on the visual environment.

The extent of potential visual impact of the proposed development on the built environment from locations around the proposed development is discussed below. The view locations discussed below are representative of locations from which it was suggested by mapping analysis that development might be visible.

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

Overview of Visual Impact on the Built Environment

The character and visual environment of Carrickmines has changed dramatically over the course of the past century from a rural area to a busy suburb, with the pace of change accelerating considerably in the late nineteenth and early twentieth centuries (after the construction of the Harcourt Street - Bray Line) and again in the early twenty-first century. While the application site is a prominent site surrounded by development sensitive to visual change (i.e. buildings in residential use and buildings and sites of heritage value), the capacity of the application site to absorb the impacts of buildings higher than that of the surrounding low density residential estates is considerable. The subject application site is located in close proximity to the M50 South Eastern Motorway, which serves as transport infrastructure of strategic national importance. A road corridor with this level of traffic is a very robust visual environment, and views of the proposed development from or south of the M50 road corridor will be in this context.

The impact of the proposed development on the visual environment is likely to be largely restricted to the local area surrounding the application site. However, having regard to the elevation of the application site, the proposed development may be visible from some more distant locations on the M50 and south of the M50. There may also be views of the proposed development from distant elevated locations, across open foregrounds or at the ends of streets aligned towards the application site. It follows, that for taller structures (e.g. taller than the prevailing height of two storeys) to be openly visible in a built up area, they must be seen across an open foreground or at the end of a long vista or alignment. Where visible at close proximity, the construction of the proposed development is likely to result in a “significant” change to the visual environment, reducing to “imperceptible” and “slight” to “moderate” at greater distance from the application site.

While the potential impact of the proposal from some nearby locations is assessed as “significant”, it is notable that there are many reasons why the viewer might be more positively disposed to the development now proposed on this long vacant site. For example, there are many who will support the development of new homes on a vacant site in close proximity to a public transport corridor (i.e. the Luas line). Moreover, the subject design proposes a new active street frontage on to Glenamuck Road North, which will provide for a greater sense of enclosure and passive supervision. Given this and given the pace and extent of development in Carrickmines over the past twenty years, it may be that many will regard the impact of the proposed development as consistent with emerging trends for development in the wider Dublin area or “moderate” in extent.

Views from Carrickmines Luas Park & Ride (View 1)

The proposed development is unlikely to be visible in views from the Carrickmines Luas Park & Ride due to intervening mature trees, although the potential for glimpses of the proposal to be just possible when trees are not in leaf cannot be discounted. Similarly, the proposed development is not likely to be visible from the designated sites to the east of the Park & Ride (SMR Ref. DU026-080001- and DU026-080002-). If visible, the proposed development is likely to form a minor part of the view.



The potential visual impact of the proposed development on views from this location is assessed as ranging from none to “imperceptible”.

Views from Glenamuck Road North (Views 2, 3 & 8)

The road at Glenamuck Road North extends south from the junction with Brighton Road and Brennanstown Road downhill in the direction of the M50 Motorway. Glenamuck Road is characterised by low density development, including expansive two storey houses on large sites and small housing estates comprised of two storey houses. Glenamuck Road North also accommodates the Carrickmines Croquet & Lawn Tennis Club, which includes a complex of sizeable one to two storey buildings.

Due to the curvature of the road and due to dense mature tree planting, much of the proposed development will be obscured in views from the junction with Brighton Road and Brennanstown Road (View 2). It is, therefore, unlikely that the proposed development will result in any visual impacts on the Foxrock Architectural Conservation Area or on nearby protected structures at Brighton Road, including The Grange (RPS Ref. I 695; Figure 7), Tullow Church (RPS Ref. I 693; Figure 8) and Tullow Church Rectory (RPS Ref. I 691; Figure 9). The potential for glimpses of the proposed development to be just possible from the upper floors of The Grange cannot be entirely discounted. If visible, the potential impact of the proposed development on views from the upper floors of The Grange is assessed as ranging from none to “imperceptible” to “slight”.

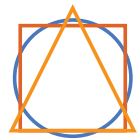
As the proposal fronts on to Glenamuck Road North, much of Block A will be visible from the section of Glenamuck Road North between the junction with Brighton Road and Brennanstown Road and the roundabout to the south, while glimpses of Block B will be possible through gaps in intervening development and vegetation. It is also inevitable that the proposed development will be visible from neighbouring residential lands on the eastern side of Glenamuck Road, particularly those in closest proximity to the site. Given the low density character of Glenamuck Road North, the proposed development is likely to appear as considerably larger in height than existing development on the road. When viewed in the context of existing low rise buildings at Glenamuck Road North, the construction of the proposed development is likely to result in a significant change to the visual environment of Glenamuck Road North. However, having regard emerging patterns of denser development in Carrickmines and the wider area, some are likely to regard the development as resulting in a “moderate” visual impact.

The proposed development is likely to be visible from a number of neighbouring residential properties of architectural heritage value on the eastern side of Glenamuck Road North, including Tullybeg (NIAH Reg. No. 60260231) on lands adjoining the application site to the north. Given the proximity of the site at Tullybeg to the application site and given that a number of windows within Tullybeg face into the application site, there is a potential for the proposed development to result in “significant” impact on the setting of the house and also on views from the house. However, it is noted that Tullybeg is set on a large site with considerable mature tree planting on the boundaries. It is further noted that the proposed development has been laid out so that the south-facing elevation of Tullybeg overlooks the proposed open space between the proposed Blocks A and B.

Also to the north, the house at Hillside (NIAH Reg. No. 60260230) is located at the northern end of a heavily planted site accommodating a large number of mature trees. Given this, the potential impact of the proposed development on views to and from Hillside is assessed as ranging from none to “imperceptible” to “moderate”.

The proposed development is likely to be visible in views to and from Carrickmines Railway Station House (RPS Ref. I 743) and the house and outoffices at Priorsland (RPS Ref. I 746). Having regard to the distance between the application site and these buildings and to the very significant change in their original contexts, the potential impact of the proposed development on views to and from these buildings is assessed as ranging from none to “imperceptible” to “moderate”.

To the south, the proposed development will be visible from the sites of the National Monuments associated with Carrickmines Castle (see View 3). While the construction of the proposed development is likely to breach the sky line in views looking north from this part of Glenamuck Road North, it must be borne in mind that the original setting of these National Monuments associated with Carrickmines Castle has been very significantly altered by the construction of the M50 South Eastern Motorway



and that these monuments are both hidden from public view from the road and largely inaccessible to members of the public. Given this, the potential for the proposed development to result in any undue negative visual impacts on the monuments of Carrickmines Castle is considerably reduced. The potential visual impact of the proposed development on views to and from the National Monuments associated with Carrickmines Castle is assessed as none to “imperceptible” to “moderate”.

Overall, the potential visual impact of the proposed development on views from Glenamuck Road North is assessed as ranging from none to “moderate” to “significant”.

Views from Pavilion Gate (View 4)

The application site is located on the eastern side of Glenamuck Road North opposing the entrance to the housing development of ten detached houses at Pavilion Gate. This road also serves to provide access to the Carrickmines Croquet and Lawn Tennis Club. Portions of the front facade of the proposed Block A and the boundary treatment on to Glenamuck Road North will be visible from the road at Pavilion Gate. While most houses in this development face away from the application site, there is a potential for the proposal to be visible through gaps in intervening trees from front facing rooms within the houses at Nos. 8, 9 and 10 Pavilion Gate. There is also a potential for the upper elements of the proposed Block A to be visible from the closest rear gardens (e.g. such as the garden to the rear of No. 1 Pavilion Gate). It is likely that the proposal will also be visible from some locations within the Carrickmines Croquet & Lawn Tennis Club. As noted above, the construction of the proposed development is likely to result in a significant change to the visual environment of Glenamuck Road North. However, having regard to emerging patterns of denser and taller development in the wider area, some are likely to regard the development as resulting in a “moderate” visual impact or one, which is consistent with emerging trends in the area. Overall, the potential visual impact of the proposed development on views from lands at Pavilion Gate is assessed as ranging from none to “moderate” to “significant”.

Views from Brennanstown Vale (Views 9 & 10)

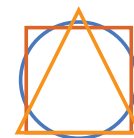
The proposed development is likely to be intermittently visible from the residential development at Brennanstown Vale to the east of the application site. Brennanstown Vale is heavily landscaped with trees and boundary hedges. This existing landscaping and existing development at Brennanstown Vale will obscure visibility of the proposed development from many locations on the access road and footpath, such as from the entrance to the estate at Brennanstown Road. While the proposed development is not likely to be visible from Brennanstown Road, there is a potential for the proposal to be just visible from the upper floors of buildings on Brennanstown Road, such as those at Ingleside (NIAH Reg. No. 60260227) and Coolgreen (NIAH Reg. No. 60260225). Where visible, the potential impact of the proposed development on views from private houses on Brennanstown Road is likely to range from “slight” to “moderate”.

Glimpses of the upper elements of the proposal are likely to be possible through gaps in intervening development and vegetation from the section of the access road closest to the application site. Where visible, the proposed development is likely to form a minor part of the view. The potential visual impact of the proposed development on views from the public realm at Brennanstown Vale is assessed as ranging from none to “slight” to “moderate”.

The proposed development is likely to be visible above existing trees and landscaping from the rear gardens and the rear windows houses in closest proximity to the application site at Brennanstown Vale (such as Nos. 4 and 6 Brennanstown Vale, but also the nearby houses at Nos. 1, 2, 8 and 10). Where visible, the construction of the proposed development is likely to result in resulting in a potentially “slight” to “significant” change to the visual environment. The potential for the proposed development to be visible from other houses at Brennanstown Vale or from Brennanstown Close cannot be discounted.

Views from residential estates to the west (Views 5, 6 and 7)

Lands to the west to of Glenamuck Road North and to the south of Brighton Road are characterised by large residential estates of one to two storey houses including Mountsandel Park, Carrickmines Little, Brighton Avenue, Brighton Court, Brighton Hall, Bright Place and Brighton Square - the impact on the residential estate at Pavilion Gate is discussed in more detail above. Visibility of the proposed development from these residential estates at Mountsandel Park, Carrickmines Little,



Brighton Avenue, Brighton Court, Brighton Hall, Bright Place and Brighton Square is likely to be limited by intervening trees and development. There is a potential for the proposed development to be just visible through gaps in intervening trees along the boundary of the Carrickmines Croquet & Lawn Tennis Club from Brighton Court (e.g. in the area around Nos. 5-14 Brighton Court) and from Brighton Avenue (e.g. in the area around Nos. 15-21 Brighton Avenue). The potential visual impact of the proposed development on views from the public realm at Brennanstown Vale is assessed as ranging from none to “imperceptible” to “moderate”.

While the potential for the proposed development to be visible from the upper floors of some houses facing towards the application site cannot be discounted, it is unlikely that the proposed development will be visible from the public realm within the residential estates at Mountsandel Park, Carrickmines Little, Brighton Avenue, Brighton Court, Brighton Hall, Bright Place and Brighton Square.

Distant views

Having regard to the topography whereby the land rises sharply from the M50 to the junction of Glenamuck Road North with Brighton Road, there are a number of locations from where there is the potential for the proposed development to be visible, such as from the M50 motorway itself and from its associated slip roads at Junction 15. As noted in the Landscape Institute and Institute of Environmental Management & Assessment's *Guidelines for Landscape and Visual Impact Assessment* “*Travellers on road, rail or other transport routes tend to fall into an intermediate category of moderate susceptibility to change. Where travel involves recognised scenic routes awareness of views is likely to be particularly high.*” Given that this section of the M50 would not be considered a “scenic route” and given that considerable development has been carried out and is envisaged at Carrickmines, the potential impact of the proposed development on views from the M50 is assessed as none to “not significant” to “moderate”. Similarly, the proposed development is likely to be visible from recently developed areas at and near Ballyogan Road and Glenamuck Road (i.e. south of the M50 motorway). Where visible, the proposed development is likely to form a relatively small element in views and is likely to be visible in the context of infrastructural development associated with the M50 and the Luas. The potential impact of the proposed development on views from these locations is assessed as ranging from none to “not significant” to “slight”.

The impacts considered above represent a worst-case scenario.

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