

Townscape and Visual Impact Assessment

Proposed Redevelopment of the Treasury Building, Grand Canal Street Lower, Dublin 2

Prepared by Model Works Ltd
for Google

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1.0 Introduction

This report assesses the potential townscape and visual effects of a proposal to redevelop the Treasury building on Grand Canal Street Lower, Dublin 2.

The report was prepared with reference to the Landscape Institute *Guidelines for Landscape and Visual Impact Assessment* 2013 (GLVIA), the Institute's Information Note *Townscape Character Assessment* 2017, and the EPA draft *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports* 2017. The assessment methodology including explanation of the criteria and terms used is provided in Appendix A. The report was prepared by Richard Butler MILI MIPI of Model Works.

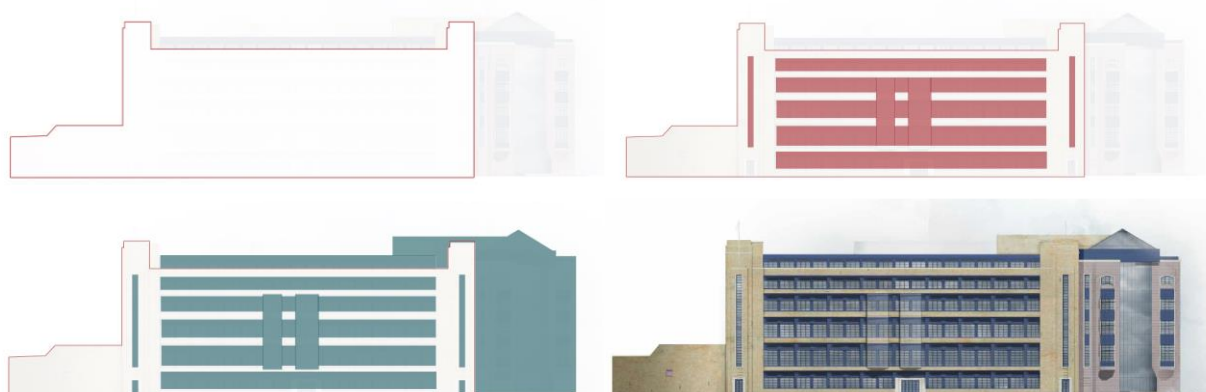
2.0 The Receiving Environment

2.1 The Site

The subject site is occupied by the Treasury Building. This is an office building developed in the late 1980s to early 1990s on the site of the former Boland's Mill Bakery. The modern building incorporates a large part of the bakery building which was itself constructed in the late 1940s to early 1950s (replacing earlier structures). The modern redevelopment retained the main structure of the bakery but replaced the fenestration, and extended the building to the east by adding an octagonal atrium projecting between flanking bays.

The resulting building has a composite, strongly geometric form with a diverse palette of materials (see Photo 1 overleaf). This includes the light red brick of the former bakery building, a pink-toned stone cladding with light stone trim to the eastern extension, and the dark tinted glazing of the atrium and windows. Heavy, decorated dark metal window frames and banded metal cladding are used to tie the historic and modern elements together.

Figure 1a-d (a) The outline of the 1940/50s bakery; (b) the fenestration removed from the 1940/50s building; (c) the elements added in the 1980/90s redevelopment; (d) the resulting building.



The modern extension was designed to read as both distinct from and tied to the historic structure. Its contrasting forms and materials (e.g. the octagonal atrium, vertical bands of windows and a general vertical emphasis, the arched window opes at the upper levels and the pink-toned cladding) succeeded in making the extension distinct. The shared elements (the metal window frames and dark tinted glazing) were less successful in tying the development together as a coherent whole.

Overall, while distinctive, the building can be considered unsightly. The modern and historic elements do not sit comfortably together; nor do they read as two separate, adjoining buildings (due to the common elements). In views from all directions the building does not make a positive contribution to the streetscape or wider townscape. The interface of the building with Grand Canal Street Lower is also unfortunate. There is an entrance in this façade but it is no longer used, and the window sills of the ground floor windows are uncomfortably high, limiting intervisibility between the building and the street. Combined with a narrow pavement on the north side of the street this reduces the streetscape quality (see Photo 2).

Photo 1 The view towards the main entrance from Grand Canal Street Lower to the south east, showing the composite form and varied materials of the building.



Photo 2 A view from Grand Canal Street Lower showing the building's poor streetscape interface.

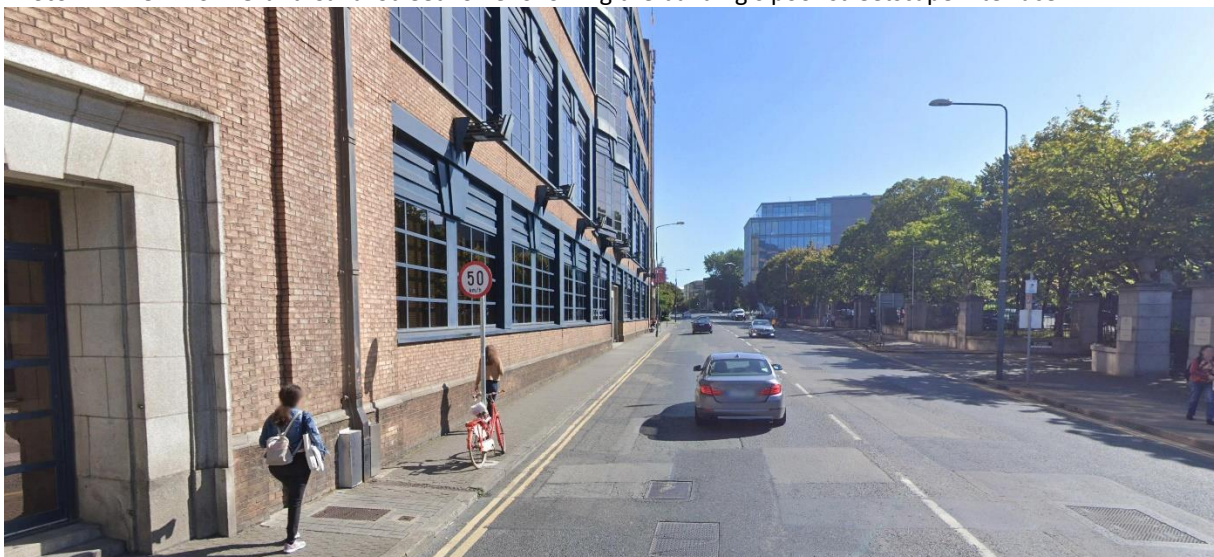


Photo 3 A view from the north east on Clanwilliam Terrace showing the building's complex, geometric profile.



Photo 4 The view towards the site from Macken Street to the north west.



2.2 Surrounding Townscape Character

2.2.1 Current Character

The site is part of the Docklands character area – specifically the Grand Canal Dock area, which can be considered Dublin's most successful contemporary urban quarter.

It is a rapidly evolving townscape in which a combination of water frontage, industrial and architectural heritage, contemporary architecture including buildings of scale, higher density and a mix of uses generates a distinct character. It is one of the few areas in the city where a capacity for change has been recognised, allowing compact growth to take place and contemporary architecture to express boldly, encouraged by planning policy.

A notable characteristic of the area is its generally well defined boundary. This is a result of the planned, 'zonal' development of the docklands originally (see Figures 2-4), and the similarly planned modern transformation of the area. This plan-led approach combined with the nature of the development (historic and modern) has contributed to the clear character transitions that occur across stretches of Ringsend Road, Barrow Street, Macken Street and Grand Canal Street Lower.

Photo 5 A view of the complex, attractive Grand Canal Docks townscape just to the east of the site.



2.2.2 Evolution of the Area

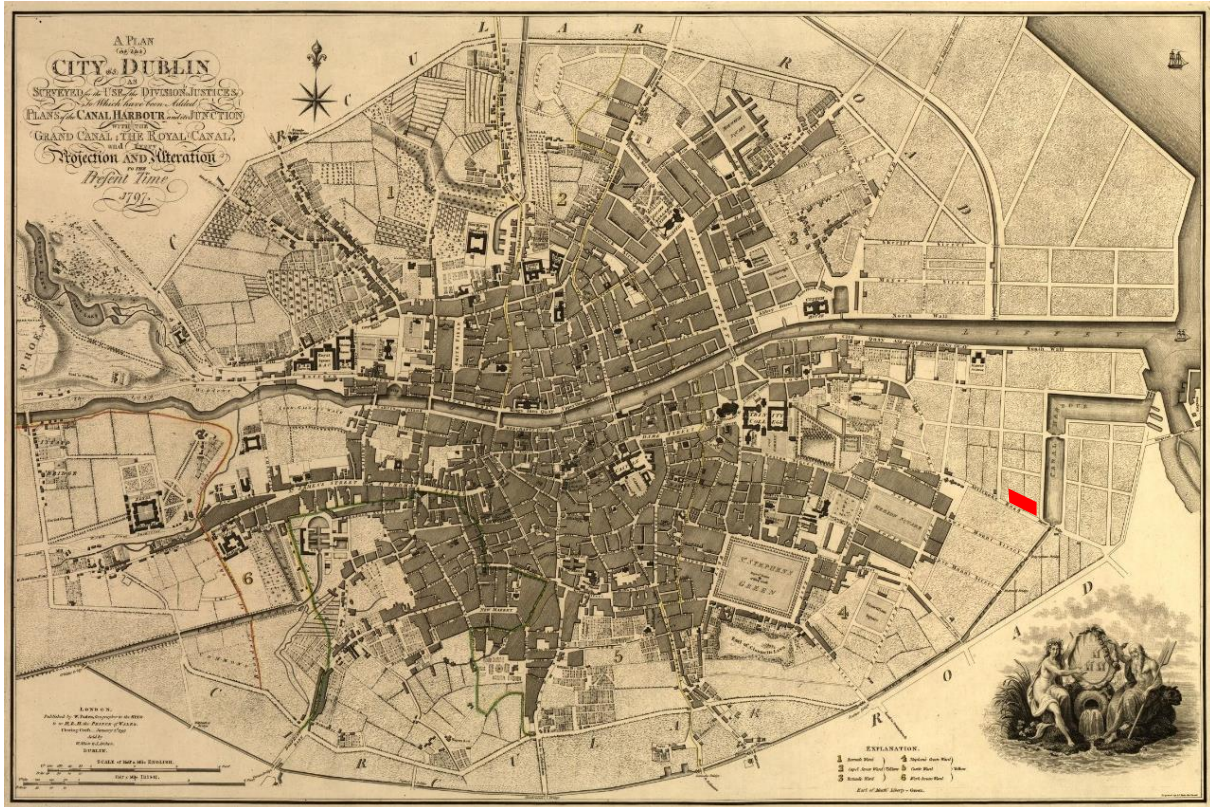
Certain characteristics of historic docklands areas make them suitable for regeneration. These include:

- a) the typically coarse, orthogonal urban grain,
- b) the large plot sizes,
- c) the large scale of the historic industrial buildings and infrastructure (docks and quays, roads, railways, cranes),
- d) the open space of the rivers and docks, which provide a favourable setting, and
- e) the relatively limited existing residential use (and other sensitive uses/buildings) in the former industrial areas. Not only is residential use generally sparse but where it exists it was co-located with industry, and could thus benefit from modern, mixed use regeneration.

While docklands areas are characterised by industrial and architectural heritage, these buildings and structures are typically (a) less prevalent, and (b) more accommodating of change in their settings than the grand civic or more ornate residential and commercial heritage buildings of historic mixed use town centre areas.

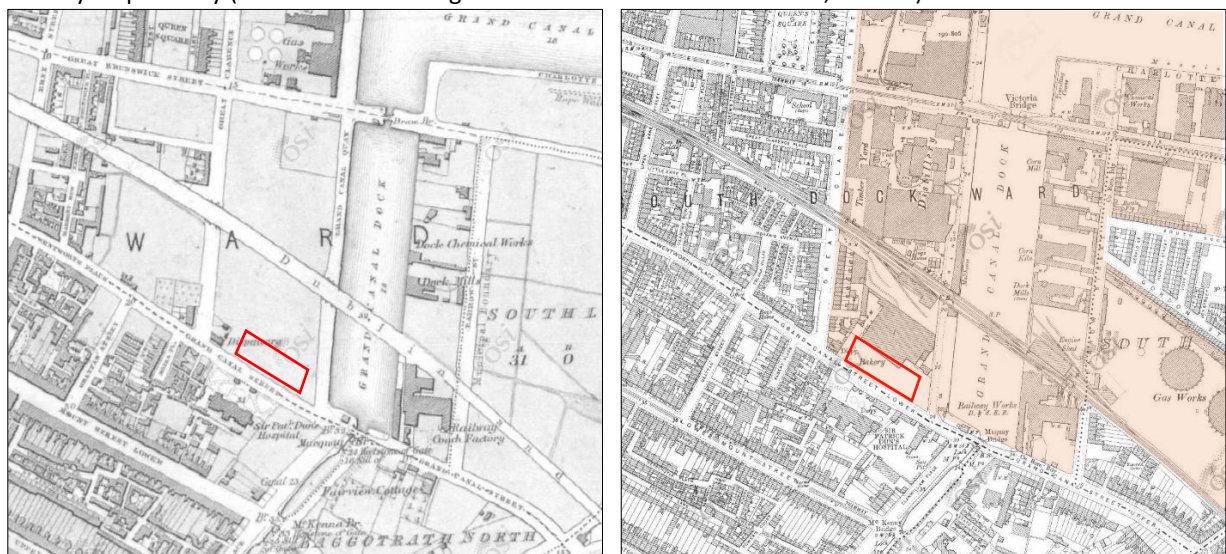
A 1797 map of Dublin (Figure 2) shows the site to have been located on the block to the west of the newly constructed Grand Canal Inner Basin, fronting 'Artichoke Road' (later renamed Grand Canal Street Lower) to the east of the city. The map clearly shows the difference in urban grain between the new/ future docklands area and the historic city centre, and also the absence of buildings in the vicinity of the site at that time.

Figure 2 1797 map of Dublin showing the newly laid out docklands area around the Grand Canal harbour to the east of the city.



Later maps show the at first slow and then rapid development of the area with large buildings and further infrastructure, notably the railway line. The 6 inch map (Figure 3) shows that while the urban area had advanced from the west the site remained vacant in the early to mid 19th century. Notable additions in the area include Sir Patrick Dun's Hospital across Grand Canal Street opposite the site (the former hospital is a protected structure, now occupied by the Marriage Registry Office) and the small residential street Albert Place to the west of the hospital. The residential streets of Lower and Upper Mount Street had also been developed further to the south.

Figures 3 & 4 The 6 inch and 25 inch OS maps showing the site context in the mid-19th century and early 20th century respectively (note the distinct edge to the docklands character area, shaded).



The 25 inch map (Figure 4) shows the dramatic change which took place in the latter half of the 19th and the early 20th century. The docklands area was now fully developed and a large bakery building can be seen on the plot to north of the subject site. Other notable changes include the development of housing along 'Great Clarence Street' (now Macken Street) to the west of the bakery, and a fine grained residential neighbourhood comprised of Greenore Terrace, Hogan's Avenue, Eblana Villas, Island Villas and Carlingford Parade to the west of Macken Street.

The aerial photograph below shows the Bolands Bakery building, now incorporated in the Treasury building on the site, under construction in the late 1940s. The building clearly represented a new development typology at the time, contrasting strongly with both the older docklands developments to the north and east, and the townscape outside the docklands to the south and west.

Figure 5 The Bolands bakery building under construction in the late 1940s.



When the site was redeveloped in the 1990s it was again a forerunner to a new phase of development in the area. It preceded the establishment of the Dublin Docklands Development Authority and the development of Grand Canal Plaza to the east and all the developments around Grand Canal Square and the Inner Basin.

It is not unusual in docklands and other regeneration areas that early developments in the process age rapidly as the regeneration momentum grows. The first phase of modern buildings can appear outdated once the contemporary character and new standards of design become established. This is the case with the subject site. Compared to the more recent developments and permissions in the area the Treasury building makes a poor contribution to townscape character and visual amenity.

The prospect of the site's redevelopment is a significant opportunity to improve the appearance of the building and the character of its immediate environment, as well as making more sustainable use of the site.

It would coincide (potentially) with two other significant developments on the city block defined by Grand Canal Street Lower, Macken Street, Clanwilliam Terrace and the railway line. The first is the permitted Boston Sidings development (Reg. Ref. 2808/19) on the northern side of the block. This is a 10 storey building with a distinctive plan form to fit the railway sidings site. The building's rounded corners are another distinctive feature.

The other possible development on the block is the proposed Treasury Annex building, currently at Further Information stage in the planning process (Reg. Ref. 3965/20). This is a site adjoining the subject site, wrapping around the corner onto Macken Street. A 10 storey building was originally proposed, attached to the western end of the Treasury building and curving around the corner. At Further Information stage the proposal was reduced to 9 storeys. In its design it does not attempt to mimic the Treasury building – either the modern or the historic bakery elements. The proposed height does however take account of the subject proposal which would see the Treasury building also increased in height (to eight storeys with rooftop plant). The Annex building would cover the western façade of the Treasury building, and would turn the corner to face the approach to Docklands from the city centre to the west.

Figure 6 A photomontage of the permitted Boston Sidings development on the same block as the site.



Figure 7 Photomontage of the Treasury Annex building (as amended at FI stage) from Macken Street, with the permitted Boston Sidings development to the left.

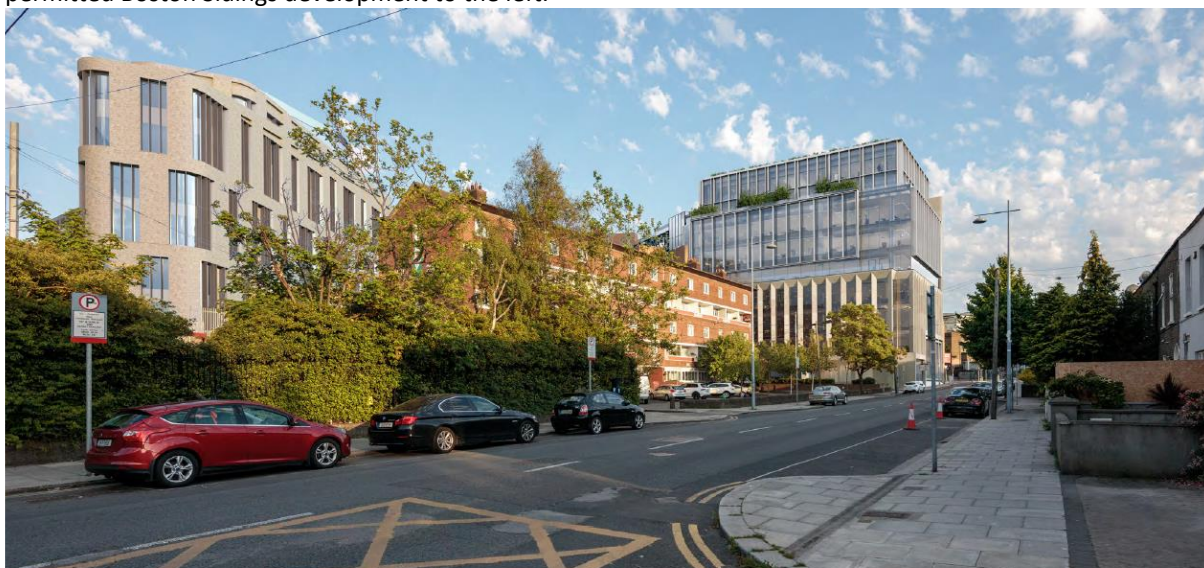


Figure 8 Photomontage of the proposed Treasury Annex building (as amended at FI stage) from Grand Canal Street Lower. The development would adjoin the Treasury building, turning the corner to face the approach to Docklands from the city centre.

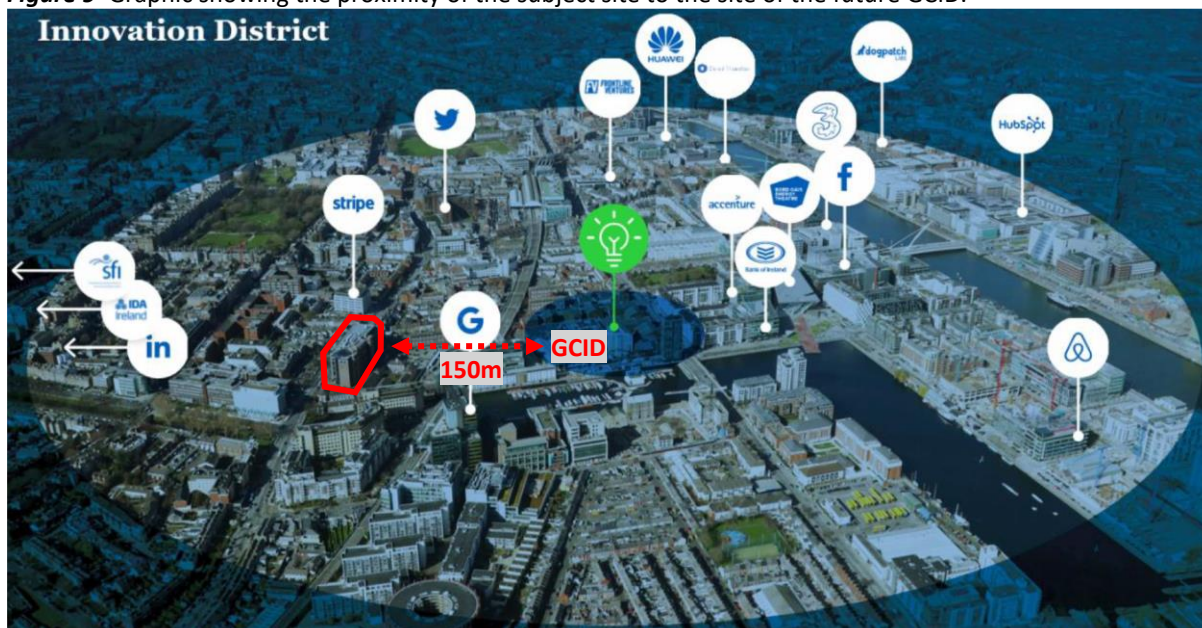


Together the three developments (Boston Sidings and the proposed Treasury Annex and the Treasury Building redevelopment) have the potential to transform a key city block in the Docklands area. This is the block first encountered when approaching/entering Docklands from the west and south. In its current condition this block (including the site) does not represent the evolved townscape character of the area, and significant change could be beneficial if of suitable quality.

2.2.3 Further Evolution - The Grand Canal Innovation District

In 2018 it was announced that Trinity College would lead the development of a 'Grand Canal Innovation District' (GCID) to be located on a c. 2.2 ha site less than 150m from the Treasury building, on the adjacent city block (see <https://youtu.be/QXu971he6Mo>).

Figure 9 Graphic showing the proximity of the subject site to the site of the future GCID.



In the 2020 *Report of the Grand Canal Innovation District Advisory Group* published by the Department of the Taoiseach it was stated: “[The GCID] can provide an internationally visible statement of Ireland’s commitment to innovation and a representation of our ambition to have the most innovative companies globally, Irish and international, operating for our capital city as well as from the regions”.

Figure 10 below is an excerpt from the 2020 GCID report. This highlights the ambition for the Grand Canal Docks area in which the site is located – *and the implications for the townscape*. It is against this ambition that the existing Treasury building, and the proposed development, should be measured.

Figure 10 Excerpt from *Report of the Grand Canal Innovation District Advisory Group*, p. 9.

There are many examples around the world of successful innovation districts such as Cambridge MA in the US, Barcelona, Toronto, London, Rotterdam and Eindhoven. These districts demonstrate high concentrations of workers in the knowledge economy and are drivers of new discoveries and patents. They have attracted further investment to their regions, provided homes for local entrepreneurs, facilitated connections to capital and customers and provided education and training opportunities for local students and senior leaders. The co-location of these key stakeholders - large and small companies, universities, cultural institutions and local community organisations - and collaborations between them are what drives innovation and transformation within the district. Figure 2 below shows Kendall Square in Boston before an innovation district was developed there and what it looks like today. The difference is indicative of progress that can be attained in a relatively short timescale.



Image top,
Kendall Square 1981

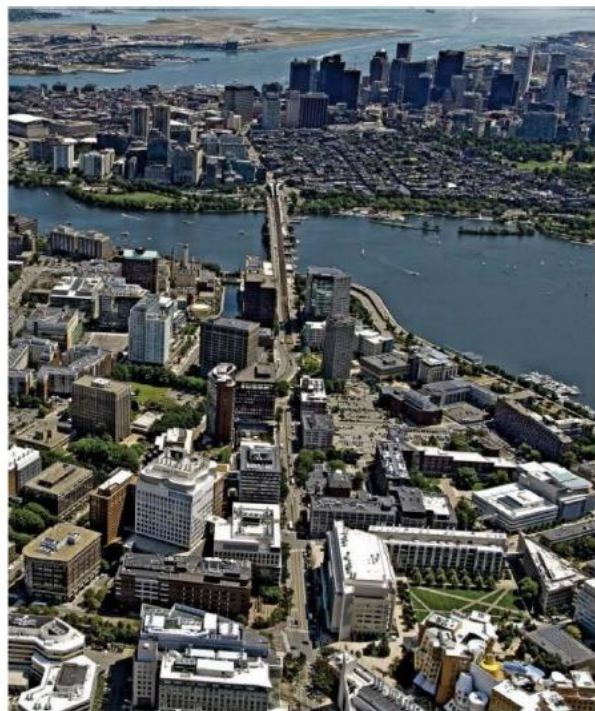


Image top right,
Kendall Square present

Figure 2 Kendall Square 1981 and present day

SC25: *“To promote development which incorporates exemplary standards of high-quality, sustainable and inclusive urban design, urban form and architecture befitting the city’s environment and heritage and its diverse range of locally distinctive neighbourhoods, such that they positively contribute to the city’s built and natural environments. This relates to the design quality of general development across the city, with the aim of achieving excellence in the ordinary, and which includes the creation of new landmarks and public spaces where appropriate.”*

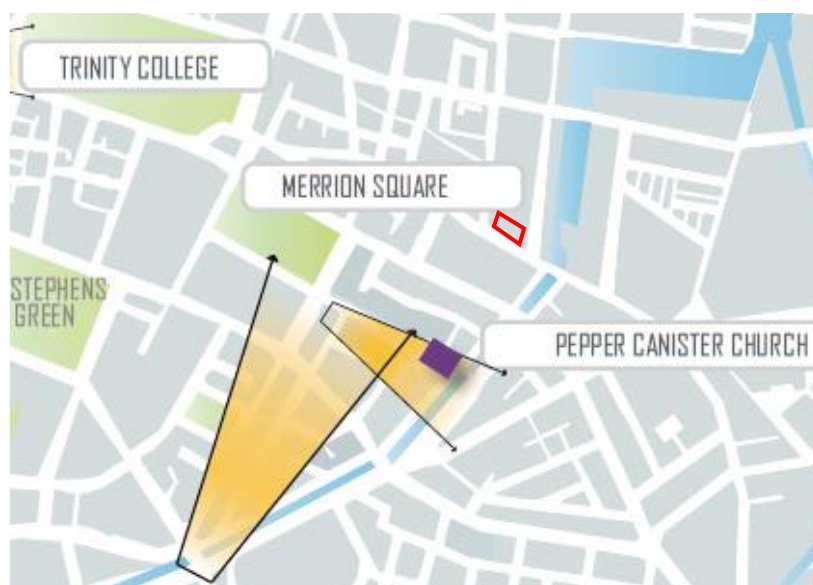
SC26: *“To promote and facilitate innovation in architectural design to produce contemporary buildings which contribute to the city’s acknowledged culture of enterprise and innovation...”*

3.1.4 Key Views and Prospects

Figure 4 of the DCDP identifies the view east along Mount Street Upper towards the Pepper Canister Church as a protected view. The site does not fall into this view (being two blocks to the north of the church), but the sensitivity of the church should be acknowledged.

The DCDP also identifies the view north along Fitzwilliam Place/ Square/ Street. There is no possibility of the proposal affecting any views along the Georgian streetscape.

Figure 12 Dublin City Development Plan protected views (excerpt of Fig. 4).



Policy SC17 states: *“To protect and enhance the skyline of the inner city, and to ensure that all proposals for mid-rise and taller buildings make a positive contribution to the urban character of the city, having regard to the criteria and principles set out in Chapter 15 (Guiding Principles) and Chapter 16 (development standards). In particular, all new proposals must demonstrate sensitivity to the historic city centre, the River Liffey and quays, Trinity College, the cathedrals, Dublin Castle, the historic squares and the city canals, and to established residential areas, open recreation areas and civic spaces of local and citywide importance.”*

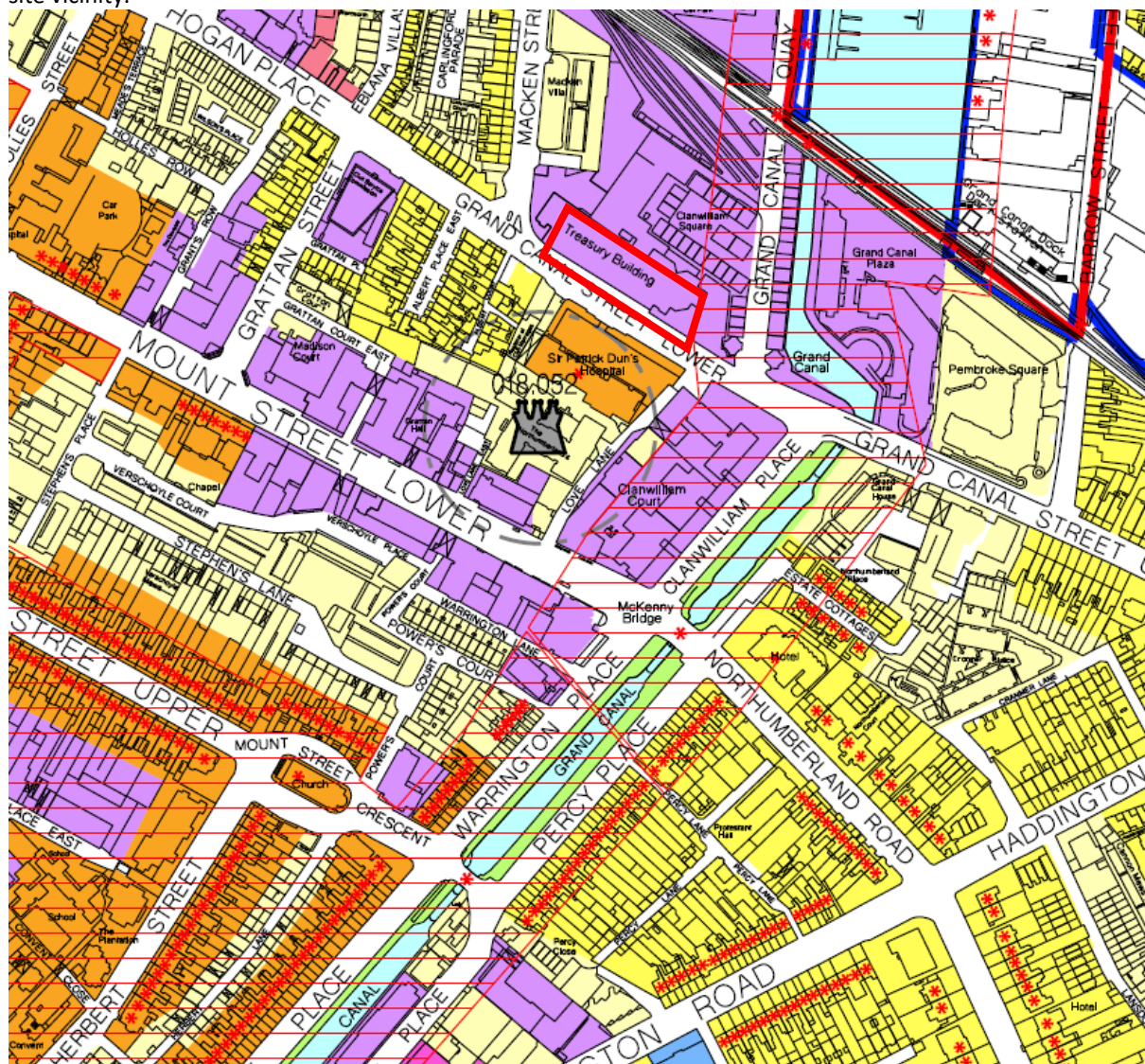
Among the sensitivities identified above, those of relevance to this assessment are the historic squares (particularly Merrion Square), the Grand Canal and the established residential area to the west of the site. The visual effects on these sensitivities are assessed in Section 5 below.

3.1.5 Conservation Areas

The site is not (and does not incorporate) a protected structure. Nor is it in a designated Conservation Area (CA). However, it adjoins the CA covering Grand Canal Dock including Clanwilliam Terrace to the east (see Figure 13). It is close to (and visible from a small part of) the CA covering the Grand Canal.

The proposed development is also potentially visible from Herbert Street to the south. Herbert Street (a) falls into the CA covering Dublin’s Georgian core, and (b) is one of the streets converging on the Pepper Cannister Church, which is a recognised sensitivity in the townscape (see 3.1.4 above).

Figure 13 Dublin City Development Plan land use zoning objectives map, showing the Conservation Areas in the site vicinity.



Regarding CAs, Policy CHC4 of the DCDP 2016 states: “Development within or affecting a conservation area must contribute positively to its character and distinctiveness, and take opportunities to protect and enhance the character and appearance of the area and its setting, wherever possible.

“Enhancement opportunities may include:

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

“Development will not:

1. Harm buildings, spaces, original street patterns or other features which contribute positively to the special interest of the Conservation Area
2. Involve the loss of traditional, historic or important building forms, features, and detailing including roof-scapes, shop-fronts, doors, windows and other decorative detail

3. *Introduce design details and materials, such as uPVC, aluminium and inappropriately designed or dimensioned timber windows and doors*
4. *Harm the setting of a Conservation Area*
5. *Constitute a visually obtrusive or dominant form."*

3.2 National Policy

3.2.1 National Planning Framework

Compact growth is one of the main principles and intended outcomes of the NPF. This encourages higher density - and therefore taller - development in urban areas where supporting infrastructure and services are available.

National Policy Objective 11 of the NPF states: *"In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities... subject to development meeting appropriate planning standards and achieving targeted growth."*

Regarding brownfield development the NPF states: *"The National Planning Framework targets a significant proportion of future urban development on infill/brownfield development sites within the built footprint of existing urban areas... This means encouraging more people, jobs and activity generally within our existing urban areas... and requires a change in outlook... It also requires active management of land and sites in urban areas."*

"To enable brownfield development, planning policies and standards need to be flexible, focusing on design led and performance-based outcomes... planning standards should be flexibly applied in response to well-designed development proposals that can achieve urban infill and brownfield development objectives in settlements of all sizes..."

3.2.2 Urban Development and Building Height Guidelines for Planning Authorities

The Guidelines state: *"it is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility..."*

"In the event of making a planning application, the applicant shall demonstrate to the satisfaction of the Planning Authority/An Bord Pleanála, that the proposed development satisfies the following criteria:

At the scale of the relevant city/town

- *"The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.*
- *Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.*
- *On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape."*

At the scale of district/neighbourhood/street

- *“The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.*
- *The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.*
- *The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure...*
- *The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.*
- *The proposal positively contributes to the mix of uses and/or building/dwelling typologies available in the neighbourhood.”*

4.0 Proposed Development

The key elements of the proposal are (1) the replacement of the eastern extension and main entrance with a new eastern extension and main entrance, (2) the vertical extension of the building by two floors plus a set-back plant room, and (3) modifications to the bakery façade, particularly the fenestration.

Figure 14 Photomontage showing the eastern and vertical extension, and the modification of the bakery façade.



The proposed eastern extension has a simple form, rounded at the corners. It is a glazed structure with a heavy, black metal frame (referencing the industrial architecture of the bakery and the wider docklands area). There is a strong horizontal emphasis in the structure, with the floors clearly expressed in the frame – visibly aligned with the floor levels of the bakery.

The vertical extension is an extension of the same structure over the top of the bakery, adding two floors to the building. Earlier iterations of the design had the eastern and vertical extensions distinct from each other in form and façade treatment. The current proposal is a deliberate simplification of the building, so that it would have only two elements – the retained bakery structure and a single contemporary structure. The intent is that by simplifying the contemporary structure the retained bakery would express more clearly in the overall composition.

The simplification of the bakery fenestration has the same intent. The existing heavy, decorated window frames distract from the historic structure. These would be replaced by with a simple grid frame, also in dark metal but closer to the original bakery window frames in style.

Another important element of the proposal is the lowering of the window sills of the ground floor windows. Currently they are uncomfortably high above street level, so that intervisibility between the ground floor spaces and the street is restricted. This element of the proposal would improve the building-to-street interface, and the proposed ground floor uses (social, gathering and sports spaces, etc.) are intended to emphasise this.

The photomontage above shows that the resulting building would have a strong character and distinct identity, and that despite the increase in height the objective of maximising the contribution of the bakery to the architectural composition would be achieved.

A notable element of the proposal is the treatment of the west elevation. In order to facilitate the proposed development of the Treasury Annex building adjoining this elevation it has been left bare, with no windows or other features, only a large brick wall.

Photomontages from locations to the west show that the blank wall would be unsightly. However, it would be hidden in the event of the development of the Annex building.



Figures 15a & b Photomontages showing the blank west elevation and the proposed Treasury Annex building for which the west elevation has been left bare.

5.0 Townscape and Visual Impacts

The Guidelines for Landscape and Visual Impact Assessment requires that the effects on views and visual amenity (i.e. visual impacts) be assessed separately from the effects on townscape, although the two topics are inherently linked.

‘Landscape’ (or ‘townscape’ in built up areas) results from the interplay between the physical, natural and cultural components of our surroundings. Different combinations and spatial distribution of these elements create variations in townscape character. Townscape impact assessment identifies the changes to this character which would result from the proposed development, and assesses the significance of those effects on the townscape as a resource.

Visual impact assessment is concerned with changes that arise in the composition of available views, the response of people to these changes and the overall effects on the area’s visual amenity - with particular focus on public views and public visual amenity.

5.1 Townscape Effects

5.1.1 Sensitivity

The townscape sensitivity of the receiving environment can be classified medium (definition: “Areas where the townscape has certain valued elements, features or characteristics but where the character is mixed or not particularly strong, or has evidence of alteration, degradation or erosion of elements and characteristics. The townscape character is such that there is some capacity for change. These areas may be recognised in townscape policy at local or county level and the principal management objective may be to consolidate townscape character or facilitate appropriate, necessary change – refer to Appendix 1).

The above classification of sensitivity takes account of the following factors:

- The site/building itself has capacity for (and would benefit from) redevelopment, particularly any modification that (a) improves the appearance and legibility of the remaining Bolands Bakery structure, (b) replaces or improves the unsightly 1990s extension, and/or (c) improves the interface of the site/ building with the Grand Canal Street Lower streetscape.
- The site is part of the Docklands townscape character area. This is an area characterised by higher density, mixed use, contemporary development including buildings of scale and architectural individuality. The area has undergone (and continues to undergo) a rapid, planned transformation. This generates capacity for further change. There is an established pattern of juxtaposition of contemporary development/ architecture (which is the dominant form) with retained built heritage. The historic elements contribute to the character of the area but do not define the area (as heritage buildings do in some other parts of the city centre).
- The site in its current condition does not make a positive contribution to the Docklands townscape or to views/ visual amenity in the area. In fact it can be considered a detractor. (The site has twice been a forerunner to phases of development in the Docklands and has therefore historically contrasted with its setting, but it now appears outdated.)
- The city block on which the site is located (defined by Grand Canal Street Lower, Macken Street, Clanwilliam Terrace and the railway line) is similarly below the standard of the wider Docklands area in terms of sustainability of land use, development typology and townscape/ architectural quality. Despite being an integral part of the docklands, from its original construction in the 18th century (see Figure 2), it appears to have been left behind and does

not read as part of the Docklands. This fact is underlined by the block's gateway position between the city centre to the west and the Docklands area.

- There is potential for the proposed development and the permitted Boston Sidings development and proposed Treasury Annex building to redefine the character of this city block and reintegrate it into the Docklands area.
- There are some sensitivities in the townscape context, notably (a) the protected structure Sir Patrick Dun's Hospital across Grand Canal Street Lower, (b) the residential neighbourhood along and to the west of Macken Street, (c) the Conservation Areas covering Grand Canal Dock, the Grand Canal and the Georgian Core to the south.

5.1.2 Magnitude of Townscape Change

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

The above classification of magnitude takes account of the following factors:

- The proposed development is a re-imagining of the existing 1990s development of the site. It is of the same typology (i.e. the retention of the bakery structure, with a modern extension), only larger (but not considerably larger) and with a different architectural expression. As an element of the townscape the site would not be substantially changed.
- The scale of the building, at eight storeys with rooftop plant, would be in character with the wider Docklands townscape, and would be similar in height to the permitted Boston Sidings development on the same city block. It is a response to (a) the national policy of compact growth, (b) the opportunity provided by a brownfield Docklands site in sub-optimal usage and condition/ appearance, and (c) a receiving environment with a capacity to accommodate change of the type proposed.
- The character and architectural quality of the development would be in keeping with the wider Docklands area, which has transformed since the site's development in the 1990s.

5.1.3 Significance of Townscape Effects

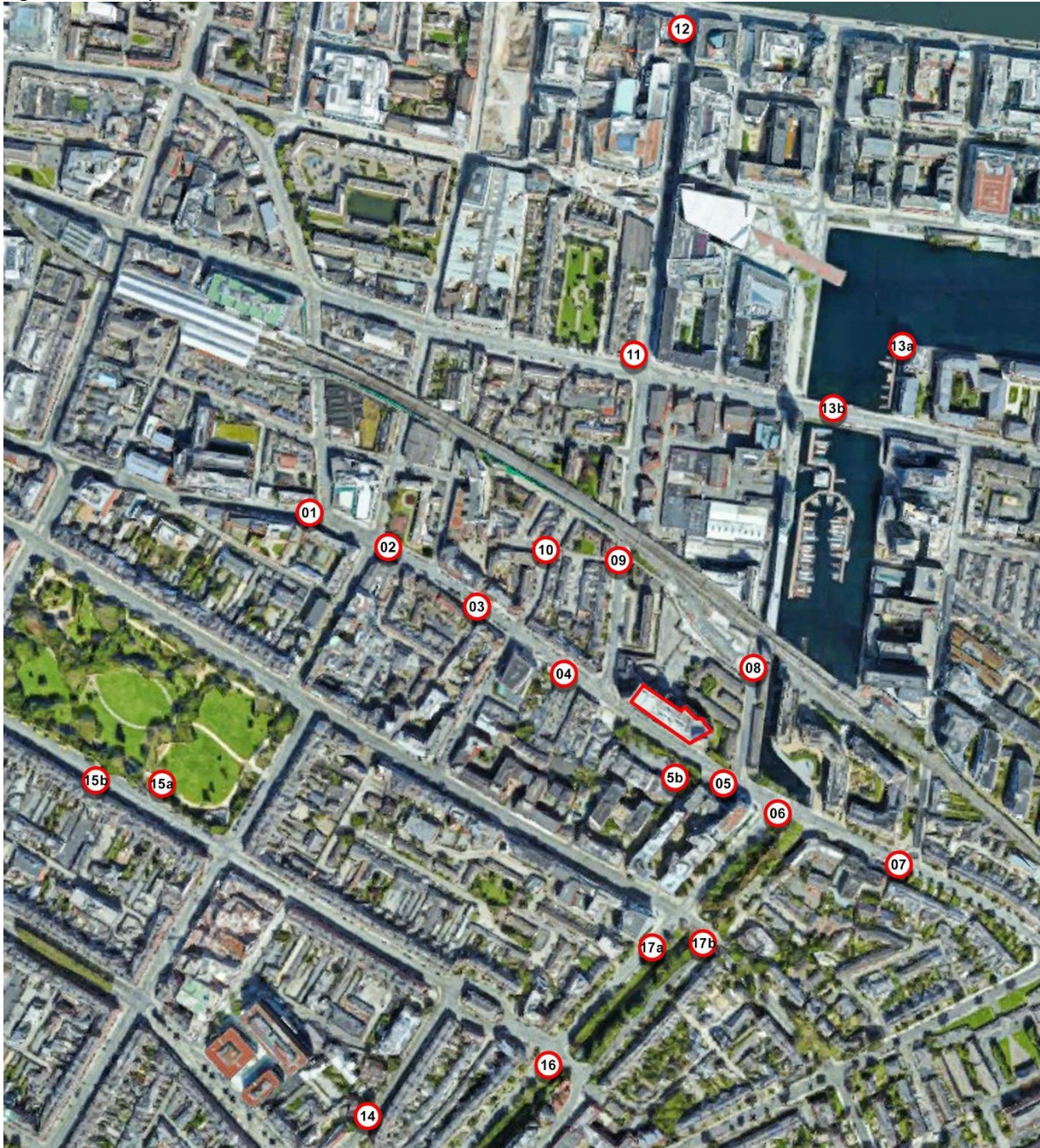
Measuring the magnitude of change against the sensitivity of the receiving environment, the significance of the townscape effects is predicted to be moderate, and informed by the factors above, the effects are predicted to be positive: (1) The development would better reflect the evolved townscape character of the Docklands area; (2) it would improve the appearance of the Treasury building/ site overall; (3) the condition and legibility of the historic bakery structure would be improved, and (4) the quality of the immediate townscape setting would be elevated.

5.2 Visual Effects

20 no. viewpoints were selected for assessment of the proposed development's potential visual effects informed by verified photomontages (see Figure 16 overleaf).

The viewpoints were selected to address (a) the roads approaching the site from the east, west and north (i.e. the public realm potentially most affected by the proposal), (b) views from places in the wider area from which the increased height may be visible, and (c) certain areas of particular sensitivity in the receiving environment (e.g. the Grand Canal, Merrion Square).

Figure 16 Viewpoints for visual effects assessment.



The viewpoints are individually assessed below. For the assessment methodology and the criteria and terms used, refer to Appendix 1.

The assessments should be read in conjunction with the photomontages provided under separate cover in Appendix 2. For each viewpoint three views are provided: (1) the existing view (photograph), (2) the proposed view (photomontage of the proposed development), (3) cumulative view (photomontage of the proposed development and the adjoining proposed Treasury Annex development and the permitted Boston Sidings development).

5.2.1 Viewpoint 1 - Fenian Street

Existing View: Fenian Street leads east towards the Docklands from the city centre. Where it meets Hogan Place the road doglegs and frames a view towards the site, which is positioned on the axis of the view, terminating the vista. The street is lined by buildings of diverse use, era, scale, architectural style and materials, collectively forming a city centre street of mixed character with a high capacity to accommodate change (i.e. no valued characteristic or feature of the street/townscape is at serious risk of depreciation).

Viewpoint sensitivity: Low-Medium.

Proposed Change: The height increase would be noticeable but not to the extent that the building would be any more conspicuous than it already is (due to its position as the focal point of the view). The more significant change would be the blank brick wall (to facilitate the development of the adjoining Treasury Annex site) replacing the distinctive fenestration of the west façade. This change would also be noticeable but overall neither the composition nor the character of the street/townscape in view would be substantially altered.

Magnitude of change: Low.

Significance of Effects: Measuring the magnitude of change against the viewpoint sensitivity, the visual effect is predicted to be slight and negative. The negative effect would result *not* from the increase in height, but rather from the blank wall facing the approach to the Docklands from the city centre.

Potential Cumulative Effects: The proposed Annex building would mask the blank façade of the Treasury building, presenting a new, highly textured, curved glazed façade to the street approaching the Docklands. Both the architecture of the Treasury Annex and the step up in height as the street reaches the Docklands are appropriate. The developments would fit comfortably into the already complex streetscape of mixed character and improve the quality of the street/ townscape overall.

Significance of cumulative effects: Slight positive.

5.2.2 Viewpoint 2 – Hogan Place

Existing View: A short distance to the east on Hogan Place the alignment of the street changes so that the Treasury building no longer terminates the vista, but it remains prominent in the middle distance. Smaller red brick residential buildings from various eras are interspersed with modern, glazed office buildings of up to seven storeys, resulting in a dual or transitional character along this stretch mid-way between the city centre and the Docklands. There is capacity for further change.

Viewpoint sensitivity: Low-Medium.

Proposed Change:

The height increase would be noticeable but in the varied context it would not substantially increase the prominence of the building. The more significant change would be the blank brick wall replacing the distinctive fenestration of the west façade.

Magnitude of change: Low-Medium.

Significance of Effects: The visual effect is predicted to be slight and negative. The negative effect would result *not* from the increase in height, which (a) is not excessive along the city

street, and (b) is characteristic on the approaches to the Docklands) but rather from the new blank wall facing the street.

Potential Cumulative Effects: The proposed Annex building would mask the blank façade of the Treasury building, stepping out from the building line on the north side of the street and presenting a new, highly textured, curved glazed façade to the approach from the city centre. Both the architecture of the Annex building and the step up in height are appropriate to the Docklands gateway location. With greater proximity the quality of the Annex building becomes more evident and its effect on the street/ townscape more positive.

Significance of cumulative effects: Slight positive.

5.2.3 Viewpoint 3 – Grand Canal Street Lower at Grattan Street Junction

Existing View: This view reveals the mixed character at this transitional location in the townscape. The street is lined by a mix of Victorian houses and modern residential, retail and office buildings of varying type, scale (2-7 no. storeys) and design and material quality. Ahead, to the left of the road, the two storey terraced houses and shops on the near side of the Macken Street junction contrast strongly with the Treasury building which reflects an historic Docklands character. The Google Docks building in the background is more representative of the current Docklands character. With such diversity in the view, and no features or characteristics of particular sensitivity, there is a high capacity for change.

Viewpoint sensitivity: Low-Medium.

Proposed Change: The height increase would be noticeable but in the context it would not substantially increase the prominence of the building. Such steps in height are characteristic around the edges of the Docklands area, where buildings of contemporary urban scale and character are often located alongside former docklands labourers' neighbourhoods. The more significant change in the view would be the blank brick wall replacing the distinctive fenestration of the west façade.

Magnitude of change: Low-Medium.

Significance of Effects: The visual effect is predicted to be moderate and negative. The negative effect would result *not* from the increase in height (the 8+1 storey height is not excessive for a city centre regeneration area in which other, taller buildings are visible), but rather from the new blank wall facing the approach to the Docklands from the west. It should be noted that the west façade is devoid of windows and other detailing/ articulation to facilitate development of the adjoining Annex site.

Potential Cumulative Effects: The proposed Annex building would mask the blank façade of the Treasury building, presenting a new, highly detailed glazed façade to the approach from the city centre – the architecture fitting for the Docklands gateway location. The broader profile of the Annex (compared to the narrow west elevation of the Treasury building on its own) reduces the perception of height. There would remain a pronounced contrast in development typology and scale across Macken Street, but this is appropriate to the location and would enrich the townscape character.

Significance of cumulative effects: Significant positive.

5.2.4 Viewpoint 4 – Grand Canal Street Lower at Albert Place

This view represents both Grand Canal Street Lower and the small historic residential enclave of Albert Place, which is zoned Z2 Residential Conservation Area.

Existing View: The Treasury building is the focal point of the view and the dominant building in its immediate context. There are four distinct parts to the site/building: (1) the high, curved brick wall around the corner (this is the Treasury Annex site), which has a significant negative effect on the streetscape - from close-up it has the appearance of a prison wall; (2) the strong vertical form of the stair core; (3) the west façade with its distinctive, banded fenestration; (4) the main façade which is visible at an acute angle. The heavy, dark metal window frames dominate this façade.

Observed critically, the building as an object on its own is not attractive. However, the bigger issue is its deadening effect on the streetscapes of both Grand Canal Street Lower and Macken Street. The significance of this is heightened by the location, which is the arrival point/ gateway into the Docklands from the city centre. The townscape around the Grand Canal Street and Macken Street junction would benefit from fundamental change.

Viewpoint sensitivity: Medium.

Proposed Change: The height increase would be noticeable but in the context it would not substantially increase the prominence of the building. The more significant changes would be to the west and south facades. The replacement of the fenestration in the west façade with a blank brick wall would disimprove the building, while the new, simplified fenestration to the main/ south façade would be an improvement.

Magnitude of change: Medium.

Significance of Effects: The visual effect is predicted to be moderate and negative. The negative effect would result *not* from the increase in height, but rather from the new blank west façade (which counteracts the improvements to the south façade). It should be noted that the west façade is devoid of windows to facilitate development of the adjoining Annex site.

Potential Cumulative Effects: The proposed Annex building would mask the blank west façade of the Treasury building, presenting a new, highly detailed façade of material quality to the viewer. The architecture of the Annex building is fitting for the location but the more significant effect would be its transformation of the streetscape, adding a large new entrance and animating the street at the junction. The two buildings are tall compared to the 2-3 storey buildings across the streets, but such a step in height and character at the edge of the Docklands is not inappropriate. The resulting composition of form, scale, architecture and materials would be complex but visually interesting and the general improvement in quality would improve visual amenity overall.

Significance of cumulative effects: Significant positive.

5.2.5 Viewpoint 5 – Grand Canal Street Lower Opposite Clanwilliam Terrace Junction

Existing View: This view from the east reveals the main 1990s extension. The extension is distinct from the original bakery structure in its form and materials, except for the common materials in the fenestration and roof level cladding. The extension appears dated. It is also not clearly a part of/ attached to the bakery building and therefore appears somewhat

incomplete – a fragment of a larger building. The heavily detailed metal window frames of the bakery façade detract from its originally simple form. The wider street/ townscape is varied in character and the view composition complex. A notable feature is the former hospital across the road. The protected structure is set back 28m+ from the road edge behind a parking area enclosed by mature trees.

Considered objectively, the Treasury building as an architectural composition is not attractive, and it dominates and defines its immediate context (the surrounding buildings being mostly unremarkable except for the hospital, which retreats somewhat from the public realm). Given the docklands location, and the presence of the protected structure, the townscape in view would benefit from change.

Viewpoint sensitivity: Medium.

Proposed Change: The angular and unsightly 1990s extension would be removed from the side of the bakery building and replaced by a new, larger form extending to the side and over the top of the bakery. While larger than the 1990s extension, due to its more simple form and materials palette (and the clear contrast of the materials with the original brick) the bakery structure would be more legible in the overall composition. The metal framed structure of the new extension is a reference to the area's (and the site's) industrial past. The rounded corners are in part a response to the emerging style on the city block; both the permitted Boston Sidings building and the proposed Treasury Annex building feature similarly rounded corners.

Magnitude of change: High.

Significance of Effects: The visual effect is predicted to be significant and positive. The new Treasury building would be a significant improvement on the existing building. It would have a strong, contemporary character and distinct identity, referencing the industrial past while also reflecting the evolved character of the Docklands. It would also improve the presentation of the retained bakery structure.

Potential Cumulative Effects: None.

Viewpoint 5b – Sir Patrick Dun's Hospital

Existing View: The view is taken from in front of the former hospital building (a protected structure) across Grand Canal Street from the site. As in View 5 the extension is distinct from the original bakery structure in its form and materials, except for the common materials in the fenestration and roof level cladding. The heavily detailed metal window frames of the bakery façade detract from its originally simple form. This seldom seen angle probably shows the architectural composition to best effect.

Viewpoint sensitivity: Medium.

Proposed Change: The angular and unsightly 1990s extension would be removed from the side of the bakery and replaced by a new, larger but simpler form extending to the side and over the top of the bakery. While larger than the 1990s extension, due to its more simple form and materials the bakery structure would be more legible in the overall composition. The new window frames of the bakery can also been seen from this angle to better reflect the original 1940/50s windows, and the metal framed structure of the modern extension clearly references these.

Magnitude of change: High.

Significance of Effects: The visual effect would be significant and positive. The proposed building would be a dramatic improvement on the existing building. Despite the extension being larger, the bakery structure is more central to the character of the overall composition, and better presented. The building would have a strong, contemporary character and distinct identity, referencing the industrial past while also reflecting the evolved character of the Docklands.

It is important to note that due to the setback of the hospital from the street the increase in height of the Treasury building would not cause excessive enclosure; the protected structure would not be crowded or dominated by the taller building.

Potential Cumulative Effects: None.

5.2.6 Viewpoint 6 – Grand Canal Street Lower at Clanwilliam Place Junction

Existing View: This view is taken from a key junction in the urban structure. It funnels traffic towards the city centre to the west or north into the Docklands and over the Liffey. To the right across the road (out of the frame of view in the photomontage) is Grand Canal Plaza, one of the early docklands regeneration developments. To the left is Clanwilliam Place, a more recent development which expanded the contemporary character across Grand Canal Street and along the canal corridor (refer to Viewpoint 16). The Treasury building is prominent ahead along the street. Its complex composite geometric form and varied materials do not make for an attractive composition. The two storey buildings lining Clanwilliam Terrace can only be considered unsustainable in the docklands/city centre context.

Viewpoint sensitivity: Low-Medium.

Proposed Change: The angular and unsightly 1990s extension would be removed from the side of the bakery building and replaced by a new, larger form extending to the side and over the top of the bakery. While larger than the 1990s extension, due to its more simple form and materials palette (and the clear contrast of the materials with the original brick) the bakery structure would be more legible in the overall composition. The contrast in height with the neighbouring two storey office building would not be any more jarring; that divergence in typology/scale already exists and in this location it is the two storey building that is the anomaly.

Magnitude of change: Medium.

Significance of Effects: The visual effect would be of moderate significance and positive. The proposed building is an improvement on the existing building. It would have a strong, contemporary character and distinct identity, referencing the industrial past while also reflecting the evolved character of the Docklands. The additional height would cause no harm to any valued feature or characteristic of the townscape in view.

Potential Cumulative Effects: The permitted Boston Sidings building would be visible to the right. The two buildings' similarities (matching height, horizontal emphasis in the facades and rounded corners) would be appreciable and together they would redefine the character of a key Docklands city block, adding buildings of architectural and material quality, strengthening the townscape character and improving legibility.

Significance of cumulative effects: Moderate positive.

5.2.7 Viewpoint 7 – Grand Canal Street Upper at Barrow Street Junction

Existing View: Grand Canal Street Upper brings traffic from Ballsbridge towards Docklands, the city centre and north over the Liffey. Barrow Street (to the right across the street) is one of main points of entry into the Docklands and one of the streets that best reflects its character (featuring a sky bridge, the Google Dock tower, the three Boland's Mills towers and retained historic dockside buildings). The view west is framed by modern buildings of diverse character, up to seven storeys tall. The Treasury building is prominent among these but makes no positive contribution to the composition or quality of the view. It is notable that the bakery structure, while protruding to both sides of the extension, is not legible as a retained historic building; it only adds to the complexity of the form. With such diversity in the view, and no features or characteristics of particular sensitivity, there is a high capacity for change.

Viewpoint sensitivity: Low-Medium.

Proposed Change: The unsightly 1990s extension would be replaced by a new, larger form almost entirely screening the bakery structure from this angle. The simpler form and materials palette, combined with the height increase, would increase the prominence of the building and improve its appearance.

Magnitude of change: Medium.

Significance of Effects: The visual effect would be slight and positive. While the Treasury building itself would be improved, this would have limited effect on the character and visual amenity of the complex city street/ townscape. The additional height would be noticeable but would have no negative effect. The reduced visibility of the bakery structure would not constitute a negative impact since in its current form it is not identifiable.

Potential Cumulative Effects: None.

5.2.8 Viewpoint 8 – Clanwilliam Terrace

Existing View: Clanwilliam Terrace extends south from Grand Canal Quay and is a busy pedestrian route in and out of the Docklands area. From positions north of the railway line (i.e. on Grand Canal Quay) the railway bridge limits the visibility of the site. From this position, having just passed beneath the bridge onto Clanwilliam Terrace, the Treasury building is prominent. It rises above the Boston Sidings wall and a low office building to the right, its complex, angular profile somewhat unsightly. In the distance across Grand Canal Street Lower Clanwilliam Place is prominent, adding to the diversity of building typologies, scale, architecture and materials in the view.

Viewpoint sensitivity: Low-Medium.

Proposed Change: The angular profile of the existing building would be largely retained, with the new extension introduced to the eastern end and above the roofline. The contrast in height with the neighbouring two storey office building would not be any more jarring; the divergence in typology/scale already exists and in this location it is the two storey building that is the anomaly. Overall the change to the character and composition of the view would be limited.

Magnitude of change: Low.

Significance of Effects: The visual effect would be slight and positive. Although of similarly complex, composite form as the existing building, the detailed design and material enhancements to the building would improve its overall appearance.

Potential Cumulative Effects: The permitted Boston Sidings development would be prominent to the right of the street as pedestrians emerge from beneath the bridge. In combination the two high quality, contemporary buildings would transform the character of the city block between the railway line and Grand Canal Street, reinforcing its position as part of the Docklands area.

Significance of cumulative effects: Moderate positive.

5.2.9 Viewpoint 9 – Macken Street

Existing View: The viewpoint represents road users on Macken Street and the residents along the street. Two storey Victorian houses on the west side of the street face a five storey Council apartment building set back behind a parking area. Ahead, at the junction with Grand Canal Street Lower, the Treasury building is prominent, its large, squat form with bands of red brick and dark fenestration distinctive but not attractive. With the low projection of the Annex from the base of the west façade, the building does not properly address or announce the junction. To the left across the street, behind the hedgerow, is the Boston Sidings site. The townscape is of mixed character, and changing. There is capacity for further change and the junction at the end of the street - as one of the entry points to the Docklands – would benefit from greater emphasis in the built form.

Viewpoint sensitivity: Medium.

Proposed Change: The increase in height and the remodelling of the north façade would transform the appearance of (that part of) the building. It would retain its strong character and the legibility of the bakery structure beneath the new upper levels, forming an attractive composition. However, the tall, blank west façade facing the street would disimprove the building. In the context the increase in height would cause no harm to any valued feature or characteristic of the view (and the height would match that of the Boston Sidings building across the road to the left).

Magnitude of change: Medium.

Significance of Effects: The visual effect would be moderate and neutral. The design and material improvements to the north façade would be counterbalanced by the blank west façade. It should be noted that the west façade has no windows to facilitate development of the adjoining Annex site.

Potential Cumulative Effects: The street and townscape would be transformed by the new Annex building which would largely screen the Treasury building from view. Along with the Boston Sidings building, which will be prominent to the left, it would expand the evolved Docklands area out to its historic boundaries along Macken Street and Grand Canal Street. The townscape character and legibility would be strengthened and visual interest and amenity enhanced.

Significance of cumulative effects: Significant positive.

5.2.10 Viewpoint 10 – Hogan Avenue and Island Villas

Existing View: The viewpoint represents the historic dock labourers' neighbourhood to the west of Macken Street. In the city centre townscape surrounding the estate a range of large, mixed use modern buildings is visible. Google Dock and the GRCQ1 building are prominent to the east; the Sharp building and 1 Grand Canal Street Lower are prominent to the south. The Treasury building can be seen to the south east above the roofline of the foreground houses. It makes no positive contribution to the view.

Viewpoint sensitivity: Medium.

Proposed Change: The taller building would protrude further above the foreground roofline, revealing more of its complex, composite form to view. Considering the fact that several large, modern buildings of diverse architectural character are visible from this position, the development would not significantly change the character or quality of the view.

Magnitude of change: Low.

Significance of Effects: The visual effect would be slight and neutral. Although more prominent due to the height increase, the development would neither improve nor disimprove the view.

Potential Cumulative Effects: The Treasury Annex building would be a prominent addition to the view, entirely screening the Treasury building. It would add a building of design and material quality to the view, strengthening the townscape character and legibility and improving visual amenity.

Significance of cumulative effects: Moderate positive.

5.2.11 Viewpoint 11 – Macken Street at Pearse Street Junction

Existing View: The view north along Macken Street from Pearse Street is of poor quality. The low, modern buildings on both sides of the junction are unsightly and their interface with the street is poor. The building to the left is part of the Trinity Technology and Enterprise Campus, which is the designated site for the Grand Canal Innovation District. The Treasury building is visible at the far end of Macken Street. Although marking the junction with Grand Canal Street Lower and the edge of the Docklands area, it makes no positive contribution to the composition or quality of the view.

Viewpoint sensitivity: Low.

Proposed Change: The increased height would expose the more attractive new upper north façade of the building to view. However, the tall, blank west façade and stair core facing the street would counteract the positive effect.

Magnitude of change: Low.

Significance of Effects: The visual effect would be slight and neutral. The design and material improvements to the north façade would be counteracted by the blank west façade. In the context the increase in height would cause no harm to any valued feature or characteristic of the view.

Potential Cumulative Effects: The distant townscape would be transformed by the proposed Annex building (which would largely screen the Treasury building from view). While not

cancelling out the negative effect of the foreground development altogether, it would introduce one building of design and material quality to the view, adding an element of visual interest and strengthening the character of the townscape. In the future, as the GCID is developed on the city block to the left of the street in the foreground, the significance of the Treasury Annex development will be reduced, but it will remain a positive feature of the evolved townscape.

Significance of cumulative effects: Moderate positive.

5.2.12 Viewpoint 12 – Macken Street at Sir John Rogerson’s Quay

Existing View: Apart from the historic building in the foreground the northern stretch of Macken Street is lined by contemporary buildings of up to seven storeys. The architectural and material quality of the buildings reflects the Docklands character but by current standards (driven by national policy of compact growth) their seven storey height appears unnecessarily restricted. The red brick Treasury building is visible at the far end of Macken Street (c. 700m distant) but is a minor element of the view. A notable feature of the view is the distant Dublin Mountains framed by the buildings along the street.

Viewpoint sensitivity: Medium.

Proposed Change: The increase in height would be discernible but it would make no significant change to the character, composition or quality of the view.

Magnitude of change: Negligible.

Significance of Effects: The visual effect would be not significant and neutral.

Potential Cumulative Effects: The proposed Annex building would be visible in the distance, in front of and therefore screening the Treasury building from view. Despite the distance the character and quality of the building would be discernible, and complementary to the modern development in the foreground. It would add a building of note to the townscape at the far end of the street, on the far side of the Docklands area, strengthening the area’s legibility.

Significance of cumulative effects: Slight positive.

5.2.13 Viewpoint 13a – Charlotte Quay, Grand Canal Dock

Existing View: This is a signature Docklands view – a complex composition of open water and boats, quays and streetscape, and buildings of diverse type, scale and architecture. The most prominent building is the distinctive 16 storey Alto Vetro and to either side of this, also fronting the dock, are the Gallery Quay and Waterways House buildings with smaller buildings visible in the gaps between them. In the distance at the southern end of the Inner Dock there is a cluster of modern office buildings among which the Treasury building can be seen. It is a minor feature of the complex composition however.

Viewpoint sensitivity: Medium.

Proposed Change: The increase in height and the new, black metal and glazing eastern extension would marginally increase the presence of the Treasury building in the view. However, in the complex docklands townscape which includes several buildings of substantially greater height this would amount to a negligible change.

Magnitude of change: Negligible.

Significance of Effects: The visual effect would be not significant but positive. If the viewer were to focus on the building its stronger form and the improved material quality of the eastern extension would be discernible and the effect would be positive. However, in the context of a complex, panoramic docklands view the significance of the change would be limited.

Potential Cumulative Effects: When constructed, the permitted Boston Sidings building will screen the Treasury building from view (even if increased to the height proposed). Boston Sidings will contribute to a renewal of the townscape character at the southern end of Grand Canal Dock, establishing a new height standard and refreshing the architectural character of this area which was part of the early phase of docklands regeneration.

Significance of cumulative effects: Slight positive.

Viewpoint 13b – McMahon Bridge, Ringsend Road, Grand Canal Dock

Existing View: This view from a similar angle but closer to the site is another example of the complexity of the Docklands townscape. The red brick building with horizontal bands of windows between Alto Vetro and Waterways House is not the Treasury building. This is the south elevation of Google GRCQ1 - a modified and extended building of similar character and scale to the bakery incorporated in the Treasury building. Despite the Conservation Area designation, contemporary architecture has been allowed to express boldly alongside the historic buildings and quays, and there is capacity for further change in the complex view.

Viewpoint sensitivity: Low-Medium.

Proposed Change: The proposed development would not be visible.

Significance of Effects: No effect.

Potential Cumulative Effects: n/a.

5.2.14 Viewpoint 14 – Herbert Street

Existing View: Herbert Street is two large city blocks (c. 350m) to the south of the site. It is so aligned that it directs views towards the site, and any tall building on the site may be visible in the distance from the street. Herbert Street is part of Dublin's Georgian core and is a Conservation Area, although – as shown in the photograph – there have been some modern interventions on the street. The vista is closed by a terrace of Georgian houses on Mount Street Upper perpendicular to Herbert Street. The house in the centre of the view has a rear extension, the roof of which protrudes above the original terrace roofline. A notable feature in the view is the cupola of the Pepper Cannister Church, which is just off the axis of the street, mostly screened by the foreground buildings.

Viewpoint sensitivity: Medium-High.

Proposed Change: The proposed development would protrude above the Mount Street roofline in the distance, to approximately the same height as the roofline of the existing rear extension to one of the houses. At a distance of over 400m the building would be relatively indistinct compared to the foreground elements in the view, but it would nonetheless intrude in the view. The factor's in the proposal's favour include:

- (a) There are already modern interventions in the view; this is not a pristine Georgian streetscape;
- (b) The Georgian roofline has already been disrupted by the rear extension to one of the houses. The protrusion of another building 350m to the rear would not be the first change to the roofline;
- (c) The proposed vegetation on the roof level terrace would soften/ blur the building's presence (in combination with the distance), making it distinct from the foreground Georgian buildings;
- (d) As a result the Mount Street Georgian terrace façade would remain legible;
- (e) The strong horizontal lines and the rhythm of the fenestration of the building, although only barely discernible at the distance, can be interpreted as complementary to the Georgian architecture which is characterised by such regularity;
- (f) The intrusion of the building would not affect the visibility of the Pepper Cannister church cupola.

Magnitude of change: Low.

Significance of Effects: The visual effect would be slight and neutral. The building would be visible and would introduce a new element to the view from a Georgian street and designated Conservation Area. However, it would be a very minor change to the composition, and not the first modern intervention in the townscape in view. There would be no loss of visual amenity, nor to the legibility of the valued elements in the view. It should be noted that the DCDP policy (CHC4 – see 3.1.5 above) on Conservation Areas allows for changes inside and outside of these areas if the development is of high design quality, sensitive to and therefore 'harmonious' with its context. This is applicable to this view.

Potential Cumulative Effects: n/a.

5.2.15 Viewpoint 15 – Merrion Square

Existing Views: Photomontages are provided for two locations to assess the potential effect on Merrion Square. 15a is a position near the centre of the park. The existing view shows the high degree of visual enclosure generated by the perimeter trees and the 4-5 storey Georgian houses surrounding the low-lying park. 15b is from Merrion Square South where the elevation of the street counteracts the built enclosure to some extent.

Further to the west, in views from within and from the streets around the square, the dense belt of mature trees around the park blocks views towards the site. It is only from the eastern half of the square (e.g. Viewpoints 15a and 15b) that visibility would be possible – if the proposed development were taller.

Viewpoint sensitivity: High.

Proposed Change: The proposed development would not be visible.

Significance of Effects: No effect.

Potential Cumulative Effects: n/a.

5.2.16 Viewpoint 16 – Herbert Place & Mount Street Crescent Junction Beside Grand Canal

This view was requested to be included in the LVIA by Dublin City Council in pre-planning consultation.

Existing View: The view along the Grand Canal towards the Docklands is an interesting and attractive view. In the foreground to the left is a terrace of Georgian Houses. To the right is the canal with lines of mature trees along the towpaths. Ahead there is a dramatic change in townscape character, with No. 1 Warrington Place prominent, along with Grand Canal Plaza and Google Docks in the distance. This is an example of neighbouring character areas mutually benefitting from their juxtaposition.

Viewpoint sensitivity: Medium-High.

Proposed Change: The proposed development would not be visible.

Significance of Effects: No effect.

Potential Cumulative Effects: No effect.

5.2.17 Viewpoint 17 – Warrington Place & Mount Street Lower Junction Beside Grand Canal

These views were requested to be included in the LVIA by Dublin City Council in pre-planning consultation.

Existing View: Photomontages are provided for two locations to assess the potential effect on the Grand Canal Corridor at McKenny's Bridge. In the foreground to the left of both views is Clanwilliam House, a late 20th century red brick office building not dissimilar to the original Bolands Bakery building on the site. Ahead to the north is a cluster of more modern buildings signalling the transition into the Docklands character area.

Viewpoint sensitivity: Medium.

Proposed Change: The proposed development would not be visible.

Significance of Effects: No effect.

Potential Cumulative Effects: n/a.

5.3 Potential Mitigation

For Viewpoints 1-4 a potential negative visual impact has been identified. This would arise if the proposed development were implemented but the adjoining Treasury Annex proposal was not permitted. In that scenario the blank brick west facade of the proposed Treasury building would be exposed to view, while the improvements to the south and east facades would not be visible.

If permission for the Treasury Annex building is not granted - and if Dublin City Council considers it unlikely that permission will be granted for a development on that site - it is recommended that it be conditioned that the proposed Treasury building design be adjusted to introduce fenestration to the west elevation. This would ensure that the visual effects on views from the west would be neutral or positive.

6.0 Conclusions

The site is located in Dublin's Docklands quarter, in a gateway position at the junction of Grand Canal Street Lower and Macken Street. Approaching from the direction of the city centre to the west (e.g. from Trinity College and Merrion Square) the Treasury building is the first part of the Docklands quarter to be seen.

The site thus occupies a significant place in the townscape, but the potential of the Macken Street and Grand Canal Street junction as a 'place' is not realised, largely because of the quality of the existing development. The 1990s development appears dated and makes no positive contribution to the adjacent streetscapes, the wider townscape character or to views/ visual amenity in the area. Both the site and the wider townscape would benefit from the site's redevelopment, especially if in concert with the adjacent proposed Treasury Annex building.

6.1 Townscape Effects

Taking account of the site's strategic location, the character and condition of the existing Treasury building and its city block, and the evolved character of the Docklands area, the sensitivity of the receiving environment was classified medium (definition: *"Areas where the townscape has certain valued elements, features or characteristics but where the character is mixed or not particularly strong, or has evidence of alteration, degradation or erosion of elements and characteristics. The townscape character is such that there is some capacity for change. These areas may be recognised in townscape policy at local or county level and the principal management objective may be to consolidate townscape character or facilitate appropriate, necessary change"*).

This classification recognises that there are some sensitivities in the area, notably (a) the protected structure Sir Patrick Dun's Hospital across Grand Canal Street Lower, (b) the residential neighbourhood along and to the west of Macken Street, and (c) the Conservation Areas covering Grand Canal Dock, the Grand Canal and the Georgian Core to the south. (Each of these sensitive receptors was individually assessed in the visual effects assessment – with no negative effects identified.)

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

The above classification of magnitude took account of the following factors:

- The proposed development is a re-imagining of the existing 1990s development of the site. It is of the same typology (i.e. the retention of the bakery structure, with a modern extension), only larger (but not considerably larger) and with a different architectural expression. As an element of the townscape the site would not be substantially changed.
- The scale of the building, at 8+1 storeys, would be in character with the wider Docklands townscape, and would reflect the height of the permitted Boston Sidings development on the same city block. It is a response to (a) the national policy of compact growth, (b) the opportunity provided by a brownfield site in sub-optimal usage and condition/ appearance, and (c) a receiving environment with a capacity to accommodate change of the type proposed.
- The character and architectural quality of the development would be in keeping with the wider Docklands area, which has transformed since the site's development in the 1990s.

Considering the nature and scale of the change proposed, and the sensitivity of the receiving environment, the significance of the townscape effects is predicted to be moderate and positive. The site/building would have a stronger, more coherent character, a simpler materials palette of appreciably high quality, and the presentation of the bakery structure as part of the whole would be improved. The lowering of the window sills along Grand Canal Street Lower would improve the interface with the street (by intervisibility with the ground floor). If the development were to go ahead in combination with the proposed Annex building, the positive effects on the Macken Street and Grand Canal Street streetscapes would be significant. By improving the quality of the building, the immediate townscape context would also be improved. No potential negative townscape effects were identified.

6.2 Visual Effects

20 no. viewpoints were selected for assessment of the proposal's potential visual effects. As well as the proposed development in isolation, the assessment considered the potential cumulative effects of the proposal in combination with the permitted Boston Sidings building and the proposed Treasury Annex building. The findings of the assessments were as follows:

Table 3 Summary of visual effects assessment

No.	Location	Viewpoint Sensitivity	Magnitude of Change	Significance of Effects	Cumulative Effects
Fenian Street, Hogan Place and Grand Canal Street Lower to the west					
1	Fenian Street	Low-Medium	Low	Slight negative	Slight positive
2	Hogan Place	Low-Medium	Low-Medium	Slight negative	Slight positive
3	Grand Canal Street Lower at Grattan Street Junction	Low-Medium	Low-Medium	Moderate negative	Significant positive
4	Grand Canal Street Lower at Albert Place	Medium	Medium	Moderate negative	Significant positive
Sir Patrick Dun's Hospital, and Grand Canal Street to the east					
5	Grand Canal Street Lower Opposite Clanwilliam Terrace Junction	Medium	High	Significant positive	n/a
5b	Sir Patrick Dun's Hospital	Medium	High	Significant positive	n/a
6	Grand Canal Street Lower at Clanwilliam Place Junction	Low-Medium	Medium	Moderate positive	Moderate positive
7	Grand Canal Street Upper at Barrow Street Junction	Low-Medium	Medium	Slight positive	n/a
Clanwilliam Terrace to north east					
8	Clanwilliam Terrace	Low-Medium	Low	Slight positive	Moderate positive
Residential neighbourhood along and to the west of Macken Street to west of the site					
9	Macken Street	Medium	Medium	Moderate neutral	Significant positive
10	Hogan Avenue and Island Villas	Medium	Low	Slight neutral	Moderate positive
Macken Street to the north					
11	Macken Street at Pearse Street junction	Low	Low	Slight neutral	Moderate positive
12	Macken Street at Sir John Rogerson's Quay	Medium	Negligible	Not significant neutral	Slight positive

Grand Canal Dock					
13a	Charlotte Quay	Medium	Negligible	Not significant positive	Slight positive
13b	McMahon Bridge, Ringsend Road	Low-Medium	None	No effect	n/a
Sensitive Receptors in historic city centre to west and south					
14	Herbert Street	Medium-High	Low	Slight neutral	n/a
15a & b	Merrion Square	High	None	No effect	n/a
16	Herbert Place & Mount Street Crescent Junction Beside Grand Canal	Medium-High	None	No effect	n/a
17a & b	Warrington Place & Mount Street Lower Junction Beside Grand Canal	Medium	None	No effect	n/a

The key findings are as follows:

- In views approaching the site (and Docklands) from the west, along Fenian Street, Hogan Place and Grand Canal Street Lower (Viewpoints 1-4), the proposed development on its own would have slight to moderate negative effects. The improvements to the south and east sides of the building would not be visible from this angle. The negative effect would result not from the increase in height, which can be accommodated on the city centre street (with a wide parking area opposite the site), but from the building's newly blank west façade. The façade has no windows or other features (to facilitate development of the adjoining Annex site) and the tall blank wall would be unsightly on the approach from the west.

When the proposed development and the proposed Annex building are considered in combination however, the cumulative effects would be slight to significant and positive. The Annex building would present a new, highly quality façade to the approach from the city centre – the architecture fitting for the Docklands gateway location. In views from close-up there would also be significant positive effects on the streetscape around the junction of Grand Canal Street Lower and Macken Street. The two developments in combination would transform the junction into a place of significance in the townscape.

Potential mitigation measure: If permission for the Treasury Annex building were not granted - and if Dublin City Council considers it unlikely that permission will be granted for a development on that site - it is recommended that it be conditioned that the proposed Treasury building design be adjusted to introduce fenestration to the west elevation. This would ensure that the visual effects of the development on views from the west (e.g. Viewpoints 3 and 4) would be neutral or positive. The currently proposed blank brick facade (to facilitate the Treasury Annex development) would be replaced by a facade similar to the existing facade, only in better condition.

- There would be significant positive effects on the views from Grand Canal Street Lower to the east and from Sir Patrick Dun's Hospital across the street to the south (Viewpoints 5 and 5b). In these views the improved coherence and overall appearance of the site/ building would be most appreciable.

A building of excessively complex, composite form and materials would be replaced by a building of more simple form and materials palette. The new building would have a strong, contemporary character and distinct identity, referencing the industrial past while also reflecting the evolved character of the Docklands. Importantly, the original bakery structure would be more legible and better presented in the overall composition.

Due to the 28m+ setback of the hospital building from the street (behind a parking area), and the screening effect of the trees inside the hospital boundary, the increase in height of the Treasury building would cause no negative effect on the protected structure.

- In views from the east and north – from within or at the edge of the Docklands area (Viewpoints 8, 9, 11-13a & b) – the development's effects would typically be neutral or slight positive. Where clearly visible the improvements to the building would improve the quality of the views. However, for the most part the magnitude of change would be limited in the complex Docklands views already characterised by a wide range of building types, scale, architecture and materials. In no case would the building height cause any harm to the overall composition or to any sensitive feature or characteristic of the view.

In some of these views (e.g. Viewpoints 9, 11), where two or more of the proposed development, the proposed Annex building and/or the permitted Boston Sidings would be visible, there would be a positive cumulative effect. In combination the developments would transform the character of a Docklands block which has been left behind in the most recent phase of regeneration. They would expand the evolved Docklands area out to its historic boundaries along Macken Street and Grand Canal Street.

- The development would not be visible from either Merrion Square or the Grand Canal corridor, two of the recognised sensitivities in the wider environs.
- The development would be visible from Herbert Place, a Georgian Street and Conservation Area some 400m to the south of the site. Although discernible, the magnitude of change would be low and the visual effect would be slight and neutral. There would be no loss of visual amenity and no loss of legibility of the historic buildings lining the street, including the Pepper Cannister Church.

In conclusion, the proposed development can be considered an appropriate intervention in the townscape, particularly if carried out in concert with the proposed Treasury Annex development.

APPENDIX 1 LANDSCAPE/TOWNSCAPE & VISUAL IMPACT ASSESSMENT METHODOLOGY

The TVIA methodology is informed by the *Guidelines for Landscape and Visual Impact Assessment*, 3rd edition 2013 (hereafter referred to as the GLVIA) and the EPA draft *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports*, 2017.

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

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

1.0 Key Principles of the GLVIA

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

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

1.2 Assessment of Both ‘Landscape’ and ‘Visual’ Effects

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

‘Landscape/townscape’ results from the interplay between the physical, natural and cultural components of our surroundings. Different combinations and spatial distribution of these elements create variations in landscape/townscape character. ‘Landscape/townscape character assessment’ is the method used in LVIA to describe landscape/townscape and by which to understand the effects of development on the landscape/townscape as a resource.

Visual assessment is concerned with changes that arise in the composition of available views, the response of people to these changes and the overall effects on the area’s visual amenity.

2.0 Townscape Effects Assessment

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

2.1 Landscape/Townscape Sensitivity

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

Table 1 Categories of Landscape/Townscape Sensitivity

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

2.2 Magnitude of Landscape/Townscape Change

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

Table 2 *Categories of Landscape/Townscape Change*

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

2.3 Significance of Landscape/Townscape Effects

To classify the significance of effects the magnitude of change is measured against the sensitivity of the landscape/townscape using the guide in Table 3. The matrix (Table 3) is only a guide. The assessor also uses professional judgement informed by their expertise, experience and common sense to arrive at a classification of significance that is reasonable and justifiable.

There are seven classifications of significance, namely: (1) imperceptible, (2) not significant, (3) slight, (4) moderate, (5) significant, (6) very significant, (7) profound.

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

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

The EPA draft *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports*, 2017 describes the significance classifications as follows:

Table 4 EPA definitions of environmental impact classifications

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

3.0 Visual Effects Assessment

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

3.1 Sensitivity of the Viewpoint/Visual Receptor

Viewpoint sensitivity is a function of two main considerations:

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

Table 5 *Categories of Viewpoint Sensitivity*

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

3.2 Magnitude of Change to the View

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

Table 5 *Categories of Visual Change*

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

3.3 Significance of Visual Effects

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

4.0 Quality of Effects

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

For landscape effects to a degree, but particularly for visual effects, this is an inherently subjective exercise since landscape and views are *perceived* and therefore subject to variations in the attitude and values of the receptor. One person's attitude to a development may differ from another person's, and thus their response to the effects of a development on a landscape or view may vary. Additionally, there might be policy encouraging a particular development in an area, in which case the policy is effectively *prescribing* landscape change. If a development achieves the objective of the policy the resulting effect might be considered positive, even if the landscape character is profoundly changed. The classification of quality of landscape and visual effects should seek to take these variables into account and provide a reasonable and robust assessment.