

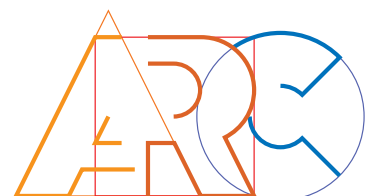


## **Strategic Housing Development**

Former Heiton Buckley site Castle Street, Bray  
ABP Reference -311610-21

## **Landscape and Visual Impact Assessment**

**April 2022**



ARC Consultants have been commissioned by the applicant to prepare this Landscape and Visual Impact Assessment in relation to a proposed Strategic Housing Development on lands at the Former Heiton Buckley site at Castle Street, No. 20 Dwyer Park and St. Anthony's, Dwyer Park, Bray, Co. Wicklow.

## Methodology

Article 1 of the European Landscape Convention defines landscape as

*“an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors”.*

The purpose of this chapter is to assess how the existence of a proposed development might change how a surrounding area might be ‘perceived by people’ visually.

The preparation of this landscape and visual impact assessment has had regard to the *Environmental Impact Assessment of Projects Guidance on the preparation of the Environmental Impact Assessment Report (European Commission, 2017)* and the draft *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (August 2017)* prepared by the Environmental Protection Agency. It is noted that the EPA Guidelines, in categorising the extent of environmental impact, uses the term ‘effects’ in place of ‘impacts’.

As has been noted in the European Commission’s 2017 EIAR Guidance, the baseline, is not static but is something continuously evolving, and the assessment of the baseline should include all relevant considerations. An understanding of the history of the development of the surrounding area is necessary in order to understand what natural and human factors acted to form the urban landscape. Historical, cultural and social concerns are factors that inform the character of any landscape and need to be understood in assessing the effects on that landscape arising from the existence of proposed development. These factors are part of the baseline.

As has been noted in the European Commission’s 2017 EIAR Guidance the perception of development by observers will be influenced by the context in which the development is seen. There are a number of different physical contexts from which proposed development at Castle Street is likely to be seen. For most observers at Castle Street and adjacent areas the proposed development is likely to be seen as a welcome change from the derelict lands of the former Heiton Buckley builders suppliers. From some nearby roads, where existing development is modest in scale, the scale of the proposed development may appear jarring to some observers. Some observers are, therefore, likely to regard the existence of the proposed development as giving rise to significant landscape and visual effects, whereas others will not.

The purpose of a landscape and visual impact assessment is, taken together with the full range of other documents lodged as part of a planning application, to assist in informing the decision making process.

Assessment of landscape and visual effects, has three main parts:

1. Analysis of the likely extent of visibility of a proposed development
2. Description of the visual sensitivity of the receiving environment and its consequent capacity to absorb development
3. Assessment of the objective extent of change in the visual character of the receiving environment likely to arise from the existence of the proposed development, and of the likely response of observers to that change.

The EPA draft Guidelines require that landscape and visual impact assessment be carried out in a manner that is systematic, impartial, and objective and independent. It is not the purpose of assessment to promote or advocate for the development. It is an important principle of impact analysis that the analysis should be capable of being repeated independently, and that repeated analysis should lead to the same conclusion. To facilitate this, the steps taken in the analysis of impacts should be clearly set out in an assessment report.

## **I. Analysis of the likely extent of visibility of a proposed development**

The first task of a landscape and visual impact assessment is to assess the likely extent and nature of visibility of the proposed development. This includes determining from what locations the proposed development is likely to be visible and from what locations it will not be. It includes determining, where visible, how major or minor an element the proposed development will be in any view. The primary determining factors when assessing extent of visual impact are:

- (i) Whether a development will be visible or not;
- (ii) Where visible, how much of any view a development will occupy; and
- (iii) Whether or not a proposed development is the focus of a view.

Each of these factors affect the visual prominence of a proposed development.

The extent of visibility of a proposed development in any view tends to be directly related to the distance of the viewpoint from the development. However, intervening obstacles such as buildings or structures, trees and planting, and topography, can modify the extent of visibility of the proposed development. Where streets or urban spaces are aligned towards the site of a proposed development, and where the buildings or trees at the end of these alignments are relatively modest in height, there is a potential for taller developments to be visible above any lower intervening buildings or other obstacles. This potential increases with the length of the open foreground but reduces when the viewpoint is closer to any intervening obstacles. It follows, that for taller structures (e.g. taller than the prevailing height of the surrounding built environment or landscape elements) to be openly visible, they must be seen across an open foreground or at the end of a long vista or alignment. From viewpoints within dense urban, or even suburban, environments, very modest buildings in the foreground can conceal even very large or tall structures from view.

An initial survey of the potential visibility of the proposed development was carried out by ARC on several dates in 2020, and further surveys of potential visibility were carried out in early 2022. Before visiting the surrounding area, ARC carried out mapping analysis to identify locations surrounding the application site, which would be representative of the extent of visibility of the proposed development, including locations from which views of the proposed development were likely.

Photomontages were prepared by Renderare from these view locations and these photomontages are appended to this report. ARC had regard to those photomontages in the preparation of this Landscape and Visual Impact Assessment.

## **2. Visual sensitivity of the receiving environment and capacity to absorb development**

As has been discussed above, the visibility of proposed development is mediated by the physical geometry of the receiving environment, including the pattern and form of the existing built environment. These are among the factors that determine the visual capacity of a receiving environment to absorb development. Among other characteristics are the visual character and uniformity of the receiving environment and its historical or cultural value.

An intact and uniform Georgian square, which is a coherent and integrated visual setting, would usually be regarded as visually sensitive with a consequent low capacity to absorb new development that might dilute the existing visual character. The same might be true of certain suburban environments. On the other hand, a town centre or city centre environment where there are structures of a diverse character and a wide range of scales are settings that are usually less sensitive and are likely to have a high visual capacity to absorb development. Castle Street Bray is one such location. Locations that have a statutory designation as an architectural conservation area or locations where there are protected structures, because of such designations are usually regarded as having an increased visual sensitivity leading to a reduced visual capacity to absorb development. Capacity to absorb development, therefore, has a direct bearing on the extent of likely landscape and visual impacts / effects.

In areas that are very uniform in character the introduction of larger structures may change the visual character of the area. In established urban areas, the introduction of new large structures as part of a process of densification has the potential to give rise to substantial visual impacts / visual effects. The extent of this change will depend on the extent of difference in visual character between the new development and the existing surrounding visual environment. The extent of change is likely to be the main factor in determining the extent of landscape and visual impacts / effects.

### 3. The extent of change in the visual character and of the likely response of observers

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

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

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

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

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

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

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

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

The range of possible effects listed above deal largely with the extent of impact; and the extent of the impact of a development is usually proportional to the extent to which that development is visible. The extent of impact will also, in part, depend on the sensitivity of the spaces from which the development is seen. This proportionality may be modified by the extent to which a development is regarded as culturally or socially acceptable. The character of the impact: positive, negative or neutral, will depend on how well a development is received by the public, and on the general contribution of the development to the built environment. The character of a landscape and visual impact, and even the duration of that impact, is very dependent on the attitude of the viewer. If a viewer is opposed to a



new building for reasons other than visual, that viewer is likely to see the building in a negative light, no matter how beautiful the building might be. Although buildings are intended to be permanent, and will be permanently visible, the extent of visual impact associated with a building often diminishes with time as further development in the area takes place.

### **The Urban Development and Building Heights Guidelines for Planning Authorities**

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

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

#### ***At the scale of the relevant city/town***

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

#### ***At the scale of district/ neighbourhood/ street***

- The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.*
- The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.*
- The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of “The Planning System and Flood Risk Management – Guidelines for Planning Authorities” (2009).*
- The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.*
- The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.”*

The Urban Development and Building Heights Guidelines for Planning Authorities are referenced here in the interests of completeness. However, for the avoidance of doubt these guidelines, nor, indeed, any other planning policy guidelines (save those related to environmental impact assessment), were considered when classifying the magnitude and extent of potential landscape and visual effects.



## Receiving Environment

The site of the proposed development consists of the lands of the former Heiton Buckley builders providers at Castle Street and includes No. 20 Dwyer Park and St. Anthony's, Dwyer Park. The south western corner of the site has frontage onto Castle Street and the corner of Castle Street and Dwyer Park. A short length of the eastern side of the site also fronts onto Dwyer Park. Otherwise the site of the proposed development is a backland site bounded on its western side by the rear of existing commercial developments on Castle Street and at its south eastern corner by the rear of houses on Dwyer Park. The northern and north eastern boundaries of the site adjoin lands that are currently disused.

In his introduction to Irish Historic Town Atlas No 9, Bray, K. M. Davies begins:

*'The Dargle River, once called the Bray River or Bray Water, flows into the Irish Sea some 18 km to the south of Dublin city, draining, with its tributaries, a roughly semi-circular area of south-eastern Co. Dublin and north-eastern Co. Wicklow. For part of its course it at one time marked the boundary between these two counties and it also serves to divide the town of Bray into two parts, 'Great Bray' and Little Bray. Constricted and swiftly-flowing for most of its passage, the Dargle has created a narrow flood plain before reaching its marshy estuary. This estuary, unlike the mouths of the Liffey further north or the Vartry and Avoca Rivers at Wicklow and Arklow further south, did not apparently attract permanent settlers during the Viking period, but high bluffs cut into solid rock on the south bank of the river, close to the tidal limit, provided a good site for the first small community of the manor of Bray in the years after the Anglo Norman invasion.'*

K. M. Davies goes on to say:

*'Certainly the site was attractive to the settlers of the late twelfth century. Walter de Ridelesford was granted the lands on either side of the Dargle c. 1173, and soon afterwards he built a castle, probably a motte, on the south side of the river'*

Initially there was no castle on the north side of the river. But Bray was susceptible to attack by the O'Byrnes and the O'Tooles who regularly came down the Dargle valley from the Wicklow Mountains. K. M. Davies records that as a result:

*'in c. 1459 a new 'ten pound' castle was built in Little Bray to defend the route over the ford from marauders from the south. This simple structure, no more than a small tower house, survived into the twentieth century.'*

Castle Street in Little Bray is the street that led from this second castle to the ford over the river; the location of the later bridge.

The flood plain at the mouth of the Dargle was, and is, bounded on the south side by higher ground the northern edge of which runs roughly parallel to the present course of the River. On the north side the high ground bounding the flood plain runs along the north side of the Upper Dargle Road and continues east to include the former lands of Ravensdale House. The site of the proposed development lies on the lower ground within the original flood plain of the Dargle.



Extract from the 25 Inch Ordnance Map of c. 1907. The site of the proposed development is outlined in red.  
 (ARC OS Licence No. CYAL50210860. Ordnance Survey Ireland/Government of Ireland)



## Likely Visibility of the Proposed Development

The fact that the site of the proposed development is on lower ground greatly reduces the potential visibility of the development. The proposed development will be visible from Castle Street and Dwyer Park and to a lesser extent from St Cronan's Road and St Patrick's Square. There will be one or two partial views of the proposed development from the Upper Dargle Road but otherwise from most of Little Bray, including the area between the Upper Dargle Road and the River; the proposed development will not be visible. From developments along the south side of the River Dargle visibility of the proposed development will also be very limited. From lands on the north side of the River to the east of the subject site, there are likely to be one or two open views of the proposed development. The land to the east of the site of the proposed development falls within Special Local Objective (SLO) 3 of the Bray Municipal District Local Area Plan 2018-2024, where the stated objective is:

*'that this land be developed as a mixed commercial, residential, education / community facilities and open space zone'.*

When the lands within SLO 3 are developed the potential visibility of the subject development will be greatly reduced.

## Relevant Characteristics of the Proposed Development

The proposed development includes the following:

- Demolition of all existing vacant commercial and residential buildings and sections of boundary wall
- Construction of a mixed-use residential and commercial development in 2 blocks ranging in height from 1 to 7 storeys set around a central podium level amenity space and a separate single storey pavilion building. The residential element will accommodate 139 apartments. The pavilion building will accommodate a community facility on Castle Street
- Provision of 59 no. undercroft car parking spaces and 3 no. creche drop-off spaces
- Landscaped communal open spaces, boundary treatments, substation, plant rooms, bin stores, bicycle parking, signage and all associated site works and services.

## Potential Landscape and Visual Effects

Given that the potential visibility of the proposed development is limited, the potential landscape and visual effects will also be limited. The likely landscape and visual effects from 11 locations in the surrounding area have been assessed and are tabled below. View by view descriptions are provided below the table.

**Table of Potential Impacts Landscape and Visual Effects**

View	Location	Potential Visual Effects
1	From St Cronan's Road	Moderate to Significant
2	From the south east end of Dwyer Park	Slight to Moderate
3	From the junction of Dublin Road with Upper Dargle Road	Slight to Moderate
4	From the junction of Dublin Road with the New Ravenswell Road	Slight
5	From the South Pier of Bray Harbour	None
6	From the south side of the River Dargle at Seapoint Court	None
7	From the south side of the River Dargle at The Maltings	None to Imperceptible
8	From Roger Casement Park	Slight
9	From near the east end of the Upper Dargle Road	None to Slight
10	From the New Ravenswell Road near Ravenswell Primary School	Moderate to Significant
11	From Castle Street at Bray Bridge	Moderate to Significant



## **View By View Descriptions**

### ***View 1: From St Cronan's Road***

This view looks east towards the site of the proposed development from St Cronan's Road at a distance of about 50 metres from Castle Street. The view is framed by two storey houses lining either side of St Cronan's Road. In the view as proposed part of the 4 to 6 storey south western block of the proposed development is seen above and behind houses at the south east end of St Cronan's Road, and part of the 6 storey north eastern block of the proposed development is seen above and behind red brick commercial development on the east side of castle street. The proposed development is seen as comparatively large elements in the view. The landscape and visual effects arising from the existence of the proposed development as seen from this view location are assessed as 'moderate' to 'significant'.

### ***View 2: From the south east end of Dwyer Park***

This view looks north west along Dwyer Park towards the site of the proposed development from the south east end of Dwyer Park. In the view as proposed, parts of the proposed development are seen to the left of centre in the view behind buildings on the west side of Dwyer Park. The proposed development is a relatively minor element in the view. The landscape and visual effects arising from the existence of the proposed development as seen from this view location are assessed as 'slight' to 'moderate'.

### ***View 3: From the junction of Dublin Road with Upper Dargle Road***

This view looks south east towards the site of the proposed development from the junction of Dublin Road with Upper Dargle Road. Parts of the two main blocks of the development are seen to the left of the view through trees on the lands of Ravenswell School. The proposed development is a relatively minor element in the view. The landscape and visual effects arising from the existence of the proposed development as seen from this view location are assessed as 'slight' to 'moderate'.

### ***View 4: From the junction of Dublin Road with the New Ravenswell Road***

This view looks south east towards the site of the proposed development from the junction of Dublin Road with the New Ravenswell Road. Parts of the development are seen in the middle distance in the centre of the view through trees on the lands of Ravenswell School and behind the corner of the Lidl supermarket. The proposed development is a minor element in the view. The landscape and visual effects arising from the existence of the proposed development as seen from this view location are assessed as 'slight'.

### ***View 5: From the South Pier of Bray Harbour***

This view looks west across the waters of Bray Harbour from near the end of the South Pier and in the direction of the site of the proposed development. In the view as proposed, the proposed development is not visible, and its hidden location is represented by a red outline. The landscape and visual effects arising from the existence of the proposed development as seen from this view location are assessed as none.

### ***View 6: From the south side of the River Dargle at Seapoint Court***

This view looks west across Reiver Dargle in the direction of the site of the proposed development from a viewing platform on the south side of the River near Seapoint Court. In the view as proposed, the proposed development is not visible, and its hidden location is represented by a red outline. The landscape and visual effects arising from the existence of the proposed development as seen from this view location are assessed as none.

### ***View 7: From the south side of the River Dargle at The Maltings***

This view looks north east across Reiver Dargle in the direction of the site of the proposed development from a green space at the south end of The Maltings. In the view as proposed, parts of the proposed development are just discernible in the distance through trees, the hidden parts of the development being represented by a red outline. In

summer conditions when trees are in leaf the proposed development is unlikely to be visible from this location. The landscape and visual effects arising from the existence of the proposed development as seen from this view location are assessed as none to 'imperceptible'.

**View 8: From Roger Casement Park**

This view looks east towards the site of the proposed development from a green space at the south end of Roger Casement Park. This green space is on high ground above the Upper Dargle Road. In the view as proposed, parts of the proposed development are visible in the distance. The proposed development is a minor element in the view. The landscape and visual effects arising from the existence of the proposed development as seen from this view location are assessed as 'slight'.

**View 9: From near the east end of the Upper Dargle Road**

This view looks east towards the site of the proposed development from an elevated green space at Sunnybank near the east end of the Upper Dargle Road. In the view as proposed, most of the proposed development is concealed from view by trees along the south side of the Upper Dargle Road, the hidden parts of the development being represented by a red outline. A small part of the northern block of the proposed development is just visible through the trees. In summer conditions when trees are in leaf the proposed development is unlikely to be visible from this location. The proposed development is a minor element in the view. The landscape and visual effects arising from the existence of the proposed development as seen from this view location are assessed as none to 'slight'.

**View 10: From the New Ravenswell Road near Ravenswell Primary School**

This view looks south west towards the site of the proposed development from the New Ravenswell Road near Ravenswell Primary School. Substantial parts of the proposed development are seen in the middle distance in the centre of the view behind trees in the foreground and beyond buildings at Dwyer Park. The proposed development is an important element in the view and is the focus of the view. The landscape and visual effects arising from the existence of the proposed development as seen from this view location are assessed as 'moderate' to 'significant'.

**View 11: From Castle Street at Bray Bridge**

This view looks north west along Castle Street towards the site of the proposed development. Substantial parts of the proposed development are seen in the middle distance in the centre of the view in the context of a busy street and a large shopping centre and car park. The proposed development is an important element in the view but does not appear inappropriate to its context. The landscape and visual effects arising from the existence of the proposed development as seen from this view location are assessed as 'moderate' to 'significant'.

**Listed Views and Prospects**

There are two relevant Views and Prospects listed under Schedule 10.14 (b) of the Bray Municipal District Local Area Plan 2018-2024 with their locations indicated on Map No: H4. These are:

- 2 The prospect towards the River Dargle, its flood plain and adjoining steep sided wooded slopes from N11.
- 12 The view from the Harbour Bridge of the Maltings and the former power station chimney.

No 2 appears to be the view from Sunnybank, View 9 above. The existence of the proposed development, almost entirely hidden from view, is not likely to give rise to any material effect on this prospect. No 12 is located between Views 5 and 6 above. The proposed development will not be visible from either location and will not be visible from the Harbour Bridge.

**W. H. Hastings FRIAI • April 2022**

RIAI Grade 1 accredited Conservation Architect

