

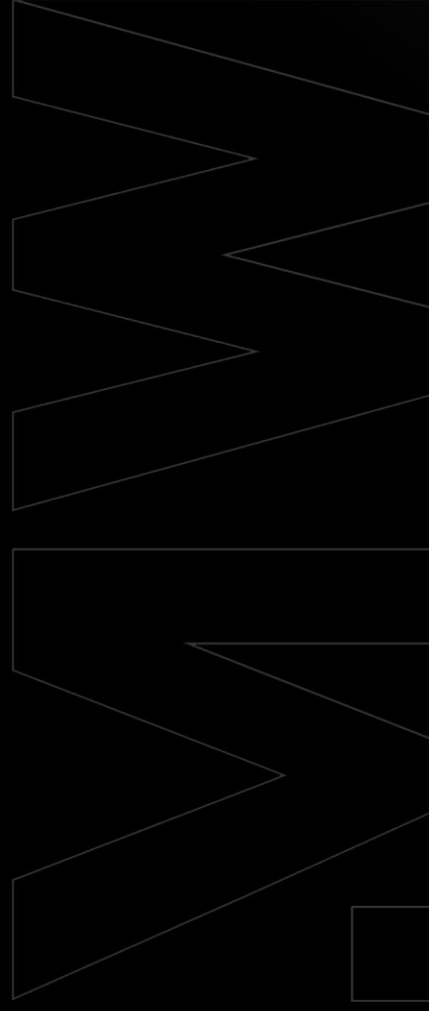
Townscape and Visual Impact Assessment

Proposed Residential Development for Older Persons at 13 & 18 Sallins Road, Beaufort Cottage and Beaufort, Sallins Road, Naas, Co. Kildare

Prepared by Model Works Ltd for

McAuley Place Ltd

March 2026



**.MODEL
WORKS**

Contents

1.0	Introduction	1
1.1	Development Description	1
1.2	Townscape and Visual Impact Assessment Methodology	1
2.0	The Receiving Environment	2
2.1	Naas Urban Morphology	2
2.1.1	<i>The Naas-Sallins Spine</i>	4
2.2	The Site	5
2.3	Surrounding Lands and Townscape Character Areas	7
3.0	Relevant Policy	13
3.1	National Policy	13
3.1.1	<i>National Planning Framework</i>	13
3.1.2	<i>Urban Development & Building Height Guidelines</i>	13
3.1.3	<i>Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities</i>	14
3.2	Naas Local Area Plan 2021-2027	16
3.2.1	<i>Land Use Zoning</i>	16
3.2.2	<i>Residential Density, Mix and Design</i>	16
3.2.3	<i>Becoming and Age Friendly Town</i>	17
3.2.4	<i>Building Height</i>	17
3.2.5	<i>Architectural Heritage</i>	17
3.2.6	<i>Protected Views</i>	18
4.0	Proposed Development	20
4.1	Land Use	20
4.2	Layout, Built Form and Height – Response to Context	20
4.2.1	<i>Block 1</i>	21
4.2.2	<i>Blocks 2 and 3</i>	22
4.3	Façade Treatments	22
4.4	Landscape Proposals	22
5.0	Visual Impact Assessment	24
5.1	Viewpoint 1 – North Main Street	25
5.2	Viewpoint 2 – Sallins Road View of Church of Our Lady and St David	26
5.3	Viewpoint 3 – Church of Our Lady and St David and the Convent Tea Rooms	27
5.4	Viewpoint 4 – Sallins Road View of Fr Murphy's Place Cottages	29
5.5	Viewpoint 5 – Sallins Road at Wolfe Tone Street Junction	31
5.6	Viewpoint 6 – Sallins Road View South Along Site Frontage	33
5.7	Viewpoint 7 – Sallins Road at Entrance to The Sycamores	35
5.8	Viewpoint 8 – Spring Gardens Estate	36
5.9	Viewpoint 9 – Abbey Bridge, Grand Canal	37
6.0	Townscape Impact Assessment	39
6.1	Townscape Sensitivity	39

6.2	Magnitude of Townscape Change	40
6.3	Significance and Quality of Townscape Impact	41

APPENDIX 1	LANDSCAPE/TOWNSCAPE & VISUAL IMPACT ASSESSMENT METHODOLOGY	iii
-------------------	---	------------

1.0 Introduction

This report assesses the potential townscape and visual impacts of a proposed residential development for older persons at 13 & 18 Sallins Road, Beaufort Cottage and Beaufort, Sallins Road, Naas West, Naas, Co. Kildare. The report should be read in conjunction with the book of verified photomontages provided under separate cover.

1.1 Development Description

Beaufort (house) is proposed to be retained and repurposed to facilitate a community room for the proposed residents and the demolition of the non-original fabric alterations and additions is proposed. Demolition of the three existing terraced cottages fronting Sallins Road is proposed.

The residential development will provide 44 no. 1 and 2-bedroom units across 3 interconnecting 4 storey blocks on a 0.48ha site. The development will also include a single storey rear garden pavilion, a single storey plant room, associated communal and public open spaces and 4 surface car parking spaces. Additional car parking (20 spaces) will be made available within the existing town centre car park located opposite the site. A pedestrian crossing is proposed at the front of the site, across Sallins Road.

Vehicular access is proposed from Sallins Road via a right of way from Father Murphy's Terrace along the southern boundary. A bridge is proposed across the Mill Lane stream connecting the rear of the site with the Luisne Gardens public open space.

1.2 Townscape and Visual Impact Assessment Methodology

The assessment was carried out with reference to the Landscape Institute *Guidelines for Landscape and Visual Impact Assessment* 2013 (GLVIA), the Institute's Information Note *Townscape Character Assessment* 2017, and the EPA *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports* 2022. The assessment methodology, including explanation of the criteria and terms used, is provided in Appendix 1.

The European Landscape Convention defines landscape as “an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors”. The word ‘townscape’ is used to describe the landscape in urban areas. The GLVIA defines townscape as “the landscape within the built-up area, including the buildings, the relationships between them, the different types of urban spaces, including green spaces and the relationship between buildings and open spaces”. Since the subject site is within the urban area, the word townscape is used in this report.

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

- Visual impact assessment is concerned with changes that arise in the composition of available views, the response of people to those changes and the overall effects on the area's visual amenity. The effects on 9 no. representative viewpoints in the receiving environment are assessed in Section 5, informed by verified photomontages.
- Townscape impact assessment is concerned with the effects of a proposed development on the *character and value* of the townscape as an environmental, cultural and economic resource. The potential effects on the townscape are assessed in Chapter 6.

The assessment was carried out by Richard Butler MILI MIPI of Model Works Ltd. Richard is a Landscape Architect and Town Planner, a member of the Irish Landscape Institute and the Irish Planning Institute, and has over 25 years' experience in LVIA.

2.0 The Receiving Environment

2.1 Naas Urban Morphology

Historical references to Naas date back to the 8th century. Its name is derived from the Irish An Nás, or Nás na Ríogh meaning ‘the place of assembly’, and for seven centuries it was the seat of the kings of Leinster. In the 12th century the Gaelic settlement was conquered by the Normans and the newly created Barony of Naas was granted to the Fitzgeralds. The Fitzgeralds built the medieval town and established the core of the current urban structure, including the classic linear street at its centre (Main Street), locally widened to form market places. The medieval period saw the development of Naas as a walled market town (see Figure 1). The site is located just to the north, outside of the historic medieval town defences.

During the 18th and 19th centuries Naas expanded rapidly due to its location on the main Dublin-Cork road, which brought traffic and trade through the town. The construction of the Grand Canal in the late 18th century again strengthened the strategic position and function of the town.

There was a further phase of rapid urbanisation in the 20th century when Naas developed as a commuter town for Dublin, accelerating after the construction of the M7 motorway. This period saw the expansion of suburban residential estates and the establishment of out-of-town shopping centres and industrial estates.

Figure 1: Map showing principal features relating to Medieval Naas (Source: NAAS TOWN DEFENCES CONSERVATION & MANAGEMENT PLAN, 2022)



As illustrated by the land use map (Figure 2) and aerial photograph (Figure 3) overleaf, Naas now has an extensive, diverse urban area. The zoned lands cover 16.4 sq km, and in places the town is over 5 km across. The town includes a mixed use town centre with planned streets and squares; the Grand Canal corridor and harbour; impressive civic buildings and churches; municipal buildings and facilities; Naas General Hospital; inner and outer residential suburbs; town-centre and out-of-town retail centres; several large business/commercial and industrial zones; and the M7 bypass. Naas is also served by a railway station at Sallins, 3km to the north of the town centre (and the site). The town’s complex history of development, its large scale and its diversity (of development era, building typologies, architecture, etc.) suggest a capacity to accommodate further change.

In 2022 Naas had a population of 26,180, making it **the largest town in Co. Kildare and the 14th largest urban centre in Ireland**. The Naas Local Area Plan 2021-2027 (Naas LAP) confirms that Naas is “*at the top of the County Settlement Hierarchy*”. In the Eastern and Midland Regional Spatial and Economic Strategy (RSES), Naas is identified as a Key Town, defined as: “*large economically active service and/or county towns that provide employment for their surrounding areas... with high-quality transport links and the capacity to act as growth drivers...*”. Accordingly, the Kildare County Development Plan 2017-2023 (Kildare CDP) aims to accommodate 14.9% of Kildare’s housing target in Naas (currently the town houses 9.6% of the county population), and the opening paragraph of the Vision for Naas in the LAP is as states:

Figure 2: Naas Local Area Plan 2021-2027 land use zoning map

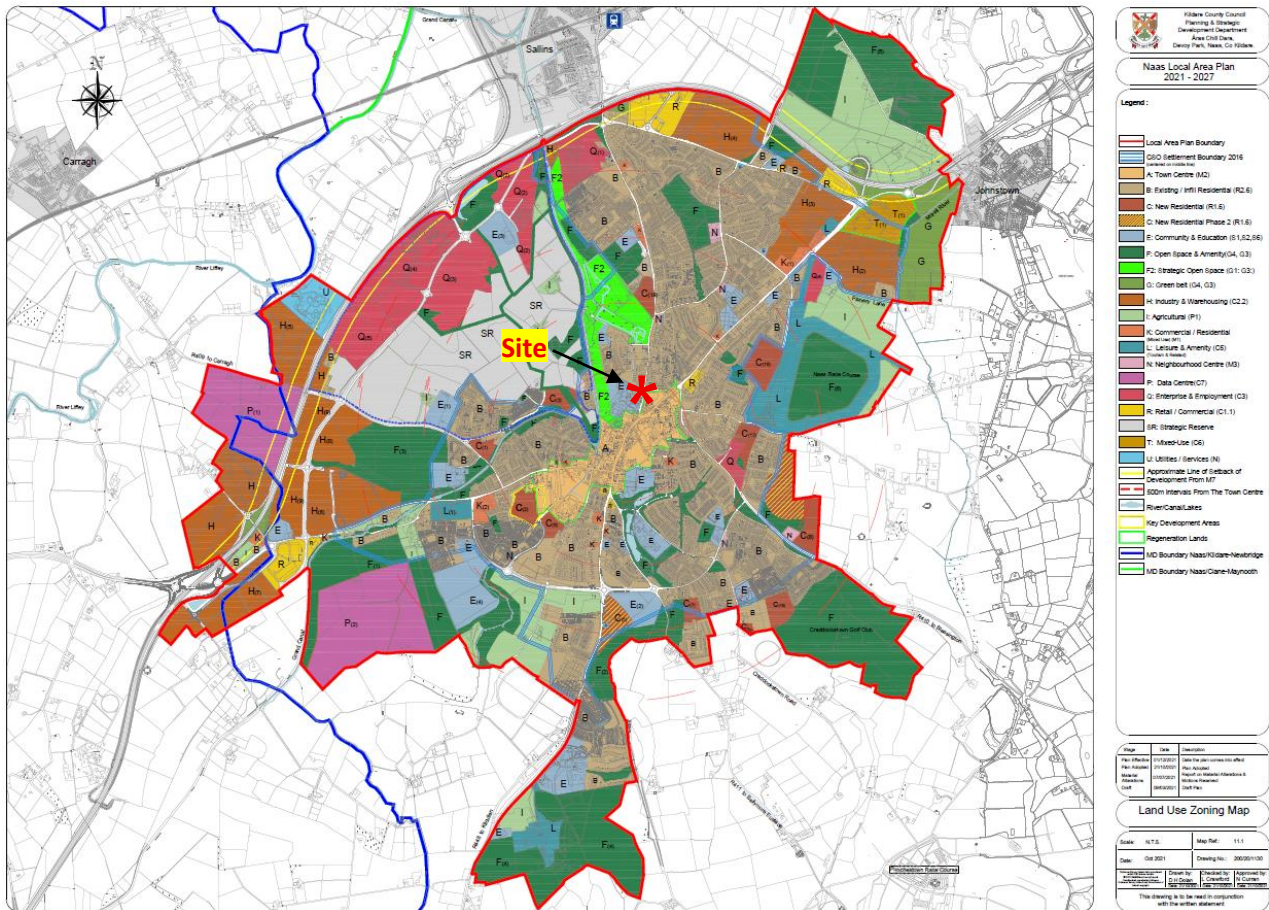


Figure 3: Site location in the context of the Naas urban area



“To ensure that the growth planned for the town up to 2031 and beyond occurs in a sustainable and sequential manner, while prioritising a low carbon, compact, consolidated and connected pattern of development.” [emphasis added]

The above is important to note as it has implications for the assessment of proposed developments’ townscape and visual impacts. The site, located in the centre of Naas, is at the apex of the urban/land use hierarchy in Co. Kildare. A key question to ask in this assessment is ‘*what should 21st century residential development in the centre of a town of Naas’s status, scale and growth ambition look like?*’.

A related factor is the national policy of Compact Growth. This is one of the main principles and intended outcomes of the National Planning Framework (NPF). Compact Growth policy encourages higher density - and therefore taller - development in urban areas where supporting infrastructure and services are available.

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...

“To enable brownfield development, planning policies and standards need to be flexible, focusing on design led and performance-based outcomes...” [emphasis added]

The policy of Compact Growth demands an increased tolerance for variations and juxtapositions in development typologies and scale in urban areas, particularly in town centres and areas well served by public transport. This has implications for townscape and visual impact assessment.

2.1.1 The Naas-Sallins Spine

An important influence on the future morphology of Naas is its relationship with Sallins – particularly Sallins Railway Station, which provides a rail link to Dublin. In line with the *Naas/Sallins Transport Strategy*, the Naas LAP’s development strategy seeks to strengthen the Naas-Sallins connection as a means to maximise the value of Sallins Railway Station to the town.

Measures to achieve this include (a) a focus on development in the town’s Northwest Quadrant (between Naas town centre and Sallins, alongside the Grand Canal), (b) the development of the Grand Canal Greenway to provide a pedestrian and cycle link between the town centre and the railway station, and (c) various pedestrian and cycle lane improvements to the Sallins Road (refer to Table 5.2 of the Naas LAP).

The result of the town’s development strategy will be a strengthening of the ‘Naas-Sallins spine’. The subject site is located on this spine, at the point of entry of the Sallins Road into Naas town centre. This gives the site some importance in the evolving urban structure.

It also means that the site will benefit *directly* from the various pedestrian and cycle infrastructure projects planned to improve the Naas-Sallins connection. This connectivity to the railway station will complement the site’s advantageous location adjacent to the town centre. The site thus represents an important opportunity for sustainable, sequential residential development.

2.2 The Site

The site is located on the Sallins Road 150m from the road's junction with Main Street in the town centre. The site is thus central to the Naas urban area and lies adjacent to the 'A. Town Centre' zoned area. The site itself is zoned 'B. Existing / Infill Residential'. The site comprises four main parts:

- **Beaufort House.** The four bay single storey house was built at the turn of the 20th century. It was later extended to the rear, and the National Inventory of Architectural Heritage (NIAH) notes that *"the house retains very little of its original features and materials"*. However, the NIAH also states: *"The house is an attractive feature of the streetscape of Sallins Road leading out of Naas to the north"*. The house is set back from the road behind a shallow front garden, and turned slightly to face the junction of Wolfe Tone Street (see Photos 1 and 2).
- **Terrace of three cottages.** To the south of Beaufort House, extending along the street towards the town centre, is a terrace of three cottages. The terrace was built separately and is not of the same architectural value as Beaufort House. The cottages have limited presence and effect in the street elevation.
- **The gardens.** The long rear gardens of Beaufort House and the cottages make up the main body of the site. The gardens are mostly covered in lawn, with some shrubs and trees around the boundaries, and a number of outbuildings to the rear of the houses (see Photos 3 and 4).
- **Mill Race and Luisne Garden.** A former mill race runs outside the rear boundary of the gardens. The channel was constructed to drive the Fryar's Mill a short distance to the north of the site. It is now lined with trees and provides a 'riparian' habitat. The site extends over the millrace to incorporate the Luisne Garden on the far side. This is a designed sensory woodland garden, accessed through the Luisne Centre, which is part of McAuley Place. The Luisne Garden extends to the north alongside the mill race, connecting the site (potentially) to an open space in the Millbridge estate, and to a woodland corridor that runs west towards the Grand Canal. The mill race and Luisne garden thus provide the potential for the site to link into the local green infrastructure network.

Photo 1: Beaufort House and the terrace of three cottages fronting the Sallins Road as the road enters Naas town centre



Photo 2: The frontage of Beaufort House and the cottages, showing the mixed use, urban character of the Sallins Road as it enters the town centre



Figure 5: Diagram from Simon Ronan Landscape Architect's Landscape Report, illustrating the potential to connect the proposed development to the local green infrastructure network due to the site's inclusion of the mill race and Luisne Garden



Photos 3, 4: The rear garden of the cottages, and the mature trees to the rear of the gardens along the mill race



2.3 Surrounding Lands and Townscape Character Areas

- **East.** To the east of the site, across the Sallins Road, is a two storey red brick retail and office building (see Photos 1, 2, and 5). This large footprint building, which includes a multi-storey car park, is part of the Naas Town Centre retail development. It stands prominently at the Sallins Road junction with Wolfe Tone Street, announcing the road's entry into the town centre.
- **South.** Adjacent to the south of the site, fronting the Sallins Road, is a small residential complex comprised of terraced cottages similar to those on the site (see Photo 5). This is part of the McAuley Place residential facility. To the rear of the two rows of cottages is a parking area serving the McAuley Place community centre and the neighbouring Mercy Convent school (see Photo 6).
- **West.** To the west of the site, across the mill race, are (a) the Luisne Centre, a small community building forming part of McAuley Place and giving access to the Luisne Garden, and (b) the recently completed Mercy Convent school. The large footprint school building presents its broad east elevation to the site, but the trees along the mill race in the western part of the site form a green buffer between the school and the site (see Photo 6).

These lands/uses to the east, south and west of the site fall into a distinct townscape character area – the Sallins Road corridor between Main Street to the south and the Wolfe Tone Street junction. This area is part of the town centre and is characterised by (a) a mix of uses including residential, retail, office, schools and other institutional uses (Council offices and McAuley Place), and (b) diverse plot and building typologies, from cottages to modern retail and office buildings, and the Church of Our Lady and St David (see Photos 5-8).

A notable characteristic of this area, on the west side of the street, is the sparsity of built form. This results from the institutional/community uses. The church and school grounds include extensive green open spaces and parking areas, and there is a notable absence of built frontage/enclosure on the west side of the street (see Figure 6 and Photos 6 and 7).

Figure 6: Site location at the point of entry of the Sallins Road into Naas town centre

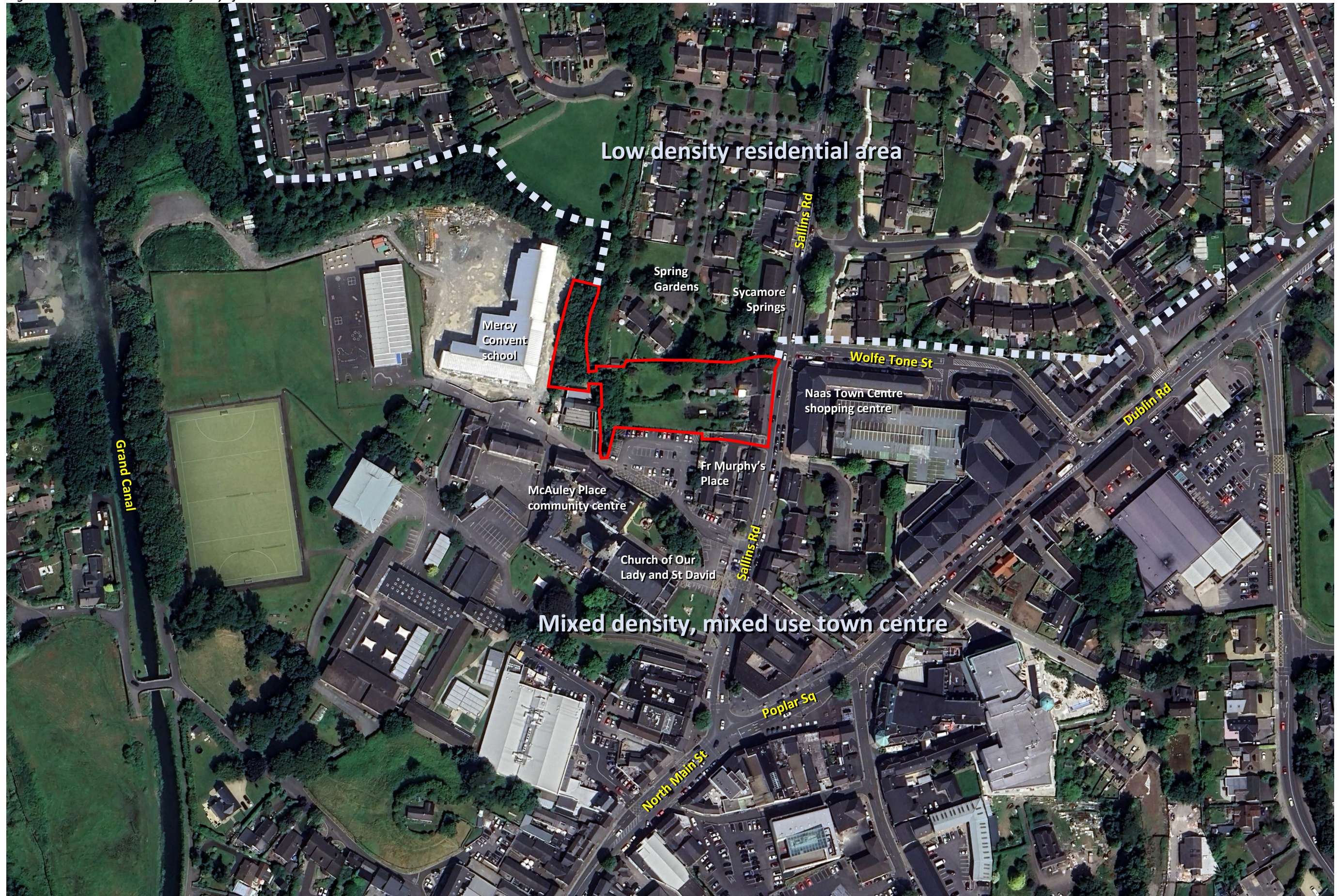


Photo 5: The terrace of cottages (Father Murphy's Place) to the south of the site fronting Sallins Road, and the Naas Town Centre retail development across the road



Photo 6: The Mercy Convent school to the west of the site, with McAuley Place community centre in the foreground left. The row of trees to the right are along the mill race in the western part of the site



Photo 7: A view north along the Sallins Road showing the church to the left opposite a modern retail and office building



Photo 8: A view back across the street, showing the modern retail and office building opposite the church



Photos 5-8 above show the wide variety of development along the town centre stretch of the Sallins Road (south of the Wolfe Tone Street junction). While the street includes a number of small scale buildings (see Photo 5), these can be considered an anomaly in a 21st century townscape of predominantly larger buildings (e.g. the schools, church, office and retail buildings). Such diversity in typology, form, scale and architecture creates capacity to accommodate change, as there is no norm with which new development can or should comply.

- **North.** To the north of the site, fronting the Sallins Road, is a small apartment complex, Sycamore Springs (see Photo 9). This is a long, low (two storey) building facing the road behind a high stone wall. The small parking area for the apartments, and a row of mature trees on the boundary, separates Sycamore Springs from Beaufort House. To the west of Sycamore Springs, and directly north of the rear garden of Beaufort House, is a part of Spring Gardens, an estate of large, detached houses. There are two houses at the end of a cul-de-sac street that back onto the subject site boundary (Photos 11, 12) – although their principal views are angled to the south west towards the Luisne Gardens portion of the site (as opposed to the main body of the site). There is a communal open space to the east of these two houses, enclosed by mature trees, which forms a green buffer between the site and the rest of Spring Gardens.

These lands to the north of the site fall into a separate character area – the Sallins Road corridor north of the Wolfe Tone Street junction. In this area, land use is predominantly low density residential, with occasional higher density buildings (e.g. Sycamore Springs) and business premises. Figure 6 above shows that the site is located at the point of entry of the Sallins Road into the town centre, and at the transition between the low density residential character area and the town centre mixed use, mixed density area.

Photo 9: A view south along the Sallins Road, approaching the town centre through the lower density residential area. The long low Sycamores Springs apartment building is ahead to the right



Photo 10: The two houses nearest to the site in the neighbouring estate to the north, Spring Gardens. Note the spire of the Church of Our Lady and St David on the skyline, beyond the subject site and the McAuley Place complex of facilities



Photo 11: The nearest house and the Spring Gardens communal open space adjacent to the site, enclosed by tall trees which provide a buffer between the estate and the subject site



Photos 9-11 show the low density residential character area to the north of the site. This area, and the town centre stretch of the Sallins Road illustrated in Photos 5-8, are the two townscape character areas potentially directly affected by the proposed development. The assessment of visual and townscape impacts in Section 5 and 6 below focusses on these areas.

3.0 Relevant Policy

3.1 National Policy

3.1.1 National Planning Framework

The 1st 'Shared Goal' and intended 'National Strategic Outcome' of the NPF is compact growth. Compact growth means *"making better use of under-utilised land and buildings, including 'infill', 'brownfield' and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport"* (NPF p.22).

Compact growth policy encourages higher density - and therefore taller - development in urban areas where supporting infrastructure and services are available. National Policy Objective 11 of the NPF states: *"In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth."*

The NPF states further: *"To enable brownfield development, planning policies and standards need to be flexible, focusing on design led and performance-based outcomes... Although sometimes necessary to safeguard against poor quality design, 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"*.

3.1.2 Urban Development & Building Height Guidelines

The Guidelines state: *"Implementation of the National Planning Framework requires increased density, scale and height of development in our town and city cores...*

"to meet the needs of a growing population without growing our urban areas outwards requires more focus in planning policy and implementation terms on reusing previously developed 'brownfield' land, building up urban infill sites... and either reusing or redeveloping existing sites and buildings that may not be in the optimal usage or format taking into account contemporary and future requirements..."

In Section 3.2 of the Guidelines 'development management criteria' are set out to guide the evaluation of development proposals for buildings taller than the prevailing heights in the area: *"In the event of making a planning application, the applicant shall demonstrate to the satisfaction of the Planning Authority/ An Bord Pleanála, that the proposed development satisfies the following criteria:*

At the scale of the relevant city/town:

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

At the scale of district/neighbourhood/street:

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

The national policy above is quoted as it has implications for the composition and appearance of our urban areas. The policy *encourages* taller buildings than heretofore, especially on brownfield sites not in 'optimal usage or format'. National policy puts a responsibility on all parties - including the land owner and planning authorities - to seek to optimise the land use yield from such sites in the interest of sustainable development.

It is also noteworthy that the Guidelines allow for "*significant increases in building height and overall development density*" even within architecturally sensitive areas and suburban areas, subject to the development responding appropriately to its context.

3.1.3 Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities

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

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

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

Naas falls into the settlement category 'Key Towns and Large Towns' (5,000+ population). The Guidelines state: "*The strategy for Key Towns and Large Towns is to support consolidation within and close to the existing built-up footprint*".

"The key priorities for the growth of Key Towns and Large Towns in order of priority are to:

- (a) *plan for an integrated and connected settlement overall, avoiding the displacement of development generated by economic drivers in the Key Town or Large Town to smaller towns and villages and rural areas in the hinterland,*
- (b) *strengthen town centres,*
- (c) *protect, restore and enhance historic fabric, character, amenity, natural heritage, biodiversity and environmental quality,*
- (d) *realise opportunities for adaptation and reuse of existing buildings and for incremental backland, brownfield and infill development, and*
- (e) *deliver sequential and sustainable urban extension at locations that are closest to the urban core and are integrated into, or can be integrated into, the existing built up footprint of the settlement.*

Table 3.5 of the Guidelines outlines residential density ranges for Key/Large Towns, with ranges provided for the following area types: ‘Centre and Urban Neighbourhood’ and ‘Suburban/Urban Extension’. **The subject site can be categorised ‘Centre and Urban Neighbourhood’** which is defined in the Guidelines as follows:

“The centre comprises the town centre and the surrounding streets, while urban neighbourhoods consist of the early phases of residential development around the centre that have evolved over time to include a greater range of land uses. It is a policy and objective of these Guidelines that residential densities in the range 40 dph-100 dph (net) shall generally be applied in the centres and urban neighbourhoods”.

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

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

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

The companion Design Manual will address best practice approaches in relation to the preservation of local character (including historic character) and amenity in more detail.

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

Specialist technical assessments and computer-generated visual aids can assist in the evaluation of more complex development proposals and in particular, where a proposal deviates from the established scale, mass or character or is situated in a sensitive context. In order to consider larger proposals in an integrated and informed way, an Urban Design Statement that addresses the proposal from an architectural and urban design perspective should form part of the required documentation. Refer to Appendix C for thresholds.

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

3.2 Naas Local Area Plan 2021-2027

3.2.1 Land Use Zoning

The site is zoned B. Existing/Infill Residential, with the objective: *“To protect and enhance the amenity of established residential communities and promote sustainable intensification”.*

The lands to the north are similarly zoned, as is the small complex of cottages adjacent to the south. The lands across the Sallins road to the east are zoned A. Town Centre. The lands to the south and west are zoned E. Community and Education.

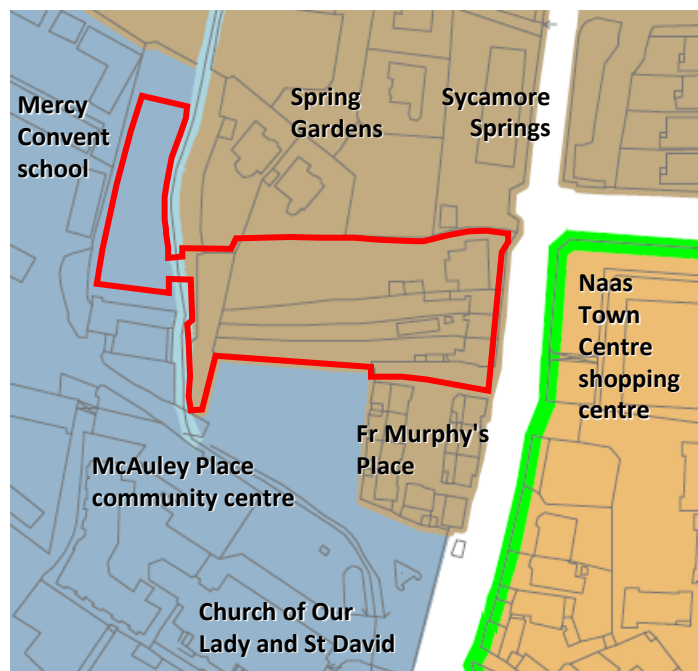
3.2.2 Residential Density, Mix and Design

Section 4.4 of the LAP states: *“Given the proximity and connectivity of Naas to Dublin and being a key employment centre in the Core Region, it will continue to be an attractive place to live. It is anticipated that there will continue to be a strong demand for a varied mix and type of housing within the Plan area, especially for single occupancy units given the limited supply, which can provide the elderly with more suitable housing in order for them to free up larger homes by downsizing. The Plan seeks to address this imbalance by ensuring a greater mix of house types. Residential schemes should provide for both a mix of dwelling size and dwelling type to cater for a diverse range of housing needs. The overall design and layout of schemes should be of high quality and comply with the urban design principles contained in the Kildare County Development Plan 2017-2023 (as varied) or any subsequent development plan.”*

Policy HC2 - Residential Density, Mix and Design: *“It is the policy of the Council to ensure that all new residential development provides for a sustainable mix of housing types, sizes and tenures and that new development complements the existing residential mix.”*

Objective HCO 2.1: *“Require that a good mix of housing types and sizes is provided in all new residential areas and in appropriate brownfield/infill areas, to meet the needs of the population of Naas, including the provision of*

Figure 7: Naas LAP Land Use Zoning Map



appropriate supported housing and longer-term residential care solutions designed for older people and/or people with disabilities....”

3.2.3 Becoming and Age Friendly Town

Section 4.4.4 of the LAP states: *“In future proofing Naas to cater for an increased older population we can help make it a town that allows people to age in their community whilst also creating stronger more sustainable settlements. Such an aspiration requires an integrated approach and targeted investment at many levels from social infrastructure, to mobility and housing.”*

3.2.4 Building Height

Section 4.4 of the LAP states: *“The [Urban Development and Building Heights Guidelines] contain a number of mandatory Specific Planning Policy Requirements (SPPRs) which local authorities are obliged to provide for when making their statutory plans. Of particular relevance to this Plan is SPPR 1 which requires local authorities to explicitly identify areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development and that such plans shall not provide for blanket numerical limitations on building height.*

Having regard to the requirements outlined, this Plan does not propose to place any height limitations on new development in Naas. Also, in keeping with the provisions set out in SPPR 1 the town centre has been identified for the possible location of taller buildings.

Taller buildings can, in circumstances where they are well-designed and sited, make a positive contribution to an urban setting, however, particular care must be taken when making such interventions in a town with such a rich historic fabric as Naas which is also an Architectural Conservation Area (ACA).

Government policy as outlined in the Sustainable Residential Development in Urban Areas: Guidelines for Planning Authorities (DEHLG, 2009) and the [Building Heights Guidelines] state that land is a scarce resource and should be managed efficiently. These guidelines set out a range of appropriate densities for different site locations having regard to the level of transport available. As a general principle, higher densities should be located in town centre infill locations and proximate to public transport.

The combination of the site’s zoning and location (adjacent to the town centre, on one of the town’s main thoroughfares and the public transport spine), and the LAP policy on residential density, housing for the elderly and building height – in addition to the national policies of compact growth, increased building height and compact settlements/sustainable residential development - indicates that multi-storey apartment development is the most appropriate use for the site, subject to (a) consideration on the impacts on the amenities of nearby residential properties, and (b) avoidance of undue impacts on architectural heritage.

3.2.5 Architectural Heritage

Section 8.2 of the LAP states: *“An Architectural Conservation Area (ACA) is defined as a place, area, group of structures or townscape that is of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest or value, or contributes to the appreciation of protected structures. An area in the town centre of Naas along Main Street and extending towards the Harbour has been designated as an ACA in the Kildare County Development Plan 2017-2023 (as varied). The ACA designation aims to protect this area within the town, that has special significance. The architectural heritage and the overall condition of the ACA is expanded upon in detail in the Naas Architectural Conservation Area, Statement of Character which accompanies this Plan. The extent of the ACA and associated views that warrant protection within the ACA are illustrated on both Map 8.1a and Map 8.2”.*

The subject site lies just outside the ACA, to the north. It is thus not subject to the same restrictions on development as the ACA itself, but its potential indirect effects on the ACA should be considered and assessed.

3.2.6 Protected Views

Map 8.2 of the LAP (excerpt below, Figure 9) identifies the 'Important Views' relating to the Naas ACA and the identified for protection in the Kildare CDP. These views were considered in the selection of viewpoints for this LVIA. Of the identified views, the following are potentially relevant to this assessment:

- Main Street.** There are two views identified at the junction of Main Street and the Sallins Road. Although neither of the two indicated views is directed towards the subject site, a viewpoint has been selected to assess the impact on the view north along the Sallins Road from this junction (Viewpoint 1 – see Section 5.1).
- Sallins Road.** The LAP identifies views north and south along the Sallins Road, along the stretch of the road passing by the Church of Our Lady and St David. The proposed development will be visible in views north along the road. Viewpoints 2 and 4 were selected to assess the impact on this identified sensitivity – see Sections 5.2 and 5.4 below.

Figure 8: Naas LAP Map 8.1a Protected Structures and ACA

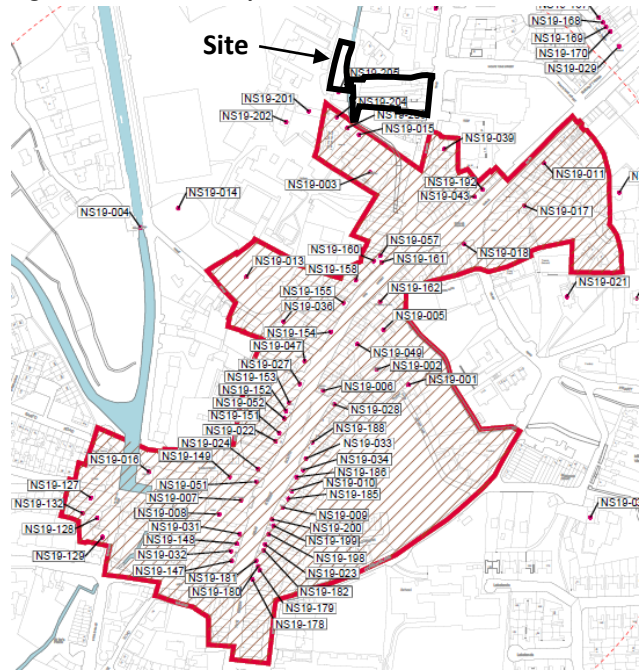
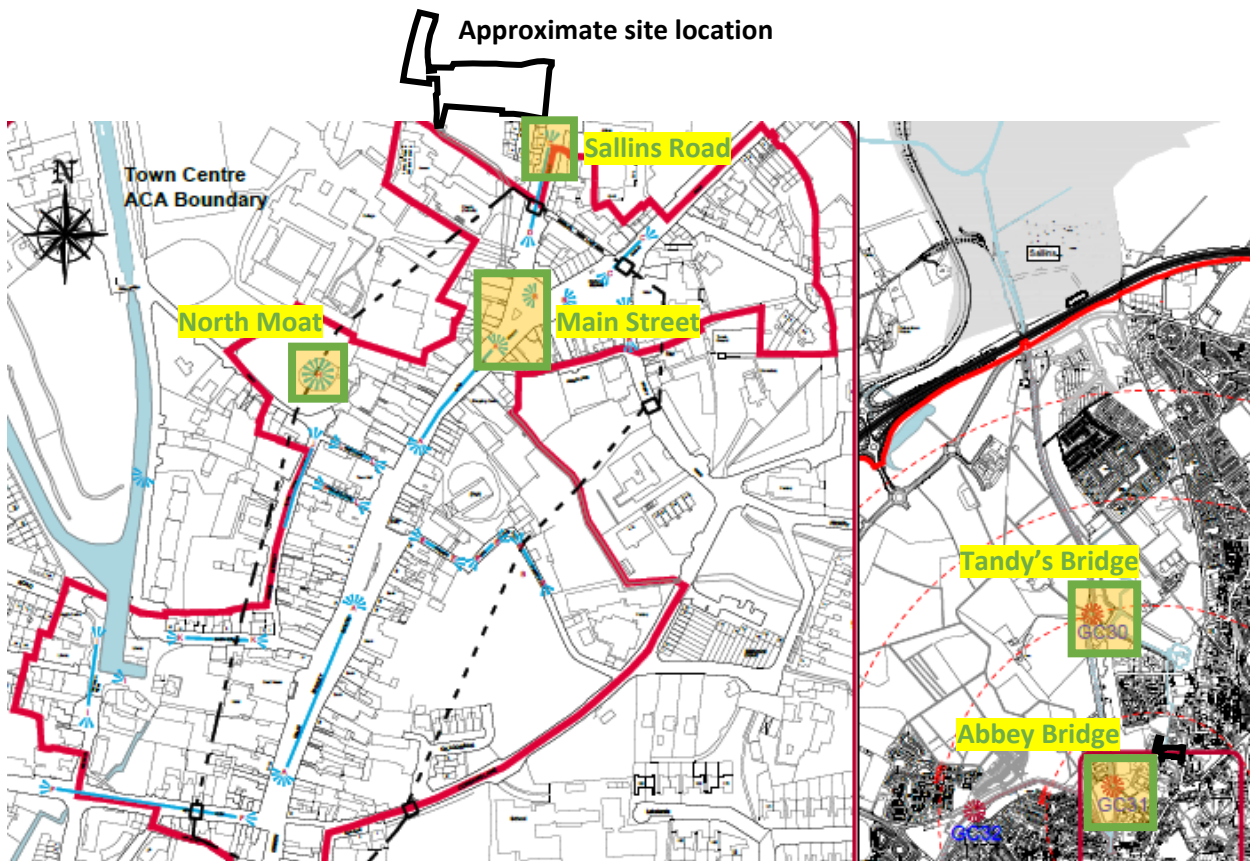


Figure 9: Naas LAP Map 8.2 ACA & Protected Views



- **North Moat.** A 360 degree view is indicated at the top of the North Moat (a Norman era castle motte). However, (a) this land is in private ownership, (b) there is now a house at the top of the motte, and (c) the house is surrounded by trees, restricting all views of the surrounding townscape from the motte. The motte is thus not accessible to the public, and there is no view of the site from the motte even for the private landowner. Therefore, the view from the North Motte is not assessed in this LVIA.
- **Grand Canal Bridges.** The LAP identifies the views from two canal bridges to the west of the site, which are protected by the Kildare CDP. These are Abbey Bridge approximately 275m from the site, and Tandy's Bridge approximately 700m from the site. Due to the separation distance and extensive mature vegetation in the intervening landscape, there is no potential for any significant visual impact on Tandy's Bridge. There is also limited potential for significant impact on the view from Abbey Bridge, but a view (Viewpoint 9) is nonetheless included in this assessment to provide evidence.

4.2.1 Block 1

Block 1 is positioned fronting the Sallins Road alongside the retained Beaufort House. The building is four storeys tall, and would establish urban-type street enclosure on the west side of the street, opposite the shopping centre. While addressing the street with its principal frontage, the building presents a double pitched gable to the south (towards the neighbouring terraced cottages and the town centre) and north (towards Beaufort House and the approach from Sallins). There is a strong contrast in typology and vertical scale between the apartment building and the neighbouring cottages, but also an appreciable dialogue due to certain shared characteristics (the pitched slate roofs and the use of light render).

Figure 11: Photomontage view north along the Sallins Road towards the site



Figure 12: CGI view of Beaufort House and Block 1 fronting the Sallins Road opposite Naas Town Centre shopping centre



4.2.2 Blocks 2 and 3

Block 2 is positioned centrally within the site, to the rear of Block 1, and combines with the smaller Block 3 to enclose a south-facing courtyard (see Figure 10 above). The setback of Block 2 also retains a sizeable open space in the western part of the site along the mill race. Blocks 2 and 3 are also four storeys tall.

Block 2 is positioned c. 21m from the nearest house in Spring Gardens. The house's alignment directs the views from its rear windows and garden to the south west. Block 2 would therefore be peripheral to the view from the house (Figure 13). Its positioning would also retain the houses' access to afternoon and evening sunlight to the south and west.

The retention and supplementation of vegetation on the shared boundary would also soften the visual impact of Blocks 2 and 3 on the Spring Gardens houses.

However, the introduction of a multi-storey apartment development in proximity to the housing estate (albeit town centre-adjacent) would unavoidably cause some visual impact.

Figure 13: Position of Block 2 in relation to nearest houses in Spring Gardens



4.3 Façade Treatments

The principal façade material is white buff brick, with light grey stone tile used to differentiate the ground floors. White render is used in places, referencing the neighbouring cottages. The window frames are timber, the balconies metal and the roof tiles slate – all high quality, natural, durable materials. The light colour of the brick and stone was selected to (a) give the development a distinct character/ identity, and (b) soften its presence in the townscape.

4.4 Landscape Proposals

The key elements of the landscape proposals (see Figure 14 overleaf) are as follows:

- **Widened footpath:** The setback of Block 1 from the street is greater than that of the existing cottages. This widens the footpath along the site's frontage to the street.
- **Street-front planting:** The small garden space in front of Beaufort House is retained, and five trees are proposed in this space, along with two further street trees in front of Block 1. A strip of ornamental planting in low planters is proposed as a privacy strip for the ground floor apartments of Block 1.
- **Retention of trees outside the northern boundary.** The mature trees just outside the northern boundary, in the communal open space of Sycamore Springs and Spring Gardens, would be retained.
- **SUDS garden.** A small garden space is provided behind Beaufort House. The space serves a water attenuation function in addition to an amenity for the community hall in the restored historic house.
- **Main open space.** The main open space is located in the western part of the site alongside the millrace. The garden includes a large circular lawn area, a retained stand of mature trees along the mill race (see Photo 4 above), and a patio surrounding a resident's garden pavilion. A privacy strip of vegetation is proposed in front of the ground floor apartments fronting the garden.

- **Bridge to Luisne Garden.** A bridge is proposed over the mill race to provide direct access from the development to the Luisne sensory woodland garden. Although this is an existing open space / green infrastructure asset, by connecting the development's open space network to it, the extent and variety of open space amenities available to the community would be substantially increased.

Figure 14: Proposed landscape masterplan

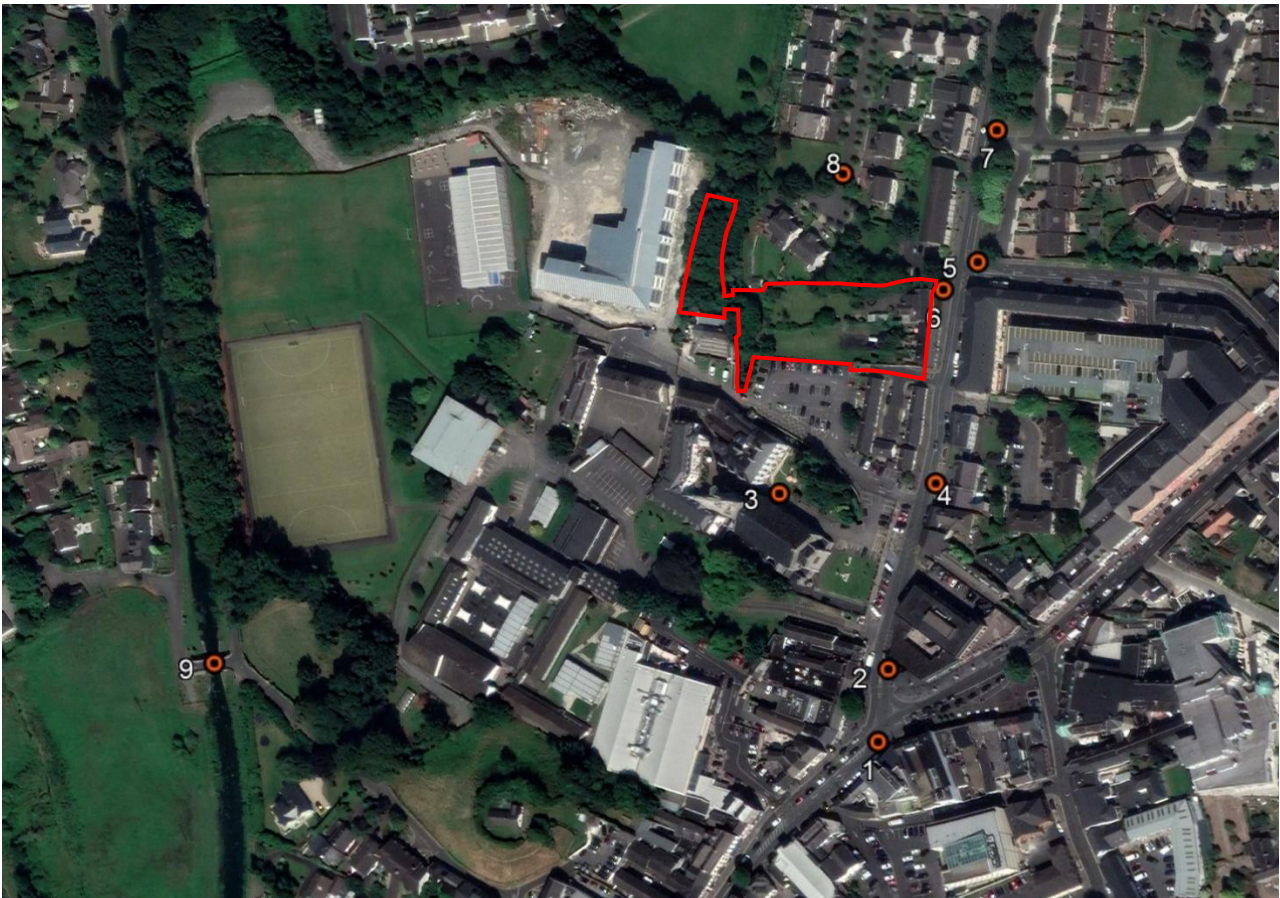


5.0 Visual Impact Assessment

Nine viewpoints (see Figure 15) were selected for the assessment of visual impact informed by verified photomontages. The viewpoints were selected to represent the main elements, character areas and groups of visual receptors in the receiving environment. The viewpoints are as follows:

- **Views from Main Street/Town Centre:**
 - 1: Junction of North Main Street, Poplar Square and the Sallins Road
- **Views from Sallins Road/Town Centre area:**
 - 2: View of Church of Our Lady and St David
 - 3: View from outside church and McAuly Place Convent Tea Rooms
 - 4: View of Fr Murphy's Place cottages (representing 'Important View' – see Figure 9 above)
 - 5: Sallins Road at Wolfe Tone Street junction
 - 6: Beaufort House frontage to Sallins Road
- **Views from residential area to north:**
 - 7: Sallins Road at entrance to the Sycamores estate
 - 8: Spring Gardens estate
- **Views from Grand Canal corridor:**
 - 9: Abbey Bridge

Figure 15: Viewpoints for visual impact assessment



The effects on the viewpoints are individually assessed below. For the methodology, terms and criteria used in the assessment, refer to Appendix 1. The assessment should be read in conjunction with the verified photomontages provided under separate cover.

5.1 Viewpoint 1 – North Main Street

Existing View:

- This is a signature view of Naas town centre, with the church spire prominent above the historic shopfronts to the left. To the right is a low, modern commercial building facing a small plaza that features the John Devoy memorial statue. Beyond the church, there is an absence of built frontage/enclosure to the Sallins Road, which reduces its legibility as a thoroughfare. (It is part of the development strategy for Naas to strengthen the connection between the town centre and Sallins. From this angle the Sallins Road lacks definition.) The trees in the foreground, on the church grounds, and in the distance beyond the site lend visual amenity to the townscape.
- **Viewpoint sensitivity: Medium.** The diversity of building typologies, scale and architecture creates some capacity to accommodate change. In urban design terms, the Sallins Road could benefit from improved definition by built form, to make the street more legible.

Proposed Change:

- **Magnitude of change: Low.** Parts of Blocks 2 and 3 are visible between the trees in the middle distance, but the overall intrusion in the view is minor. The pitched, dark coloured roofs and well articulated facades divide the massing into smaller visual units, so that the buildings take their place comfortably in the townscape.



◀◀ Angle of View 73° Horizontal (24 mm Lens)

◀ Angle of View 39° Horizontal (50 mm Lens)

▶

▶▶

Significance of Effect:

- **Slight positive.** Despite its limited visual presence, the development is recognisably a contemporary urban building. Positioned along the Sallins Road, this has the effect of extending the town centre along the road - in line with the LAP strategy of strengthening the Naas-Sallins spine and consolidating the town centre. The development does no harm to and valued element or characteristic of the view.

5.2 Viewpoint 2 – Sallins Road View of Church of Our Lady and St David

Existing View:

- The church (a protected structure) is the dominant element in the view, and its stature – along with the wide, busy streetscape and the modern building to the right – generate urban character. This is counteracted somewhat by the sparsity of built form to the left of the street. The trees in the space however add maturity and visual amenity to the townscape.
- **Viewpoint sensitivity: Medium-High.** This viewpoint represents a protected view, and provides an unobstructed view of the church, a protected structure. However, the clearly urban location and the diversity of built form and architecture do contribute to some capacity for change.

Proposed Change:

- **Magnitude of change: Medium.** The development is a prominent addition in the middle distance along the street, well removed from the church. Block 1 addresses the street and presents its double-pitched gable wall to the viewer, while Blocks 2 and 3 form a courtyard to the rear, orientated towards the church and the town centre. The development typology (multi-storey residential) and height cause the buildings to catch the eye. However, the disaggregated form, pitched roofs, well articulated facades and variations in colour succeed in reducing the massing and softening the buildings' presence.



Angle of View 73° Horizontal (24 mm Lens)

Angle of View 39° Horizontal (50 mm Lens)

Significance of Effect:

- **Moderate positive.** The development causes an appropriate shift in townscape character towards a more contemporary urban condition, through consolidation of built form along the key town centre thoroughfare. The development strengthens the urban character and adds visual interest, without negative impact on the valued elements in the view (specifically the church, which also provides favourable scale context). The design response to the context is appreciable, specifically the built frontage to the Sallins Road and the courtyard orientation towards the church and the town centre.

5.3 Viewpoint 3 – Church of Our Lady and St David and the Convent Tea Rooms

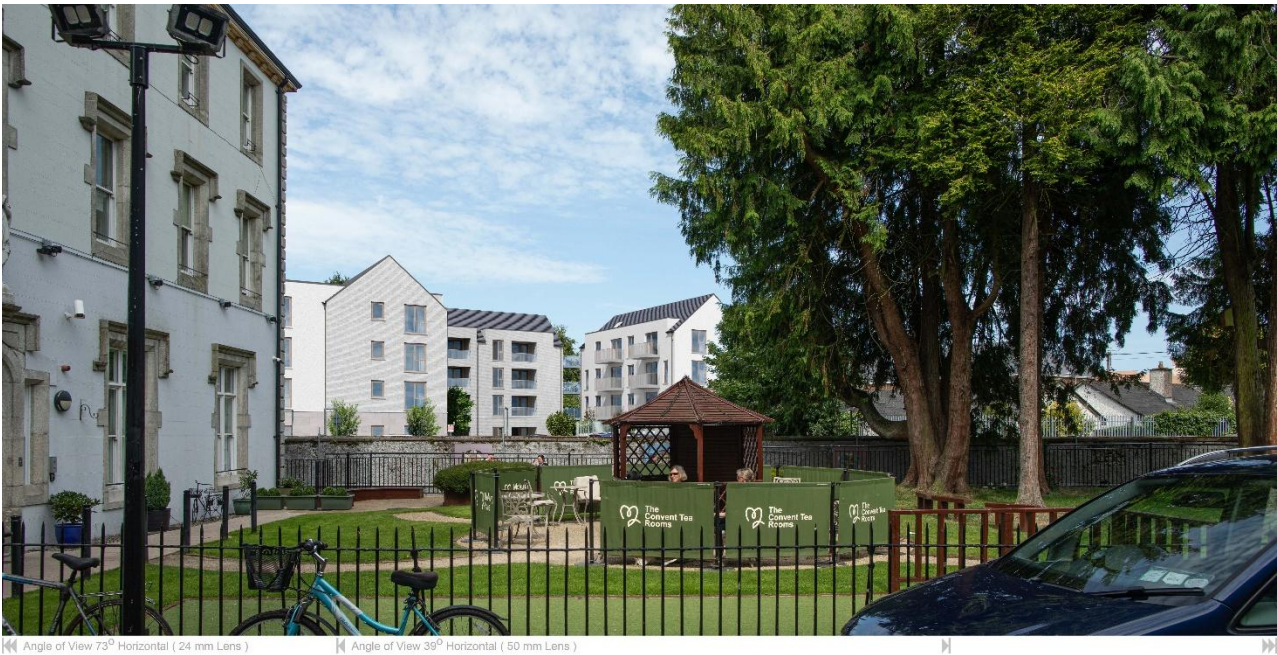
Existing View:

- The view is taken from the side of the church, a protected structure, near the entrance to the McAuley Place Convent Tea Rooms, which are housed in the repurposed Mercy Convent, also a protected structure. The former convent building frames the view to the left. The tea rooms outdoor seating area is in the garden in the foreground, framed by mature evergreen trees to the right.
- Hidden behind the convent garden wall is a car park serving McAuley Place and the Mercy Convent school, beyond which is the site. The tall trees in the distance are those outside the far/northern boundary of the site in the communal open space of the neighbouring residential estates.
- **Viewpoint sensitivity: Medium-High.** The viewpoint represents a community gathering place adjacent to two protected structures. It should be noted that although the view north towards the site is characterised by open space, this is a town centre location. The photograph below is from the same position but looking east towards the Sallins Road. There is thus some tolerance for change (as there must be in the 21st century town centre), as well as precedent for large buildings (the church, the former convent, and the new school building nearby).

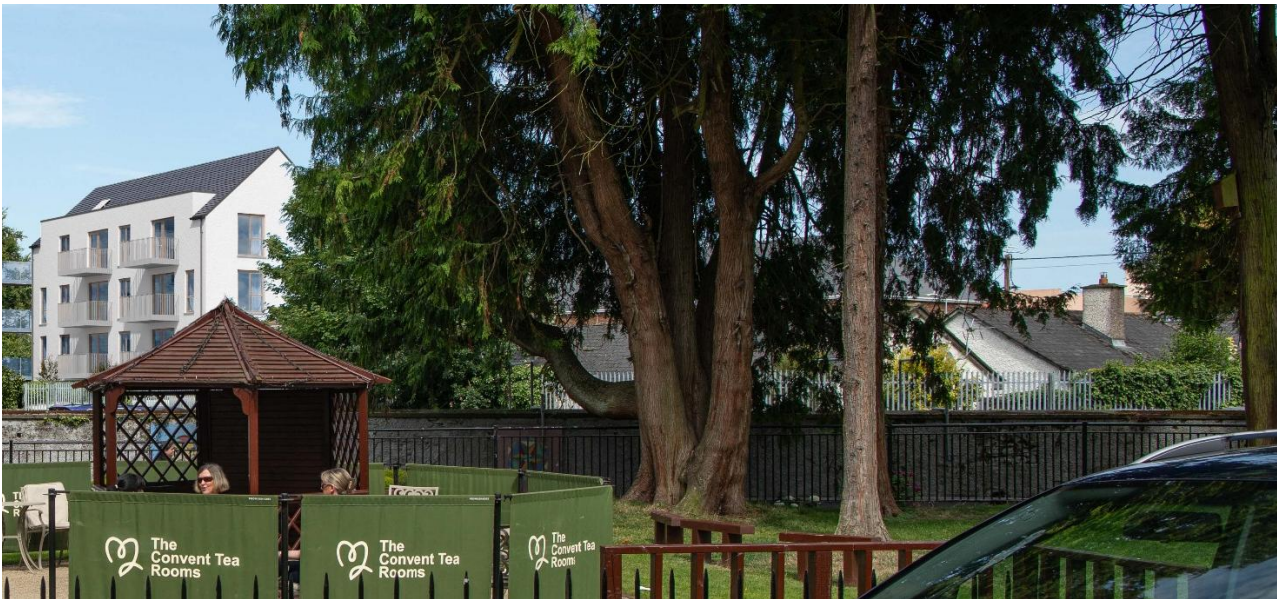


Proposed Change:

- **Magnitude of change: Medium.** The three buildings are prominent additions to the view, forming a courtyard orientated towards the church, enclosing the institutional grounds and parking areas. There is sufficient separation distance from the church and convent to avoid any crowding of the historic buildings. Open space and trees remain key elements of the view.



- The disaggregated form, emphasised by variations in material, and the well articulated facades are effective in reducing the massing and softening the buildings' visual presence.
- Despite the difference in scale, there is dialogue between the new buildings and the neighbouring cottages (visible through the trees to the right) in their shared use of pitched slate roofs.



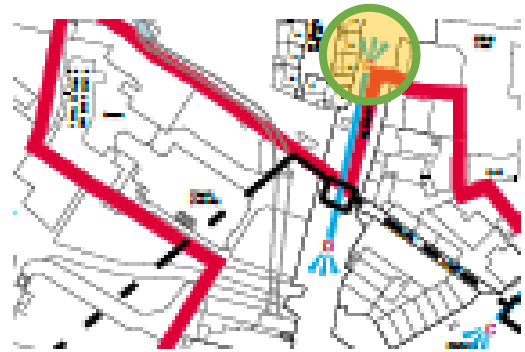
Significance of Effect:

- **Moderate positive.** The new buildings appreciably respond to the church, convent and institutional grounds in their positioning and scale (which is not dissimilar to that of the church and convent). They do not appear over-scaled for the location, and do not result in any sense of excessive enclosure. While clearly of contemporary urban character, due to their considered design and high quality materials, the buildings complement the historic elements of the landscape, and combine with them to form a cohesive composition. The resulting shift in character – towards a more contemporary urban condition – is appropriate in the town centre location in which consolidation and densification is encouraged by national and local policy.

5.4 Viewpoint 4 – Sallins Road View of Fr Murphy's Place Cottages

Existing View:

- This viewpoint represents the Important View identified on Map 8.2 of the LAP (circled green, right), looking north along the Sallins Road at the edge of the town centre area. The designation appears to recognise the *importance* of the view more so than its visual amenity, since the view is not particularly attractive (see below). However, as the main thorough-fare linking Naas town centre to Sallins (and the railway station), this view as the road departs the town centre is important.



- To the left of the street are two terraces of cottages that form part of McAuley Place. Beyond them are the three cottages on the site, and these screen Beaufort House from view. The trees on the skyline are those outside the site's far/northern boundary in the neighbouring estates. The street is relatively wide and urban in character (the bus stop, parking machine, etc. contributing to this). To the right is a small shop and beyond that the long, low Naas Town Centre shopping centre, opposite the site.
- Viewpoint sensitivity: Medium.** Although this viewpoint represents a protected view, there are no valued elements (buildings, spaces, etc.) other than the trees, and the composition is not particularly attractive. The built environment could benefit from renewal or enhancement, to reinforce the importance of Sallins Road in the Naas urban structure.

Proposed Change:

- Magnitude of change: Medium-High.** The four storey Block 1 is a prominent addition to the street elevation, with Blocks 2 and 3 to the rear, enclosing a courtyard. Block 1 addresses the street to the east (opposite the shopping centre), and presents a double pitched gable towards the south (towards the church and the town centre). There is a pronounced transition in scale between the terraced cottages and the development (the transition to the shopping centre across the street is less abrupt), but also an appreciable dialogue in their parallel pitched roofs. The disaggregated form, variations in materials and well articulated facades reduce the massing.



Significance of Effect:

- **Significant positive.** The development causes a significant shift in townscape character towards a more contemporary urban condition. The development typology and scale are appropriate for a site fronting a town centre street in a town with supportive policy for compact growth / densification. It is the neighbouring cottages that should be considered the anomaly in this location.
- It would not be appropriate to mimic the neighbouring development (which is of unsustainably low density for the location). However, the proposal does display a balanced response to the context in its form and architecture, by (a) providing built frontage/enclosure to an important town centre street; (b) marking the gateway to the town centre; (c) addressing the church, convent and wider town centre to the south; and (d) adopting certain characteristics of the neighbouring buildings.

5.5 Viewpoint 5 – Sallins Road at Wolfe Tone Street Junction

Existing View:

- This is where the Sallins Road enters Naas town centre. To the left, Wolfe Tone Street gives access to the Dublin Road and multi-storey car park of the Town Centre shopping centre. The corner of the shopping centre frames the view. To the right across the street is a large tree in the parking area/communal space of a small apartment development, Sycamore Springs, adjacent to the site.
- Despite its modest scale and architecture, Beaufort House catches the eye. The house is set back from the street at a slight angle behind a small front garden. The church spire is prominent above the roof of the house. The terraced cottages along the street are less attractive, and there is a lack of substance to the built form west (right) side of the street – apart from the church spire.
- **Viewpoint sensitivity: Medium.** There are valuable elements in the view, specifically Beaufort House and the church spire. However, the cottages, the shopping centre and a lack of stature to the built form on the west side of the street contribute to a somewhat underwhelming gateway to the town centre – apart from the church spire. There is capacity for change in the view.

Proposed Change:

- **Magnitude of change: High.** The four storey Block 1 is a prominent addition to the street elevation, replacing the row of three cottages beside the retained Beaufort House and rising behind the house. There is a pronounced transition in scale and typology between Block 1 and Beaufort House (and the cottages along the street). The transition to the shopping centre across the street is less abrupt.



Horizontal (24 mm Lens) Angle of View 39° Horizontal (50 mm Lens)

- The new building screens the church spire from view.
- The disaggregated form, variations in materials and well articulated facades reduce the massing and contribute to an attractive and interesting composition of old and new built form and architecture.
- Also visible from this proximity is the widening of the footpath along the site frontage (refer to Viewpoint 6), which allows for the planting of four street trees. In time these will mature to soften the built frontage and add greenery to the street.

Significance of Effect:

- **Significant neutral.** The development causes a significant – and appropriate - shift in townscape character towards a more contemporary urban condition. The development typology and scale are appropriate to the site location fronting a key thoroughfare at the gateway to the town centre. Naas has a stated ambition (and supportive policy) to achieve substantial growth through consolidation/densification of the town centre. It is the neighbouring cottages that should be considered the anomaly.
- The loss of the church spire from the view is significant (hence the neutral classification of the effect). However, the church does not form part of the street elevation, being set well back, and its main value its contribution to townscape legibility. The landmark church would be replaced by a landmark composition of historic and contemporary architecture, appropriately located at the town centre gateway, reinforcing the Naas-Sallins spine. Additionally, from this proximity, the design and material quality of the development are appreciable, resulting in a net improvement in the quality of the built environment.

5.6 Viewpoint 6 – Sallins Road View South Along Site Frontage

Existing View:

- Beaufort House is in the foreground, set back from the street at a slight angle behind a small front garden. Compared to View 5, the extent of the church spire's protrusion is limited. The adjoining terrace of cottages is less attractive than Beaufort House. Their proximity to the road edge is evident. At the far end of the site the footpath is very narrow, for a town centre street particularly (and considering this is the pedestrian route to Sallins Railway Station).
- The eye is drawn to the elevation across the street. In the foreground is Naas Town Centre shopping centre, a two storey building of limited architectural quality. Further on, towards the Main Street junction, is a complex composition of historic and modern buildings – none of great stature, architectural or visual interest. There is a distinct increase in density however, indicating the road's arrival in the town centre.
- **Viewpoint sensitivity: Low-Medium.** The clearly town centre location combined with the diversity of buildings and architecture and a lack of valued features (other than Beaufort House) contributes to a high capacity to accommodate change in this view.



Proposed Change:

- **Magnitude of change: High.** Block 1 is a prominent addition to the view, rising behind the retained Beaufort House and combining with it to form an interesting composition of historic and modern typologies and architecture. The disaggregated form, steps in height and pitched roofs soften the transition in scale from the apartment building to Beaufort House and across the street to the shopping centre. The design and material quality of the building are appreciable from this proximity.
- This view shows the significant improvements in the streetscape, including the widening of the footpath and the addition of street trees. The own-door apartments benefit from a strip of privacy planting in low planters against the façade.



Significance of Effect:

- **Moderate positive.** The introduction of a multi-storey apartment building to the street causes a significant shift in character - towards a more contemporary urban condition. This change is appropriate for the location, on a key thoroughfare linking the town centre to Sallins Railway Station, at the gateway to the town centre. The additional diversity is not unusual or undesirable in a 21st century town centre.
- The embrace of Beaufort House by the development creates an interesting architectural composition – of two buildings, old and new, both of high quality, emphasising each other’s character and enhancing their context. Additionally, the density of the development will generate activity/animation on the street, to the benefit of the townscape.

5.7 Viewpoint 7 – Sallins Road at Entrance to The Sycamores

Existing View:

- To the left of the road is a stand of trees behind which is a row of suburban-style houses in The Sycamores estate. The trees also screen Naas Town Centre shopping centre 70m ahead at the Wolfe Tone Street junction. To the right is a house converted for commercial use, and the Sycamore Springs apartment block behind a high stone wall along the street. Sycamore Springs is only two storeys tall, and pitch roofed, giving the building the appearance of a terrace of houses.
- The street has a suburban character despite (a) it being main road link between Naas town centre and Sallins Railway Station, and (b) the proximity to the town centre. The visibility of the church spire does give some indication of the proximity to the centre, and a more complex urban townscape can be discerned in the distance ahead, but legibility is not strong.
- **Viewpoint sensitivity: Medium.** The trees in the view provide visual amenity, but the built elements in view are underwhelming and the townscape lacks legibility - given the location, on the Sallins Road approach to the town centre.

Proposed Change:

- **Magnitude of change: Low.** Block 1 is visible ahead beyond the Wolfe Tone Street junction. The street-front façade is just visible behind the tree (in winter it would be more exposed), and the block rises above the roofline of the Sycamore Springs apartment building. Even with much of the building screened, street-front position and the step up in height are evident, indicating the street's arrival in the town centre.



Significance of Effect:

- **Slight positive.** Despite the relatively limited intrusion of the development, it causes a shift in character along the Sallins Road corridor, and marks the gateway to the town centre. This improves legibility, with no loss or compromise of any value feature or characteristic of the view.

5.8 Viewpoint 8 – Spring Gardens Estate

Existing View:

- The view is taken from the Spring Gardens estate road approaching the two houses that back onto the site's northern boundary. The houses enjoy an exceptional level of landscape/visual amenity, with communal open space in front (to the right out of view) and to the side (left in the view). These spaces feature numerous large trees that add to the amenity and a high degree of visual enclosure. The houses are turned at an angle, so that their rear gardens orientate towards the Luisne Garden and the Mercy Convent grounds to the south west (see Figure 13 above).
- The church spire rises above the roof of the house nearest to the site, adding to the character and visual amenity of the houses' context. It should be recognised that the church spire also indicates the houses' proximity to the town centre – the church being the town's most prominent landmark.
- **Viewpoint sensitivity: Medium-High.** The houses enjoy a high level of landscape/visual amenity, and as residential receptors they are sensitive to change. However, it is also a factor that the houses are located adjacent to the centre of a large town; there must be some tolerance for change in these locations.

Proposed Change:

- **Magnitude of change: Low-Medium.** Block 2 protrudes above the roofline of the nearest house, presenting a double pitched gable wall towards the shared boundary. The disaggregated form and variations in material break the building into smaller visual units, moderating its visual presence. Block 2 is positioned so that it is not in the direct line of sight from the rear windows and garden of the house, but rather peripheral to the view (see Figure 13 above). The house would thus retain an unobstructed view south west towards the proposed development's main open space and the Luisne Garden across the mill race.



Significance of Effect:

- **Slight negative.** The introduction of a multi-storey building in close proximity to the two houses would unavoidably result in a negative visual impact. However, measures have been taken to moderate the degree of intrusion, and the two houses would retain an enviably high level of residential amenity. Their location adjacent to the town centre demands a degree of tolerance for change in their context. The town centre is where urban consolidation and densification must take place, and is designated to occur (see Section 3.2.4 above).

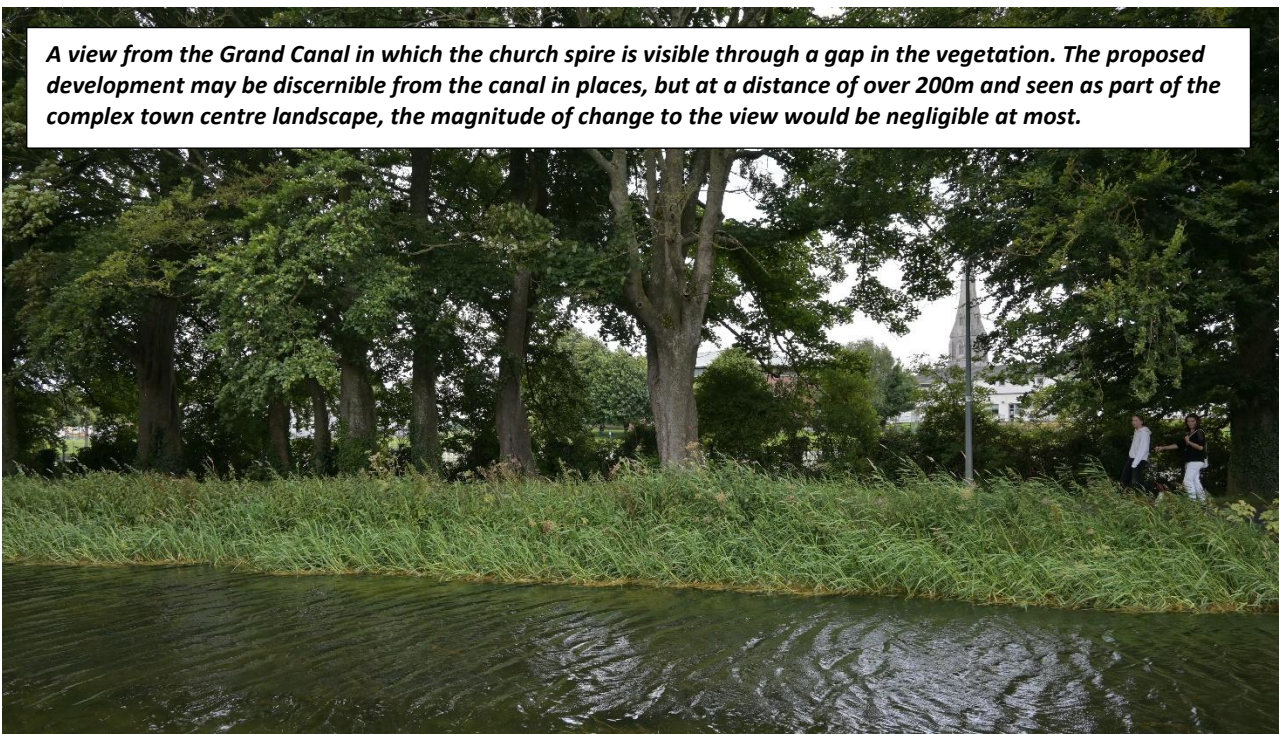
5.9 Viewpoint 9 – Abbey Bridge, Grand Canal

Existing View:

- Views from the Abbey Bridge are protected in the Kildare CDP (refer to Section 3.2.6 and Figure 9 above). The bridge is approximately 275m from the site and separated from it by the densely vegetated Naas Old Cemetery, the grounds of St Mary's College, and the Church of Our Lady and St David. In the view from the bridge towards the site, the trees around the old cemetery block the view in spring and summer. In the winter months more of the town centre would be visible.
- The same is true for the stretch of the canal passing to the west of the site. The trees around the boundary of St Mary's College and Mercy Convent school block the view (in spring/summer - see photographs below).



A view from the Grand Canal in which the church spire is visible through a gap in the vegetation. The proposed development may be discernible from the canal in places, but at a distance of over 200m and seen as part of the complex town centre landscape, the magnitude of change to the view would be negligible at most.



- **Viewpoint sensitivity: Medium-High.** The canal provides a corridor of green-blue open space of high amenity value close to Naas town centre. While the canal corridor itself is of high value and sensitivity, due to its proximity to the town centre there must be some tolerance for change/urban evolution in its context.

Proposed Change:

- **Magnitude of change: None-Negligible.** In spring/summer, the proposed development is screened by the trees in the foreground around the Old Cemetery beside Abbey Bridge. In winter, the development may be discernible through the bare tree canopies, but at a distance of 275m and forming part of a complex of town centre landscape, it will constitute a negligible change at most.



Significance of Effect:

- **Imperceptible neutral.**

6.0 Townscape Impact Assessment

6.1 Townscape Sensitivity

The GLVIA states that landscape/townscape sensitivity¹ should be classified with consideration of ‘the particular project or development that is being proposed’ and ‘the location in question’.

The townscape sensitivity of the receiving environment can be classified ‘medium’ (definition: *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 principal management objective may be to consolidate landscape character or facilitate appropriate, necessary change).*

The medium sensitivity classification is based on the following factors:

- The site is located in/adjacent to Naas town centre. Naas is the county town of Kildare, and described in the Naas LAP as *“at the top of the County Settlement Hierarchy”*. In the Eastern and Midland RSES, Naas is designated a Key Town, and the Kildare CDP includes the objective to accommodate 14.9% of Kildare’s housing target in Naas (currently the town houses 9.6% of the county population).
- The opening paragraph of the Vision for Naas in the LAP is as follows: *“To ensure that the growth planned for the town up to 2031 and beyond occurs in a sustainable and sequential manner [i.e. closest to the centre first], while prioritising a low carbon, compact, consolidated and connected pattern of development”, i.e. higher density development typologies.*
- The NPF 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... To enable brownfield development, planning policies and standards need to be flexible, focusing on design led and performance-based outcomes...”*.
- The site is zoned ‘B. Existing / Infill Residential’.

The above points are important when assessing the sensitivity of the receiving environment *to the development type proposed* specifically. Town centres are where infill development, urban consolidation and densification must occur. This is recognised in the Naas LAP, which states: *“Having regard to the [Building Heights Guidelines], **this Plan does not propose to place any height limitations on new development in Naas. Also, in keeping with the provisions set out in SPPR 1 the town centre has been identified for the possible location of taller buildings**”*.

- The site is located at the point of entry of the Sallins Road into Naas town centre, and has broad frontage to the road (opposite the Naas Town Centre shopping centre). The Sallins Road provides the link between Naas and Sallins Railway Station. This elevates the road’s status in the urban structure and in turn gives the site some importance in the townscape due to its ‘gateway’ location with respect to the town centre. The Building Heights Guidelines suggest that additional height can be used to enhance the urban design context for key thoroughfares (such as the Sallins Road).
- The site location on the Naas-Sallins spine also means that the site will benefit directly from the various pedestrian and cycle infrastructure projects planned to improve access to the railway station. This access

¹ Sensitivity is determined by two factors:

1. **Susceptibility to change:** *“This means the ability of the townscape receptor (whether it be the overall character or quality/condition of a particular landscape type or area...) to accommodate the proposed development without undue consequences for the maintenance of the baseline situation and/or the achievement of landscape policies or strategies”;*
2. **Value of the landscape/townscape receptor:** This can be indicated by designations or, where there are no designations, by the judgement of the assessor.

to the station will complement the site's advantageous location with respect to town centre retail, services, cultural and other amenities.

- The site lies at the interface between two townscape character areas (see Figure 6 above) - the mixed density, mixed use town centre to the south, and a low density residential area to the north.
 - The mixed use town centre area to the south, with the Sallins Road as its spine, is characterised by (a) a mix of uses including residential, retail, office, schools and other institutional uses (Council offices and McAuley Place), and (b) diverse plot and building typologies - from cottages to modern retail and office buildings, and the Church of Our Lady and St David. Such diversity creates capacity to accommodate change, as there is no norm with which new development could or should comply.

This area is also characterised (on the west side of the Sallins Road) by a sparsity of built form. The church and school grounds include extensive green open spaces and parking areas, and there is a notable absence of built frontage/enclosure – other than terraced cottages - on the west side of the street. For a town centre street/area, this is unusual, and unsustainable.

Within this mixed use, mixed density town centre area is a complex of terraced cottages, immediately to the south of the site, also fronting the Sallins Road. While forming part of the town centre (and therefore having some tolerance for change), these cottages as residential receptors must also be considered sensitive.
 - To the north of the site and the Wolfe Tone Street junction (which marks the northern edge of the town centre), is an area of predominantly low density residential use – including the Sycamore Springs apartment building and the Spring Gardens estate. The nearest houses to the site in Spring Gardens are the most sensitive receptors to the impacts of development on the site. There will be an unavoidable juxtaposition in development typologies and scale at this interface between the site and Spring Gardens.

There are thus many factors pointing to the site being highly suited to development of the type proposed, but also some sensitivities requiring consideration and a sensitive design response. Hence the medium townscape sensitivity classification.

6.2 Magnitude of Townscape Change

The magnitude of townscape change which would result from the proposed development can be classified 'high' (definition: *Change that is moderate to large in extent, resulting in major alteration to key elements, features or characteristics of the landscape and/or introduction of large elements considered uncharacteristic in the context. Such development results in change to the character of the landscape.*).

The high magnitude of change classification reflects the following:

- A multi-storey apartment development represents a new development typology for the town centre character area to the south of the site (though not the town centre as a whole) and the low density residential area to the north.
- At four storeys, the buildings are tall for the context. While the historic large buildings in the vicinity (the church and convent) provide precedent for scale, the buildings would nonetheless introduce a new scale of contemporary building to the area.
- The architecture and the palette of materials are contemporary – specifically 'contemporary residential' in character. This too is a departure for the area.
- The development is prominently located, fronting the Sallins Road at the road's point of entry to the town centre. It thus occupies a gateway location on the Naas-Sallins spine, which is an important element in the Naas urban structure.

For these reasons (its scale, prominent location and divergence from the existing character), it is unquestionable that the development would change the character of its townscape context, affecting (a) the Sallins Road gateway to the town centre, (b) the remainder of the town centre stretch of the Sallins Road, (c) the context of a number

of valued historic buildings (the church, convent and Beaufort House itself), and (d) part of the low density residential area to the north.

While the change in the immediate environs would be notable, the spatial extent of the impact would be limited. The visual impacts would not extend beyond the junction of North Main Street to the south, would not extend further east than the Sallins Road itself, would not extend as far as the Grand Canal to the west, and would not extend beyond the nearest parts of Spring Gardens to the north. The townscape impact would thus be quite significant locally, but quite contained. This is reflected in the summary of the visual impact assessment below.

Table 1: Summary of visual effects assessment

No.	Viewpoint Location	Viewpoint Sensitivity	Magnitude of Change	Significance of Effects
1	North Main Street	Medium	Low	Slight positive
2	Sallins Road view of Church of Our Lady and St David	Medium-High	Medium	Moderate positive
3	Church of Our Lady and St David and the Convent Tea Rooms	Medium-High	Medium	Moderate positive
4	Sallins Road view of Fr Murphy's Place cottages	Medium	Medium-High	Significant positive
5	Sallins Road at Wolfe Tone Street junction	Medium	High	Significant neutral
6	Sallins Road view south along site frontage	Low-Medium	High	Moderate positive
7	Sallins Road at entrance to The Sycamores estate	Medium	Low	Slight positive
8	Spring Gardens estate	Medium-High	Low-Medium	Slight negative
9	Abbey Bridge, Grand Canal	Medium-High	None-Negligible	Imperceptible neutral

6.3 Significance and Quality of Townscape Impact

Measuring² the magnitude of change (high) against the sensitivity of the receiving environment (medium), **the significance of the townscape impact is classified 'significant'** (EPA definition of moderate significance: *"An effect which, by its character, magnitude, duration or intensity alters a sensitive aspect of the environment"*).

Due to its prominent location, its scale, and its departure from the existing development typologies and architecture represented in the area, the proposed development would unquestionably alter the character of its immediate receiving environment. Because the affected area includes (a) the Sallins Road gateway to the town centre, (b) the town centre stretch of the Sallins Road, (c) the townscape context of a number of valued historic buildings (the church, convent and Beaufort House itself) and (d) part of the low density residential area to the north, the impact would be 'significant'.

Such significant impact is not necessary negative. It can be positive if (a) appropriately sited, (b) responsive to the context, and (c) of high design and material quality, so that it would result in a net improvement in the quality of the townscape.

² See Appendix 1, Section 2.3 and Table 3.

As to the appropriateness of the location, the *Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities* includes the following 'Key Priorities' for Key Towns and Large Towns (such as Naas): (a) "strengthen town centres", (b) "realise opportunities... for incremental backland, brownfield and infill development", and (c) "deliver sequential and sustainable urban extension at locations that are closest to the urban core".

The Guidelines recommend "*residential densities in the range 40 dph-100 dph (net)... in the centres and urban neighbourhoods*" of Key/Large Towns. The proposed development would yield a density of 91 dph. This indicates that the development typology and scale are appropriate for the location.

The site's frontage to a key urban thoroughfare and its gateway location with respect to the town centre also warrant development of the stature proposed – to mark the entrance to the town centre (on the approach from Sallins) and provide built enclosure/definition to the street. Conceptually, the proposal is what 21st century residential development in Naas town centre should look like.

The photomontages show that the proposed development also responds meaningfully to the sensitivities in its immediate environment, specifically the smaller scale residential buildings adjacent to the south (the complex of terraced cottages fronting the Sallins Road) and to the north west (the nearest houses in Spring Gardens). The height of the proposed buildings steps down towards these neighbouring buildings, so that the transition in scale is not excessively abrupt.

Nonetheless, in views from these neighbouring residential properties (e.g. Viewpoint 8), it is unavoidable that the introduction of an apartment development of contemporary urban density/scale will cause some negative impact. Those existing houses currently are located in – and enjoy views of – a townscape of sparse built form, numerous mature trees, and featuring the impressive church with its tall spire. Inserting a multi-storey apartment development in the vicinity of these houses will (a) screen some of the elements that currently provide visual amenity, and (b) increase the built/visual enclosure experienced on these properties. Such impacts are an unavoidable consequence of compact growth policy. Importantly, the affected houses would retain an enviably high level of residential amenity if the development were to be permitted and constructed.

Finally, the analysis of the proposed development in Section 4, supported by the photomontages and CGI views, indicates that the proposed development is of high design and material quality. The buildings are attractive and distinctive. The communal open spaces are also of high quality and would contribute to a high level of residential amenity afforded to the residents (complementing the accessible, town centre location) – as well as contributing to the local green infrastructure network. Although only a small part of the overall proposal, the widening of the public footpath along the site's Sallins Road frontage, and the planting of a row of street trees, would enhance the local public realm.

In conclusion, while the development would cause a significant impact on the townscape and views in the immediate environs, its effects would be overwhelmingly positive.

APPENDIX 1 LANDSCAPE/TOWNSCAPE & VISUAL IMPACT ASSESSMENT METHODOLOGY

The TVIA methodology is informed by the *Guidelines for Landscape and Visual Impact Assessment*, 3rd edition 2013 (GLVIA) and the EPA *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports*, 2022.

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

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

1.0 Key Principles of the GLVIA

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

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

1.2 Assessment of Both Landscape/Townscape and Visual Effects

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

- Landscape/townscape results from the interplay between the physical, natural and cultural components of our surroundings. Different combinations and spatial distribution of these elements create variations in landscape/townscape character. ‘Landscape/townscape character assessment’ is the method used in LVIA to describe landscape/townscape and by which to understand the effects of development on the landscape/townscape as a resource.
- Visual assessment is concerned with changes that arise in the composition of available views, the response of people to these changes and the effects on the area’s visual amenity.

2.0 Townscape Effects Assessment

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

2.1 Landscape/Townscape Sensitivity

The sensitivity of the landscape/townscape is a function of its land use, landscape patterns and scale, visual enclosure and the distribution of visual receptors, and the value placed on the landscape/townscape. The nature and scale of the development in question is also taken into account, as are any trends of change, and relevant policy. Five categories are used to classify sensitivity (Table 1).

Table 1 Categories of Landscape/Townscape Sensitivity

Sensitivity	Description
Very High	Areas where the landscape exhibits very strong, positive character with valued elements, features and characteristics that combine to give an experience of unity, richness and harmony. The landscape character is such that its capacity to accommodate change in the form of development is very low. These attributes are recognised in landscape policy or designations as being of national or international value and the principal 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 principal 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 principal 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 principal 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 principal management objective for the area is to facilitate change in the landscape through development, repair or restoration.

2.2 Magnitude of Landscape/Townscape Change

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

Table 2 Categories of Landscape/Townscape Change

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

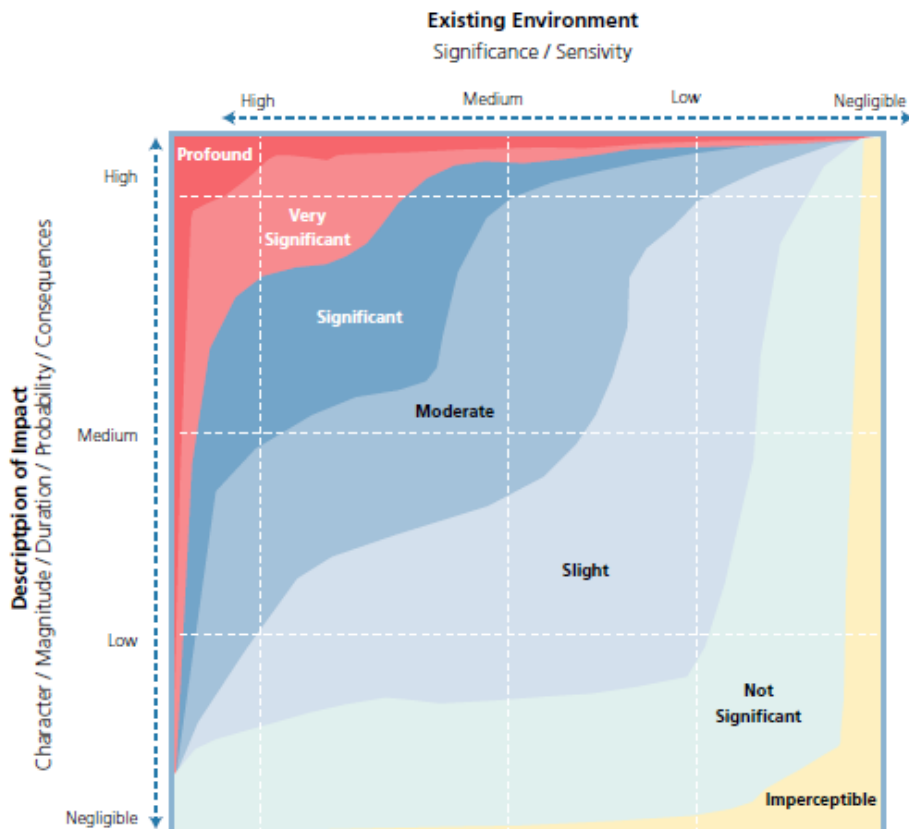
2.3 Significance of Landscape/Townscape Effects

To classify the significance of effects the magnitude of change is measured against the sensitivity of the landscape/townscape using Table 3 and Figure 1 as a guide. The significance classification matrix (Table 3) is derived from the EPA’s *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports*, 2022 (specifically Figure 3.4 of the Guidelines – see Figure 1 below). In addition to this guidance the assessor uses professional judgement informed by their expertise, experience and common sense to arrive at a classification of significance that is reasonable and justifiable.

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

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

Figure 1: ‘Chart showing typical classifications of the significance of impacts’ (Source: Figure 3.4 of the EPA’s *Guidelines on the Information to be Contained in Environmental Impact Assessment Reports*, 2022)



The impact significance classifications are taken from the EPA Guidelines, which define the classifications as follows (Table 4):

Table 4 EPA definitions of environmental impact classifications

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

3.0 Visual Effects Assessment

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

3.1 Sensitivity of the Viewpoint/Visual Receptor

Viewpoint sensitivity is a function of two main considerations:

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

Five categories are used to classify viewpoint sensitivity (Table 5).

Table 5 Categories of Viewpoint Sensitivity

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

3.2 Magnitude of Change to the View

Classification of the magnitude of change takes into account the size or scale of the intrusion of development into the view (relative to the other elements and features in the composition, i.e. its relative visual dominance), the degree to which it contrasts or integrates with the other elements and the general character of the view, and the way in which the change will be experienced (e.g. in full view, partial or peripheral view, or in glimpses). It also takes into account the geographical extent of the change, as well as the duration and reversibility of the visual effects. Five categories are used to classify magnitude of change to a view (Table 6).

Table 6 Categories of Visual Change

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

3.3 Significance of Visual Effects

To classify the significance of visual effects, the magnitude of change to the view is measured against the sensitivity of the viewpoint, using the guidance in Table 3 and Figure 1 above.

4.0 Quality of Effects

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

For landscape/townscape effects to a degree, but particularly for visual effects, this is an inherently subjective exercise since landscape and views are perceived and therefore subject to variations in the attitude and values of the receptor. One person's attitude to a development may differ from another person's, and thus their response to the effects of a development on a landscape or view may vary.

Additionally, there might be policy encouraging a particular development in an area, in which case the policy is effectively prescribing landscape change. If a development achieves the objective of the policy the resulting effect might be considered positive, even if the landscape character is profoundly changed. The classification of quality of landscape and visual effects should seek to take these variables into account and provide a reasonable and robust assessment.