

**DUBLIN CITY COUNCIL  
PROPOSED WASTE TO ENERGY FACILITY  
AT PIGEON HOUSE ROAD  
POOLBEG PENINSULA, DUBLIN 4**

**An Bord Pleanála Reference 29S.EF2022**

# **ORAL HEARING**

## **LANDSCAPE (AND VISUAL) ASPECTS**

**PROOF OF EVIDENCE**

**of**

**THOMAS BURNS**

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Landscape, Planning and Environmental Consultants

## **1.0 INTRODUCTION**

### **Qualifications and Professional Experience**

- 1.1 My name is Thomas Burns and I am a Landscape Architect and Partner with the firm of Brady Shipman Martin. I hold a Bachelor of Agricultural Science Degree in Landscape and a postgraduate Diploma in Environmental Impact Assessment Management. I am a Member of the Irish Landscape Institute and the European Foundation of Landscape Architecture.
- 1.2 I am a landscape architect and partner with Brady Shipman Martin a multi-disciplinary firm providing services in Landscape Architecture, Town Planning, Urban Design and Visualisation. I have 17 years professional experience in landscape and visual assessment, landscape characterisation, master-planning and implementation. During the course of my experience I have carried out landscape and visual assessments for major commercial, infrastructural and strategic developments for private and public clients and have acted as a witness at numerous planning inquiries.

## **2.0 THE LANDSCAPE ASSESSMENT**

### **Introduction**

- 2.1 The landscape section of the Environmental Impact Statement (EIS) assesses the likely significant effects of the proposed Dublin Waste to Energy Facility on the receiving landscape and visual environment. The assessment included:
- an analysis of the existing character of the site and its surrounds
  - an analysis of the visibility of the site from its immediate and contextual surrounds;
  - a review of aerial photography of the site and its context;
  - a review of statutory documents, various publications and reports;
  - a review of plans, sections and elevations of the proposed scheme; and
  - visits to the site of the proposed development and its surrounding environment.
- 2.2 The assessment methodology has regard to:
- the Environmental Protection Agency (EPA) '*Guidelines on the information to be contained in Environmental Impact Statements*', 2002;
  - the EPA '*Advice Notes on Current Practice (in the preparation of Environmental Impact Statements)*', 2003, and
  - the Landscape Institute (UK) '*Guidelines for Landscape and Visual Impact Assessment*', 2002.

## **Photomontages**

- 2.3 Thirty-eight Photomontages were prepared from viewpoints in the surrounding landscape. These were prepared from a wide selection of locations and include for both day-time and night-time views. The Photomontages are representative of the typical range of views towards the proposed facility and provide for an understanding of the physical and visual nature of the proposed development within its setting.

## **3.0 THE EXISTING LANDSCAPE**

### **Context and Location**

- 3.1 The Site is located on Poolbeg Peninsula an area of reclaimed land extending eastwards into Dublin Bay from Ringsend. The open waters of Dublin Bay – with Bull Island to the northeast, lie to the northeast, east and southeast of the peninsula. The peninsula has a central location within the bay and is visually dominated and terminated by the twin Poolbeg stacks. The visual prominence of the peninsula is reinforced by views over water and by surrounding topography, which forms an enclosing arc around the bay from Killiney in the southeast to Howth to the northeast.
- 3.2 The sweep of Dublin Bay takes in primarily residential locations from Dun Laoghaire and Blackrock, to Sandymount, Irishtown and Ringsend all south of the River Liffey and from Fairview and Clontarf to Sutton north of the bay. The nearest residential areas to the site are at Ringsend, Irishtown and Sandymount located between 1 and 2km east and south of the site, while Clontarf is situated 2km directly north of the site.
- 3.3 Dublin Bay is an important area for both land-based and water-based recreational activities. Such activities include coastal walks, beach activity, sailing, windsurfing, fishing and swimming. The eastern end of Poolbeg Peninsula is a popular destination for walking and bird watching and a small beach is located on the south shore, east of Ringsend Wastewater Treatment Plant.
- 3.4 Irishtown Nature Park is located to the southeast of the site. Originally create by landfilling activities, the area has developed as an ecological park and is a well-used amenity. A coastal walk runs along the south shore of the peninsula, connecting the nature park to Sean Moore Park in Ringsend.
- 3.5 Further notable features include the South and North Seawalls and the extensive areas of estuary at Sandymount and Clontarf, where extensive areas of mudflats are exposed at low tide.

## The Site

- 3.6 The principal part of the Site, comprising 5.5 hectares, is centrally located in an almost north south alignment on Poolbeg Peninsula. Pigeon House Road lies to the immediate north; Shellybanks Road to the immediate west; Ringsend Wastewater Treatment Plant to the east, while to the south undeveloped land extends to the embankment along the southern shore of the peninsula. Irishtown Nature Park is located to the southeast.
- 3.7 The immediate context of the site is illustrated on Aerial Photographs in Plates 1 and 2. (These images are also included in the EIS as Plates 6.2 and 6.3.)



**Plate 1 Aerial view – towards south**

- 3.8 Poolbeg Peninsula stretches eastward from the South Bank roundabout and comprises part of the docklands area at the mouth of the River Liffey. Land uses on the peninsula are typical of a port setting and comprise a wide variety of industrial-type activities including power generation, waste-water treatment, metal recycling, concrete batching, oil storage, gas regulation and freight storage. The Dublin Port Ferry Terminal lies to the north of the peninsula. The peninsula also contains some open and undeveloped areas as well as areas of amenity and recreational use with Irishtown Nature Park on the southern shore being of particular interest.



**Plate 2 Aerial view towards east**

- 3.9 The site itself has a particularly industrial context, located as it is between the combined Synergen – Dublin Bay Power Plant to the west and the Ringsend Wastewater Treatment Plant to the east. The northern portion of the site is occupied by a scrap metal recycling yard. A molasses plant operates on the central portion immediately south of the recycling yard, while the southern end of the site is fenced off and is currently under derelict hard standing.
- 3.10 Existing ground levels in and around the site are generally between of between 3.0 and 6.0m above ordnance datum. Within Irishtown Nature Park – the only area of any notable elevation, ground levels rise to 20m in height. A berm of some 7-10m in height extends along the southern coastline as far as Sean Moore Park at Ringsend.

**Landscape Character**

- 3.11 The character of the area is essentially determined and dominated by a combination of the surrounding presence of expansive water; the enclosing coastal landscape of Dublin City; and the intensive industrial infrastructure of the peninsula.
- 3.12 At proximity the overall character and particularly as it relates to the site, is overwhelmingly industrial in nature. The surrounds may also offer opportunity for amenity and recreation but the over-riding industrial nature of the peninsula prevails.

- 3.13 The peninsula is also of interest because of its coastal setting and the views offered over surrounding water, landscape and city. Similarly, Poolbeg peninsula with its various physical features and particularly the twin stacks has a pivotal influence on the seascape of Dublin Bay.
- 3.14 The site itself has a central location within the surrounding mosaic of industrial landscape and is visually indistinct and consistent with its surrounding industrial character. As such, while Poolbeg Peninsula has a significant landscape and seascape presence within Dublin Bay and its surrounds, the site itself is of low landscape sensitivity.

### **Visual Character and Quality**

- 3.15 Despite its industrial nature the wider Poolbeg peninsula has a strong visual presence within Dublin Bay and its immediate coastal landscape. The peninsula is openly visible from within the arc of the bay and the twin Poolbeg stacks are amongst the most dominant features of Dublin City. The stacks themselves are visible from a wide section of the city landscape, including from a citywide selection of elevated commercial, office and residential developments; from elevated sections of the M50 Motorway and from many streets where the alignment facilitates longer views towards Poolbeg, e.g. Bath Avenue.

- 3.16 The visual character of the site is consistent with its industrial and port-related surrounds and as it comprises little of particular note within this setting. The site – or rather the silos and structures thereon – are visible from more immediate coastal areas of Dublin Bay, particularly from Sandymount to Irishtown; from Dollymount to Clontarf; and from areas within the north port of Dublin. Within such views the site lies centrally on the peninsula and comprises generally lower structures than areas to either its immediate east or west.



***View from the south-western corner of the site with the twin Poolbeg stacks in the background***

- 3.17 At proximity, including from Irishtown Nature Park, the site is viewed as part of the general mosaic of industrial clutter which characterises the developed areas of the peninsula. In this setting the site has little in way of positive visual quality. The molasses plant which occupies the central portion of the site is ordered and its blue silos amongst the most prominent elements on the site. Most of the remainder of the

site includes large mounds of scrap metal or abandoned hard-standing and is visually degraded in appearance. In overall terms the site has an industrial and visually degraded character which is of poor visual quality.

### **Landscape Planning**

- 3.18 The relevant statutory Development Plans are the Dublin City Development Plan 2005 –2011 and the Dublin Docklands Master Plan 2003. In addition reference is made to the Draft Poolbeg Framework Plan Dublin South Bank, 2003. The Dun Laoghaire Rathdown County Development Plan 2004-2010 and the Fingal County Development Plan 2005-2011 are also referenced on visual grounds.

#### ***Dublin City Development Plan 2005 – 2011***

- 3.19 The majority of the lands at Poolbeg on which it is proposed to locate the facility, are zoned Z7A in the Dublin City Development Plan. Lands immediately east, west and north of the site are zoned Z7 the objective of which is also *'to provide for the protection and creation of industrial uses and facilitate opportunities for employment creation.'*
- 3.29 Lands south of the subject site are zoned Z6, the objective of which is *'to provide for the creation and protection of enterprise and facilitate opportunities for employment creation.'* Lands south-east of the proposed site (Irishtown Nature Park) and along the south peninsula coast are zoned Z9 *'to preserve, provide and improve recreational amenity and open space'.*
- 3.31 In discussing the Coastline (section 11.1.5, page 86), the Development Plan, at Chapter 11 Recreation Amenity and Open Space Chapter 11 notes that *with new developments in waste treatment the quality and recreational potential of these strands are now much improved. The coastline itself is a valuable amenity with recreational potential which has been partially exploited by the creation of walkways at Clontarf and Sandymount.*
- 3.20 The Development Plan goes on to state that is the policy (Policy R014, page 86) of *Dublin City Council to maintain its beaches at Dollymount, Sandymount, Merrion and Poolbeg/Shellybanks to a high standard and develop their recreational potential as a seaside amenity, in order to bring them a Blue Flag standard within the development plan timeframe.*
- 3.21 Under Specific Objectives (Section 11.3.0, page 88), the Development Plan notes that it is an objective (Objective R01) of Dublin City Council to continue to develop – amongst others – the following parks, open spaces and amenities,
- Sean Moore Park (including the provision of an appropriately sited children's playground subject to available funding);
  - Irishtown Nature Park (unless and until protected by a Special Amenity Area Order);

3.22 Further Specific Objectives which pertain to the coastline and its amenity potential include increasing pedestrian and cycle routes along the coastline (Objective RO8, page 90); enhancing the entire area of Dublin Bay (Objective R09, page 90); and reviewing the extent of canal, coast and river amenity zonings (Objective R016 page 90).

3.23 The Dublin City Development Plan 2005 – 2011 designates the South Bank/Poolbeg area as a Framework Development Area (FDA 13). A number of the principles particular to the South Bank / Poolbeg Framework Development Area FDA 13 have relevance to the proposed development. Pages 117 and 118 of the Written Statement set out 11 development principles for future development in this area, including:

1. *To ensure that new development facilitates the implementation of a global landscape plan for the Poolbeg Peninsula developed in the context of the unique landscape qualities of the peninsula, river and bay area.*
3. *To support a 'differentiated character' approach within an overall landscape framework that will allow for the consolidation of specific activities.*
5. *To allow for utilities operation and expansion within an overall environmental improvement strategy and landscape plan.*
8. *To initiate a phased development of both commercial development and public realm–landscape/road infrastructure. To ensure that key elements of the landscape framework are of the highest quality design and are implemented early in the overall phasing plan to set future precedent for area character.*
9. *To ensure phased implementation of major redevelopment sites can be linked to the implementation of significant public realm packages of the landscape framework plan identified outside of the commercial sites in question.*
11. *To ensure that the unique landscape qualities of the Poolbeg Peninsula, rivers and bay area are recognised in any development proposals for the Poolbeg area and that the existing open character and nature of the views from Irishtown Nature Park are retained as far as practicable.*

#### **Dublin Docklands Area Master Plan 2003**

3.24 One of the key strategic objectives established for the Master Plan is:-

- (o) *Promote the sustainable physical renewal of the Area to a high environmental standard, reflecting high quality urban design and architecture, combined with energy efficiency.*

3.25 The Dublin Docklands Area Master Plan recognises that the Poolbeg Peninsula contains under-utilised land, which is poorly laid out, is

largely within state ownership, is isolated from any residential areas, and requires a coordinating plan to realise its physical and economic development.

- 3.26 The Plan also recognises the interface between both the residential areas of Ringsend and high amenity areas along Sandymount Strand and the utilities/general industry on the Poolbeg Peninsula. It points out that in relation to the proposed development that the key planning considerations in the assessment of a proposal are likely to relate to access, the management of truck movements and the impact upon amenities.
- 3.27 The lands at Poolbeg on which it is proposed to locate the facility, are located within Zone 7 in the Dublin Docklands Area Master Plan. The objective of this zone is *'to provide for the protection and creation of industrial uses and facilitate opportunities for employment creation.'*
- 3.28 Lands immediately east, west and north of the site are similarly located within Zone 7. Lands south of the subject site are within Zone 6 is *'to provide for the creation and protection of enterprise and facilitate opportunities for employment creation.'* Lands south-east of the proposed site (Irishtown Nature Park) and along the south peninsula coast are within Zone 9 *'to preserve, provide and improve recreational amenity and open space'.*

#### ***Draft Poolbeg Framework Plan Dublin South Bank, 2005***

- 3.28 The Poolbeg Framework Plan is a detailed forward looking plan, the purpose of which is to provide for a comprehensive framework and concept plan for the regeneration of Poolbeg Peninsula. It comprises 2 documents,
- The Southbank Framework - contains the background to the project, options and scenarios for development, and the overall framework;
  - The Poolbeg Landscape Framework (Poolbeg Project) – providing a comprehensive framework for the development / regeneration of the peninsula.
- 3.29 The Framework Plan defines three distinct zones of character: Zone 1 to the west providing for a new urban quarter; Zone 2 in the centre of the peninsula providing for a modern utilities habitat;, and Zone 3 to the east providing for a recreation/amenity area based on ecological and cultural character.
- 3.30 The proposed site is situated in Zone 2 the objective of which is *'to allow for operation and expansion of utilities with sufficient new development to establish a waterfront related development character'.* Development Zone 2 is further outlined as, *'A core area retained for public utility functions that would allow for further limited expansion of the same (potential thermal waste treatment plant)'.*

- 3.31 Primary potential for intervention includes environmental improvement measures through the landscape strategy to increase accessibility of coastal routes, Irish Town Nature Park and through-access to the South Bull Wall. The Plan also expresses longer-term potential to accommodate development extension zones to northern and southern edges.
- 3.32 Primary potential for intervention includes environmental improvement measures through the landscape strategy to increase accessibility of coastal routes, Irish Town Nature Park and through-access to the South Bull Wall. Key proposals include a substantial westward extension of Irishtown Nature Park to link new development and the promenade. Any new utility structures within the zone will be of distinctive high quality design and, the Plan also expresses longer-term potential to accommodate development extension zones to northern and southern edges – *i.e.* north and south of the subject site.

#### ***Other Development Plans***

- 3.33 The Fingal Development Plan identifies that much of Howth Head is subject to a Special Area Amenity Order (SAAO) and there are objectives to preserve views from many local roads and walks. In addition, there is an objective to preserve views from the Howth (Coast) Road leading east from Kilbarrack towards Sutton.
- 3.34 The Dun Laoghaire Rathdown Development Plan indicates objectives to preserve views from various sections of the coast road between Booterstown and Dun Laoghaire.
- 3.35 Views coast-wards from all of these locations take in the full arc of Dublin Bay, its immediate foreground of coastal water and backdrop of cityscape. The existing industrial developments at Poolbeg are visible within such views – as is the full range of the bay and its adjoining city edge. While the Poolbeg stacks are prominent in the views the site is of no particular visual relevance.

#### **Summary**

- 3.36 Poolbeg Peninsula is a significant feature within the landscape and seascape of Dublin City. Despite its physical isolation; the peninsula has a central visual setting within the arc of Dublin Bay, reinforced by the dominant visual presence of the 210m high twin stacks of Poolbeg ESB Station. As a result and despite its overwhelmingly industrial character, Poolbeg Peninsula has a significant landscape/seascape character as well as visual character within Dublin City.
- 3.37 By contrast the site, which is centrally located on the peninsula, is visually indistinct and its character is consistent with the core industrial nature of its surrounds. At proximity the site has a visually degraded industrial appearance and is of low landscape sensitivity. The site has no specific landscape or visual-related designation. However the wider peninsula and coastal setting is also an important amenity and recreational resource, particularly in terms of its

association with Dublin Bay and because of Irishtown Nature Park located southeast of the site.

## **4.0 CHARACTERISTICS OF THE PROPOSED DEVELOPMENT**

### **Introduction**

4.1 The proposed facility has a number of characteristics of landscape and visual note. The construction stage will entail:

- significant demolition works,
- major earthwork activities,
- the construction of a major building together with two smaller buildings,
- the provision of various infrastructural elements, fencing, landscaping *etc.*

4.2 Thereafter the proposed development involves the operation, maintenance and management of a significant waste to energy facility. This involves the introduction of a significant physical and visual structure – with two associated stacks – and its on-going activity and operation including; transport aspect, emission of plumes, lighting *etc.*

### **Outline Characteristics of the Proposed Facility**

4.3 The main building occupies a central position on the site and presents a strong architectural spiraling form that envelops and screens the principal elements of the waste to energy activities and operations. As a structure it comprises three principal elements: a base, the internal technical plant, and the enclosing building fabric.

4.4 The base provides anchorage and robustness for the building. The building fabric surrounds the technical plant in a wrap-around manner with characteristic rounded corners and inward-sloping facades. The overall height of the structure is 52m and it provides the facility with a contemporary visual styling. The technical elements are enclosed within the main building and some will be illuminated so as to facilitate viewing through proposed glazing in the northern elevation.

4.5 Twin stacks are to be located alongside the northern elevation of the proposed building. In contrast to the ESB stacks at Poolbeg Generating Station, the proposed stacks are slender and rise to 100m in height - approximately half of the height of the two main stacks at Poolbeg. In operation a plume will be visible from the stacks and the degree of visibility will vary depending on climatic factors, including temperature and wind speed.

4.6 Other elements include an entrance control building, weighbridges, site fencing, landscape berming, planting of trees and general landscape works. A pump house is to be located on the northern side of Pigeon House Road and 2 parallel 'in-water' and 'out-water' pipes -

each approximately 1.0m in diameter - will arch up and over Pigeon House Road at the northeast corner of the site.



***Aerial view of proposed Dublin Waste to Energy Facility***

## **5.0 IMPACT OF THE PROPOSED DEVELOPMENT**

### **Introduction**

- 5.1 The proposed development is of visual significance and is located on a prominent peninsula and on a site, which is visually open relative to its surroundings. As a result the development will be visible from a wide range of areas around and across the arc of Dublin Bay. However, while the proposed development will be a prominent development, the nature of its landscape and visual impact will be strongly influenced by the inherent character of its existing industrial setting and the nature of existing views to and from this prominent coastal setting.
- 5.2 When compared to existing developments on the peninsula the proposed facility can also be viewed as a major change in the architectural approach to industrial-related development. While the peninsula has many large buildings these are clearly industrial and functional in appearance. With the notable exception of exceptionally tall elements (*i.e.* Poolbeg Stacks) the existing structures comprise a visually cluttered collection of container stacks, silos, warehouses,

*etc.* Against this background the proposed development seeks to enclose the waste to energy operation and process within a single architecturally styled structure.

### **Impact on Landscape, Cityscape and Seascape**

- 5.3 The proposed building constitutes a significant landmark development to be located on a visually robust peninsula of unique position and character within Dublin Bay. At present the peninsula includes a significant and prominent hard core of the established industrial landscape of Dublin Port. As such, whilst of central and pivotal significance within the bay, the site itself is of low visual sensitivity and of low sensitivity in terms of landscape character. In effect, the site is already dominated by the existing array of industrial or port-related uses and structures, which include a myriad of large buildings, silos, container stacks, *etc.*, all of which combine to give the predominant industrial character of the area.
- 5.4 While the proposed development is significant in its own right it will not adversely alter the existing unique character of the Poolbeg peninsula within Dublin Bay. The peninsula will remain unaffected in its central and pivotal feature within the arc or sweep of the bay. Furthermore, the independent nature of the existing 210m high Poolbeg Stacks will be unaffected and they will retain their predominant landmark influence on the character of the peninsula and the bay.
- 5.5 At a site level the proposed facility will represent a significant change in the character of industrial development on the peninsula, particularly and most notably in contrast of architectural approach. Surrounding developments are a visually cluttered collection of traditionally open industrial developments, while the Dublin Waste to Energy Facility proposes enclosing all of the technical plant within a single building. This influence and impact of such as single structure will be most significant from the south shore of the peninsula including the currently undeveloped lands, the coastal walk and Irishtown Nature Park. In views from such locations the development will present a dominant and single massing of façade closing-off what is presently a more visually open area through the central portion of existing industrial areas.
- 5.6 While the proposed development will not have a significant impact in terms the landscape, cityscape or seascape character of the wider Dublin Bay area, the facility will have a significant influencing presence on the immediate character of the peninsula, and particularly on the south shore areas. However, this is not considered to be of a negative nature. The proposed facility has been designed as a landmark structure, defining a new approach for architectural treatment of industrial development on this pivotal peninsula site.

### **Visual Impact**

- 5.7 In illustrating the likely physical and visual nature of the proposed facility, some 36 day-time Photomontages have been prepared from a

wide variety of surrounding areas extending from Killiney Hill through Sandymount, Poolbeg, Clontarf to Howth. In addition 3 night-time Photomontages have also been prepared.

- 5.8 The proposed Dublin Waste to Energy Facility will be visible from many areas both on the peninsula and within the wider setting of Dublin Bay. However within this context it is only the main building and its associated stacks which is considered to have any potential for appreciable impact. The building rises to 52m and while it is of a highly individualistic architectural design it will also be a structure of considerable visual mass. As a result, the facility will have a strong visual presence especially when viewed in contrast to the more dispersed and cluttered visual nature of its industrial surrounds.
- 5.9 The main building will be a visually prominent structure. In addition, the facility includes for twin stacks rising to 100m – approximately one-half of the height of the Poolbeg Stacks against which, the proposed stacks are significantly more slender in appearance. As such, the proposed stacks will not have the visual dominance or presence that the existing stacks and the peninsula contains many such vertical features, including other stacks, which are of more comparable height to the proposed structures.
- 5.10 In operation a plume will be visible from the stacks. The degree of visibility will vary depending on climatic factors, including temperature and wind speed. Plumes and the effect of various climatic conditions on density and dispersion is also a feature associated with the existing stacks at Poolbeg.
- 5.11 It is considered that potential for appreciable visual impact arises from two distinct locations. Firstly, from locations on Poolbeg peninsula, most especially from areas south and southeast of the site and secondly, from areas off the peninsula most especially from where the proposed facility is viewed from directly north within Dublin Port (Photomontage Viewpoint 36) or from beyond at Clontarf (Photomontage Viewpoint 7); and from the southwest and south at Irishtown (Photomontage Viewpoints 15 & 16) and Sandymount (Photomontage Viewpoint 17).
- 5.12 The proposed facility will represent a significant visual intrusion when viewed from Irishtown Nature Park and from the south shore of the peninsula. From such proximate locations the scale of the main building will be fully appreciated and it will have a dominating visual influence on views north to the existing industrial lands. That considered, in being highly individualistic, the proposed development will also be of visual interest and merit in its own right. Therefore, while the proposed facility will have a significant visual impact from these open and recreational based areas many viewers will see this significant impact as being negative while others may consider its strong architectural-styling to be a positive influence.
- 5.13 As views move from the peninsula to the main coast at Clontarf, Irishtown and Sandymount the proposed development will be viewed more increasingly within the visual context of the whole of the

peninsula with its existing industrial setting. While the proposed facility will be a significant visual element, the visual expanse of contextual development will dilute the influence and impacting nature of the main building. While the visual impact will remain significant for the coastal promenade, the strand and the bay at Sandymount, as the viewer moves away from the coast or further along the coast, the impact reduces as the development becomes an increasingly smaller part of its wider developed context.



***Viewpoint 17 – Typical view north toward the Poolbeg Peninsula from the promenade at Sandymount.***

- 5.14 Outside of areas located immediately to the north, south and southwest, the proposed facility will have little visual impact. Views, at present from locations such as Howth, Sutton, Dollymount, Killiney Hill, Dun Laoghaire, the Dublin Mountains, Mount Merrion, Deerpark etc. are all of some considerable distance. Such views take in an expansive panorama of the city and the bay within which individual developments on Poolbeg - with the obvious exception of the Poolbeg Stacks - are not visually significant.



***Viewpoint 7 – Typical of an open view south from Clontarf.***

- 5.15 It is intended to illuminate the site for normal operation during night-time. However, the Poolbeg peninsula is already an area of high illumination set within the backdrop of the city proper. As such the lighting associated with the proposed development will not give rise to any additional impact. A feature of the proposed facility is the proposal to have a large area of glazing on the north elevation. It will be possible to view illuminated internal plant through this area of glazing – thereby giving added visual interest to viewers from Pigeon House Road or from within port areas on the north side of the Liffey Estuary.

#### **Impact on Landscape Planning**

- 5.16 The proposed development is sited within an area of existing industrial land use and zoning, an area identified as such within both the Dublin City Development Plan and the Draft Poolbeg Framework Plan.
- 5.17 The subject site is located on an infill site between the existing Ringsend Wastewater Treatment Works on the east and an existing

Power Plant to the west. Further infrastructural and industrial operations lie on the northern side of Pigeon House Road. Lands immediately south of the site are also zoned for development/enterprise uses. As such, the subject site and its locality have a well-established infrastructural/industrial character.

- 5.18 The Draft Poolbeg Framework Plan similarly envisages the retention of core industrial activities within the central area on the peninsula. However, the Plan also envisages a change in the approach to ongoing development and the use of strong architectural treatments in what would remain clearly industrial developments. This aspect is relevant to the architectural design detailing and boundary treatment of the proposed development given its prominent visibility from areas of amenity at Irishtown Nature Park and Sandymount Strand.
- 5.19 The Dublin Docklands Masterplan recognises that the Docklands area is not a homogenous with a coherent overall visual built form and that it contains areas of individual vernacular character, as well as areas characterised by visual disorder with little sense of three-dimensional containment. The Poolbeg Peninsula is one such area which has little visual containment, containing variously scaled industrial buildings along with large areas of surrounding open surfaces.
- 5.20 The Dublin Docklands Masterplan outlines a number of urban design guiding principles which are of relevance in considering the development at the subject site.

#### **Context**

- 5.21 The context of an area refers to its existing layout, form, content and fabric. Each has its own essential characteristics reflective of its time, economy and the culture of its builders and inhabitants. The proposed design responds to defining elements in the area which determine its character, and to reinforce, exploit or develop it in the new development. In this regard, the context of the subject site is set by large scale public utilities and industrial developments, and also by the Irishtown Nature Park to the southeast of the site. At present the most defining features of the area are the ESB power station twin stacks which stand as a landmark for the city and the environs of Dublin Bay.

#### **Variety**

- 5.22 The Docklands Masterplan recognises that the entire docklands area is characterised by a wide variety of different environments and that the variety contributes to the enjoyment of the area and that designers should seek to conserve and articulate it and not impose homogeneity. This is of relevance to the proposed facility where an innovative approach has been taken to treatment of the presentation of the facility.
- 5.23 In terms of design, the Poolbeg Project Plan which is part of the overall Framework states that '*An opportunity is presented here to consider exceptionally large objects as credible components of a contemporary landscape composition*'. This is particularly pertinent to

the proposed facility, which it is accepted will be a significant feature on the local landscape.

5.24 Section 5.7 of the Dublin South Bank Development Strategy outlines the general approach to overall massing on the peninsula. It states that this is driven by many aspects including:

- The adjacency of existing areas of specific height and use;
- The specific character of open space and waterfront adjoining development sites;
- The need to establish landmark features (buildings) in particular locations to reinforce identity and area legibility;
- to current trends and market demand (p.74)

Again, these criteria are of particular importance to the scheme which will be a development of substantial scale and height.

5.25 In conclusion, it is important to note that the facility is to be sited within the context of the existing industrial-related uses of the peninsula – including the ESB generating Station and the Ringsend Wastewater Treatment Plant – significant structures in their own right. The existing amenities and planning designations apply in the context of this receiving background and include for the retention and on-going development of such activities in this location.

5.26 The proposed development has no direct impact on any surrounding landscape, amenity or recreational designation; however, the main building will be an imposing structure within views from Irishtown Nature Park; the south shore walk; portions of Sean Moore Park; Sandymount Bay and its associated promenade. As such, while the development will be prominent – in contrast to the open massing and visual clutter of its surrounding industrial setting, the facility will not have any significant adverse impact on landscape planning aspects. In proposing an innovative enclosed structure of architectural styling the development can also be seen as harbinger for the regeneration and re-development of the peninsula in line with envisaged objectives of the Framework Plan.

### **Summary**

5.27 The proposed building constitutes a significant highly individualistic development to be located on a visually prominent peninsula within Dublin Bay. While the development is largely in-keeping with the industrial uses envisaged for the site, the single architecturally-styled structure contrasts significantly with its more traditional industrial surrounds.

5.28 The principal landscape and visual impacts relate to areas on the peninsula rather than along the main coast, where the development is viewed within its wider port and port-related industrial context. On Poolbeg Peninsula the proposed development will have a significant landscape and visual influence on the setting and views from areas such as Irishtown Nature Park and from the south shore of the

peninsula. Significant visual impact will also extend across Sandymount Bay to the promenade from Sandymount to Irishtown.

## **6.0 MITIGATION MEASURES**

6.1 The proposed development will comprise a major structural element of visual prominence which, given its scale and the nature of the site, cannot be visually screened. In such scenario mitigation is best achieved in the consideration of avoidance, reduction, and remediation in the siting and design of the proposed development. Such considerations have informed the basis of the proposed facility and these are reflected in a number of ways.

- The development is to be sited within an area of clearly established 'hard' core industrial development.
- The site itself has a visually degraded appearance of little or no landscape or visual sensitivity – albeit as part of the wider peninsula it occupies a central and pivotal setting within Dublin Bay.
- The design proposes a building of significant architectural merit. In this way the building is clearly a departure in terms of recent development on the peninsula and in conjunction with the provisions of the Poolbeg Masterplan can set the trend for the rejuvenation of the architectural quality of the industrial elements on the peninsula.

6.2 In particular, the design and layout includes a number of positive elements which relate to openness, landmark quality and to its surroundings. The building has been designed to reveal its function through glazing on the northern elevation – thereby creating insight into and an understanding of the concept of 'waste to energy'. The proposed architectural treatment ensures that the building will contrast in an innovative manner with its industrial surrounds. Finally, the building has been orientated on the site so as to creating a strong connection from north to south along the site, thereby defining the building line and character.

6.3 In terms of landscape restoration, it is proposed to establish a strong evergreen visual screen along the eastern, southern and western boundaries of the site. This includes for dense hedgerow planting of Escallonia and Olearia backed by Pine trees in feature locations. While it is proposed to retain openness through the northern Pigeon House Road boundary, four spiraling berms will provide for definition and framing of views towards the glazed northern elevation. In this way the landscaping seeks to visually anchor the facility, screening the low-level traffic movements, whilst setting-off the architectural treatment of the building.

6.4 A new line of Sycamore trees will be established along the line of Shellybanks road to replace existing trees that will be lost during the course of construction of the facility.

## **7.0 RESIDUAL IMPACT**

- 7.1 The proposed development will remain as an individualistic building of visual significance on the peninsula. In this context the building will continue to have a strong visual influence and hence impact – particularly on its immediate environs on the peninsula. However, it has the potential to be viewed as a positive landmark building and as part of the envisaged framework for Poolbeg the proposed development has the potential to act as a catalyst for the positive architectural treatment of industrial development on this unique peninsula.

## **8.0 OUTLINE RESPONSE TO SUBMISSIONS IN RELATION TO LANDSCAPE AND VISUAL IMPACT**

- 8.1 A number of persons and organisations have raised objections against the proposed development by reference to landscape and visual aspects of the proposed development. I have set out my comments under the issues raised in the following sections. These relate to 2 primary areas; firstly visual impact of the development which has been assessed in detail in the EIS and also covered in this brief of evidence; and secondly impact on amenity and recreational facilities. Again while this latter issue has also been considered in the EIS and in the brief of evidence the following points of relevance are also noted.

### **Impact on Amenities and Recreational uses**

- 8.2 Poolbeg is an entirely man-made feature created through the gradual infilling of shallow coastal areas. The infilling facilitated the eastward expansion of port-related and industrial land-uses and despite its central and prominent location these same activities continue to dominate and determine the landscape and visual character of the peninsula to this day.
- 8.3 Despite this industrial context, the peninsula has established important amenity and recreational uses, including a small beach at Shellybanks; walks along the Bull Wall and the south shore of the peninsula and Irishtown Nature Park itself the product of landfilling activities.
- 8.4 All of these amenity and recreational features – together with additional amenities including Sean Moore Park and coastal promenades at Sandymount and Clontarf – have established and continue to be enjoyed on an on-going basis against the existing background of significant industrial and port-related activities.
- 8.5 Significantly, the proposed development has no direct impact on any surrounding landscape, amenity or recreational feature or designation. It is accepted that the main building will be an imposing

structure within views from Irishtown Nature Park; the south shore walk; portions of Sean Moore Park; Sandymount Bay and its associated promenade. However all of these amenities exist under the influence of already significant developments including the Ringsend Waste-water Plant, the Poolbeg Generating Station and other surrounding facilities.

- 8.6 As such, while the development will be prominent – in contrast to the open massing and visual clutter of its surrounding industrial setting, the facility will not have significant adverse impacts on amenity and recreational aspects.