

## Greater Dublin Drainage Project Addendum

**Environmental Impact Assessment Report Addendum:  
Volume 3A Part A of 6**

**Chapter 12A Landscape and Visual**

**Uisce Éireann**

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## 12. Landscape and Visual

### 12.1 Introduction

As detailed in Chapter 1A (Introduction) in Volume 2A Part A of this Environmental Impact Assessment Report (EIAR) Addendum, we have reviewed Chapter 12 (Landscape and Visual) in Volume 3 Part A of the EIAR submitted with the original 2018 planning application, in the light of:

- Changes to the baseline environment;
- The requirement for updated surveys; and
- Changes to the law, policy, and industry standards and guidance in the intervening period.

Table 12.1 includes a summary of the project elements which were incorporated into the planning design for the Greater Dublin Drainage Project (hereafter referred to as the Proposed Project) following direction at the Oral Hearing in 2019 and the subsequent planning conditions applied to the planning permission originally granted on 11 November 2019. A full description is included in Chapter 4A (Description of the Proposed Project) in Volume 2A Part A of the EIAR Addendum. The remaining elements of the Proposed Project included in the 2018 planning application remain unchanged.

**Table 12.1: Updated Proposed Project Elements**

Updated Element	Outline Description of Updated Element
Ultraviolet (UV) Treatment	<ul style="list-style-type: none"> <li>• UV Treatment is to be included in the treatment process at the proposed wastewater treatment plant (WwTP) in the northern section of the WwTP site.</li> <li>• The UV treatment system will be designed for the expected flows at the plant and will be installed on the final effluent line. UV treatment will be in operation 24 hours a day, 365 days a year.</li> <li>• The UV system will consist of a minimum of three and a maximum of four treatment units located below or partially below ground level with an above-ground Motor Control Centre (MCC) (in a kiosk) along with minor maintenance and control equipment (e.g. shut-off button, frame for supporting, retracting and cleaning of UV lamps etc.).</li> </ul>
River Mayne Culvert Extension	<ul style="list-style-type: none"> <li>• Extension of the River Mayne Culvert on the proposed access road to the WwTP by 4m (from 21m to 25m) to cater for the full width of the future north south link road.</li> </ul>

This Chapter of the EIAR Addendum should be read in conjunction with Chapter 12 (Landscape and Visual) in Volume 3 Part A of the EIAR submitted with the original 2018 planning application.

It should be noted that the updated landscape assessment for the proposed Regional Biosolids Storage Facility (RBSF) is included in Section 14A (Landscape) in Volume 4A Part A of this EIAR Addendum.

### 12.2 Methodology

The methodology employed for the purpose of this Addendum assessment was to review the landscape and visual baseline context relative to that which existed in 2018 when the original Chapter 12 (Landscape and Visual) was submitted as part of the 2018 planning application. This includes reference to both the physical environment and legislative / policy context.

#### 12.2.1 Relevant Guidance Documents

This Section of Chapter 12 (Landscape and Visual) in Volume 3 Part A of the EIAR submitted with the original 2018 planning application was reviewed in order to determine if there have been any updates to the legislation and / or guidance governing the assessment of landscape and visual in the intervening period.

There has been no change to the best practice guidelines for landscape and visual assessment in Ireland and the United Kingdom (UK), which remain as the Institute of Environmental Management and Assessment (IEMA) and Landscape Institute (UK) Guidelines for Landscape and Visual Impact Assessment (referred to as the GLVIA) (IEMA and Landscape Institute 2013).

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There have been no material changes to national level landscape legislation and policy. Although, the National Landscape Strategy for Ireland 2015 – 2025 (Department of Arts, Heritage and the Gaeltacht 2020) was published in 2020 and recommended the preparation of a national landscape character assessment, this has not yet been produced.

In 2022, the Environmental Protection Agency (EPA) published an updated set of Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (hereafter referred to as the updated EPA Guidelines) (EPA 2022). The updated EPA Guidelines do not have a material consequence for the assessment contained in this Addendum Chapter, as there are no aspects that would require variation to the methodology or presentation of the landscape and visual impact assessment (LVIA), as completed for Chapter 12 (Landscape and Visual) in Volume 3 Part A of the EIAR in the 2018 planning application.

### 12.2.2 Desk Study and Consultation

An updated desk-based review was undertaken for this Addendum Chapter.

The main consideration in relation to landscape and visual policy change is the Fingal County Council (FCC) Fingal Development Plan. The Fingal Development Plan 2017–2023 (hereafter referred to as the Previous Fingal Development Plan) (FCC 2017) was considered in the 2018 assessment and has been superseded by the Fingal Development Plan 2023–2029 (hereafter referred to as the Current Fingal Development Plan) (FCC 2023). A review of the Current Fingal Development Plan indicates that although Green Infrastructure and Natural Heritage have now been brought together into Chapter 9, rather than being separately contained in Chapter 8 and Chapter 9 of the Previous Fingal Development Plan, there has been no material change to landscape and visual policy within the landscape and visual study area for the Proposed Project. The Green Infrastructure Section in the Current Fingal Development Plan contains a single ‘Landscape’ related policy (i.e. ‘GINHP9 Landscape Character’) and this policy is identical to ‘GI36’ from the Previous Fingal Development Plan.

The Fingal Landscape Character Assessment is brought through into the Current Fingal Development Plan and still indicates that the Proposed Project is predominantly contained in the ‘Low Lying Agriculture’ character type, but with the western and eastern portions contained in the ‘River Valley and Canal’ type and the ‘Coastal’ type, respectively. The landscape sensitivity assigned to each of these landscape character types in the Current Fingal Development Plan remains the same as for the Previous Fingal Development Plan.

The Current Fingal Development Plan contains six landscape policies and objectives to the Previous Fingal Development Plan’s seven, with the only difference (other than number reference) being that ‘Objective NH37’ to ‘*Ensure that new development meets high standards of siting and design*’ from the Previous Fingal Development Plan has not been included in the Current Fingal Development Plan.

In terms of ‘Views and Prospects’, there are no new designations shown on the Green Infrastructure maps included in the Current Fingal Development Plan that are relevant to the Proposed Project. However, where there is only one objective relating to ‘Views and Prospects’ in the Previous Fingal Development Plan, it is joined by another policy and another objective in the Current Fingal Development Plan, namely:

***‘Policy GINHP26 Preservation of Views and Prospects***

*Preserve Views and Prospects and the amenities of places and features of natural beauty or interest including those located within and outside the County’; and*

***‘Objective GINHO58 Landscape/Visual Assessment***

*Require a Landscape/Visual Assessment to accompany all planning applications for significant proposals that are likely to affect views and prospects’.*

There will be no designated views and prospects materially impacted by the Operational Phase of the Proposed Project and a LVIA was prepared to accompany the original 2018 planning application. Thus, the

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new policy and objective will not alter the previous assessment carried out in Chapter 12 (Landscape and Visual) in Volume 3 Part A of the EIAR submitted with the original 2018 planning application.

Following an Oral Hearing process, An Bord Pleanála (ABP) previously made a decision to grant the planning application by Order dated 11 November 2019 under reference number ABP-301908-18 for the Proposed Project. That decision was quashed by Order of the High Court and the case was remitted by that Court to ABP for a fresh determination. Following the remittal Order, ABP decided that given the passage of time since the submission of the original planning application, and in accordance with Section 37F(1)(c) of the Planning and Development Act 2000 (as amended), Uisce Éireann should have the opportunity to update, where appropriate, the EIAR and Natura Impact Statement, and any other information submitted.

In light of this, ABP contacted those who had made submissions as part of the original consultation process in 2018 advising that the case had been reactivated under a new reference number (ABP-312131-21) and invited those interested parties to make any further general submissions / observations on the planning application by 30 September 2022. A total of 16 submissions were received and these were reviewed.

All points raised in submissions have been considered alongside those captured in Chapter 12 (Landscape and Visual) in Volume 3 Part A of the EIAR in the 2018 planning application and are reflected on and provided for, where relevant, in the baseline, impact and mitigation sections of this Addendum Chapter.

### **12.2.3 Study Area**

There are no changes to the study area or the information presented in this Section of the EIAR in the 2018 planning application.

### **12.2.4 Field Studies**

The requirement for updated surveys was also considered. On the basis that much of the baseline photography used for the photomontages that informed the visual impact assessment had been captured prior to 2018, it was considered necessary to recapture it. This was pertinent because the receiving landscape and visual context of, particularly the proposed WwTP study area, is contained in the dynamic urban fringe area that has been subject to notable development in the intervening period. Fieldwork to capture the updated viewpoint photography also allowed for a general review of the baseline setting of those key areas where viewpoints had previously been selected (Operational Phase above-ground infrastructure sites).

New photomontages have been prepared using the original design renders incorporated within the updated photography and are included in Volume 6A (Photomontages) of this EIAR Addendum. The updated photomontages were compared to the original photomontages to determine if any material change has occurred that might influence the previously assessed impacts.

### **12.2.5 Impact Assessment Criteria**

There is no change to the impact assessment criteria that was employed for the LVIA in Chapter 12 (Landscape and Visual) in Volume 3 Part A of the EIAR submitted with the original 2018 planning application, which remains consistent with relevant guidelines and best practice. There are therefore no changes required to this Section of the EIAR in the 2018 planning application.

## **12.3 Baseline Environment**

A desk-based review has been undertaken to assess any changes to the baseline environment, with regards to landscape and visual, since the original 2018 planning application.

In terms of changes to environs of the proposed Abbotstown pumping station, the enclosed setting appears largely the same as it did for the assessment carried out for Chapter 12 (Landscape and Visual) in Volume 3 Part A of the EIAR in the 2018 planning application, and is still in use as part of the National Sports Campus at Abbotstown, and specifically as part of the cross-country running course. There is also little in the way of overt change to the corridor of the proposed orbital sewer route and outfall pipeline route. However, the

Portmarnock Greenway has been commissioned in the intervening period and runs alongside the R106 Coast Road between Baldoyle and Portmarnock. This represents an additional visual receptor rather than a feature that has a notable influence on landscape character. There has been further easterly expansion of the Drumnigh Manor Housing estate since 2018 to consolidate infill residential development between the R124 Regional Road and the Dublin to Belfast railway line. The 'Skylark' Phase of the same housing development on the eastern side of the railway line has also recently been completed. The proposed outfall pipeline route will run immediately adjacent to the south and south-east of this residential estate bringing new residents in close proximity to Construction Phase works. In particular, the 'Skylark' Phase of this development is within 500m of proposed temporary construction compound no. 9 that will be positioned adjacent to the west of the R106 Coast Road at Baldoyle Estuary.

The most noticeable changes to the baseline setting of the Proposed Project since 2018 occur in the vicinity of the proposed WwTP, where a second hotel (Holiday Inn Dublin Airport) has been constructed immediately to the north of the Clayton Hotel Dublin Airport. These both lie around 500m to the west of the proposed WwTP site. There is also a recently completed residential estate running between Malahide Road and Belcamp College which is around 900m to the east of the proposed WwTP site at its nearest point. These recent developments serve to reinforce the general baseline descriptions included in this Section of the EIAR in the 2018 assessment, which highlighted the varied and dynamic land use context of this urban fringe area. The new developments are consistent with the land uses around them and they are not in the immediate context of the proposed WwTP site. The recent hotel and residential developments contribute in a minor and general manner to the intensity of built development in this rural urban interface without representing marked change.

### **12.4 Impact of the Proposed Project – Construction Phase**

The updated Proposed Project elements, as outlined in Section 12.1, and the changes to the baseline environment outlined in Section 12.3, have been considered against the previous LVIA in Chapter 12 (Landscape and Visual) in Volume 3 Part A of the EIAR in the 2018 planning application.

The only material variation in respect of Construction Phase impacts is that the additional visual receptor of the Baldoyle Portmarnock Greenway will afford close views of proposed temporary construction compound no. 9 at the western end of the proposed outfall pipeline route that will run under Baldoyle Estuary. This will lie inland adjacent to the road / Greenway, and it should be noted that this section of road is a designated scenic route, albeit with the main source of visual amenity in the opposite direction out across the estuary to the east.

It is not considered that the Greenway is of any greater visual sensitivity than the designated scenic route (High-Medium in the original assessment) and the viewing context is the same. Thus, it is not considered that the significance of Construction Phase visual impact is any greater than was previously assessed in respect of the designated scenic route (Slight and Temporary) in this Section of the EIAR in the 2018 planning application. There will also be views of proposed temporary construction compound no. 9 from the recently completed phases of the Drumnigh Manor / Skylark residential developments that straddle the railway line to the north of the R123 Regional Road. Although closer than residential development in this area in the original baseline, these housing estates are still separated from the proposed outfall pipeline route and proposed temporary construction compound no. 9 by a series of farmed fields.

The River Mayne Culvert extension will be under the proposed access road to the WwTP and will only result in landscape and visual impacts during the Construction Phase from additional heavy goods vehicle (HGV) movements and site activity. However, as this is only a 4m extension from the River Mayne Culvert assessed in the 2018 planning application, this will not result in a noticeable increase of impacts, in the context of the Construction Phase works assessed in this Section of the EIAR in the 2018 planning application.

## 12.5 Impact of the Proposed Project – Operational Phase

The updated Proposed Project elements, as outlined in Section 12.1, and the changes to the baseline environment outlined in Section 12.3, have been considered against the previous LVIA in Chapter 12 (Landscape and Visual) in Volume 3 Part A of the EIAR in the 2018 planning application.

The only potential variation in respect of Operational Phase impacts relative to the 2018 assessment is in the context of the proposed WwTP, where the addition of a new hotel and residential developments, to the west and east of the site respectively, have altered the baseline context to a minor degree. These developments are consistent with the general description of the varied and dynamic baseline context of this area provided in the assessment in the EIAR in the 2018 planning application. Furthermore, they only serve to reduce the sensitivity of the receiving environment by reinforcing the transition from rural to urban of this interface area in a manner that is consistent with development plan land use zoning objectives. The assessment in the EIAR in the 2018 planning application judged the Operational Phase significance of landscape impact from the proposed WwTP to be 'Moderate to Slight' on balance of a 'High' impact magnitude and a 'Low' landscape sensitivity. This is still deemed a reasonable judgement on the basis that the sensitivity has not reduced beyond 'Low', as the recent developments have further reinforced the 'Low' sensitivity of the receiving landscape.

The proposed UV treatment infrastructure that will be included within the proposed WwTP site was not considered in the 2018 assessment as it was a subsequent addition. However, it is considered that the proposed UV treatment infrastructure will not have any material bearing on the visual impact of the proposed WwTP, as it is modest in scale relative to the overall WwTP facility and will be internally contained within the context of other proposed buildings within the site, such that it will not be discernible from surrounding receptors. Likewise, the River Mayne Culvert extension will be a 4m extension to the previously assessed culvert and will be under the proposed access road to the WwTP. Therefore, it will not result in any material increase in Operational Phase landscape and visual impacts relative to the assessment presented in the EIAR in the 2018 planning application.

As detailed above in Section 12.2.4, an updated set of photomontages has been prepared using recently captured photography (November 2022) and is included in Volume 6A (Photomontages) of this EIAR Addendum. A comparative assessment of the new photomontages relative to the previous photomontage set is provided in Table 12.2.

**Table 12.2: Comparative Assessment of Visual Impacts at Selected Viewpoints (Original versus Updated Baseline Photography)**

Viewpoint No.	Location	Change to Baseline View	Change to Visual Impact Assessment (Y/N)
VP1	Clonshaugh Road (adjacent to the proposed WwTP site access)	Aside from several new posts and poles in the immediate foreground and the fact that the latest image is a winter view, and the previous image was captured in summer, there is no material change to the view.	No
VP2	Top storey of Clayton Hotel Dublin Airport	The latest view reveals that a line of conifers just beyond the foreground service station has been removed and this opens up the view marginally. However, this change is offset from the direction of the proposed WwTP site. The corner of the new Holiday Inn Dublin Airport Hotel can also be seen in the bottom left-hand corner of the latest view along with some associated surface level parking. This hints at a higher level of built development in the foreground context, which is already well developed. However, this is of no material consequence to the baseline view and the effect of the proposed WwTP.	No
VP3	Local road at Springhill	This view was captured approximately 10m to the south-east of the original view and shows a higher degree of vegetation throughout the fore-to-middle ground than the original. However, it is clear that there is little change to the visual setting and the proposed WwTP remains substantially out of view.	No
VP4	Private dwelling at Middleton	Updated imagery not available (refer to Section 12.9 for further explanation), but a review of recent aerial imagery indicates no material change to the visual setting.	No

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Viewpoint No.	Location	Change to Baseline View	Change to Visual Impact Assessment (Y/N)
VP5	Springhill House	There is now a slightly stronger sense of enclosure from vegetation throughout the fore-to-middle ground, which is not wholly explained by the seasonal variation between the original and updated image. Even some of the mature broadleaf trees are apparently larger, which is not surprising given the 7 year interval between images. Whilst there remains a discernible view of the roof profile of the proposed WwTP facility, it is noticeably reduced. The pre-mitigation impact was previously deemed 'Medium-Low' and the post-mitigation view 'Low'. These judgements are now considered to be 'Low' and 'Low-Negligible' respectively.	Yes – significance reduced to <b>Slight</b> (pre-mitigation) and <b>Slight-Imperceptible</b> (residual)
VP6	Baskin Lane near intersection with Clonsaugh Road	Aside from seasonal and crop-stage variation, there is no material difference to the baseline view.	No
VP7	M1 Motorway Airport Interchange	Based on the vertical gauge of the motorway sign beyond the slipway embankment, it can be seen that vegetation in the road corridor context has matured slightly, but the proposed WwTP was obscured even in the original view.	No
VP8	Glazed skyway between sections of Dublin Airport Terminal 2	There are three large additional silos now contained in the airport context of this view, just to the right of the proposed WwTP site alignment. Whilst this contributes to a marginally increased sense of enclosure to the foreground setting, it does not alter the viewing context of the proposed WwTP in any material way.	No
VP9	Baskin Lane at Ballymacartle	The foreground vegetation has changed slightly, but this has little consequence for the view of the proposed WwTP, which remain substantially screened.	No
VP10	St. Doulagh's Church on the R107 Malahide Road	Aside from slight seasonal variation, this view remains substantially unchanged.	No
VP11	Sports Ground adjacent to R139 Road (Craobh Chiaráin Hurling and Football Club)	Updated imagery not available (refer to Section 12.9 for further explanation), but a review of recent aerial imagery indicates no material change to the visual setting.	No
VP12	Sports ground adjacent to Balgriffin Cemetery (Cumann Peil Innisfail)	There is almost no variation in this baseline view since the original assessment.	No
VP13	Belcamp Park	The latest view was captured approximately 40m to the west of the original view, but aside from the foreground reverting to naturalistic grassland from a sports pitch, the perimeter trees still preclude a view of the proposed WwTP.	No
VP14	St. Francis' Hospice (Proposed Abbotstown Pumping Station View)	Updated imagery not available (refer to Section 12.9 for further explanation), but a review of recent aerial imagery indicates no material change to the visual setting.	No

On the basis of the comparative analysis of visual impacts at selected viewpoints contained in Table 12.2, it is considered that the only material change to the visual impact assessment included in Chapter 12 (Landscape and Visual) in Volume 3 Part A of the EIAR of the 2018 planning application is a marginal reduction in impact for VP5 at Springhill House due to intervening vegetation having matured since the original image was captured. Any minor changes noted to the baseline visual setting in the way of new development (i.e. VP2) do not have a consequence for the visual impact assessment and would only serve to assimilate the Proposed Project to a marginally greater degree in this urban fringe context.

### 12.6 'Do Nothing' Impact

The 'Do-Nothing' impact is considered to be the same as was assessed in Chapter 12 (Landscape and Visual) in Volume 3 Part A of the EIAR of the 2018 planning application. This is on the basis that the same factors of urban fringe development pressure and Fingal Development Plan zoning objectives are still in place, including for a new orbital relief road (the East-West Distributor Road) that will run adjacent to the south of the proposed WwTP site.

## **12.7 Mitigation Measures**

Based on the comparative assessment of impacts identified in Chapter 12 (Landscape and Visual) in Volume 3 Part A of the EIAR of the 2018 planning application and the present day, it is not considered that additional mitigation measures are now required, or that the previously proposed mitigation measures should be altered or removed. Therefore, there are no changes required to the information presented in this Section of the EIAR in the 2018 planning application.

Notwithstanding the above, as part of the current remittal application, a Biodiversity Assessment (included as Appendix 2 to the Addendum Planning Report) has been prepared in response to Uisce Éireann's Biodiversity Action Plan (BAP) (Uisce Éireann 2021) which includes as a key objective of ensuring 'no net loss (NNL)' of biodiversity when delivering projects. It has also been prepared cognisant of the recent adoption of Policy GINHP10 and GINHP14 of the Current Fingal Development Plan (FCC 2023).

As part of this, the original landscape mitigation plans for the proposed Abbotstown pumping station and WwTP sites were used to calculate the balance of biodiversity loss and gain at each of these sites and to feed into the overall biodiversity assessment calculations for the Proposed Project. The relevant Landscape Mitigation Plans at each site have been updated to provide an annotation of the biodiversity assessment figures (refer to Figure 12.1 and Figure 12.2 in Volume 5A of the EIAR Addendum). However, the design itself has not changed.

The relevant Landscape Management Plans which will be prepared and implemented by the appointed contractor during the Construction Phase will align with the updated Landscape Mitigation Plans included as Figure 12.1 and Figure 12.2 in Volume 5A of the EIAR Addendum for the proposed WwTP and proposed Abbotstown pumping station, respectively.

## **12.8 Residual Impacts**

As there are no material changes to the previously assessed impacts of the Proposed Project in Chapter 12 (Landscape and Visual) in Volume 3 Part A of the EIAR of the 2018 planning application, and therefore the mitigation measures originally proposed will also remain unchanged, the residual impacts of the Proposed Project are considered to be the same as presented in this Section of the EIAR in the 2018 planning application, or marginally reduced, as is the case with VP5 (refer to Table 12.2).

## **12.9 Difficulties Encountered in Compiling Required Information**

The main difficulty experienced in preparing this Chapter of the EIAR Addendum was obtaining access to three of the previous viewpoint locations (VP4, VP11 and VP14) that are located within private property. Viewpoints for visual impact assessment are not normally obtained from private property, so it was the original images that depart from standard practice. To overcome this difficulty, recent aerial imagery (Google 2023; Bing 2023) was utilised to determine if the visual context was likely to have changed since the original assessment. No material changes were noted for any of these views.

## **12.10 Conclusion**

This Addendum Chapter has considered all updates to elements of the Proposed Project, updates to the baseline environment and whether there have been any updates to guidance and reference material since the 2018 planning application submission. Following consideration, there are no material changes to the assessment of landscape and visual as a result of any of the updates discussed in this Addendum Chapter.

## **12.11 References**

Bing (2023). Bing aerial imagery.

Department of Arts, Heritage and the Gaeltacht (2020). National Landscape Strategy for Ireland 2015 – 2025

EPA (2022). Guidelines on the Information to be Contained in Environmental Impact Assessment Reports

FCC (2017). Fingal Development Plan 2017 – 2023

FCC (2023). Fingal Development Plan 2023 – 2029

Google (2023). Google aerial imagery.

IEMA and Landscape Institute (2013). Guidelines for Landscape and Visual Impact Assessment

Uisce Éireann (2021). Biodiversity Action Plan

### Directives and Legislation

Planning and Development Act 2000 (as amended)