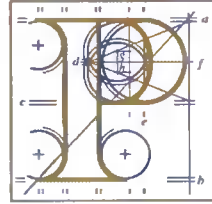


Number: ABP-312093-21

Authority Reference Number: SD21A/0155



An
Bord
Pleanála

J.O'T



South Dublin County Council
Planning Department
County Hall

2 December 2021

to replace chimney flue with telecommunications structure and all associated site works
at the Mullyroan Community & Youth Centre, Marian Road, Rathfarnham, Dublin 14

Sir / Madam,

Enclosed is a copy of an appeal under the Planning and Development Act, 2000, (as amended).

Submissions of documents etc., to the Board. N.B. Copies of I-plans are not adequate, all drawings and maps should be to scale in accordance with the provisions of the permission conditions.

The planning authority is required to forward specified documents to the Board under the provisions of section 128 and section 37(1)(b) of the Planning and Development Act, 2000, (as amended). Please forward, **within a period of 2 weeks beginning on the date of this letter**, the following documents:-

1. A copy of the planning application made to the planning authority and a copy of any drawings, maps (including ordnance survey number) particulars, evidence, a copy of any environmental impact assessment, other written study or further information received or obtained by your authority in accordance with the regulations under the Acts. If practicable, the original of any drawing with coloured markings should be provided or a coloured copy,

2. A copy of any technical or other reports prepared by or for the planning authority in relation to the application,

3. A certified copy of the relevant Manager's Order giving the decision of the planning authority,

4. A copy of the notification of decision given to the applicant,

5. Particulars of the applicant's interest in the land or structure, as supplied to the planning authority,

6. A copy of the **published notice** and a copy of the text of the **site notice** erected on the land or structure,

o Áitiúil
s
hreán Gréasáin
mhphost
Tel (01) 858 8100
LoCall 1890 275 175
Fax (01) 872 2684
Website www.pleanala.ie
Email bord@pleanala.ie

64 Sráid Maoilbhríde 64 Marlborough Street
Baile Átha Cliath 1 Dublin 1
D01 V902 D01 V902

- (vii) a copy of requests (if any) to the applicant for further information relating to the application appeal together with copies of reply and documents (if any) submitted in response to such requests;
- (viii) a copy of any written submissions or observations concerning the proposed development to the planning authority,
- (ix) a copy of any notices to prescribed bodies/other authorities and any responses to same,
- (x) a copy of any exemption application/certificate within Part V of the 2000 Act, (as amended),
- (xi) a copy of the minutes of any pre-planning meetings.

2. To ensure that the Board has a full and complete set of the material specified above and that it can proceed with full consideration of the appeal, please certify that the planning authority holds no other material relevant to the case coming within the above list of items by signing the certification on the reverse of this letter and returning the letter to the Board.

3. In addition to the documents mentioned above, please supply the following:- Particulars and documents relating to previous decisions affecting the same site or relating to applications for development in near proximity. "History" documents should include;

- a) the Manager's Order,
- b) the site location, site layout maps, all plans and drawings,
- c) particulars and all internal reports.
- d) details of any extensions of time given in respect of previous decisions.

Copies of I-plan sheets are not adequate.

Where your records show that a decision was appealed to the Board, it would be helpful if you would indicate the Board's reference.

Submissions or observations by the planning authority.

4. As a party to the appeal you may, under section 129 of the 2000 Act, (as amended), make submissions or observations in writing to the Board in relation to the appeal within a **period of 4 weeks beginning on the date of this letter**. Any submissions or observations received by the Board outside that period shall not be considered, and where none have been validly received, the Board may determine the appeal without further notice to you.

Please note that in accordance with section 251 of the Planning and Development Act, 2000 (as amended), the period beginning on 24th December and ending on 1st January, both dates inclusive, should be disregarded for the purposes of calculating the last date for lodgement of submissions or observations.

Contingency Submission

Tel	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Riomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough
Baile Átha Cliath 1	Dublin 1
D01 V902	D01

5. If the decision of your authority was to refuse permission, you should consider whether the authority wishes to make a contingency submission to the Board as regards appropriate conditions which, in its view, should be attached to a grant of permission should the Board decide to make such a grant. In particular, your authority may wish to comment on appropriate conditions which might be attached to a permission in accordance with section 48 and/or 49 of the 2000 Planning Act (Development / Supplementary Development Contributions) including any special condition which might be appropriate under section 48(2)(c) of the Act.

Any such contingency submission, in circumstances which your authority decided to refuse permission, would be without prejudice to your authority's main submission in support of its decision.

Please quote the above appeal reference number in any further correspondence.

I hereby certify that the planning authority has complied with section 128 and section 37(1)(b) of the 2000 Act, (as amended), and that all material relevant to (ABP-312093-21) the request at 1 on page 1 of this letter has been forwarded.

Signed: _____

Print:(_____)

Date: _____

Yours faithfully,

PP Sínead White
Liam Halpin
Direct Line: 01-8737280

BP07 - Xmas

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1890 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



PLANNING APPEAL CHECKLIST/ DETAILS

Appellant details	Ontower Ireland Limited Address: Suite 311, Q House, 76 Furze Road, Sandyford Industrial Estate, Dublin 18 D18 YV50.
Agent	Kevin Gillespie, 4Site House, Raheen Business Park, Limerick
Appeal Type	First Party Appeal (Commercial)
Fee	€1500 (Cheque enclosed)
Planning Authority	South Dublin County Council
Planning Ref. No.	SD21A/0155
Site Location	Ballyroan Community & Youth Centre, Marian Road, Rathfarmham, Dublin 14
SIGNED	<i>Kevin Gillespie</i>
DATE	29 th November, 2021

AN BORD PLEANÁLA	
LDG-	<u>046299-21</u>
ABP-	_____
01 DEC 2021 OK	
Fee: €	<u>1500</u> Type: <u>cheque</u>
Time:	_____ By: <u>post</u>

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1

26 November 2021

Our Ref: Ballyroan Community and Youth Centre, Marian Road, Rathfarnham, Dublin 14

Planning Register Number: South Dublin County Council – SD21A/0155

Dear Sir/Madam,

Re: Appeal Under Section 48(10)(b) of the Planning and Development Act 2000 by the Applicant (Ontower Ireland Limited, Suite 311, Q House, 76 Furze Road, Sandyford Industrial Estate, Dublin 18) in relation to Schedule - Reason for Refusal Number 1 of South Dublin County Council's Notification of Decision to Refuse a Permission for the replacement of an existing 12m decommissioned chimney flue with a 20m multi-user telecommunications support structure to include antennas and dishes and all enclosed within a shroud to match the existing decommissioned chimney flue and 2No outdoor cabinets and associated site works and a proposed new flue to replace an existing flue on an existing permitted building and accessed via the existing permitted access at Existing Yard at Ballyroan Community and Youth Centre, Marian Road, Rathfarnham, Dublin 14.

1.0 Introduction and Summary of the Appeal

Kevin Gillespie of Indigo, Raheen Business Park, Limerick (formerly known as 4Site Telecoms, Raheen Business Park, Limerick) acts on behalf of the appellant (and applicant) Ontower Ireland Limited, Suite 311, Q House, 76 Furze Road, Sandyford Industrial Estate, Dublin 18.

A full planning application was submitted by the planning applicant, Ontower Ireland Limited to South Dublin County Council on 10 June 2021. The application proposed the replacement of an existing 12m decommissioned chimney flue with a 20m multi-user telecommunications support structure to include antennas and dishes and all enclosed within a shroud to match the existing decommissioned chimney flue and 2No outdoor cabinets and associated site works and a proposed new flue to replace an existing flue on an existing permitted building and accessed via the existing permitted access at Existing Yard at Ballyroan Community and Youth Centre, Marian Road, Rathfarnham, Dublin 14.

The proposed site is designed to support 3G and high speed 4G broadband services including future 5G rollout for the mobile operator Three Ireland ('Three') and A.N Other operators. As such, by accommodating Local and National Broadband providers/operators, the proposed development will bring significant improvement in the provision of mobile and broadband data and in particular in indoor coverage to the Ballyroan/Ballyboden area.

By Order dated 12 November 2021, South Dublin County Council notified the applicant of the decision to refuse permission for the proposed development pursuant to 1No. reason for refusal. This appeal is solely related to the aforementioned Reason for Refusal 1 which relates

to the visual impact of the proposed development upon the visual amenity of the area and on the Protected Structure (Ballyroan Parish Church) and its setting.

Reason for Refusal 1 states as follows:

- 1) *Given the height of the proposed chimney at this location, (to merely support telecommunications and within such close proximity to a Protected Structure, Ballyroan Parish Church (RPS Ref. 264), the overall visual impact of the proposal results in a significant adverse visual impact. Such impact cannot be mitigated against in any way, therefore the scale of the visual impact is considered to be high. The replacement chimney will be highly visible at this location and can be viewed from all directions from the Protected Structure site. The new 20m chimney will diminish the overall visual amenity of the area and will result in a direct significant adverse visual impact on the Protected Structure (Ballyroan Parish Church) and its setting. This would be contrary to the 'LC' zoning objective for the area which seeks 'to protect, improve and provide for the future development of Local Centres'. The proposal would also be contrary to HCL Policy 3 Protected Structures of the SDCC Development Plan 2016 – 2022 where the special character of a Protected Structure including its historic curtilage would be adversely impacted.*

Our client, Ontower Ireland Limited, Suite 311, Q House, 76 Furze Road, Sandyford Industrial Estate, Dublin 18, is of the opinion that the abovementioned reason for refusal cannot be sustained in the particular circumstances of the submitted planning application (SD21A/0155) such that permission should in fact be granted as the proposed development wholly complies with the provisions of the South Dublin County Council Development Plan 2016 - 2022.

As such, we are appealing this Reason for Refusal under Section 37(1)(a) of the Planning and Development Act 2000 which provides that,

'...An applicant for permission and any person who made submissions or observations in writing in relation to the planning application to the planning authority in accordance with the permission regulations and on payment of the appropriate fee, may, at any time before the expiration of the appropriate period, appeal to the Board against a decision of a planning authority under Section 34'.

This letter therefore forms the applicant's appeal as provided for under Section 37(1)(a) of the Planning and Development Act 2000 against Reason for Refusal 1 of the Planning Authority's decision.

A copy of the Planning Authority notification is at Appendix A and the statutory appeal fee of €220 is attached.

2.0 Background Information

2.1 The Appellant

Ontower Ireland Limited is a company of Cellnex, which is a European Telecommunications infrastructure provider, providing telecommunications infrastructure services and support to Irish mobile and other telecommunications service providers. Ontower is the legal entity or trading name for the organisation in Ireland.

The organisation has significant commercial relationships with each mobile network operator in the State namely Three, Vodafone and Meteor/eir in addition to radio, broadband and emergency communication service providers.

In addition to managing their existing portfolio of 1,150 sites in Ireland, Ontower plans to add new developments to support the ongoing infrastructural requirements of the telecommunications industry and to facilitate the provision of broadband in current "black spot" areas and to also facilitate higher data transmission speeds in both urban and rural areas through various initiatives. The involvement of private sector firms such as Ontower Ltd. (and its parent company Cellnex), in the roll-out of telecommunications infrastructure, is a significant and fundamental pillar in the Governments telecommunications policy.

2.2 The Planned Occupants

The appeal site has been designed as a multi-user site capable of meeting all operator requirements to support voice and broadband communications with antennas, transmission dishes and equipment. The proposed site is actively required by Three who are in the process of upgrading their networks so as to increase the capacity of existing sites and to increase geographic coverage for its customers. This is in line with their commitment to invest in the mobile and wireless network and to enable more efficient infrastructure roll-out in the future. The operator's existing deployment in the wider area do not meet current coverage objectives for the Ballyroan/Ballyboden area. With this application therefore, the proposed telecommunications installation will extend Three's voice and data service over a wider coverage footprint and will also provide viable co-location space for planned future technology upgrades. This will improve mobile and broadband coverage in the surrounding area as well as providing competition for such services for the local businesses and community in the wider Ballyroan/Ballyboden area. The proposed solution will allow all operators to deploy 3G and high speed 4G broadband services including future 5G rollout services.

The existing 4No. mobile network sites are located within 1.22km (approx.) of the target coverage area. As a result of this distance and the intervening terrain and topography, this area is a services blackspot for Three and other mobile operators.

3.0 The Proposed Development

The proposed development comprises the replacement of an existing 12m decommissioned chimney flue with a 20m multi-user telecommunications support structure to include antennas and dishes and all enclosed within a shroud to match the existing decommissioned chimney flue and 2No outdoor cabinets and associated site works and a proposed new flue to replace an existing flue on an existing permitted building and accessed via the existing permitted access and all required in the provision of localised mobile and broadband services. The

infrastructure proposed supports the requirements of Three and has also been made for A.N. Other operators, with the equipment installed on completion of commercial terms. The aforementioned equipment will be cabled underground to 2No. adjacent communication cabinets.

In addition, the proposed 2No. outdoor cabinets will be sited in a gated area adjacent to the existing building in the yard which ensures that this element of the proposal as far as practicable is wholly screened from any direct views which will assist to reduce some of the impact of the development in its local setting. This approach contributes to reducing the impact of the development which is in line with the proper planning and development of the area.

Access to the site is directly from Orchardstown Villas and then via the in-curtilage access to the rear of Ballyroan Parish Church which leads to the existing yard area adjacent to the Ballyroan Community and Youth Centre whereat it is proposed to site the telecommunications installation. Post construction, the site will be accessed approximately twice in any one year for maintenance/operator works.

The layout of the development was designed using best practice principles to enhance the durability and function of the site while minimising, where possible, its visual intrusion. The structure height at which the equipment is erected within the shroud i.e. 17m - 20m AGL (approx.), is necessary in this location to ensure functionality for transmission and future requirements for Three Ireland and importantly alignment by line of sight with their existing telecommunications structures in the wider Co. Dublin area.

The antennas and dishes will be enclosed within a shroud to match the existing decommissioned chimney flue to ensure the proposal as far as practicable blends into its surroundings. This approach contributes to reducing the impact of the development which is in line with the proper planning and development of the area.

4.0 The Proposed Location

The subject site is located at the Existing Yard at Ballyroan Community and Youth Centre, Marian Road, Rathfarnham, Dublin 14. The site is identified on Use Zoning Map 10 of the South Dublin County Council Development Plan 2016-2022 as being within Objective LC – “To protect, improve and provide for the future development of Local Centres”.

5.0 Plan Zonings and Designations Applicable to the Appeal Site

The subject site is not located within any designated areas – Special Protection Area; Special Area of Conservation; Proposed Natural Heritage Area or Area of Architectural Potential as defined by Index Map of the South Dublin County Council Development Plan 2016-2022.

There are no defined Prospects in the vicinity of the subject site as also defined by the Index Map of the South Dublin County Council Development Plan 2016-2022.

6.0 Heritage

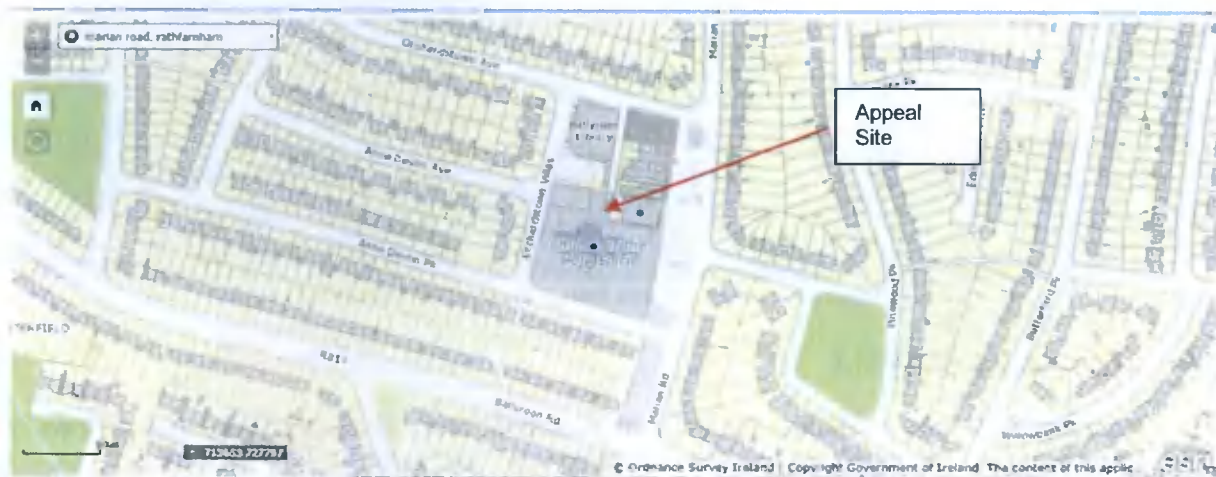
The Architectural Heritage in the immediate area is detailed in Table 1 below:

Record Number	Class	Distance to Structure
11216039	Church of the Holy Spirit	30m south of application site

Table 1: Record of Architectural Heritage

Map Ref	RPS Ref	Distance to Structure
264	264	Church of the Holy Spirit - 30m south of application site

Schedule 2: Record of Protected Structures



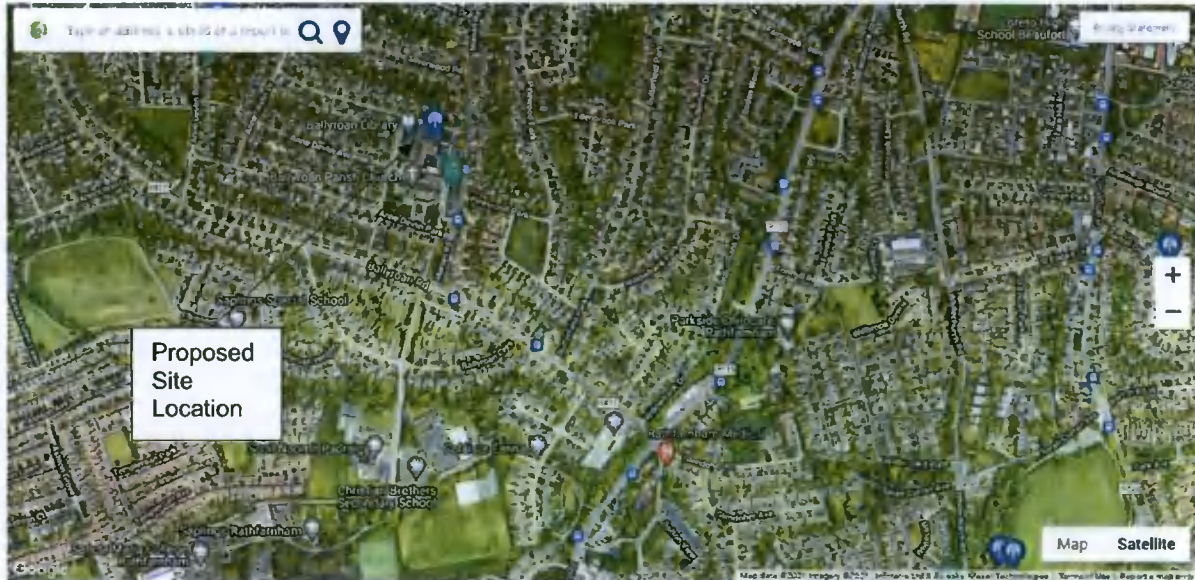
Map 1: Record of Architectural Heritage

7.0 Existing Telecoms Structures

There are 5 No. Telecoms sites within 1.22km (approx.) of the proposed site at Existing Yard at Ballyroan Community and Youth Centre, Marian Road, Rathfarnham, Dublin 14.

Site ID: 3310 – Meteor is a rooftop installation above the parade of shops fronting Marian Road but it is not at an operating height/line of sight which will align with Three Ireland’s other installations in the wider area and in any event does not provide for co-location opportunities for Three Ireland’s proposed antennas and dishes; **Site ID: DU0631** – Three Ireland and **Site ID: DN128** – Vodafone Ireland which is a rooftop installation above the parade of units at Orchardstown Park and where Three Ireland already have an installation. However, this site is over 0.7km away from coverage objective and therefore is unable to cover the specific target area with acceptable voice and data requirements and is also low in height such that coverage from this site is limited; **Site ID: DN384** – Vodafone Ireland which is a rooftop installation above the parade of units at Barton Drive. However, this site is 1.22km (approx.) from coverage objective and therefore is unable to cover the specific target area with acceptable voice and data requirements and in any event does not provide for co-location opportunities for Three Ireland’s proposed antennas; **Site ID: 1356** – Meteor and **Site ID: DU0344** – Three Ireland which is a fake tree and where Three Ireland already have an installation. However, this site

is 1.13km (approx.) from coverage objective and therefore is unable to cover the specific target area with acceptable voice and data requirements; and Site ID: DNBLB – Vodafone Ireland this site is 1.07km (approx.) from coverage objective is unable to cover the specific target area with acceptable voice and data requirements and in any event is too low such that by reason of the intervening clutter in the urban/ suburban environment, it will not serve into the target areas (See Map 2 Below).



(Map 2: Existing Telecommunications sites – Source: Siteviewer.com/reg.ie)

8.0 Reason for Refusal 1

The Planning Authority’s reason for refusal provides that, in its opinion, the proposed development would seriously injure the amenities of properties in the vicinity and would seriously injure the visual amenities of the area.

We respond as follows.

The Matter of the Rationale for the Chosen Subject Site

At the outset to the response to the Council’s reason for refusal, it is necessary to detail the rationale behind the identification of the subject site for a new telecommunications structure.

In the particular circumstances of this application, and as detailed at Section 3 of the Technical Justification dated 1 August 2019 as undertaken by Three and as submitted at Appendix B, the specific target area for Three is a site at Ballyroan/Ballyboden, Rathfarnham as this will provide Three with sufficient overlap of the coverage footprint to adequately serve the town and surrounding environs. In particular the overlap will counteract the reduced cell shrinkage affect that occurs during high customer data usage at peak times as the bandwidth reduces and contention rate increases.

Section 4 of the Technical Justification dated 1 August 2019 and the updated Technical Justification dated 4 October 2021, details the existing indoor coverage to the target area and subsequently if the proposed development is granted permission, the predicted coverage of

the new site in isolation and also the indoor coverage to both the target area and the overlapping of this with the existing coverage to the north west of Ballyroan/Ballyboden arising from the existing approved Three development in that area (Site ID: DUO631). However, as confirmed in the Technical Justification dated 1 August 2019 as undertaken by Three, this site unable to cover the target area with acceptable voice and data requirements as this site is low in height such that coverage is limited to the target area. Similarly, the existing Vodafone infrastructure (Site ID: DNBLB) and approved under SD20A/0042 and which is sited approximately 1.07km from the target area at Eir, Scholarstown Road, Ballyboden, Dublin 16 is also too far from the target area and too low such that by reason of the intervening clutter in the urban/ suburban environment, it will not serve into the target areas.

Having regard to the foregoing, the 'search ring' to identify a new site in respect of the current target area is c. 500m diameter and mainly comprises low rise suburban residential housing, schools/colleges and associated playing pitches. Moreover, there are no ESB substations in which to erect a new structure in the 'search ring' nor are there any tall buildings or other structures in the 'search ring' upon which to erect the proposed equipment.

In respect of existing commercial/retail areas, it is accepted that the Rosemount Shopping Centre, Marion Road is both within the 'search ring' and within the immediate vicinity of the proposed application site but a rooftop location would fail to improve service for the target area. This is why the existing 7m high Vodafone site at Rosemount Shopping Centre (Site ID: DN128) was discounted as being suitable upon which to co-locate – as confirmed at Section 3.2 of the Technical Justification dated 1 August 2019 as undertaken by Three. In the updated Technical Justification report as also attached at Appendix B, this is further qualified in so far as it confirms that the 7m high Vodafone site at Rosemount Shopping Centre is too low and will need extra height to cover the target areas as the Church (14m) and Ballyroan Community & Youth Centre buildings are blocking coverage. Having regard to this, and after undertaking a sequential approach to the site selection process, Ontower Ireland Limited considered that the proposed site at the Ballyroan Community & Youth Centre in which there is an existing 12m high concrete flue and as such an already established visual impact on the Protected Structure and wider area, would, subject to an increase in height to 20m, not only improve coverage to the target area but also as a choice of last resort, would meet the technical and operational requirements for Three in the Ballyroan/Ballybodan area.

The matter of the Bespoke Design of the proposed Structure

As detailed previously, there is an existing 12m high concrete flue at the appeal site which it is proposed to replace with a 20m multi-user telecommunications glass-reinforced plastic (GRP) shrouded support structure to include antennas and dishes etc. GRP is a composite material made of a polymer matrix reinforced with fibres which is strong, extremely light and highly versatile and importantly in the particular circumstances of this case, will be colour-matched to that of the colour of the existing decommissioned chimney flue. In doing so, it is considered that this approach will contribute to reducing the impact of the proposed development which is in line with the proper planning and development of the area

The Correct Test of the Visual Impact of the Proposed Structure

As detailed previously, there is an existing 12m high concrete flue at the appeal site which, of itself, causes a visual impact upon both the Protected Structure and the wider visual resource. The Architectural Conservation Officer confirmed in the consultation response dated 4

November 2021 that, *“the existing chimney.... does not cause any negative visual impact”*. Therefore clearly a 12m high structure is acceptable. The correct test therefore of the visual impact of the proposed structure is not one of the whole of its 20m height, but only that of the top 8m of the structure, this being because a 12m high structure in this location, in this visual resource and in this proximity to a Protected Structure has been deemed by the Architectural Conservation Officer to not have a negative visual impact and so be acceptable. So the correct visual test/assessment therefore is whether the 8m causes a significant adverse impact on the visual resource. The test is not one of adopting a starting position of there being an existing ‘nil’ impact on the visual resource because of course that would be wholly incorrect. There is an existing structure, it is 12m in height, it does have an existing and established visual impact on the Protected Structure and the visual resource but it has been determined that this visual impact is acceptable such that it does not cause a negative visual impact.

The matter of the ‘LC’ Zoning Objective

The Council in its reason for refusal has clearly misunderstood the intention and purpose of the ‘LC’ zoning objective for the area. The Council correctly states that the objective is, *“to protect, improve and provide for the future development of Local Centres”*, the local centre in question being that of the Rosemount Shopping Centre, Marian Road, Rathfarnham. However, the Council goes on to mis-apply that intention and purpose by conferring that any negative visual impact is (and must be) contrary to the zoning. That is wholly and fundamentally misplaced.

As is clearly to be seen, read and properly understood, the purpose and intention of the LC zoning is regarding the future development of the local centres and to secure their protection and/or improvement. It is therefore an irrelevant consideration that the proposed structure may or may not have a visual impact on the local visual resource and the Council is/was fundamentally incorrect to attach any weight to this and to do so to bolster the reason for refusal. This is because visual impact per se (negative or not) has no bearing upon the protection and/or improvement of the local centre. The loss of a number of traders or the addition of new traders and their new retail offer will clearly have a bearing upon the protection and/or improvement of the local centre and that is what the clear intention and objective of Zoning ‘LC’ is seeking to effect.

It is contended therefore that the Council has mis-directed itself in its consideration of this matter and this has unjustly infected its decision and therefore harmed the planning applicant/appellant by incorrectly apportioning significant weight to its opinion in the final planning balance exercise.

The matter of visual impact

Aside from the Council mis-directing itself in respect to the matter of the ‘LC’ zoning objective as detailed above, the Council contends that the, *“overall visual impact of the proposal results in a significant adverse visual impact....such impact cannot be mitigated and therefore the scale of the visual impact is considered to be high.....it will result in a direct significant adverse impact on the Protected Structure and its setting”*.

The appellant, however, asserts that the Council’s analysis is incorrect and that at worst, the predicted effects would be moderate for the most affected. These are areas in close proximity in which the magnitude of change is slight-to-moderate as the chimney flue would be visible in

an environment which contains a high degree of built elements that has an ability to absorb some noticeable change. But as the proposed chimney flue would rise above existing height lines in some cases (roofs and treetops) against the sky backdrop which also holds the church spire in its backdrop, the magnitude of change would affect a sensitive element. That being said, the impact is slight from all other areas as either the receptors are less sensitive, or the magnitude and intensity of change is considered small and intermittent. In support of the appellant's opinion, we would respectfully refer An Bord Pleanala to the updated Visual Impact Assessment report at Appendix C which provides a detailed assessment of how the proposal responds to the setting, character and appearance of the Protected Structure. This report is prepared by ACP - Architectural Conservation Professionals who are a longstanding and professionally recognised Landscape Architect/Conservation company and experts in this field and who have undertaken their assessment, impartially and objectively.

The planning applicant/appellant contends that when read as a whole, the evidential conclusions confirm that the Council's reason for refusal cannot be sustained.

9.0 Conclusion

On the evidential case presented above, we state that South Dublin County Council was incorrect to refuse permission for the proposed development.

As such, we contend that the appeal should be allowed and that permission is granted for the replacement of an existing 12m decommissioned chimney flue with a 20m multi-user telecommunications support structure to include antennas and dishes and all enclosed within a shroud to match the existing decommissioned chimney flue and 2No outdoor cabinets and associated site works and a proposed new flue to replace an existing flue on an existing permitted building and accessed via the existing permitted access at Existing Yard at Ballyroan Community and Youth Centre, Marian Road, Rathfarnham, Dublin 14.

Yours sincerely,



K. Gillespie MRTPI
Agent for Ontower Ireland Limited



APPENDIX A



An Rannóg Talamhúsáide, Pleanála agus Iompair
Land Use, Planning & Transportation Department
Telephone: 01 4149000 Fax: 01 4149104 Email: planning.dept@sdblincoco.ie

Kevin Gillespie,
4Site Telecoms
Raheen Business Park
Limerick

**NOTIFICATION OF DECISION TO REFUSE PERMISSION
PLANNING & DEVELOPMENT ACT 2000 (as amended) AND
PLANNING REGULATIONS THEREUNDER**

Decision Order No.	1465	Date of Decision	11-Nov-2021
Register Reference	SD21A/0155	Date	15-Oct-2021

Applicant: Ontower Ireland Limited

Development: Replace existing 12m decommissioned chimney flue with a 20m multi-user telecommunications support structure to include antennas and dishes and all enclosed within a shroud to match the existing decommissioned chimney flue; 2 outdoor cabinets and associated site works and a proposed new flue to replace an existing flue on an existing permitted building and accessed via the existing permitted access; the development will provide improved wireless broadband services in the area.

Location: Ballyroan Community & Youth Centre, Marian Road, Rathfarnham, Dublin 14

Time extension(s) up to and including:

Additional Information Requested/Received: 04-Aug-2021/15-Oct-2021

Clarification of Additional Information Requested/Received:

DECISION: Pursuant to the Planning and Development Act 2000 (as amended), dated as above a decision to **REFUSE PERMISSION** is hereby made for the said development for the reason(s) set out on the Schedule hereto.

REASON(S)

1. Given the height of the proposed chimney at this location, (to merely support telecommunications and within such close proximity to a Protected Structure, Ballyroan Parish Church (RPS Ref. 264)), the overall visual impact of the proposal results in a significant adverse visual impact. Such impact cannot be mitigated against in anyway, therefore the scale of the visual impact is considered to be high. The replacement chimney will be highly visible at this location and can be viewed from all directions from the Protected Structure site. The new 20m chimney will diminish the overall visual amenity of the area and will result in a direct significant adverse visual impact on the Protected Structure (Ballyroan Parish Church) and its setting. This would be contrary to the 'LC' zoning objective for the area which seeks 'to protect, improve and provide for for the future development of Local Centres'. The proposal would also be contrary to HCL Policy 3 Protected Structures of the SDCC Development Plan 2016-2022 where the special character of a Protected Structure including its historic curtilage would be adversely impacted.

Please note that upon receipt of this document you are obliged to remove the planning site notice in compliance with Article 20 of the Planning and Development Regulations 2001 (as amended). Please note that any valid submissions or observations received in accordance with the provisions of the Planning and Development Regulations 2001 (as amended), have been considered in the determination of this application.

Register Reference: SD21A/0155

Signed on behalf of the South Dublin County Council.

Yours faithfully,

Brian Connolly 12-Nov-2021
for Senior Planner

NOTES

(A) REFUND OF FEES SUBMITTED WITH A PLANNING APPLICATION

Provision is made for a partial refund of fees in the case of certain repeat applications submitted within a period of twelve months where the full standard fee was paid in respect of the first application and where both applications related to developments of the same character or description and to the same site. An application for a refund must be made in writing to the Planning Authority and received by them within a period of two months beginning on the date of the Planning Authority's decision on the second application. For full details of fees, refunds and exemptions the Planning & Development Regulations, 2001 should be consulted.

(B) APPEALS

1. An appeal against the decision may be made to An Bord Pleanála. The applicant or ANY OTHER PERSON who made submissions or observations to the Local Authority may appeal within FOUR WEEKS beginning on the date of this decision. (N.B. Not the date on which the decision is sent or received).
2. Every appeal must be made in writing and must state the subject matter and full grounds of appeal. It must be fully complete from the start. In the case of a third party appeal it must be accompanied by the acknowledgement by the Planning Authority of receipt of the submissions/observations. Appeals should be sent to:
The Secretary, An Bord Pleanála, 64 Marlborough Street, Dublin 1.
3. An Appeal lodged by an applicant/ agent or by a third party with An Bord Pleanála will be invalid unless accompanied by the prescribed fee. A schedule of fees is at 7 below.
4. A party to an appeal making a request to An Bord Pleanála for an Oral Hearing of an appeal must, in addition to the prescribed fee, pay to An Bord Pleanála a further fee (see 7 (g) below).
5. A person who is not a party to an appeal must pay a fee to An Bord Pleanála when making submissions or observations to An Bord Pleanála in relation to an appeal.
6. If the Council makes a decision to grant permission/grant permission consequent on a grant of outline permission and there is no appeal to An Bord Pleanála against this decision, PERMISSION/PERMISSION CONSEQUENT ON A GRANT OF OUTLINE PERMISSION will be granted by the Council as soon as may be after the expiration of the period for the taking of such an appeal. If any appeal made in accordance with the Acts has been withdrawn, the Council will grant the PERMISSION/PERMISSION CONSEQUENT ON A GRANT OF OUTLINE PERMISSION/RETENTION as soon as may be after the withdrawal.
7. Fees payable to An Bord Pleanála from 10th December 2007 are as follows:
 - (a) Appeal against a decision of a Planning Authority on a planning application relating to commercial development made by the person by whom the planning application was made. where the application relates to unauthorised development.....€4,500.00 or €9,000 if an E.I.A.R. is involved
 - (b) Appeal against a decision of a planning authority on a planning application relating to commercial development made by the person by whom the planning application was made. other than an appeal mentioned at (a)..... €1,500.00 or €3,000.00 if an E.I.A.R. is involved
 - (c) Appeal made by the person by whom the planning application was made, where the application relates to unauthorised development other than an appeal mentioned at (a) or (b)..... €660.00
 - (d) Appeal other than an appeal mentioned at (a), (b), (c) or (f) €220.00
 - (e) Application for leave to appeal..... €110.00
 - (f) Appeal following a grant of leave to appeal..... €110.00
 - (g) Referral €220.00
 - (h) Reduced fee (payable by specified bodies) €110.00
 - (i) Submission or observations (by observer) €50.00
 - (j) Request from a party for an Oral Hearing..... €50.00

If in doubt regarding any of the above appeal matters, you should contact An Bord Pleanála for clarification
at Telephone 01-858 8100



APPENDIX B



ACP *Architectural Conservation Professionals*



Winners of Excellence Awards 2018

Heritage and Conservation

International Preservation and Conservation Award 2019

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Visual Impact Assessment Report

For

Proposed telecommunication equipment at Ballyroan Community & Youth Centre, Marian Rd, Rathfarnham, Dublin 14.

Client: Ontower Ireland Ltd.



Date: 24th September 2021

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**Copies of this report
have been presented
by ACP to:**

The Client (Ontower Ireland Ltd).

Acknowledgements:

Architectural Conservation Professionals acknowledges any information supplied by the Client and information obtained from the Record of Protected Structures (RPS), the National Inventory of Architectural Heritage (NIAH) and record of Monuments and Places (RMP)

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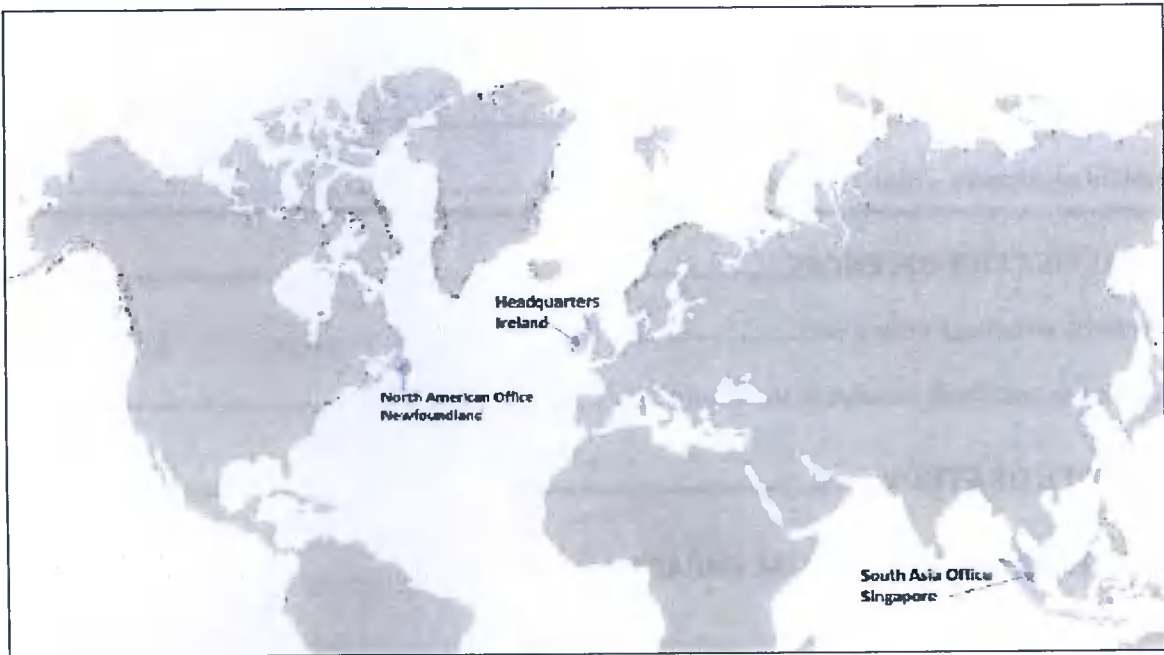
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GLOSSARY OF TERMS

1. *ACA*

An **Architectural Conservation Area** is a place, area, group of structures or townscape that is of special architectural, scientific, social or technical interest, or that contributes to the appreciation of a protected structure, whose character it is the objective of a development plan to preserve - Section 52 (1) (b) of the 2000 Act.

2. *Area of Special Planning Control*

Areas of Special Planning Control provide powers to planning authorities not alone to give protection to the character of certain qualifying areas, but also to enhance that character, that is, to restore it and to require owners and occupiers to conform to a planning scheme – Section 84, of the 2000 Act

3. *NIAH*

The **National Inventory of Architectural Heritage**. The purpose of the NIAH is to identify, record, and evaluate the post-1700 architectural heritage of Ireland, uniformly and consistently as an aid in the protection and conservation of the built heritage. NIAH surveys provide the basis for the recommendations of the Minister for Arts, Heritage and the Gaeltacht to the planning authorities for the inclusion of particular structures in their Record of Protected Structures (RPS)

4. *Protected Structure*

A “**protected structure**” is defined as any structure or specified part of a structure, which is included in the Record of Protected Structures. The term “structure” is defined by Section 2 of the 2000 Act to mean “any building, structure, excavation or other thing constructed, or made on, in or under any land, or any part of a structure so defined, and where the context so admits, includes the lands on, in, or under which the structure is situate”. – Section 2 (1) of the 2000 Act

5. *Section 57 Declaration*

Section 57 Declaration Owners or occupiers of a protected structure may request a ‘declaration’ under Section 57 of the 2000 Act. The purpose of which is for planning authorities to clarify in writing the kind of works that would or would not materially affect the character of that structure or any element of that structure which contributes to its special interest. Declarations guide the owner as to what works would and would not require planning permission in the context of the protection of the architectural heritage. This is because the character of a protected structure cannot be altered without first securing planning permission to do so.

6. *RMP*

Archaeological sites are legally protected by the provisions of the National Monuments Acts, the National Cultural Institutions Act 1997 and the Planning Acts. The **National Record of Monument & Places (RMP)** is a statutory list of all known archaeological monuments provided for in the National Monuments Acts. It includes known monuments and sites of archaeological importance dating to before 1700AD, and some sites which date from after 1700AD.

7. *RPS*

Record of Protected Structures. A Protected Structure is a structure which is considered to be of special interest from an architectural, historical, archaeological, artistic, cultural, scientific, social or technical point of view. The Record of Protected Structures (RPS) is a list of the buildings held by a Local Authority which contains buildings considered to be of special interest in its operational area. Section 51 (of the 2000 Act) requires that the development plan shall include a Record of Protected Structures and that the Record shall include every structure which is, in the opinion of the Planning Authority, of special interest.

Levels of significance – NIAH Definitions 2006

<i>International Significance</i>	Structures or sites of sufficient architectural heritage importance to be considered in an international context. Examples include St Fin Barre's Cathedral, Cork. These are exceptional structures that can be compared to and contrasted with the finest architectural heritage in other countries.
<i>National Significance</i>	Structures or sites that make a significant contribution to the architectural heritage of Ireland. These are structures and sites that are considered to be of great architectural heritage significance in an Irish context. Examples include Ardnacrusha Power Station, Co. Clare; the Ford Factory, Cork; Carroll's Factory, Dundalk; Lismore Castle, Co. Waterford; Sligo Courthouse, Sligo; and Emo Court, Co. Laois.
<i>Regional Significance</i>	Structures or sites that make a significant contribution to the architectural heritage within their region or area. They also stand in comparison with similar structures or sites in other regions or areas within Ireland. Examples would include many Georgian terraces; Nenagh Courthouse, Co. Tipperary; or the Bailey Lighthouse, Howth. Increasingly, structures that need to be protected include structures or sites that make a significant contribution to the architectural heritage within their own locality. Examples of these would include modest terraces and timber shopfronts.
<i>Local Significance</i>	These are structures or sites of some vintage that make a contribution to the architectural heritage but may not merit being placed in the RPS separately. Such structures may have lost much of their original fabric.
<i>Record only</i>	These are structures or sites that are not deemed to have sufficient presence or inherent architectural or other importance at the time of recording to warrant a higher rating. It is acknowledged, however, that they might be considered further at a future time

Penalties for Offences

Architectural Heritage Protection

A Protected Structure and built fabric within its curtilage is protected by law under Part IV of the Planning and Development Act 2000. The penalties for breaches of this Act are severe. Section 156 of the Act states:-

(1) A person who is guilty of an offence under *sections 58(4), 63, 151, 154, 205, 230(3), 239 and 247* shall be liable—

(a) on conviction on indictment, to a fine not exceeding £10,000,000, or to imprisonment for a term not exceeding 2 years, or to both, or

(b) on summary conviction, to a fine not exceeding £1,500, or to imprisonment for a term not exceeding 6 months, or to both.

Monuments and Places included in the Record

Section 12 (3) of the Act provides for the protection of monuments and places included in the record stating that

"When the owner or occupier (not being the Commissioners) of a monument or place which has been recorded under subsection (1) of this section or any person proposes to carry out, or to cause or permit the carrying out of, any work at or in relation to such monument or place, he shall give notice in writing of his proposal to carry out the work to the Commissioners and shall not, except in the case of urgent necessity and with the consent of the Commissioners, commence the work for a period of two months after having given the notice."

A person contravening this requirement for two months notification to the Commissioners of Public Works in Ireland of proposed works at or in relation to a recorded monument or place shall (under Section 13 of the Act) be guilty of an offence and be liable on summary conviction to a maximum penalty of a £1000 fine and 12 months imprisonment and on conviction on indictment to a maximum penalty of a £50,000 fine and 5 years imprisonment.

It should also be noted that Section 16 of the National Monuments (Amendment) Act 1994 amended the National Monuments (Amendment) Act 1987 (the Act of 1987) so that under Section 2 (1) (a) (iv) of that Act **the use or possession of a detection device**

"in, or at the site of, a monument recorded under section 12 of the National Monuments (Amendment) Act, 1994,"

is prohibited otherwise than in accordance with a consent of the Commissioners of Public Works in Ireland granted under the provisions of Section 2 of the Act of 1987.

A person contravening the above provisions relating to use or possession of detection devices shall (under Section 2 (5) of the Act of 1987) be guilty of an offence and be liable (under Section 23 (1) of the Act of 1987) on summary conviction to a maximum penalty of a £1000 fine and 6 months imprisonment or on conviction on indictment to a maximum penalty of a £50,000 fine and 12 months imprisonment.

It should be further noted that under Section 7 (1) (a) of the National Monuments (Amendment) Act 1994 a member of the Garda Síochána may without warrant seize and detain:

"a detection device found in, at the site of, or in the vicinity of a monument recorded under Section 12 of the Act unless the person in possession of the device has a consent of the Commissioners of Public Works in Ireland in accordance with the provisions of Section 2 of the Act of 1987."

1.0 Scope of Study

This report follows a request by our client to prepare a Visual Impact Assessment for the proposed communications infrastructure at Ballyroan Community & Youth Centre, Marian Rd., Rathfarnham, Dublin 14. It follows an RFI (CD21A/0155) from South Dublin County Council and considers the effects of the proposal on the visual environment in terms of its contribution to the nature and quality of views currently experienced.

2.0 Basis for the Visual Impact Assessment

2.1 Introduction

This report examines the likely effects of proposed changes to the visual amenity available to people as a result of the replacement of 12m chimney flue with a 20m multi-user lattice tower and associated infrastructure to be encased in a chimney flue to match existing at Ballyroan Community & Youth Centre, Marian Rd. Dublin 14. The purpose of the report is to identify potential positive/negative impacts and assess the predicted effects on the visual amenity. It also considers and proposes measures to mitigate negative impacts. The assessment comprised of desk-top and field survey utilizing relevant local authority policy documents, topographic maps and plans, field notes, and photographic records and observations. The field work was conducted on 18 September 2021 on a clear day in which visibility was good and deemed appropriate for assessment. Assessment considered the impact on the public realm only and no private property was accessed as it is beyond the scope of the report.

2.2 Methodology

2.2.1 Guidelines, plans, and policies

The report follows best practice guidance in visual impact assessment detailed in:

- Landscape Institute's (UK), *Guidelines for landscape and visual impact assessment* (3rd edition, Landscape Institute, 2013).
- Transport Infrastructure Ireland, *Landscape Character Assessment (LCA) and Landscape Character and Visual Impact Assessment (LVIA) of specified infrastructure projects – overarching technical document* (Dublin, 2020).

The report regards the following relevant guidelines and local authority policies and plans:

- *South Dublin County Council Development Plan 2016-2022* (South Dublin County Council, 2016).
- *Landscape Character Assessment of South Dublin County* (Minogue & Associates, 2015).

2.2.2 Structure and approach

The assessment addresses the likely impacts on landscape character and visual environment including extent of visible development, loss of visibility of existing features or the introduction of new features. The report follows the structure below:

- Landscape baseline: the receiving environment.
- Description of the proposed development.
- Identification and description of effects.
- Proposed mitigation of impacts.
- Evaluation of predicted effects of the development on the landscape character and visual environment.

2.2.3 Definition of terms

The quality of the impact may be described as:

- Neutral – neither enhance or detract from the visual or landscape character.
- Positive – improve or enhance the visual or landscape character.
- Negative – reduce or have an adverse effect on the visual or landscape character.

The duration of impacts is defined as follows:

- Temporary – lasting one year or less.
- Short-term – lasting one to seven years.
- Medium-term – lasting seven to fifteen years.
- Permanent – lasting over sixty years.

The significance of impacts is described as follows:

- Imperceptible – an impact without noticeable consequences.
- Slight – causing noticeable changes in the visual or landscape character without affecting its sensitivities.
- Moderate – alters the visual or landscape character in a manner that is consistent with emerging trends or where an important element is affected.
- Significant – an impact which by its magnitude, duration or intensity alters sensitive aspects of the visual or landscape character.
- Profound – an impact which obliterates sensitive characteristics.

3.0 Visual baseline: the receiving environment

3.1 Study area: landscape character and visual amenity

The proposed site is located at Ballyroan Community & Youth Centre, Dublin 14 which is in a suburban residential area bounded by the R817 to the southwest, the R114 to the north, and Marian Rd to the east. To assess the visual amenity the report considers the landscape character which forms a principal component of the nature, quality, and value of the visual environment. Impact on the landscape character is assessed in this report in the context of its contribution to the visual environment only.

South Dublin County Development Plan (2016-2022) (CDP) contains details of the county's landscape character assessment which is based on a study conducted in 2015 that identified 5 Landscape Character Areas (LCA) for the district (fig. 3.1).¹ The proposed site is in the Landscape Area: Suburban South Dublin which although is not assessed in detail owing to its urban nature requiring a smaller scale analysis, has been identified with some key characteristics as follows:

- 'Built-up urban area with extensive housing estates and industrial /commercial parks. Variety of house styles and layouts dating from the late 19th century to late 20th century.
- Settlements of Rathfarnham, Templeogue and Clondalkin with important historical legacy and remnants.
- Major traffic corridors with M50 traversing north- south through the area, and LUAS line travelling north from Tallaght, parallel to the M50, to city centre.
- Corridors of natural and semi natural vegetation, notably along the River Dodder (a linear park) and the Camac River.
- Grass open spaces in gardens, industrial parks, golf courses, school playing fields, and miscellaneous spaces in housing areas.
- Street trees planting.

¹ *Landscape Character Assessment of South Dublin County* (Minogue & Associates, 2015), pp 77-9.

Recreational facilities – public parks and golf courses - provide amenities and ecological resources.’

The landscape values and forces for change for LCA: Suburban South Dublin are identified as follows:

Landscape values:

‘Public Parks with recreational and ecological resources.
Dodder River Valley.
19th century industrial heritage.
Views out to Dublin Mountains and agricultural hinterland.’

Forces for change:

‘West boundary is set against agricultural and mountain hinterlands. Untidy urban developments can adversely impact on the character of the hinterlands.
Urban developments can impact on open views to the hinterlands.
Ongoing urban infrastructure developments notably road improvements generate increasing volumes of traffic and detract from opportunities to create or maintain tranquil settings.
New infill or other built developments can be insensitive to remnant historical or vernacular features.’

The LCA Suburban South Dublin ‘extends east from Tallaght/Oldbawn to Rathfarnham, and north/north-west along the county boundary to Clondalkin.’ It ‘retains little of historical significance and the setting of its primary settlements have been radically altered by built developments, notably through the 20th Century.’² Its landscape condition, which requires more detailed assessment, was identified as:

‘the older settled urban areas such as Rathfarnham have matured into relatively leafy suburbs, whereas more recent developments have created a sense of anonymity. They do not appear to have benefited from comprehensive master planning which would have considered housing, roads and open space provision in an integrated manner.’³

In addition to the landscape designations, South Dublin CDP identifies and Scenic Views and Prospects. There are no Scenic Views and Prospects within the study area, the nearest being about 2km to the southwest with two more about 2.5km to the west and southwest of the proposed site (fig. 3.2). In respect of these views, the South Dublin CDP states⁴

‘they include localised views and panoramic prospects of rural, mountain, hill, coastal and urban landscapes such as Dublin City and environs, Dublin Bay, the Liffey Valley and the Dublin and Wicklow Hills and Mountains including the Glenasmole Valley. Views of places of natural beauty or interest are not confined to those that are visible from scenic places but also from and to existing built up areas.’

They ‘relate to prominent landscapes or areas of special amenity value or special interest that are widely visible from surrounding areas. Prospects from prominent public places will be protected.’

Natural heritage in vicinity of the proposed site includes a proposed Natural Heritage Area: Dodder Valley (fig. 3.2). The Dodder River and amenity spaces lie to the north of the proposed development about 1km at its nearest point. A number of Protected Structures and Architectural Conservation Areas designated in South Dublin CDP are within the study area. One, the Church of the Holy Spirit (RPS: 264), is adjacent the proposed development, while some ACAs are within 1km to the east,

² *Landscape Character Assessment*, p. 78.

³ *Ibid.*

⁴ South Dublin CDP, pp 159-160.

southeast and northeast including Boden Village Cottage ACA and Saint Patrick's Cottages ACA (fig 3.3).

Landscape sensitivities and planning objectives

Though the Landscape Character Assessment prepared for South Dublin CDP contains assessment of landscape and visual sensitivities and landscape values as a means to determine the LCAs capacity to accommodate change⁵, there are no details in respect of sensitivity and value for the LCA: Suburban South Dublin. South Dublin CDP lists a number of heritage objectives that are pertinent to this report:

Landscape objectives⁶:

HCL7 Objective 1:

To protect and enhance the landscape character of the County by ensuring that development retains, protects and, where necessary, enhances the appearance and character of the landscape, taking full cognisance of the Landscape Character Assessment of South Dublin County (2015).

HCL7 Objective 2:

To ensure that development is assessed against Landscape Character, Landscape Values and Landscape Sensitivity as identified in the Landscape Character Assessment for South Dublin County (2015) in accordance with Government guidance on Landscape Character Assessment and the National Landscape Strategy.

Views and prospects objectives⁷:

HCL8 Objective 1:

To protect, preserve and improve Views and Prospects of special amenity, historic or cultural value or interest including rural, river valley, mountain, hill, coastal, upland and urban views and prospects that are visible from prominent public places.

Built heritage objectives⁸:

HCL3 Objective 2:

To ensure that all development proposals that affect a Protected Structure and its setting including proposals to extend, alter or refurbish any Protected Structure are sympathetic to its special character and integrity and are appropriate in terms of architectural treatment, character, scale and form. All such proposals shall be consistent with the Architectural Heritage Guidelines for Planning Authorities, DAHG (2011) including the principles of conservation.

HCL4 Objective 2:

To ensure that new development, including infill development, extensions and renovation works within or adjacent to an Architectural Conservation Area (ACA) preserves or enhances the special character and visual setting of the ACA including vistas, streetscapes and roofscapes.

⁵ *Landscape Character Assessment*, pp 81-93.

⁶ South Dublin CDP, p. 158.

⁷ *Ibid*, p. 160.

⁸ South Dublin CDP, p. 154.

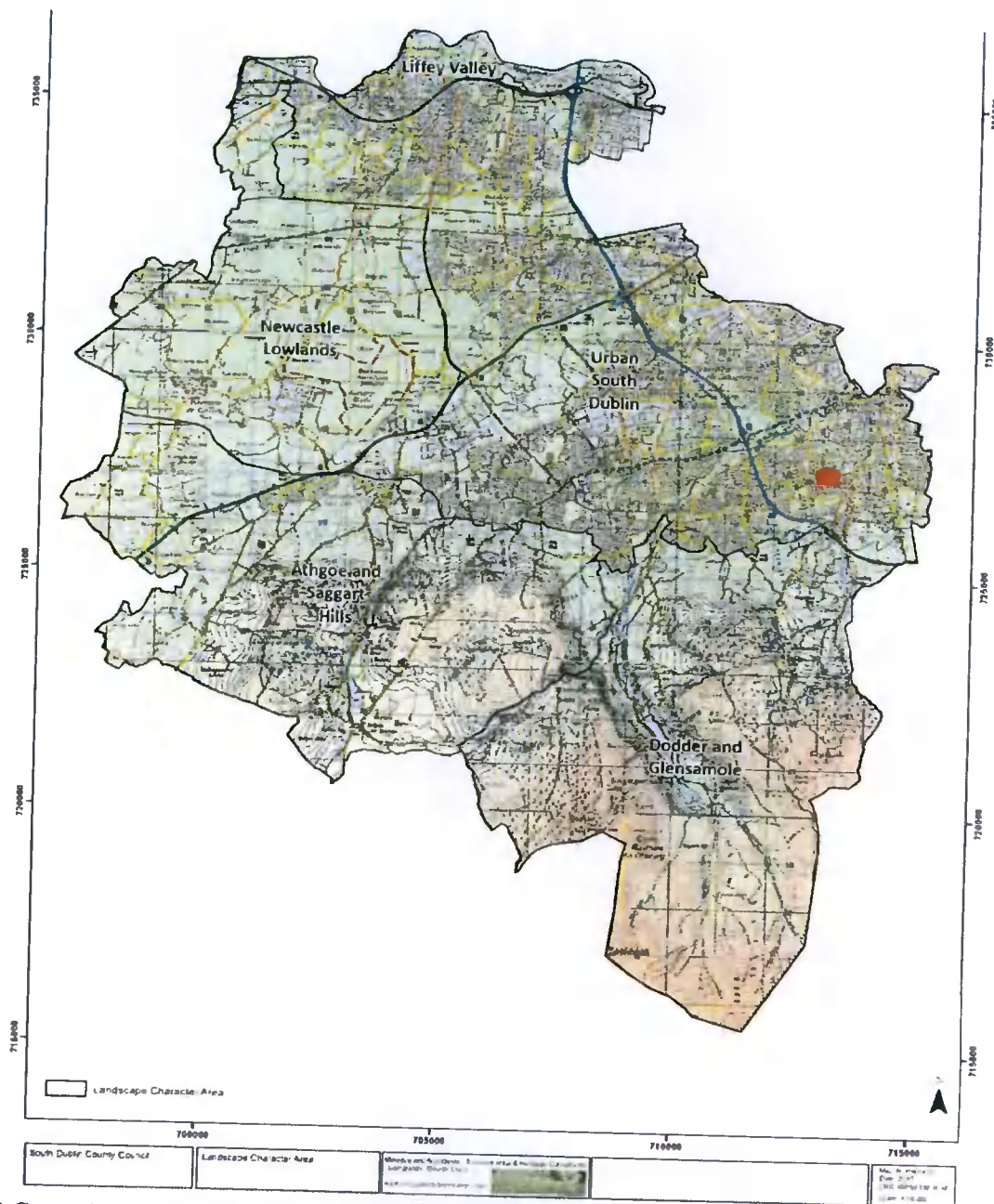


Fig. 3.1 Copy of Landscape Character Areas map for South Dublin County Council. The proposed site falls into Urban South Dublin (approximate location in red).⁹

⁹ Landscape character assessment, p. 54.



Fig. 3.2 Scenic View and Prospects (purple hatch) and proposed Natural Heritage Area: Dodder Valley (green hatch) designated in South Dublin CDP. Approximate location of site in red.¹⁰

¹⁰ South Dublin heritage designations, available at: www.heritagemaps.ie, accessed 15 September 2021.

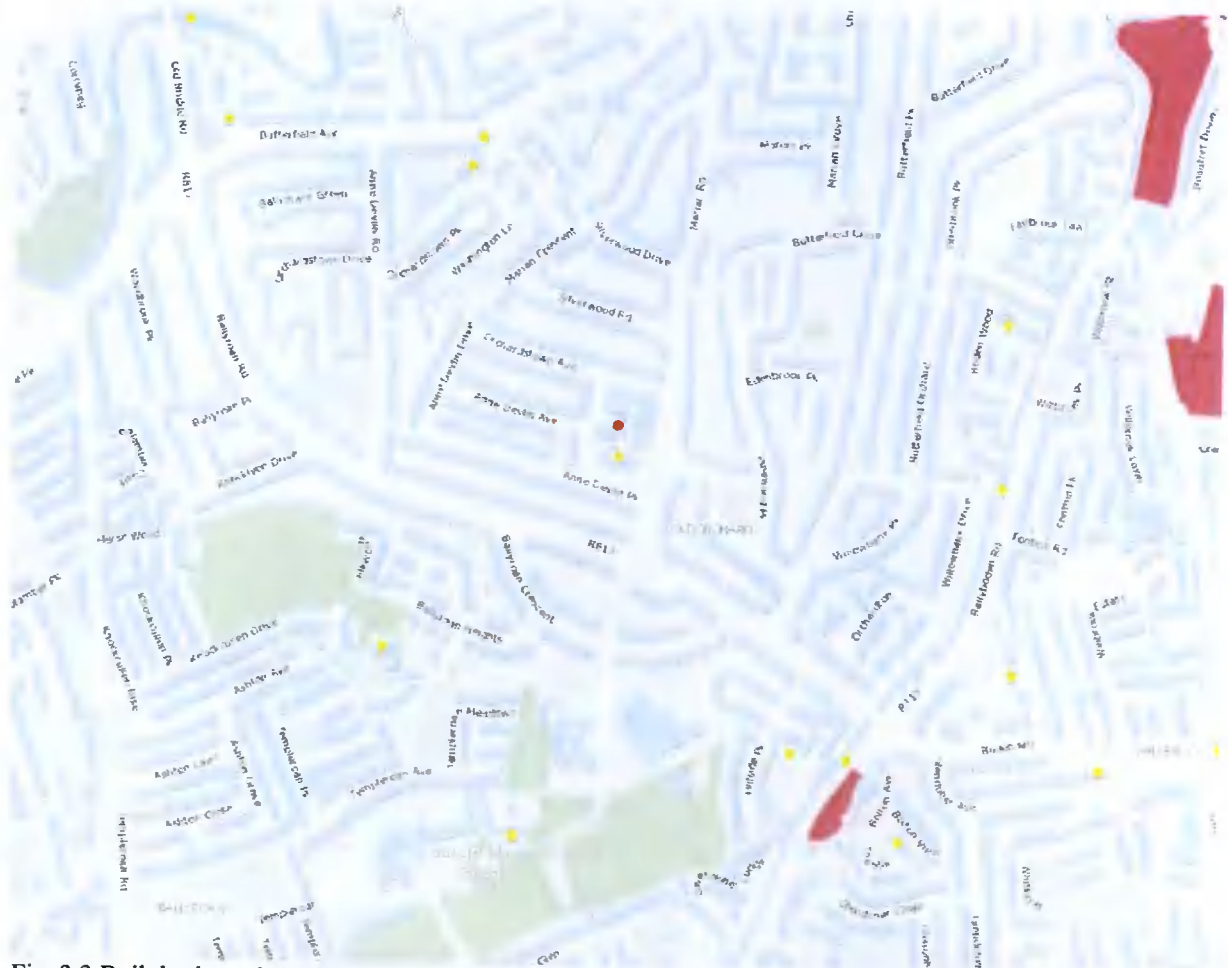


Fig. 3.3 Built heritage (Protected Structures in yellow and Architectural Conservation Areas in pink) designated in South Dublin CDP. Approximate location of proposed site in red.¹¹

Study area and site: specific description

The proposed site is in an urban environment which covers relatively flat terrain for the most part. The prime land uses within the study area comprises public and commercial buildings, residential housing, recreational spaces and riparian strips along the watercourse which connects with the Dodder River situated to the north. The houses in the surrounding neighbourhoods are generally two-storey detached or semi-detached with front gardens, street trees and grass verges creating a suburban environment with a vegetal character owing to the relatively high degree of green infrastructure (figs 3.4-8).

The most prominent building in terms of scale and height is the Church of the Holy Spirit (RPS: 264), the spire of which is visible from within the surrounding area creating a distinctive visual landmark in the study area (fig. 3.9). While the church spire extends some distance into the skyline and dwarfs the roof line of houses within its immediate proximity, views of it from further distances are largely screened or partially screened by treelines or houses owing to their heights across similar terrain.

The area surrounding the proposed site is visually relatively contained as a result of the terrain and high level of tree canopy which means long distance views are limited to areas where vistas are afforded across open spaces or along narrow streets. In these limited cases, slightly more expansive views are offered to distant hills. An elevated area to the south of Ballyroan Rd offers some wider

¹¹ Ibid.

views across the study area from open spaces within this residential area. Otherwise, where streets are aligned by houses, gardens and street trees, views are limited in range and expanse. (figs. 3.10-12).

The proposed site is located in Ballyroan Commercial Centre comprising shops, youth centre, library, pastoral centre and the protected structure Church of the Holy Spirit (RPS: 264). There is an existing 12m square concrete chimney flue on the site bounded to the east by the youth centre, to the west by the pastoral centre, while the library and church are slightly more distant to the north and south respectively. There is open access across a public open space connecting each of these buildings (figs. 3.13-15).



Fig. 3.4 Ballyroan public library with street trees and access street to the community and commercial centre.



Fig. 3.5 Ballyroan commercial centre with car park and low rise properties.



Fig. 3.6 Surrounding area is formed by street trees, two-storey residences with front garden, and pocket parks which creates a sub-urban character with strong vegetal elements.



Fig. 3.7 Some open green spaces within residential areas formed by greens and parkland trees. The low rise environment offers some views to surrounding hills.



Fig. 3.8 Section of riparian corridor aligning Ballyboden Rd about 1km to the east of the proposed site.



Fig. 3.9 Church of the Holy Spirit (RPS: 264) brings historic character and distinctive landmark to the visual environment.



Fig. 3.10 An elevated area of open space to the south of the proposed site offering more expansive views.



Fig. 3.11 Typical street vista created by street trees and property boundaries.



Fig. 3.12 Some streets to the west enable partial views to distant hills.



Fig. 3.13 Location of proposed site. Proposal to replace existing chimney flue. View looking north with library in the background and pastoral centre to the left.



Fig. 3.14 Height of the existing chimney flue in relation to the pastoral and youth centres.



Fig. 3.15 Current chimney flue with Church of the Holy Spirit (RPS: 264) in the background.

3.2 Defining the study area and visual receptors

The character of the area surrounding the proposed site is designated Landscape Area: Suburban South Dublin in South Dublin CDP, but no visual or landscape sensitivities nor values have been attributed to it. This assessment of the local visual environment within this LCT was found to be suburban in nature and containing considerable green infrastructure and open space as well as small scale houses from the 20th century predominantly. These elements create a medium quality visual environment owing to the mix of built and vegetal element, the relatively mature tree canopy, and the contrast between enclosed streets and open spaces. The terrain is predominantly flat and restricts long range visibility across expansive space.

The Church of the Holy Spirit is the most prominent building in terms of scale, height and architectural merit being a protected structure. In this assessment it was found to be the visually most dominant from the more longer range views owing to the height and distinctive character of the church spire. Though prominent, views remain limited to relatively close range from adjacent streets.

The zone of visibility is therefore set to around 0.5-1km which should enable assessment of the proposed structure from areas most affected due to proximity, elevation, or sensitivity in terms of having a designated status, such as the protected structure and ACAs in the area. Beyond this, it is unlikely that the proposed development would be visible, or the level of visibility would be partial and slight. The Scenic Routes identified in the South Dublin CDP fall beyond the zone of visibility and so they are not included.

Within this, the visual receptors (those affected) are identified as the users of the residential streets, Ballyroan commercial centre, Church of Holy Spirit (protected structure), and open amenity spaces. In each case the visual receptors are users of the public realm only and no private residences have been accessed within their private property as it is beyond the scope of this report.

The visual receptors are located on fig. 3.16 together with the selected viewpoint locations representing the types of views currently experienced by these visual receptors. These viewpoints form the basis of assessment of potential visual effects.



Location of visual receptors

- R1 – Ballyroan Rd / R817
- R2 – Residential East and Marian Rd.
- R3 – Residential West
- R4 – Residential South
- R5 – Ballyboden Rd / R115 / ACAs

Viewpoint locations ↑

Proposed site location •

Fig.3.16 Types and location of visual receptors and location of viewpoints.

3.3 Assessment of viewpoints

Several viewpoints have been selected that represent each visual receptor and these are located on fig. 3.16. All viewpoints are assessed below for the nature and significance of the visual amenity together with its sensitivity to change.

Table 3.1 Assessment of viewpoints.

R1: Ballyroan Rd/ R817

Views 1 to 5 represent those experienced by users of Ballyroan Rd/ R817 which offer some partial views of the proposed site along it. View 1 shows the roadside residences and front gardens along with footpath and street trees in the middle ground against the sky backdrop. This section of has relatively high amount of tree canopy. Moving further east the level of tree cover reduces at Views 2-5 which are similar in nature and show roadside residences and front gardens in the middle ground with foot paths and grass verges in the foreground. The roof line of houses forms the backdrop against the sky backdrop. The church tower adjacent to the proposed tower is visible in the centre background above the roof line of houses along this stretch of road. Of these, View 3 shows relatively open views of the church spire rising above the rooflines in a view frame holding open amenity space and tree canopy which softens the urban character. Views of the proposed site are reduced to slight at View 5 which hold a small amount of church spire adjacent the proposed tower in the background beneath the tree canopy. There is sensitivity to change to the height lines of the existing treetops and roofline of residences against the sky backdrop through the introduction of new industrial materials and forms into the visual environment which contains built elements of historic significance.



View 1



View 2



View 3

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View 4



View 5

R2: Residential East and Marian Rd.

Views 6 to 13 represents the views experienced along Marian Rd and residential areas to the

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east of the proposed site. Views 6 and 10-13 show the nature of view along Marian Rd. View 6 is from the north on approach to the proposed site and shows residences along the road with front garden boundaries formed by hedgerow and ornamental shrubs and street trees which form the middle and background. The church spire adjacent the proposed site is visible above the roof tops but beneath the tree canopies. Views 10 and 11 are similar showing more of the commercial centre in the background on approach from the north and east. Garden properties and street trees occupy the middleground of View 10. There are more open views of the site in Views 10 and 11 with both the church spire and existing chimney flue in the background against the sky backdrop. View 12 shows the nature of view from an open space within a residential area to the east. Garden and street trees form the right and left foreground and middleground while street trees further back create the background, beyond which the church spire rises into the sky backdrop. View 13 shows the approach along Marian Rod from the south showing the edge of an open amenity space with relatively established trees in the foreground and middleground beyond which the commercial centre properties and car park is seen partially. The proposed site is not currently visible. Views 7 to 9 represent views from residential areas to the east where there are partial glimpses of the proposed site on approach from View 7 to 8. These show front facades of suburban residences and their garden boundaries beyond which the church spire adjacent the proposed site is visible in the background against the sky backdrop and beneath the roof line. There are no views of the proposed site from around View 9 which shows a row of residential houses and relatively established street trees in the foreground and middleground against the sky backdrop. In each case more visibility of the proposed site could be afforded when the canopies drop in the dormant season. There is sensitivity to change to the height lines formed by church spire, residences roofline, and treelines through the introduction of new materials and forms into the visual environment which contains significant built elements and forms, some of a historic nature.



View 6



View 7



View 8

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View 9



View 10

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View 11



View 12

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View 13

R3: Residential West

Views 14 to 21 represent the views experienced by residential areas and open spaces to the west of the proposed site. Views 14 and 15 are from Anne Devlin Ave and are similar in nature showing the residences on both sides of the street with their garden properties and street trees forming the foreground and middle ground with the pastoral building in the background. In View 14 the chimney flue is in the left background but beneath the tree canopy while the church spire rises against the sky backdrop. Along this street from around View 15 the chimney flue is concealed behind tree canopy. Views 16, 17 and 18 show the nature of view from Anne Delvin Park to the southwest of the proposed site. Views 16 and 17 are similar showing the street residences and trees on approach to the proposed site. The proposed site is not visible beyond tree canopies in View 17 but moving closer to it at View 16 the church spire adjacent the site comes into view where canopies are reduced. At closer range shown in View 18 the church façade and spire forms the right middle ground and garden of dwelling forms the left middleground against the sky backdrop. The chimney flue forms the centre background against the sky backdrop but remains beneath the tree line and church spire. Views 19 and 20 shows the nature of visibility from Orchardstown Ave and Anne Devlin Dr from the northwest. View 19 shows garden trees and facades of houses in the foreground and middleground beyond which there are slight glimpses of the upper portion of the church spire adjacent the proposed site in the background. Views 20 is similar in nature in terms of character and shows a small amount of the church spire adjacent the proposed site in the background above the roofline of houses from Orchardstown Ave. Intermittent views of the proposed site are afforded where there are breaks in houses. View 21 illustrates the nature of view along the street immediately north of the proposed site showing an access street to the public commercial space between two buildings in the foreground and middle ground beyond which the existing chimney flue is in the background and hold the church and church spire in its backdrop. In these views, greater

visibility of the proposed site may be afforded with canopies drop. There is sensitivity to change to the suburban environment which holds considerable vegetal elements in its view frame. There is sensitivity to change to the height lines of suburban environment formed by roofs, tree canopies and the church spire against the sky backdrop through the introduction of new materials and forms into the visual environment which contains some built, industrial, and historic elements.



View 14



View 15



View 16

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View 17



View 18

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View 19



View 20

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View 21

R4: Residential South

Views 22 to 25 represent the views experienced from residential areas and green spaces to the south of the proposed site. The nature of these views is similar having considerable open green space and vegetal elements. View 22 shows the nature of view from a residential street and green space just off the R817 showing the facades of properties along the R817 in the middle ground with green open space in the foreground. Trees rise into the skyline with the church spire adjacent the proposed site in the background against the sky backdrop. View 23 shows a green space in the foreground aligned with dense mature hedge on the right and left with partial views of front facades of houses in the background. The church spire adjacent the proposed site is slightly visible above the hedge line in the background against the sky backdrop. View 24 shows the edge of this green space at closer range which shows the facades of more houses in the background and a greater portion of the church spire in the background above the roof and hedge line. View 25 shows the nature of view from an elevated residential area to the south of the proposed site which is formed by an open green space in the foreground and upper stories of residences in the left middle ground and parkland trees in the right middle ground. Roof tops of houses, trees, and the upper part of the church spire adjacent the proposed site form the background against the sky backdrop. There may be more visibility of the proposed site when canopies drop in the dormant season. There is sensitivity to change to the vegetal nature of these views which hold some historic elements (church spire) and to the height lines defined by rooflines, church spire, and treelines against the sky back through the introduction of new industrial material and forms.



View 22



View 23

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View 24



View 25

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R5: Ballyboden Rd / R115 / ACAs

Views 26 to 28 represent the views experienced by users of Ballyboden Rd (R115) and the ACAs located on this road. The nature of each of these views is similar showing the riparian and sylvan corridor along the stream which feeds into the Dodder River. This corridor is formed by a thick and mature tree belt which occupies the middleground with the R115 in the foreground and can be seen in all views. These include the ACA to the southeast, a point along the R115 to the east of the proposed site, and from the ACA to the northeast. The proposed site is not visible. There may be some partial or slight visibility once the canopy drops in the dormant season. There is sensitivity to change to the sylvan character through the introduction of new materials and forms into the visual environment.



View 26



View 27



View 28

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The landscape surrounding the site is deemed to be of low sensitivity with no sensitivity designations assigned it in South Dublin CDP with the exception of the Church of the Holy Spirit (protected structure). The character of the areas is suburban in nature having a mix of built and industrial elements with a diversity of tight streets and open spaces. The visual amenity is of medium quality as a result of the small-scale street networks, low-rise buildings, architectural diversity and level of vegetal cover and green space. The visual amenity assessed in this report was found to be limited in range and contained primarily along streets with some more expansive views across green areas. Though largely limited and contained in nature, the visual amenity is enhanced by the church spire which creates a landmark feature in the surrounding area. Though the area has not been designated any particular sensitivities in South Dublin CDP, the church being a protected structure contributes to the visual environment due to its architectural form and historic character. There is an objective to protect such character in South Dublin CDP. Views of the proposed site are limited to close range open views from adjoining streets. While some elevated views enable more long distance ranges beyond localised streets, these offer no-to-slight glimpses of the proposed site and are intermittent in nature. The main vulnerabilities come from the residential streets and amenity spaces and commercial areas at close range, particularly those which also hold the church (protected structure) in their backdrops.

4.0 Description of the proposed development

The development proposes to locate telecommunication equipment to be shrouded within a chimney flue adjacent to Ballyroan Community and Youth Centre, Marian Rd, Rathfarnham, Dublin 14. The main components of the proposal are as follows:

- 1 nr. proposed 20m lattice tower with ladder, antenna and dishes mounted and enclosed in a concrete chimney flue and fixed on concrete foundation (5x5 m approx.).
- Concrete foundation to be dressed with existing paving.
- Proposed cabinets on concrete plinth (1.4x4.3m approx.).
- Removal of existing 12m chimney flue.

5.0 Identification and description of effects

The proposed development would potentially affect the nature and quality of the visual amenity of selected viewpoints and their visual receptors. The potential impacts are reviewed below, and these will then be considered with a view to suitable mitigation measures and/or alternative designs in section 6.0 below. Refer also to photomontage study (Indigo: visual impact appraisal).

5.1 R1: Ballyroan Rd/ R817

View 1, 2, 3, 4, 5: the visual amenity experienced from the R817/Ballyroan on approach from the southwest and southeast shown at Views 1, 2, 4 and 5 would be largely unaffected due to intervening houses and street trees which conceal views of it. There are more open views of the proposed site at the junction with Marian Rd (View 3) which would experience some change as the top of the proposed chimney flue is likely to be visible above the rooftops and beneath the tree

line. It would also show the church spire in its view frame. Receptors would be affected during the during the operational phase in the long term.

5.2 R2: Residential East and Marian Rd.

View 6, 7, 8, 9, 10, 11, 12, 13: The residential areas to the east of Marian Rd. would be largely unaffected to the northeast as visibility is minimal as shown in Views 7 and 9. From around View 8 and moving south along this residential street more intermittent visibility would be afforded the proposed development in which the upper portion of chimney flue may be seen but this is likely to be minimal owing to intervening houses and trees which largely screen views. The residences around View 12 would experience most change as the proposed chimney flue would be visible above the Community Centre roofline, particularly in the winter months when the canopy has dropped. This would show a considerable portion of the proposed chimney flue in the view which holds the church spire in its frame. Marian Rd would experience no to some change to the visual environment on approach from the north. Of these the area at View 6 from the north and View 13 from the south would be unaffected as the proposed chimney flue would not be seen from the north (at View 6) while intervening trees screen views from the south (at View 13). When the canopies drop, partial visibility is likely to be afforded. The most affected on Marian Rd would be the section from View 10 up to View 13 which would show relatively open views of a considerable portion of the proposed chimney tower where the church spire forms the backdrop. Receptors would be affected in the construction and operational phases in the long term.

5.3 R3: Residential West

Views 14, 15, 16, 17, 18, 19, 20, 21: the visual amenity experienced for users of these residential streets would remain unaffected in Views 17, 19 and 20. View 15 and 16 would have minimal change as although a portion of the proposed chimney flue would be visible above rooflines at a distance, this would be a small amount and limited to the winter months when canopies drop. The most affected are from closer range in this area as shown in Views 14, 18 and 21. Of these, View 21 would be the least affected as while a most of the proposed chimney flue and cabinets would be visible with the spire in its backdrop, there is a high degree of built elements in the visual environment that have the ability to absorb the change to a greater degree. Views 14 and 18 would show the proposed chimney flue against the sky backdrop in a frame that holds more vegetal elements and the church spire in view. Change would affect users in construction and operational phase in the long term.

5.4 R4: Residential South

Views 22, 23, 24, 25: the visual amenity experienced from these areas would remain unaffected in Views 23, 24 and 25 as the proposed chimney flue would not be visible beyond intervening houses and trees. View 23 may afford some visibility of the upper portion in the winter when canopy has dropped but this would be minimal. View 22 may be slightly affected where the upper portion of the proposed chimney flue may be seen above the roofline but beneath the tree line. Changes would affect users in the long term during operational phase.

5.5 R5: Ballyboden Rd / R115 / ACAs

View 26, 27, 28: the quality of the visual amenity from this road and ACAs to the southeast and northeast would remain unaffected as the proposed development would not be visible owing to intervening tree cover.

5.6 Summary

Most of the visual receptors would experience some change to the visual environment because of the proposed development. Where visibility is afforded the proposed chimney flue, it ranges from partial and intermittent to relatively open at close proximity. Potential visual impact arises for sensitive receptors. These are Ballyroan commercial Centre and along Marian Rd to the east owing to the proximity and amount of chimney flue that would be visible. The impacts are absorbed to a degree from these areas owing to the level and diversity of built elements in the environment. This creates some ability to absorb the changes being introduced through increased heights, materials and forms. For some of the most sensitive, which are the amenity spaces and commercial area users, the most noticeable change will be experienced in which the proposed chimney flue will be visible in proximity of the church spire. This adds more sensitivity owing to its protected status. Further sensitivity arises from amenity areas along residential streets in proximity to the east which creates a vista towards the church. In the winter months when canopies drop, greater portions of the chimney flue may become available at closer ranges from the surrounding areas. Impacts would be of a long term duration overall and experienced during construction phase (for some receptors where openly visible) and operational phase (for all).

6.0 Mitigation

Mitigation measures are limited as there is no scope for tree planting to help screen the proposed chimney flue. Therefore, mitigation is limited to design of the chimney flue and more particularly to its fabric. It is suggested that material be selected from suitable built materials/colours in the surrounding environment to aid the chimney flue blend more harmoniously. It could be possible to develop a design which references the materials of the church spire for example. The form of the proposed chimney flue is in contrast with the existing church spire but if built sensitively in terms of bulk and mass, it could contribute positively to the visual environment. These are subject to further design analysis.

7.0 Evaluation of predicted effects (after mitigation)

Table 7.1 summary of views discussed above to be read in accordance with definition of terms (2.2.3). The evaluation of effects place judgements on the significance of impact and provides a summary of predicted visual effects (after mitigation) in a series of categories of significance. These are based on proposals without further mitigation measures for this development and relate only to the public arena and not reflective of the predicted impact on private properties.

Table 7.1 Summary of predicted landscape character and visual effects.

Visual receptor	View No	Description of view and character	Quality of impact	Duration	Significance
R1	1-5	Ballyroan Rd/ R817	Neutral to negative	Permanent	Imperceptible to slight
R2	6-13	Residential East and Marian Rd.	Neutral to negative	Permanent	Imperceptible to moderate
R3	14-21	Residential West	Neutral to negative	Permanent	Imperceptible to moderate
R4	22-25	Residential South	Neutral to negative	Permanent	Imperceptible to slight
R5	26-28	Ballyboden Rd / R115 / ACAs	Neutral	Permanent	Imperceptible

8.0 Summary

The character of the area surrounding the proposed site is designated Landscape Area: Suburban South Dublin in South Dublin CDP, but visual and landscape sensitivities and values have not been attributed to it. This assessment of the local visual environment within this LCT was found to be suburban in nature and containing considerable green infrastructure and open space as well as small scale houses creates a medium quality visual environment. The Church of the Holy Spirit (protected structure) adds to the quality being a visual landmark with architectural merit and historic character.

The view types are limited in range being contained within localised streets and delimited by houses and trees. Views are therefore largely contained primarily along streets with some more expansive views across green areas or at elevated locations. Within these the most vulnerable receptors are those that catch open amenity space, tree canopies and the church spire in their view frame, while others contain a high degree of built element which are not of particular merit though hold the church spire in their backdrop.

The visual receptors (those affected) are identified as the users of the residential streets, Ballyroan commercial centre, Church of Holy Spirit (protected structure), and open amenity spaces. The proposed development's potential effects on the visual amenity of the study area would impact four of the five assessed visual receptors to some degree.

Mitigation is not possible through the planting of trees. Therefore, the potential impacts will arise from the design of the proposed chimney flue. The chimney flue design should take references from the surrounding environment to help absorb changes through similar materials and colours. In terms of form, the chimney flue could add to the visual diversity of the area if its mass and bulk does not compete negatively with the church spire. This is subject to further analysis.

The report bases its assessment on the current design of the chimney flue (without details of the above recommended mitigation measures).

In this, the predicted effects would be moderate for the most affected. These are areas in close proximity in which the magnitude of change is slight-to-moderate as the chimney flue would be visible in an environment which contains a high degree of built elements that has an ability to absorb some noticeable change. But as the proposed chimney flue would rise above existing

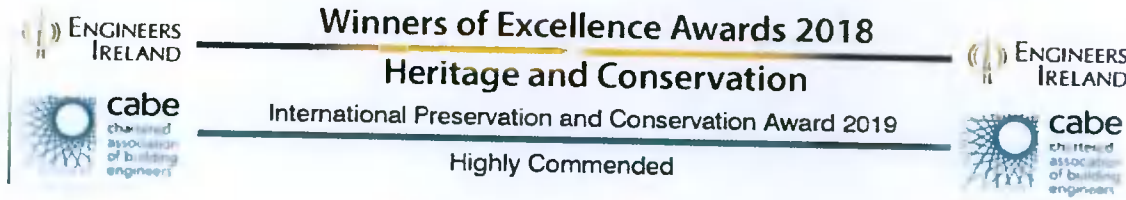
height lines in some cases (roofs and tree tops) against the sky backdrop which also holds the church spire in its backdrop the magnitude of change would affect a sensitive element. The impact is slight from all other areas as either the receptors are less sensitive, or the magnitude and intensity of change is considered small and intermittent.

These predictions are based on the proposal without the suggested mitigation measures recommended in section 6.0 which would be subject to further design analysis.

9.0 Signing Off Statement

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Client: Ontower Ireland Ltd.

Signed: _____
For ACP Archcon Professionals Limited.

Date: 24/09/2021





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APPENDIX C



RF Technical Justification Report

For proposed mobile telecommunications installation

Site ID: DU1548

Site Name: Ballyroan_Ballyboden

Address: Ballyroan Community and Youth Centre, Rathfarnham, Dublin 14

Prepared by:

Darren Humphries – Senior Radio Engineer, Three Ireland

Date: 01/08/2019



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2.0 Network Planning and Performance	P.3
3.0 Coverage Requirements at Ballyroan_Ballyboden	P.5
4.0 Service Coverage Plots / Predictions	P.6
5.0 Technical Conclusion	P.10

1.0 Introduction

This section provides a technical justification for the proposed installation (radio base station) in Ballyroan/Ballyboden, Rathfarnham, Dublin 14. The installation is required to provide 2G voice, 3G and 4G data service provision in the area. The installation forms part of an integrated telecommunications network system which has been meticulously planned out to provide best possible network performance within the limitations encountered in this rural environment. The current uptake of devices has put additional pressures on the network meaning existing base stations are undergoing significant upgrades in technology to meet this demand and so are critical in maintaining current and future service provision. Failure to maintain this installation will have an immediate and negative impact on Three's network and its customers. This site is proposed to provide mobile voice and data coverage to the Ballyroan/Ballyboden area and to improve voice and broadband access to residents & business users in the area.

2.0 Network Planning and Performance

The site selection process at the network planning stages is central to creating an overall network that is efficient and meets customer expectation but also meets the regulatory systems within which the network is operating. Aside from the land-use planning and property procurement, addressed in other sections of the report, there are many external factors that affect network performance. Performance can be affected by various issues such as the technology of the devices used, the local environment the signals need to travel through, the fundamental physics behind wireless transmission and more. Some of these cannot be avoided and measures must be taken to try to minimise these negative effects. The following will briefly elaborate on some of these issues in order to understand the limitations on site choice for radio planners.

2.1 Physical Obstructions

Wireless signals can have trouble penetrating solid objects which can be any numbers of things such as hills, buildings, single walls or even people. The more obstructions you have between the transmitter and receiver, the more chance there is that the signal strength will be affected so sites are chosen with as clear a line of site to the next base station as possible.

2.2 Network Range & Distance between Devices

The further apart the networked devices that are trying to communicate with each other are, the more the signal strength drops. This is due to way that wireless signals propagate covering a wider area as they travel further and because of this, as the signal spreads more, the weaker it becomes, in general, if the distance is doubled the signal becomes 8 times weaker and so on.

2.3 Wireless Network Interference

Wireless Networking is becoming more and more common and therefore more wireless transmissions are being sent through the air. Signals operating at similar frequencies can cause interference with each other and have a significantly negative effect on the performance of the network. This means that more widely used frequency bands can be severely affected by the overcrowding of wireless signals to a point where a device will not operate at an acceptable level. Other wireless technologies can cause identical interference such as mobile phones and microwave ovens that operate within the same ranges.

2.4 Signal Sharing

Wireless Networks allow more than 1 device (Smart phone, Tablet etc.) to communicate with a base station at any one time. This sharing of connection means that the more customers accessing the network, the more devices the base station has to try and communicate with instantaneously. The point of access has to delegate its resources to each subscriber individually per the amount of transmitting radios it operates on.

2.5 Network Usage- Bandwidth / Data Speeds

With the widespread take-up of Smart Phones and other 4G internet ready mobile devices a more common problem is network usage. The more people utilising the network bandwidth, the less bandwidth there is to share between them. As bandwidth requirements increase with for example when accessing video streaming and other bandwidth intensive applications existing base station technologies need to be upgraded in or to maintain performance. The proposed 3G services provided on 900Mhz band and 4G services delivered on the 800Mhz band give a larger cell coverage area compared to older 3G on 2100Mhz band and provide better building penetration / indoor coverage. The 4G services provide data speeds far in excess of 3G services (up to 10 times faster) and can outperform fixed line broadband services in a lot of cases and especially in Rural and some Suburban areas.

2.6 Local Environment Characteristics

Particular to indoor networks or coverage, wall construction properties can be one of the biggest inhibitors of wireless signals. Construction materials used in building and offices have different levels of effect; concrete is a usual suspect in badly performing indoor network coverage. Basically the thicker the walls, the less success the signal will have penetrating through it whilst maintaining a high strength.

3.0 Coverage Requirements at Ballyroan/Ballyboden and environs

The main driver for the new site at Ballyroan/Ballyboden, Rathfarnham is to improve service to the large area of residential and commercial premises in the wider area. This site will provide voice and high speed data services to the surrounding residential areas and amenities in the Ballyroan area. By not deploying a suitable site, a coverage blackspot for all users will remain in this area leading to poor Voice and Data services. ***

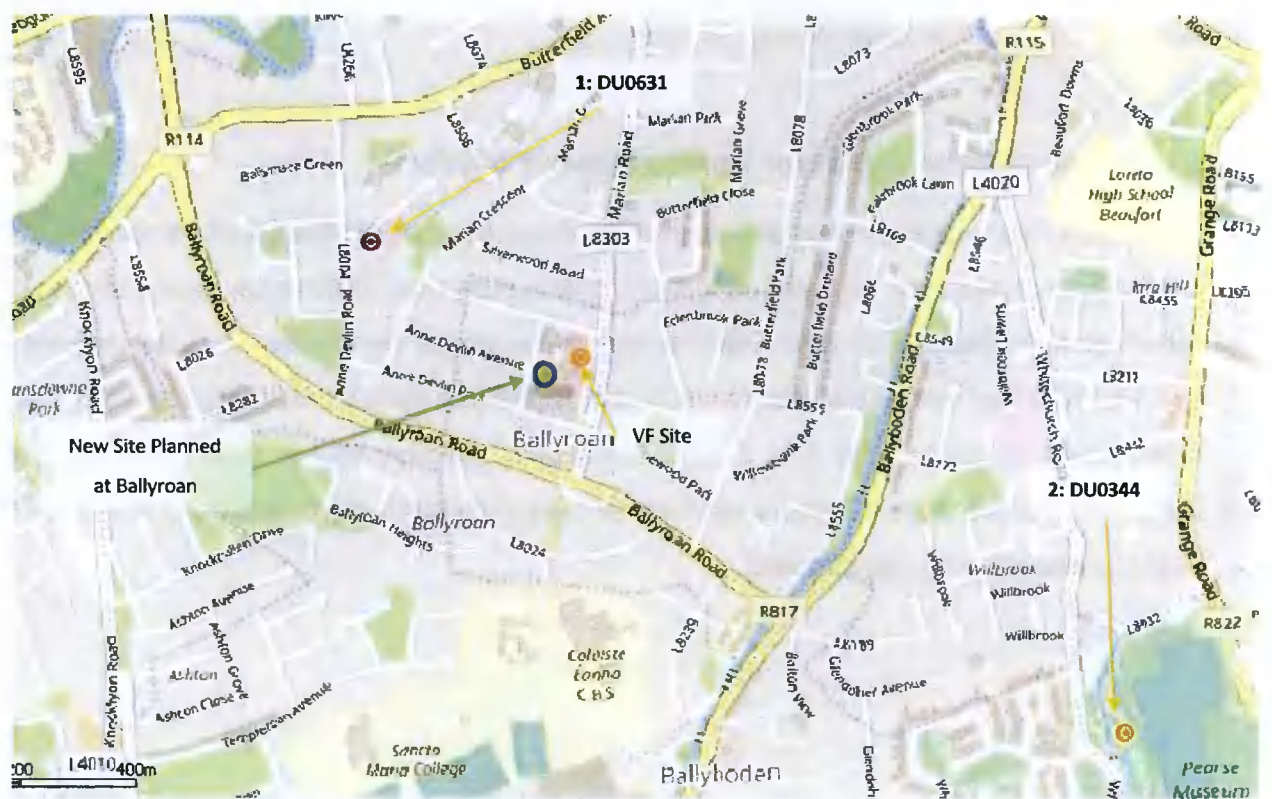
The specific location chosen for the new site will provide Three with sufficient overlap of the coverage footprint to adequately serve the town and surrounding environs. In particular the overlap will counteract the reduced cell shrinkage affect that occurs during high customer data usage at peak times as the bandwidth reduces and contention rate increases. Keeping a good dominant cell serving the area means continuous service to the residential and business customers.

3.1 Restrictions on Locating on Existing Telecoms Structures

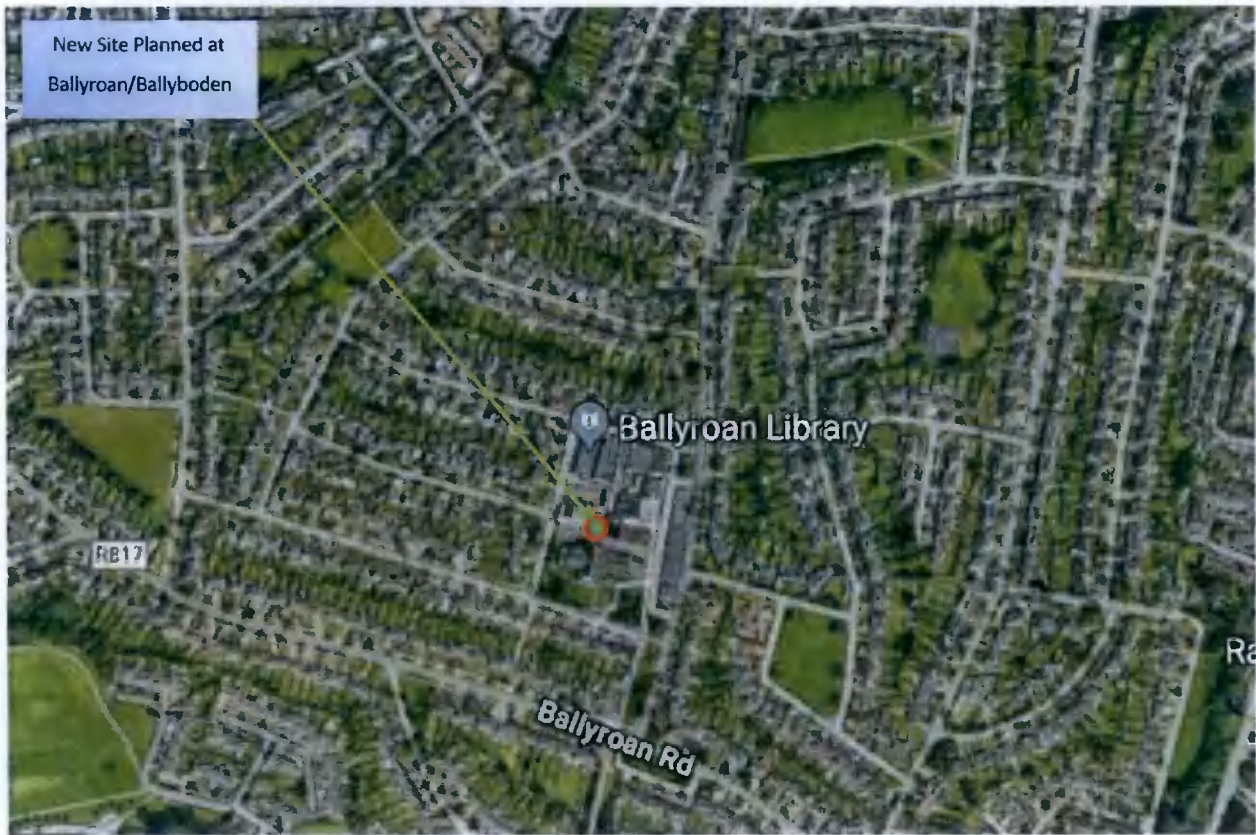
Three Ireland has a policy to co-locate into existing telecommunications structure where possible, that are located with the target area. Following compressive search of the target search area, no existing base station options were identified that could be shared or upgraded to provide the necessary coverage required. Only as a last resort have Three Ireland considered that building a new site is the only option available. The poor existing 2G/3G coverage in the area is due to the existing site being too low and far from the coverage objective for the overall area. The only way to cover this with suitable radio coverage into this location is by building a new site in the site proposed.

3.2 Existing Sites Analysed

1. H3G site DU0631 – This is over 0.7km away from coverage objective – unable to cover specific area with acceptable voice and data requirements- Note: This site is low in height also thus coverage is limited
2. H3g Site DU0344 – This is 1.0km away from coverage objective and fails to offer adequate Voice and Data services today to the area suffering from poor service (Ballyroan/Ballyboden)
3. Vodafone site in Ballyroan SC – This is a 7m high solution which fails to improve service for the desired area.



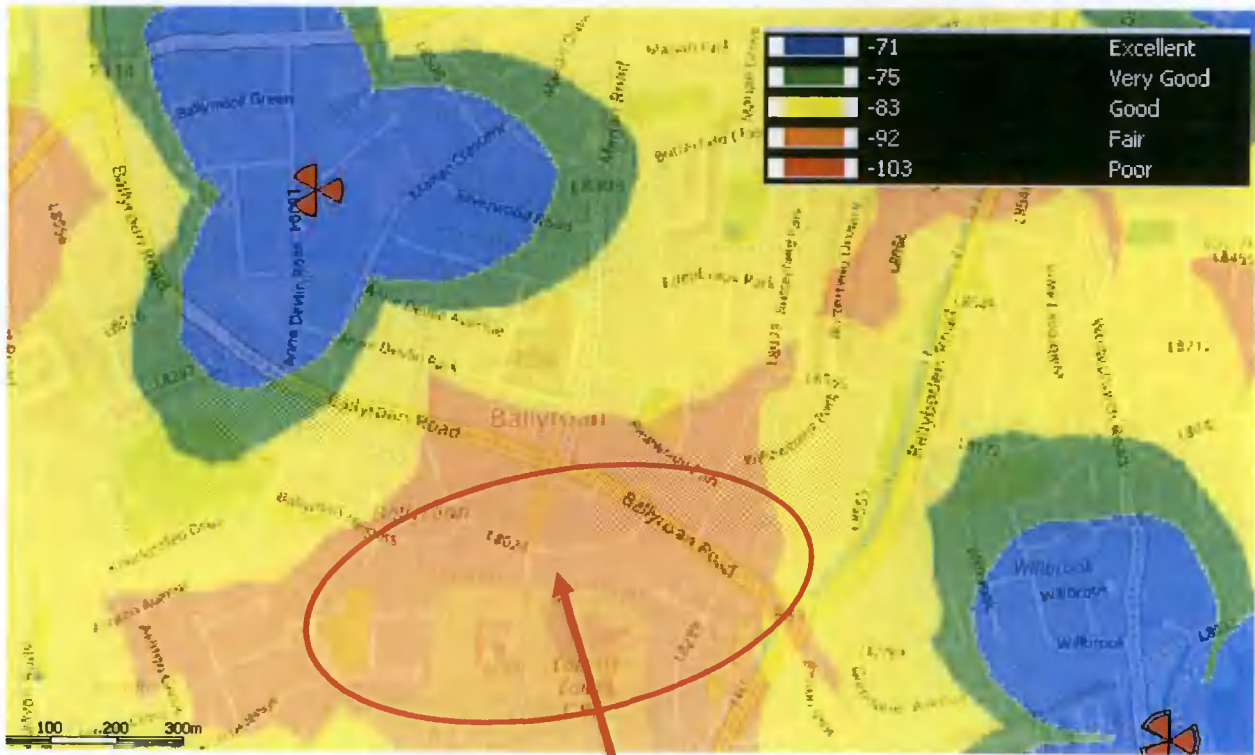
Please note that the coverage maps provided illustrate optimal coverage with all other sites in the vicinity operating at maximum efficiency. Should one or more of these sites experience a technical fault, require maintenance or upgrading works which would result in equipment power down, the adjacent sites act as a back-up system to maintain a consistent level of service in the area. This explains the importance of each base station in the overall network and ensures network resilience in network operations.



4.0 Service Coverage Plots / Predictions

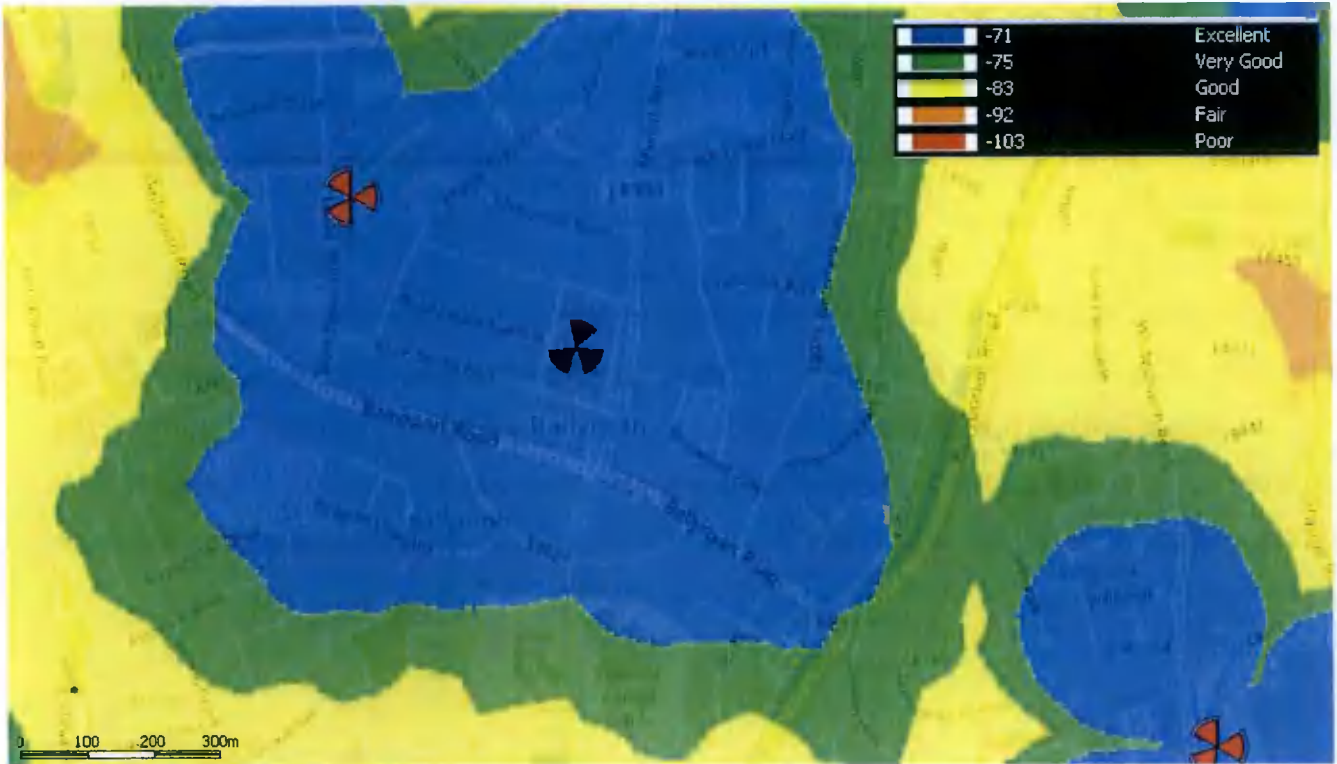
The coverage maps on the following page illustrate the service coverage from the proposed installation at Ballyroan_Ballyboden.

EXISTING 3G INDOOR COVERAGE

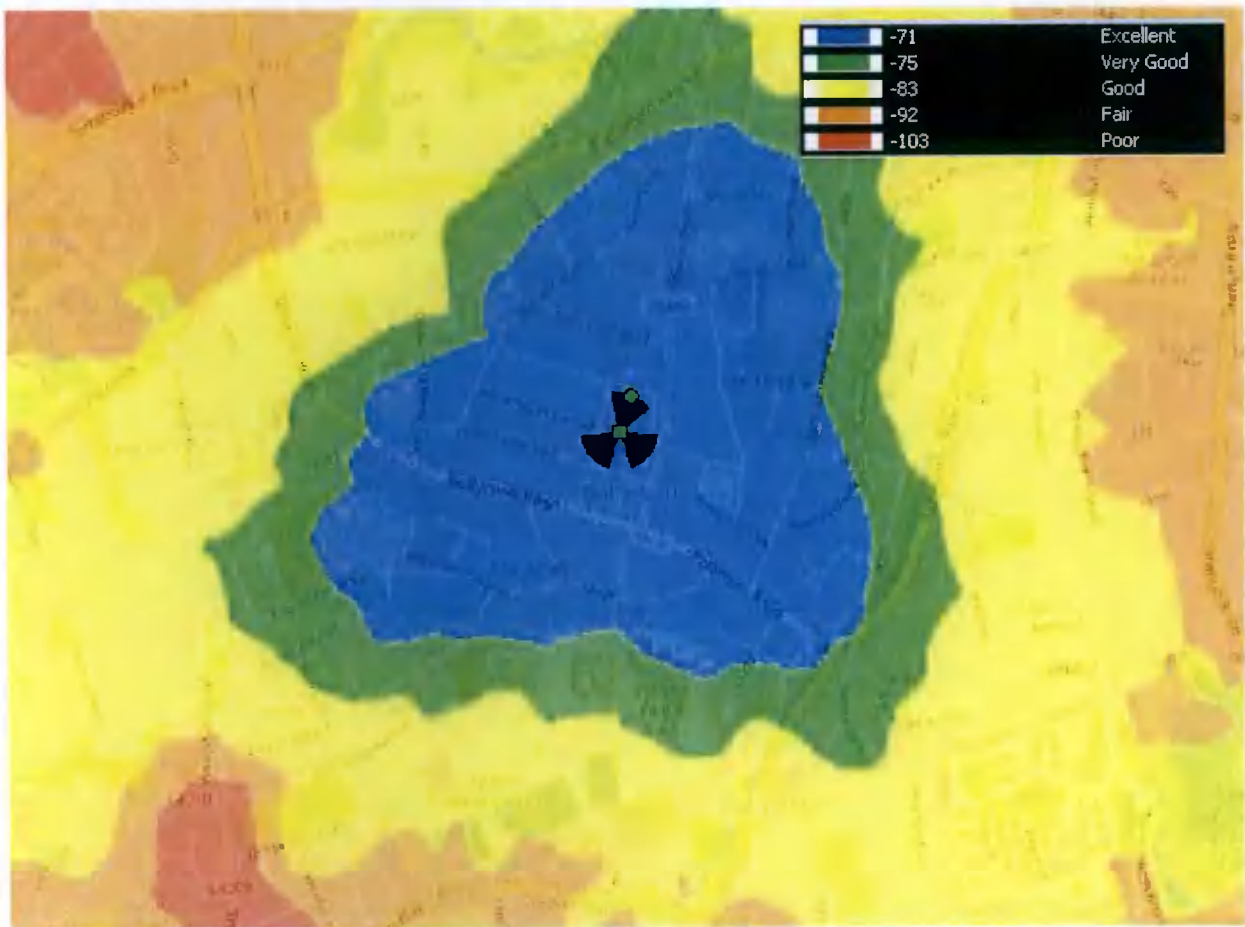


Comment: Fair to Poor Coverage reflects poor Voice and Data experience

PROPOSED 3G INDOOR COVERAGE WITH ADDITION OF NEW SITE



Zoom In of Predicated Coverage with New Site



5.0 Technical Conclusion

The evidence provided within this Technical Justification demonstrates the technical need for an installation site at Ballyroan/Ballyboden, Rathfarnham to maintain a high quality network coverage for 2G/3G/4G and deliver good customer experience to the large number of residential dwellings, commercial and retail units in the area.

The proposed installation will form part of an established telecommunications network system that Three operates in the area and has been carefully chosen to ensure performance levels are maintained. The site is considered the best possible solution to meet both the existing and future demands of its customers in this area. Failure to progress this installation in its current location as can be seen in the plot provided has a negative impact on Three's network by leaving customers in the Ballyroan/Ballyboden area with limited services.



Additional Details for Technical Justification

DU1548 - Ballyroan_Ballyboden,
Ballyroan Community & Youth Centre,
Marian Road,
Rathfarnham,
Dublin 14,
Co Dublin

4th October 2021

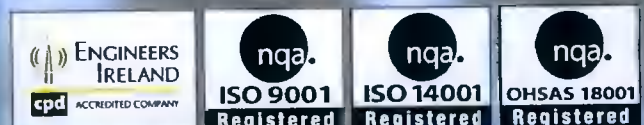


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1. Introduction

The following report outlines the areas targeted by the new proposed structure at Ballyroan for coverage enhancement. Details are also provided justifying the reason other nearby sites were discounted as candidates.

The proposed structure will allow Three to bring a significant improvement to their network coverage and capacity in the area and as such it will provide better indoor and outdoor voice and broadband services to Ballyroan area and its surrounding residential and local business.

2. Site Details

Site	Latitude	Longitude	Height (Antenna top)
DU1548 Ballyboden	53.290211	-6.2990130	20m

3. Discounting Existing Sites

This section outlines what was considered when selecting Ballyroan as a candidate for a new 20m structure. A large consideration is to future proof the site against further local clutter clipping and the technology evolution. Due to site spacing, terrain, structural and other limitations, there are many areas in the country where network operators have weak or non-existent voice and broadband data services. These are known as coverage or service blackspots. The operator's network planning teams identify and prioritise blackspots based on a significant cluster of residential and commercial customers along with any key roads or rail infrastructure. In the case of the area around Ballyroan the coverage is weak despite the nearest site is 100 meters away. This site as well as the surrounding sites will not provide adequate services into the target area due to the antenna height and due to the urban and suburban clutter.

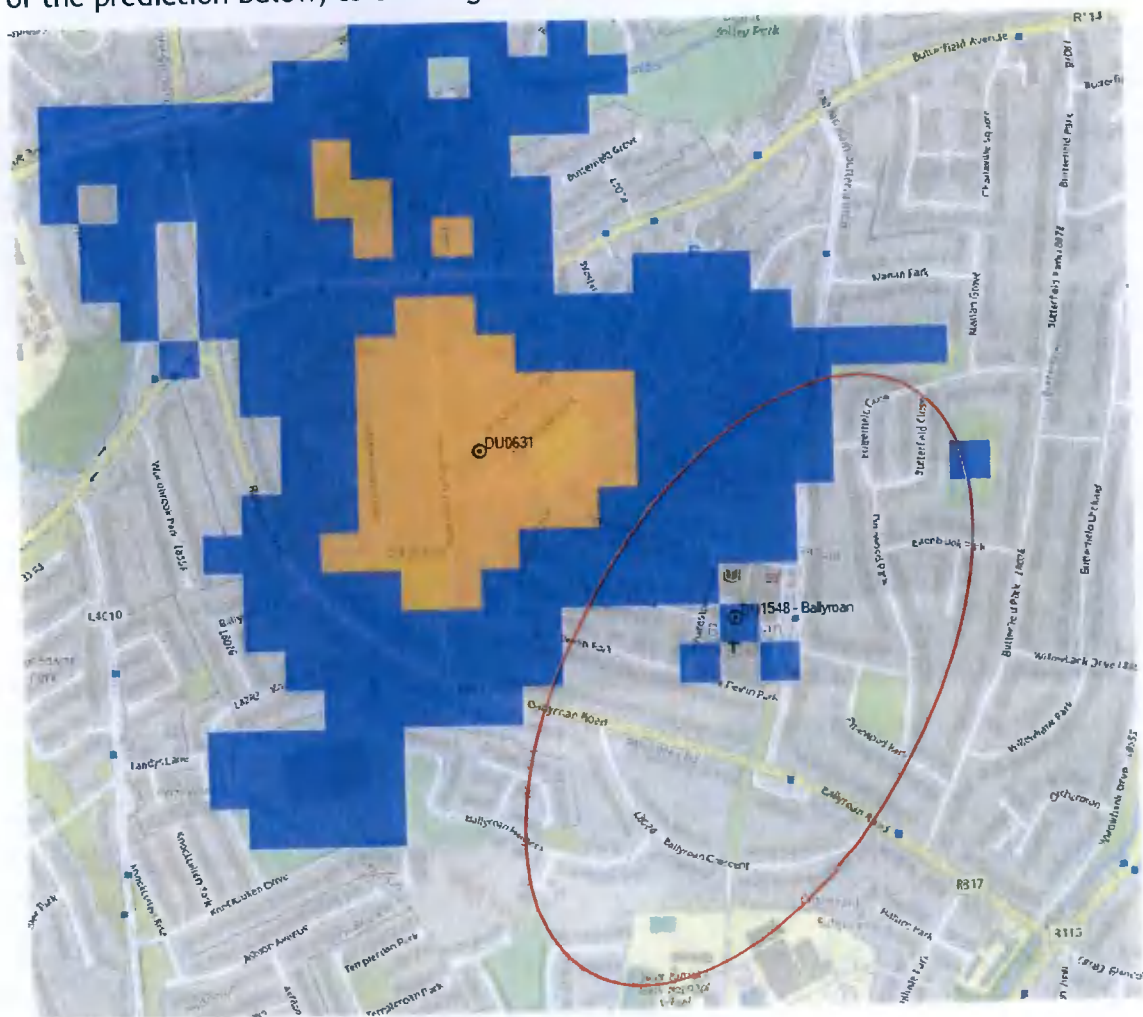
A full list of surrounding sites within 1km radius of the proposed site is detailed below:

Closest Existing Sites	MNO Refs	Distance (m)	Suggested Discount Reason
Orchardstown Park	Three: DU0631 VF: DN128	385m	9 meters rooftop. This site is designed to cover Butterfield area, Ballyroan Rd (R817), a section of Butterfield Ave (R114) and due to clutter in the urban/ suburban environment, this site will not serve into the target areas.
Rosemount SC	Eir: DN_3310	100m	7 meters rooftop. This site is too low to cover the target areas as it's footprint is limited and obstructed by surrounding clutter such as the adjacent Church and the Ballyroan Community & Youth Centre buildings.
Templeogue Tennis Club	DU0430	915m	14 meters pole. Site designed to serve Templeogue Village, Templeogue Rd (R137) and because of the distance the clutter in the urban/ suburban environment, this site will not serve into the target areas.
The Morgue Pub	VF: DN310 Eir: DN_3557	895m	9 meters rooftop. This site is designed to cover Templeogue Village, Templeogue Rd (R137) and it's quite low and due to clutter in the urban/ suburban environment, this site will not serve into the target areas. Both existing chimneys have shrouded solutions and no space available for additional operater

3.1 Orchardstown Park

Two mobile operators are located at this site, Three: DU0631 and Vodafone: DN128.

Nine meter high rooftop site: this site was designed to cover Butterfield area, Ballyroan Rd (R817), a section of Butterfield Ave (R114) and it's quite limited by the clutter in the urban/ suburban environment; surrounding buildings, houses and the church are limiting the site to provide adequate in-building coverage (see map of the prediction below) to the target area of Ballyroan.



3.2 Rosemount SC

One mobile operator is located at this site, Eir: DN_3310.

Seven meters rooftop: this site is too low and will need extra height to cover the target areas as the Church (14m) and Ballyroan Community & Youth Centre buildings are blocking coverage. The proposed site at the Ballyroan Community & Youth Centre will be 20m which will clear the buildings in the area, in particular the main section of the church.





3.3 Templeogue Tennis Club

One mobile operator is located at this site, Three: DU0430.

14 meters pole. Site designed to serve Templeogue Village and Templeogue Rd (R137). Because of the distance, of the clutter in the urban/ suburban environment, and the terrain elevation this site will not serve into the target areas.



3.4 The Morgue Pub

Two mobile operators are located at this site, Vodafone: DN310 and Eir: DN_3557.

Nine meters rooftop site. This site is designed to cover Templeogue Village and Templeogue Rd (R137). This site due to the limited height, distance from the target area and to the clutter in the urban/ suburban environment doesn't have the capability to serve into the Ballyroan area. Also two operators have equipment on the existing chimneys of the building and there is limited space for a third operator.



A full list of surrounding sites between 1Km and 2Km radius of the above mentioned site is detailed below:

Closest Existing Sites	MNO Refs	Distance (m)	Suggested Discount Reason
Ballyboden Eircom exchange 14m - 20m tower Plan Ref No. SD20A/0042	DN_1315	1120m	20-meter tower. The proposed site is too far from the target area even with the available slots is too low and due to clutter in the urban/suburban environment, this site will not serve into the target areas.
The Sarah Curran	DU0108	1345m	10 meters rooftop. This site is meant to cover Rathfarnham area, a section of Grange Rd (R115) and due to its distance and the antenna height this site will not serve into the target areas.
Pearse Museum	DU0344	1120m	28 meters pole. Site designed to cover Willbrook area, Ballyboden area, a section of Grange Rd (822), and due to its distance and to clutter in the urban/suburban environment, this site will not serve into the target areas.
Ballyboden	DU1312	1380m	17 meters tower. The purpose of this site is to cover Ballyboden area, Edmondstown area, Prospect Manor area, and due to its distance this site will not serve into the target areas.

Stocking Lane Signal	DU1132	1880m	14 meter pole. Site designed to cover the M50 and it's too low and doesn't have line of sight with the target areas.
Knocklyon Shopping Centre	DU0181	1480m	8 meters rooftop. Low site on top of the shopping centre which is meant to provide coverage to Knocklyon area, a section of the M50 and it's too far and due to clutter in the urban/suburban environment, this site will not serve into the target areas.
Willington, Templeogue	DU0574	1785m	8 meters rooftop. This site is meant to cover Templeogue area and due to the height, distance and clutter type environment (urban/suburban), this site will not serve into the target areas.
St Marys College RFC	DU1182	1635m	17 meters pole. Site designed to infill Templeogue area as well as Cypress Down area; due to the distance and the clutter type (urban/suburban) environment, this site will not serve into the target areas.

