

Dun Laoghaire-Rathdown County Council  
Planning Department  
County Hall  
Marine Road  
Dun Laoghaire  
Co. Dublin  
A96 K6C9

Our Ref: PTI: DN\_2939 Wyattville Road

14/11/2023

By Email Only

## **APPLICATION FOR SECTION 254 LICENSE**

**APPLICATION UNDER PLANNING & DEVELOPMENT ACT 2000 (AS AMENDED) (SECTION 254)**

**INSTALLATION AT R118 ROAD, LOUGHLINSTOWN, KILLINEY, CO. DUBLIN (E: 724877, N: 724681, ITM).**

Dear Sir/Madam,

Please find attached an application for a Section 254 License, submitted on behalf of the applicant, namely, Emerald Tower Limited, 1<sup>st</sup> Floor, Marketing Suite Building, Lake Drive, Citywest Business Campus, Dublin D24 YXW2. This application is being submitted by the applicant's planning consultant, namely, Entrust Planning & Environmental, Unit 1D Deerpark Business Centre, Oranmore, Co. Galway H91 X599.

This License Application comprises:

- Cover Letter & Planning Statement (this document);
- Section 254 Drawings;
- Photomontage Report;
- Cultural Heritage Report;
- Letter from Applicant confirming Safety Statement is in place;
- Confirmation of Public Liability and Employers Liability Insurance of €13 million each;
- Letter of indemnity for Dun Laoghaire-Rathdown County Council;
- Eir ICNIRP Declaration;
- License Fee in the sum of €125.00, payable by electronic transfer as agreed with Margaret O'Carroll.

As per the Council requirements it is confirmed that the following information is included:

- Application Letter (this document);
- Insurance Certificate (included above);
- Comreg Authorisation (see section 2.3 of this document);
- Site Assessment (see sections 3,4 & 5 of this document);
- Location Map and associated plans, elevations and photomontages attached;
- Payment Confirmation by electronic transfer as agreed with Margaret O'Carroll;

- Radio emissions compliance statement (Eir ICNIRP Declaration) attached.

Schedule of Drawings

No.	Title	Drawing No.	Scale
1	Overview Map	DN-2939-01-PD-01	1:1000
2	Site Layout Plan	DN-2939-01-PD-02	1:100
3	North-West Elevation Plan	DN-2939-01-PD-03	1:100
4	South-East Elevation Plan	DN-2939-01-PD-04	1:100
5	Equipment Details	DN-2939-01-PD-05	1:50

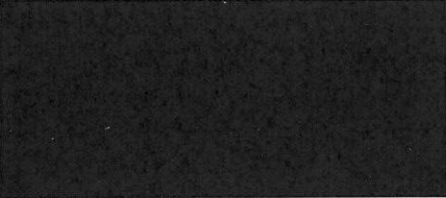
We write in connection with a proposal for a Section 254 License to install a 'Streetworks Pole' for the co-location of two separate operators equipment within the same pole, in order to provide high speed broadband and data services to the local community by two operators from a single pole, thus obviating the need for two separate structures, which is in accordance with the 'Telecommunications Antenna and Support Structures, Guidelines for Planning Authorities', 1996, which are strongly supported by the County Development Plan, in order to prevent a proliferation of new telecommunications structures.

The enclosed application is identified as the most suitable option and design that balances operational need with local planning policies and national planning policy guidance.

We are committed to maintaining a positive relationship with all Local Authorities and we would be happy to provide any additional information in relation to this application.

We look forward to receiving your acknowledgement and decision in due course.

Yours faithfully



For and on behalf of:  
Emerald Tower Limited

Tel: 

Email: 

**WIRELESS BROADBAND & DATA  
COMMUNICATIONS  
STREETWORKS POLE**

**INSTALLATION AT  
R118 ROAD  
LOUGHLINSTOWN  
KILLINEY  
CO. DUBLIN**

**PLANNING STATEMENT  
INCORPORATING ENVIRONMENTAL CONSIDERATIONS**

**Prepared by**

**Entrust Limited**

**November 2023**

## 1. Introduction

- 1.1. This Planning Statement incorporating Environmental Considerations (**the Statement**) has been prepared by Entrust Limited, a firm of Chartered Planning Consultants, that specialises in infrastructure planning (**the Agent**), on behalf of Emerald Tower Limited (**the Applicant**), in support of an application for a Section 254 License (**the License**) to Dun Laoghaire-Rathdown County Council (**the Local Authority**) for; the installation of an 18m dual operator pole, associated equipment, together with ground-based equipment cabinets and all associated site development works for wireless data and broadband services (**the Proposed Development**).
- 1.2. The Proposed Development will be installed on the R118 Road, Loughlinstown, Killiney, Co. Dublin (**the Site**).

### Planning History

- 1.3 A previous application was made in relation to a similar development sited near the site subject of this application, reg. ref. CTT.22.049-272940, for the installation of an 18m pole and ground cabinets to be placed on a grass verge at the junction of Church Road and Killiney Road. The application was referred to relevant departments in the Council for comments, including; Parks & Landscape Services, Conservation and Water Services. Their comments can be summarised as follows:
- It was noted that the extent of ongoing site works do not match the details of the drawings submitted;
    - Changes to the adjoining road layout
    - 2 no. cabinets located in the vicinity of the site missing, therefore unclear what impact additional furniture would have here,
    - New footpath not shown in drawings
  - Unclear how the proposal would relate to its environment in terms of visual clutter,
  - Seeks clarity whether additional landscaping/structures are intended for this site,
  - The road adjacent the site is identified for active travel upgrades in the CDP,
  - The site is in proximity to St Matthias Church, a Protected Structure, considered to be contrary to objective HER8.
  - The site location has been identified within the maintenance wayleave for Irish Water, as such it would not be recommended,
- 1.4 The drawings submitted were, to the best of the applicant's knowledge, up to date based on their site survey and utilities data, the subsequent road layout changes were not commenced nor plans for same available prior to lodgement of the application. The proposed location has been amended away from this road junction and other street infrastructure and instead is to be placed in a wall recess along the public road to the west of this site. In this respect the issues noted in relation to infrastructure, road alignment works and street clutter have been mitigated here.
- 1.5 The applicant and their agents presented three alternative locations for the proposed development, based on the search ring required by Eir which includes the lands adjacent St Matthias Church. During this meeting on 27<sup>th</sup> June 2023 the preferred option was to location the proposed development along the R118 road within an existing recess in the wall. It was also noted that this site would be in proximity to the Church of St. Mathias which is listed as a Protect Structure, thus any proposal here would need to assess the potential for impact on the Church and its setting. In this respect the applicant, via their consultants, have submitted a cultural heritage report and photomontages to determine the extent to which the Church and its setting would be affect by the proposal.

- 1.6 The applicant has addressed the previous issues pertaining to the site through the siting and design of the proposal here to avoid undue negative impacts to the receiving environment. It is believed that the revised location is appropriate to accommodate this development considering the extent of similar tall infrastructure equipment visible here, that its being set into the recessed wall will mitigate any impacts to pedestrian movement and most importantly that the

## 2. Background

### Applicant

- 2.1. This request is being made on behalf of the applicant, namely, Emerald Tower Limited, of 1<sup>st</sup> Floor, 30313 Lake Drive, City West, Dublin 22, to provide coverage initially for Eir Mobile and then subsequently for a second operator to be co-located on the same pole as Eir Mobile.
- 2.2. Emerald Tower Limited (applicant) is a wholly owned subsidiary of Phoenix Tower International (PTI), the operating company for its Irish operations. PTI is a United States headquartered company with operations in 18 countries worldwide including in Europe (Ireland, Cyprus, France, Malta, Italy and Spain). PTI owns and operates approximately 14,600 telecommunications sites across the world including the Eir Mobile portfolio of approximately 650 telecommunications sites it purchased in 2020. In Ireland, PTI works by leasing space on its portfolio of telecommunications sites to different mobile operators and other providers including wireless broadband providers, ensuring the optimum environmental solution is achieved by the co-location of different operators on PTI's sites.
- 2.3. Emerald Tower Limited is authorized by ComReg to provide Electronic Communications Services and Networks, which allows them to apply for a license under section 254 (1) of the Planning and Development Act, 2000 (as amended), for the establishment of overground electronic communications infrastructure and associated physical infrastructure. Please see ComReg's website for further details at <https://serviceregister.comreg.ie/Services/Search?q=Emerald>

### Operator

- 2.4. The Operator, namely Eircom Limited, trading as eir, is the largest communications provider in Ireland providing an essential public service throughout the country. Its three divisions include a wholesale fixed-line network through its OpenEir unit, providing copper and fibre-based access products to a wide range of Irish telecommunications companies from its telephone exchange network. The company's retail division provides services including fibre broadband and digital TV services for Irish homes and businesses. Eir also operates a national wireless data and broadband network under its own Eir brand and under the GoMo brand, which this proposal is for, and which proposes to become a crucial network point in its national wireless high-speed data and broadband network.

## 3. Proposed Development

### Site Location

- 3.1. The site is located on the public footpath on Wyattville Road (R118), set back from the footpath being recessed into the wall that separates the road and the green to the west. The R118 (Dual Carriageway), is located to the immediate east of the site. The proposed location would be between existing vertical structures, such as street lights, the dual

carriage way is home to various other street furniture like road signs and traffic lights which is typical of busy road networks such as these.

- 3.2. A car park is located to the south of the site across Church Road approximately 40m away with St. John's National School further along 140m from site. Mature/Semi mature trees are placed along long stretches of the Church Road and Killiney Avenue. The area to the east of the site along Killiney Avenue is mainly residential. St. Matthias' Church is located 90m away to the north.
- 3.3. There was a rigorous search for the chosen site location following three separate surveys of the area, the results of which can be found in section 5.7 of this document as to why the final site location was chosen, having taken into consideration the concerns raised by the Council.



Figure 1 Site Location

**Site Ownership**

- 3.4. The site is located on land owned by Dun Laoghaire County Council.

**Design**

- 3.5. The proposal is to install a new 'Streetworks Pole' with Eir's antennas to be encased inside the top of the pole, with space for a second operator's antennas below the eir antennas, a cabinet for Eir Mobile and provision for a second cabinet for a subsequent operator to be co-located onto this installation in future. The equipment dimensions are as follows:

Streetworks Pole		Cabinets (1 & 2)	
Height	18m	Height	1) 1.9m, 2) 1.9m
Diameter or Width	406mm (Diameter)	Length	1) 1.3m, 2) 1.9m
		Depth	1) 0.8m, 2) 0.8m

Area	0.13m <sup>2</sup>	Area	1) 1.04m <sup>2</sup> , 2) 1.52m <sup>2</sup>
Volume	2.33m <sup>3</sup>	Volume	1) 1.768m <sup>3</sup> , 2) 2.584m <sup>3</sup>
Colour	Galvanised	Colour	Dark Fir Green

<b>Total Streetworks Pole &amp; Cabinets</b>			
Area	2.69m <sup>2</sup>	Volume	6.682m <sup>3</sup>
Footpath Width 3.9m, Cabinet Doors Open 3.9m, Cabinet Doors Closed 3.9m			
<b>No Change</b>			

<b>Dishes (2)</b>	300mm (Diameter)	<b>Antennas (encased inside pole)</b>	4m H x 406mm (Diameter)
Colour	Goose Grey	Colour	Galvanised

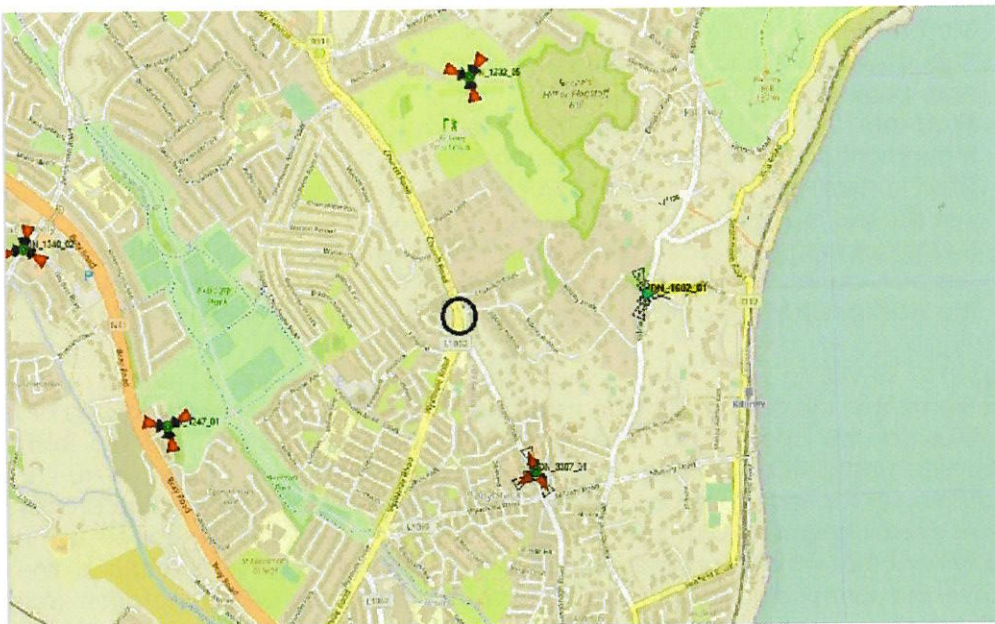
- 3.6. Great care and attention have been given to the design of the Proposed Development.
- It is proposed that the structure will be coloured in a galvanised (CL 3093W) finish and will assimilate with the typical sky colour in Ireland and surrounding street infrastructure, however, it is possible for the proposed development to be painted in any colour including a dark fir green or black finish which could be requested by way of a conditional License;
  - Slimline, slender and un-fussy design to minimise any negative visual impacts;
  - Pole design to blend in with existing street infrastructure such as street lighting, road signs poles and traffic lights poles;
  - Sited into the recessed wall here the proposal will have no impact on pedestrian movements here, nor would it affect the existing 3.9m footpath widths here;
  - Sited in relatively close proximity to existing Street lights along Church Road blending into the existing character along the streetscene;
  - It was decided to locate the proposal to the west of Church Road as the proposal is similar in design to the existing vertical infrastructure in the area where it would have the least possible impact on residential amenity in the surrounding area.
- 3.7. As part of eir Mobile's continued network improvement programme, there is now an urgent requirement in this area to provide new and improved high speed data and broadband services, for the operator to improve overall network coverage. The site following the proposed installation will be capable of accommodating new, more advanced technologies for two separate operators within the surrounding area. The proposed pole, at an overall height of 18m is the absolute minimum available to support two operators equipment that will allow all these criteria to be met and to achieve antenna 'line of sight' above the surrounding landscape topography, built form and vegetation (surrounding high trees).
- 3.8. Consideration has been given to technical, engineering, environmental, health and safety and land use planning viability in the siting and design of the proposed telecommunication's installation. The height of the structure has been driven by the requirement to achieve the desired level of coverage to the wider area. The proposed location, in our view, would provide the optimum location to site this equipment achieving the desired area and level of coverage, whilst minimising the number of telecommunications installations and minimising visual impact.
- 3.9. In light of the applicant's efforts to design the best solution for this particular site so as to minimise the impact of the development on the environment, it is considered that the appearance of the proposed structure would not seriously impact upon the visual or residential amenity of the area, nor would it form an obtrusive feature within the surrounding

area. The proposal strikes a good balance between environmental impact and operational considerations. The proposed height, colour and design represent the best compromise between the visual impact of the proposal on the surrounding area and meeting the technical requirements for the Site. Taking all matters into account, it is considered that this proposal which is to provide new and improved high speed broadband and data services, initially for eir Mobile and a second operator on a single structure as opposed to having eventually two separate structures in this area, would not be discordant within the local environment.

#### 4. Technical Justification

4.1. Eir has stated that *"As part of Eir Ltd licensing requirements and the continuing rollout of their 3G, 4G and 5G networks, Eir require a site in this area of Wyattville Road, Killiney, Co Dublin. The current sites in the area for Eir do not provide adequate indoor service for highspeed mobile broadband in and around the area. Eir's current coverage in this area specifically around Killiney Avenue, Ralahine, Watson Park, Watson Drive, Pinewood and Church Road are all areas that experience reduced quality of service and capacity and a Mobile base station deployment at the proposed location would greatly support Eir customers in the area."*

4.2. Eir Search Ring DN\_2939

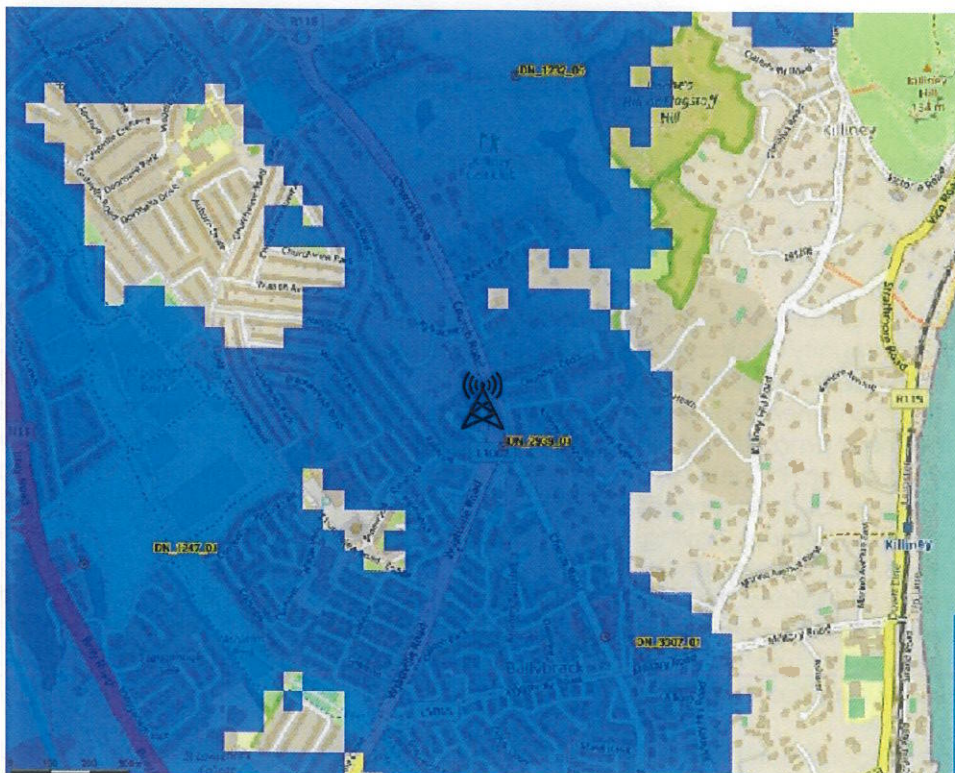


4.3. Existing Indoor Coverage without DN\_2939

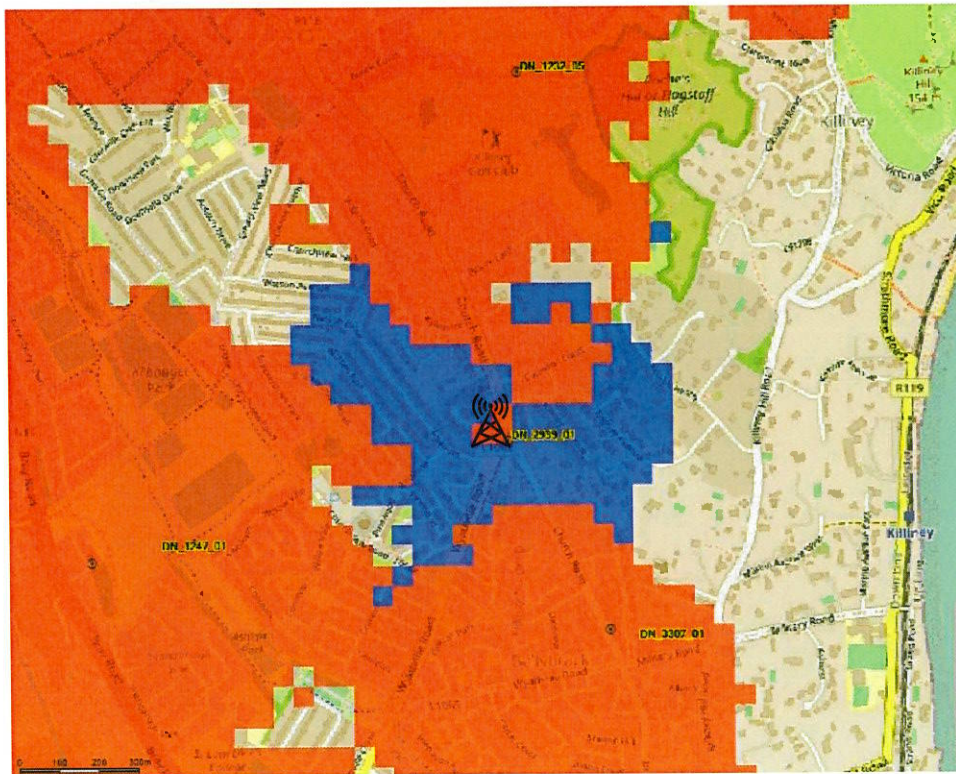




4.4. Predicted New Indoor Coverage with DN\_2939



4.5. Existing and Predicted Indoor Coverage with DN\_2939



## 5. Site Selection Process and Discounted Options

- 5.1. Eir will always co-locate on an existing telecommunications structure as a first choice if a suitable existing structure exists, as it has done on many hundreds of its sites in its radio network to date and which it has already done here at the nearest existing 2 out of 4 telecommunications structures as shown below in table 1.
- 5.2. There are no suitable existing structures in this search area to locate Eir's equipment and the local community in this densely populated residential area currently suffer from a severe lack of high-speed wireless broadband and data services. Eir would not be looking to provide the much-needed coverage here if it could do so by its two existing two structures. Due to the sheer amount of intervening vegetation and built form as well as the increasing capacity issues on its network as a result of increasing demand here in this densely populated area for data services, means Eir cannot meet its wireless broadband and data objectives here without having a new structure which is proposed as a last resort in accordance with the sequencing approach to finding a site in accordance with the 1996 Government Guidelines. The location has been selected on the basis that it is the optimum location in this search area and the only option which is a last resort. The height is the lowest height possible to 'see' over surrounding high trees and built form in the area for two operators to share the same pole.
- 5.3. To avoid any confusion as to why a new telecommunications installation is required here which is a central point in this application, all the mobile operators namely Three, Eir and Vodafone have an obligation to provide 100% coverage throughout the country, including at this location. The nearest existing sites are too far away for the newer technologies to work including 4G and 5G technologies and to a large extent 3G, due to the required data speeds for applications like social media, internet browsing and downloading, the

technology range which depends on the number of users at any one time can be only several hundred metres. What is required is a balance between planning requirements and people's entitlements to modern communications facilities which affects their quality of life, which is classed by the government as an essential public service like water and electricity so these services are required in all areas. Unlike the earlier 2G technology in the late 1990's which had a range of up to 10KM and not several hundred metres for 4G and 5G technologies, so back then masts could be located miles away from their coverage target area, but that is not the case nowadays, so it is respectfully requested that the Council show's flexibility for the newer technologies with regards to siting, whilst protecting amenity, which is what the applicant considers it has done very successfully here as there are no resulting significant environmental impacts resulting from the proposed development as is demonstrated in this planning statement.

5.4. The siting of the Proposed Development was decided upon after firstly analysing the requirements to provide new and improved broadband coverage here as explained above. Then a sequential approach was taken to choosing the site in accordance with the County Development Plan and 1996 Government Guidelines. From this a number of existing telecommunications sites (table1) were investigated. To ensure the efficient operation of a radio network, alternative sites must be within the cell search area, which is shown in section 4.1 and 4.2 of this document. These sites must be at relatively high points to ensure the antennas can transmit and receive over the proposed cell area. Sites also must have the following characteristics, they must be environmentally suitable i.e. where any inevitable and associated impacts are within acceptable parameters;

- Within search ring to meet wireless broadband coverage objectives;
- Be capable of being developed; sufficient space for pole and cabinets, avoiding underground utilities and free of overhead obstructions like cables;
- Sufficient pavement space for wheelchair access and buggys/prams;
- Minimise any impacts on the residential amenity of the area;
- Available power and fibre connections nearby.

5.5. In compliance with each operator's license, all attempts to utilise any existing telecommunications structures where they represent the optimum environmental solution have been employed. The ComReg site Finder mast register was used to search for existing sites in the area which is the most up to date source of information and is shown in the table 1 below.

No.	Site Location	Location	Reason
1	Church Rd, Killiney, Dublin	E: 323960 N: 224316	Three Ireland is located at this site (behind church louvers) and the church building cannot support another provider so it would not meet Eir's coverage objective here.
2	Kilgobbet Grove, Cabinteely, Co. Dublin	E: 323960 N: 224316	This site is significantly outside the search ring. Eir, Vodafone, and Three Ireland are already co-located at this site so it would not meet Eir's coverage objective here.
3	Church Rd, Killiney, Dublin	E: 325241 N: 224171	This site is significantly outside the search ring. Eir is already co-located at this site with Three Ireland so this site would not meet Eir's coverage objective here.
4	Shanganagh Rd, Glenageary, Ballybrack, Co. Dublin	E: 325255 N: 224027	This site is significantly outside the search ring. Vodafone is located on this site, and it is very close to an existing Eir site (3), so it would not meet Eir's coverage objective here.

5.6. During the alternative sites assessment, there were no suitable existing telecommunications sites identified which would be capable of providing the coverage required in this instance. As you can clearly see in the Comreg map below there is a total absence of existing telecommunications sites in this area along Church Road / Killiney Avenue, hence why Eir requires a site here.

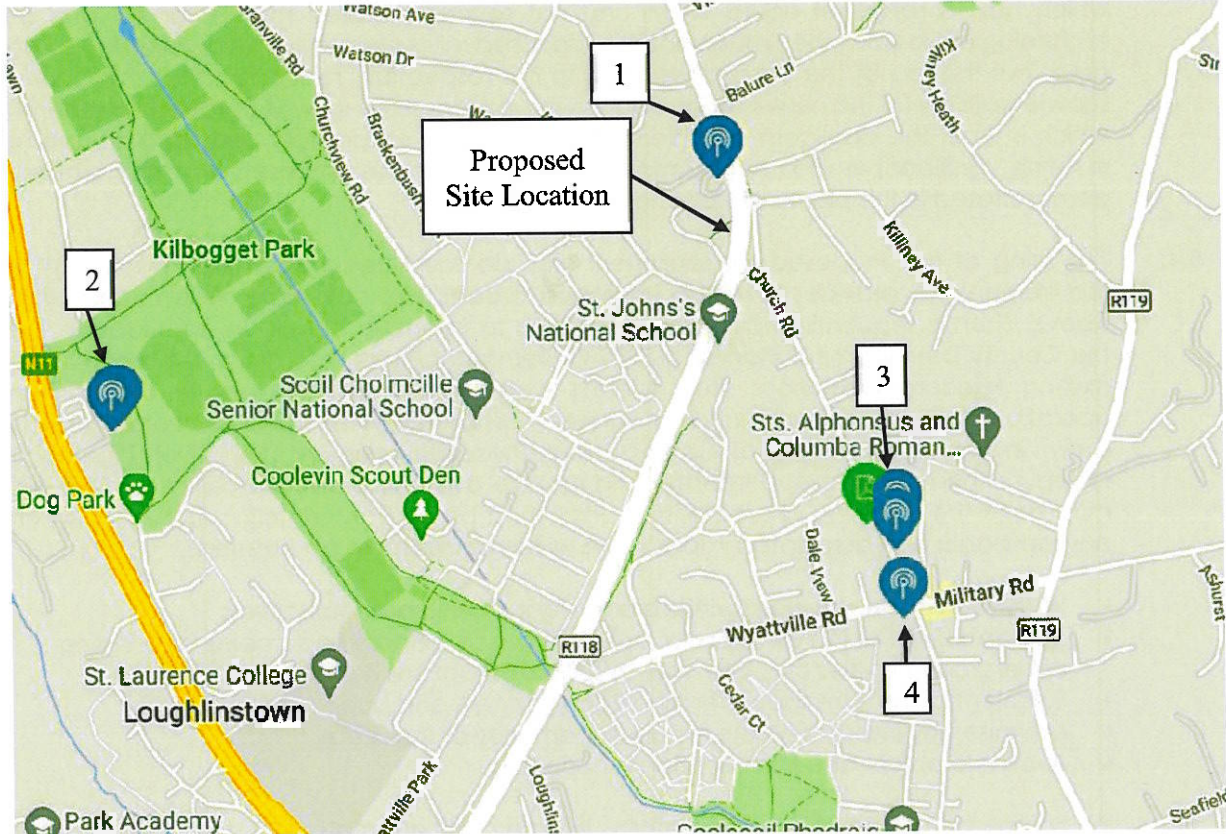


Figure 2 ComReg Site Finder depicting existing telecommunications sites in the area.

5.7. There was a rigorous search for a suitable new site here and the final site location was chosen following three separate site visits. Of the four options considered it was finally decided to proceed with Option C below, the chosen site.

- Option A (X: 324968, Y: 224643) is located within a green 'traffic island' on the eastern side of the R118 (dual carriageway) and the western side of Killiney Avenue (2 lane), c. 57m south of a roundabout at Killiney Avenue and 40m north of a junction with Church Road. The precise location is centrally located between a street light and copse of semi-mature trees on the western side of this 'island', with sufficient distance away from any tree roots. There are a number of existing 12m lamp posts in the immediate area and a number of semi-mature and mature trees particularly to the north of the R118 (dual carriageway) along both sides of it, towards St. Matthias Church of Ireland which contains antennas in its louvres. This site option is close to the chosen site location however this site option is in direct view of several dwellings.
- Option B (X: 324909, Y: 224815) is located on a grass verge along Church Road (R118 Road). The site is surrounded by semi-mature (c. 6-8m) and mature trees with approx. 15m in height along the roadsides and in the close proximity to the site. This location is approx. 70m away from the St. Matthias' Church (listed building) and which is c. 44m from another listed building across the road from the church. The proposed location failed as it did not meet Eir's coverage objectives here mainly due to the signal being blocked by trees and it was outside the search area.

- Option C (X: 324975, Y: 224611) is located on a grass verge beside a footpath connecting the Killiney Avenue Road and Church Road (R118). The R118 (Dual Carriageway), is located to the immediate west of the site. The proposed location would be between young/semi mature trees and light poles. A car park is located to the south of the site across Church Road approximately 40m away with St. John's National School further along 140m from site. Mature/Semi mature trees are placed along long stretches of the Church Road and Killiney Avenue. The area to the east of the site along Killiney Avenue is mainly residential. St. Matthias' Church is located 135m away to the north.
- Option D (X: 324952, Y: 224574) is located on a grass verge between streetlights before a bus-stop along the Wyattville Road. Semi mature trees are located along the opposite side of the road as the site. Further semi mature trees are located to the south-east of the site screening the nearest residential properties. Streetlights are very common along both sides of Church Road and Wyattville Road. A car park is located to the south of the site, close to the site boundary. St. John's National School is located further along Wyattville Road, 90m away. The nearest housing is located 37m away to the east, across the car park. Further housing across the R118 to the west of the site in Ralahine estate. St. Matthias' Church is located 160m to the north along the R118. This site was considered to be very close to the adjoining school.
- Having considered the above 4 options, it was decided to proceed with an 18m streetworks site at Option C location, following a re-survey and following the failure of Option B which was previously put forward to Eir, as it is outside the search ring.

## 6. Environmental Considerations



Figure 3: Environmental Designations Map

### Heritage, Ecology and Landscape

- 6.1. As can be seen in the Environmental Designations Map above in Figure 4, the proposal is suitably distanced away from any landscape or ecological sensitive designated areas that will not be impacted by the proposal.
- 6.2. With regards to built heritage, the site is situated to the south of the Church of St Matthias which is a protected structure (RPS no 1686), the associated parochial hall and rectory buildings are also listed buildings. A Cultural Heritage Impact Assessment has been carried out to determine the extent of potential impact of the proposal on the Church and its setting. The report finds;
- No designated archaeological or architectural heritage sites will be negatively affected by the proposed telecommunications development.
  - The protected structures sit within a modern streetscape, beside a busy dual-carriageway road in a built up suburb and thus their original 19<sup>th</sup> century setting has long been lost;
  - Although the pole will be visible it would appear indistinguishable from existing metal poles in the area.
- 6.3. Therefore, the proposed development will not have any overly negative impact on the receiving environment here considering the baseline character of the streetscape reflects the modern utilities of suburban development.

**Health**

- 6.4. Compliance with emission limits is regulated by ComReg. A license to provide services is subject to compliance with strict emission controls. The limits are specified by the International Commission for Non-Ionising Radiation Protection (ICNIRP), including for this site since it was first built. We attach an ICNIRP Declaration as evidence of this compliance.

**Visual Assessment**

- 6.5. The contents of this section of the document have been prepared in accordance with the Guidelines for Landscape and Visual Impact Assessment (3rd Edition) 2013. This section of the report should be read in conjunction with the attached photomontage and wireframe report.

Sensitivity	Typical descriptors
<b>High</b>	Receptors with proprietary interest in the view such as residential properties, and receptors undertaking recreating where the view is a key reason for the activity, e.g. user of public footpaths and bridleways and open access land.
<b>Medium</b>	Receptors with moderate interest in their environment, e.g. workers, pedestrian cyclists and other non-motorised users of major movement corridors and people taking part in outdoor sports
<b>Low</b>	Receptors with passing of momentary interest in their environment, e.g. motorists.

Table 2: Visual Sensitivity

- 6.6. The sensitivity of a visual receptor is determined by a combination of the value of the view and the susceptibility of the visual receptors to the change that the Proposed Development will have on the view. Visual receptors are the people who will be experiencing the views.
- 6.7. Magnitude of Change is an expression of the extent of the effect on the visual receptors that will result from the introduction of the Proposed Development. The magnitude of change is assessed in terms of the size and scale of the effect and the geographical extent of the area influenced.
- 6.8. Levels of magnitude of change - high, medium to high, medium, medium to low and low - are applied in order that the judgement used in the process of appraisal is made clear.

The criteria used to determine magnitude of change differ for the effects on landscape receptors and visual receptors, as well as the cumulative effects on both.

Magnitude	Description of Change
<b>Large</b>	Total loss or major alteration to key landscape elements/features/characteristics such that post development the landscape character area would be fundamentally changed.
<b>Medium</b>	Partial loss or alteration to one or more key landscape elements/features/characteristics such that post development the landscape character area would be partially changed
<b>Low</b>	Minor loss or alteration to one or more key landscape elements/features/characteristics such that post development the change/loss would be discernible, but the landscape character would be similar to the baseline.
<b>Negligible</b>	Very minor loss of alteration to one or more key landscape elements/features/characteristics of the baseline conditions. Change would be barely distinguishable approximating to no change.

Table 3: Magnitude of Change

- 6.9. The magnitude of change resulting from the Proposed Development on a visual receptor is made by combining the assessment of size or scale of the change in views and the geographical extent over which such changes occur.
- 6.10. Effects on Visual Receptors - The level of the effect is determined through the combination of the sensitivity with the magnitude of change that will be brought about by the Proposed Development. The appraisal applies professional judgement and identifies the level of effect defined as being minor, moderate or major. Intermediate levels may also be applied such as minor-moderate and moderate major.

Magnitude of Change →	High	Medium-High	Medium	Medium-Low	Low	Negligible
Visual Sensitivity ↓						
High	Major	Major	Moderate /Low	Moderate/Low	Moderate/Low	Negligible
Medium-High	Major	Major-Moderate /Low	Major-Moderate /Low	Moderate/Low	Moderate/Low or Moderate-Minor	Negligible
Medium	Major-Moderate /Low	Major-Moderate /Low	Moderate /Low	Moderate/Low or Moderate-Minor	Moderate/Low -Minor	Negligible
Medium-Low	Major-Moderate /Low	Moderate /Low	Moderate /Low or Moderate -Minor	Moderate/Low -Minor	Moderate/Low or Moderate-Minor	Negligible
Low	Moderate /Low	Moderate /Low or Moderate -Minor	Moderate /Low - Minor	Moderate /Low or Moderate-Minor	Minor	Negligible

Table 5: Illustrative Matrix of Effects

- 6.11. Where the visual effect has been classified as Major or Major/Moderate significant effects may occur. Effects identified as moderate or less are not considered to be significant. As with many aspects of visual assessment, significance of effect also needs to be quantified with respect to the scale over which it is felt. An effect may be locally significant, or significant with respect to a small number of receptors, but not significant when judged in a wider context.

- 6.12. Any effect may be described as temporary or permanent, direct or indirect, positive or negative and cumulative and these various types of effect described below have a bearing on the acceptability or otherwise of any impact. Visual effects can be described as temporary or permanent and reversible or irreversible. Due to the long-term nature of telecommunications structures, they are generally regarded as a long-term reversible addition to the landscape preserving the choice for future generations whether or not to retain what might be regarded as the landscape fabric of today.
- 6.13. It is possible to identify a number of sensitive receptors within the study area, which should then be further investigated through field visits and the production of photomontages and wirelines. The most important viewpoints (VPs) are identified as being points whereby the Proposed Development is likely to show the greatest amount of visibility or impact on the largest number of users and as such these warranted further investigation.
- These VP's are:
- VP1 – Church Road north of the site
  - VP2 – Church Road, from St Matthias Church north of the site
  - VP3 – Killiney Avenue east of the site
  - VP4 – Church Road south of the site
- 6.14. The photomontages attached will illustrate the views from locations where the proposed communications mast would be theoretically visible. This in turn has informed the locations of the final viewpoints. The viewpoints were selected where theoretical points of visibility intersected public roads, residential areas, cultural heritage assets and public rights of way (PROWs).
- 6.15. Visual impact assessment in relation to the Proposed Development. It is ascertained, however, that the considered viewpoints are locations which are publicly accessible and expose the development in its fullest form in order to assess the highest possible impact of the proposal. The remainder of this section now considers each of these viewpoints in turn and discusses the potential impact of the Proposed Development and comments on its potential significance.

Table 6: Viewpoints Analysis

Viewpoint 1	VP1 – Church Road north of the site E: 724885 N: 724798 Distance to Proposal: 116m
<b>Existing Character</b>	This viewpoint (VP) is taken along Church Road, approx. 116m northeast of the proposed location of the development. This image shows the extent of the road network here, comprising a dual carriageway, bound on both sides by stone walls and mature trees. The surrounding area consists of existing built up suburb, in the distance some housing estates and commercial buildings are visible.
<b>Receptor Type and Sensitivity</b>	The typical receptor at this location would be road users such as pedestrians, motorists, and cyclists. The sensitivity is therefore medium.
<b>Nature of Change</b>	From this viewpoint, the proposal is partially visible, the top of the pole appearing alongside other street lights along the side of the road here, however, the design of the proposal is similar to the existing street furniture particularly the close by street lights which allows it to be absorbed seamlessly into the host environment. The nature of change is therefore considered to be low.
<b>Magnitude of Change</b>	In relation to the view at this VP, the magnitude of change is considered to be low as the proposed development is predicted to have a minor loss or alteration to one or more key landscape elements/ features/



	characteristics such that post development the change/loss would be discernible, but the landscape character would be similar to the baseline.
<b>Summary of Visual Assessment</b>	Sensitivity: Medium (Road users)
	Magnitude: Low
	Level of effect: Moderate-Low
<b>Significant effect?</b>	<b>No</b>

<b>Viewpoint 2</b>	<b>VP2 – Church Road, From St Matthias Church north of the site</b> E: 724862 N: 724796 Distance to Proposal: 113m
<b>Existing Character</b>	This viewpoint (VP) is taken along Church Road, approx. 113m northwest of the site. This VP is taken by the access to St Matthias Church which is listed as a Protected Structure, thus it is sensitive to changes to its setting. This VP shows the boundary to the church grounds, the church tower and how this site interacts with the extensive modern road network to the front of the site.
<b>Receptor Type and Sensitivity</b>	The typical receptor at this location would be road users such as pedestrians, motorists and cyclists. The sensitivity is therefore Medium.
<b>Nature of Change</b>	The proposed development will be partially visible from the perspective of this viewpoint as the proposal is almost fully screened by the mature trees in the surrounding area and the top of the pole visible alongside the existing streetlight. The nature of change is considered to be low as the proposed development will not have any negative impact upon the landscape.
<b>Magnitude of Change</b>	In relation to the view at this VP, the magnitude of change is considered to be low as the proposal is predicted to have a very minor loss of alteration to one or more key landscape elements/features/characteristics of the baseline conditions. Change would be barely distinguishable approximating to no change.
<b>Summary of Visual Assessment</b>	Sensitivity: Medium (Road users)
	Magnitude: Low
	Level of effect: Low
<b>Significant effect?</b>	<b>No</b>

<b>Viewpoint 3</b>	<b>VP3 – Church Road west of the site</b> E: 724998 N: 724744 Distance to Proposal: 137m
<b>Existing Character</b>	This view is located on Killiney Avenue approx. 137m north of the site. There is a mature tree in the foreground within the garden of a dwelling at this viewpoint along with mature / semi-mature trees and streetlights in the background.
<b>Receptor Type and Sensitivity</b>	Primary receptors at this location would be residential dwellings along with road users such as motorists, pedestrians and cyclists. The sensitivity is therefore high.
<b>Nature of Change</b>	From this VP, the proposed development will be invisible from this direction screened by a copse of trees. This dwelling backs onto the road junction and as such it can be taken that this images shows how the proposed development might be viewed from other dwelling looking westwards in the direction of development.

**Magnitude of**

<b>Summary of Visual Assessment</b>	Sensitivity: High (Residential Dwellings)
	Magnitude: Negligible
	Level of effect: Low
<b>Significant effect?</b>	<b>No</b>

<b>Viewpoint 4</b>	VP4 – Church Road south of the site E: 724889 N: 724606 Distance to Proposal: 80m
<b>Existing Character</b>	This viewpoint is located approximately 80m from the proposal to the southwest of Church Road. There semi-mature and mature trees present in the background while this viewpoint is mainly dominated by the main Church Road dual carriageway and the streetlights that line this road. The church is partially visible in the background being mostly screened by the existing trees on the grounds.
<b>Receptor Type and Sensitivity</b>	Primary receptors at this location would be road users such as motorists, pedestrians, and cyclists. The sensitivity is therefore medium.
<b>Nature of Change</b>	The proposed development will be visible from the perspective of this viewpoint given its proximity to the site. However, the proposal is considered to fit in comfortably to its host environment here as it is absorbed and assimilated into its location by the presence of existing street lighting poles which helps to ensure the proposal is not seen as a dominating or isolated structure and instead is viewed at the same or similar height as the existing street lighting poles along Church Road. Further, the ground cabinets are setback from the footpath therefore not having any impact on the pedestrian environment here. This viewpoint confirms that the location has the capacity to accommodate the proposal without it resulting in any significant impacts.
<b>Magnitude of Change</b>	In relation to the view at this VP, the magnitude of change is considered to be medium as the proposed development is predicted to have some loss or alteration to one or more key landscape elements/features/characteristics such that post development the change/loss would be discernible, but the landscape character would be similar to the baseline.
<b>Summary of Visual Assessment</b>	Sensitivity: Medium (Road users)
	Magnitude: Medium
	Level of effect: Moderate
<b>Significant effect?</b>	<b>No</b>

## 7. Relevant Planning Policy and Guidance

### National Planning Framework (NPF)

- 7.1. Under the NPF, one of the 10 goals or national strategic outcomes is to create a strong economy that can foster enterprise and innovation and attract talent and investment. It states that delivering this outcome will require the coordination of growth and place making with investment in world class infrastructure including digital connectivity, which this application supports. It also supports a second goal regarding international connectivity.
- 7.2. Under the NPF, in Chapter 4, regarding Urban Places, this well designed and located proposal supports Objective 4 to ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.

- 7.3. Within the NPF it is emphasised how in the information age, telecommunications networks play a crucial role in enabling social and economic activity. In section 2.2, one of the NPF's strategies is to strengthen Ireland's digital connectivity by 5 measures, one of which is to improve local connectivity to principal communications (broadband) networks.
- 7.4. In section 5.1 the NPF states that a major focus will be on addressing connectivity gaps in communications infrastructure.
- 7.5. **Analysis:** this proposal supports two of the ten goals of the NPF in improving digital connectivity, including international connectivity for not only a strong local economy but also to encourage social interaction. Ever since the original 2G mobile networks were built in the late 1990's, national and local policy has changed since then from acknowledging the economic benefits of the then wireless voice communications networks to nowadays acknowledging the social benefits of modern day wireless broadband communications networks which has recently been most evident during the Covid pandemic where many people's only social interaction with family and friends was through hand held digital devices like mobile phones, tablets and laptops. There has never been a greater socio-economic appreciation or need for wireless broadband with home working / hybrid working as well as for social interaction and helping to alleviate social isolation, which this proposal strongly supports and as such will help to improve the quality of the lives of the local community here.

### **Regional Spatial & Economic Strategy for Eastern and Midlands Regional Assembly (RSES) 2019-2031**

- 7.6. The RSES establishes the high level objectives to grow the economy and sustainable development for the eastern and midlands regions, which includes Dublin. The strategy acknowledges the importance of broadband as an essential service alongside water and transport for good quality living and is mentioned for prioritising investment in placemaking. The document lays out these priorities in its regional policy objectives (RPOs).
- 7.7. The Regions dispersed settlement pattern and its peripheral location in Europe makes it particularly dependent on efficient communications - good rail, road, sea, air and telecommunications links are of the utmost importance. The RSES seeks to enhance communications and technology across the Region.
- 7.8. RPO 4.2 seeks to ensure that all necessary infrastructure is provided alongside all residential and employment areas including, the provision of broadband services. This policy also outlines the need to safeguard adequate service capacity is available to match demand within the receiving environment. Orderly growth. It is evident that the proposed nature of works, for provision of a streetworks pole for telecommunication, fall subject to this objective as it is intended to provide needed broadband capacity.
- 7.9. The strategy continues further to highlight the essential nature of broadband for modern living, stating that good connectivity is vital to continued growth and enhancing communities set out in RPO 8.25.
- 7.10. **Analysis:** this proposal is in accordance with the high level objectives set out for priority development in the eastern and midlands region, namely the priority roll out of broadband services and telecoms connectivity. Broadband services are now considered as a necessary infrastructure to be provided in proximity to all residential and employment lands, including provisions to ensuring such services have capacity available to match demand. In this regard the proposal seeks to ensure capacity is available to service Dublin currently and into the future as the city continues to consolidate its population with the existing built up urban areas like Ranelagh.

## **Dun Laoghaire-Rathdown County Development Plan 2022-2028 (CDP)**

### **Telecommunications (Section 10.6.1)**

- 7.7. The widespread availability of a high-quality telecommunications network throughout DLR is critical to the development of a knowledge economy, will help attract inward investment in hi-tech knowledge-based industries and will engender the image of the County as the premier entrepreneurial County in the State. It will also assist home working thereby reducing commuting.
- 7.8. It is a Policy Objective to promote and facilitate the provision of an appropriate telecommunications infrastructure, including broadband, fibre optic connectivity and other technologies, within the County.

### **Telecommunications (Section 12.9.8)**

- 7.9. In the consideration of proposals for telecommunications antennae and support structures, applicants will be required to demonstrate:
- Compliance with the Planning Guidelines for 'Telecommunications Antennae and Support Structures' (1996), and Circular Letter PL 08/12 issued by the Department of the Environment and Local Government (as may be amended from time to time), and to other publications and material as may be relevant in the circumstances.
  - On a map the location of all existing telecommunications structures within a 1km radius of the proposed site, stating reasons why (if not proposed) it is not feasible to share existing facilities having regard to the 'Code of Practice on Sharing of Radio Sites', issued by the Commission for Communications Regulation.
  - To what degree the proposal will impact on the amenities of occupiers of nearby properties, or the amenities of the area - e.g. visual impacts of masts and associated equipment cabinets, security fencing treatment etc. – and the potential for mitigating visual impacts including low and mid – level landscape screening, tree-type masts being provided where appropriate, colouring, or painting of masts and antennae, and considered access arrangements.
  - Any impacts on rights-of-way and walking routes.
  - That the proposal shall not have a significant negative visual impact.
- 7.10. The Council's policies on architectural heritage and conservation are noted, specifically policy HER8, which establishes protections for protected structures and their settings as well.

#### **Policy Objective HER8: Work to Protected Structures:**

- ii. Ensure that any development proposals to Protected Structures, their curtilage and setting shall have regard to the 'Architectural Heritage Protection Guidelines for Planning Authorities' published by the Department of the Arts, Heritage and the Gaeltacht.
- iv. Ensure that any development, modification, alteration, or extension affecting a Protected Structure and/or its setting is sensitively sited and designed, and is appropriate in terms of the proposed scale, mass, height, density, layout, and materials.
- v. Ensure that the form and structural integrity of the Protected Structure is retained in any redevelopment and that the relationship between the Protected Structure and any complex of adjoining buildings, designed landscape features, or views and vistas from within the grounds of the structure are respected.

### **Zoning**

- 7.11. The site which forms part of the local road infrastructure is not zoned.
- 7.12. **Analysis:** The Dun Laoghaire-Rathdown County Development Plan 2022-2028 (CDP) underlines that telecommunications infrastructure is a key requirement within the County. The availability of services such as high-speed broadband is essential to the national economy but also to local communities in everyday life. It is considered by the applicant that this proposal fully adheres to; Policy Objective EI20 as the proposal promotes and facilitates the provision of an appropriate telecommunications infrastructure. The proposal is fully compliant with the Planning Guidelines for 'Telecommunications Antennae and Support Structures' (1996) as is shown below. It has been demonstrated that in Figure 3 and Table 1 of this document why the nearest existing telecommunications structures of which Eir is located on two of them cannot be used, the predicted visual impact has been described in section 6 of this document supported by the accompanying photomontage report which predicts a maximum level of moderate-low visual impact in the area immediately surrounding the proposal. In section 3.5 and 3.6, the proposed design of the structure was discussed where it was confirmed that the pole can be painted in any colour that the Planning Authority may prefer however a galvanised colour is proposed to match existing streetlights and to blend in with the typical sky colour. The Council's policies on architectural conservation have been noted in this application, given the proximity of St Matthias Church (RPS) to the north of this location, however it is noted that the Church and adjoining building have undergone changes including the provision of a single storey mono-pitched extension and also to facilitate the development of a telecoms antenna within the tower of the Church. In this context the proposal is considered a minor addition to the existing road infrastructure consistent along the R118 road and would not undermine the character of unique qualities of Church and parochial buildings. In addition, the applicant has submitted a cultural heritage impact assessment. The findings of this report conclude that the proposed development will have no detrimental or significant changes to the setting of the church as the area surrounding the church has undergone significant changes from its original 19<sup>th</sup> century setting that the addition of a similar pole here would not be unusual. This in conjunction with other Council objectives to deliver necessary infrastructure it is considered that the proposal in the subject location along the dual carriageway shows planning balance wherein it will not have undue negative impacts on the area but will undoubtedly provide many benefits for those living and working here.

**Department of Environment Heritage and Local Government,  
Telecommunications, Antenna and Support Structures (Guidelines for Planning  
Authorities – 1996) and Circular PL07/12**

- 7.13. Government policy for the development of telecommunications infrastructure is set out in the Department of Environment, Heritage and Local Government Telecommunications Antennae and Support Structures (1996) and Circular Letter PL07/12 which updated certain sections of the Guidelines.
- 7.14. Paragraph 1.2 states that: *'The Government's telecommunications policy aims to place Ireland in the top quartile of OECD economies as regards the availability, price and quality of telecommunications services in order to promote industrial and commercial development, to improve personal and household security and to enhance social interchange and mobility.'*
- 7.15. With regards to visual impact, the Guidelines detail that: *'In most cases the applicant will only have limited flexibility as regards location, given the constraints arising from radio planning parameters, etc., already referred to.'*
- 7.16. The guidelines recommend a hierarchy of suitable locations for telecommunications equipment which has been followed here as part of the site selection process, and which

has been demonstrated has a lack of existing telecommunications structures within this search area.

- 7.17. In regard to co-location and sharing, section 4.5 states that 'Sharing of installations (antennae support structures) will normally reduce the visual impact on the landscape' and 'All applicants will be encouraged to share and will have to satisfy the authority that they have made a reasonable effort to share'. It is confirmed that Emerald Tower Limited actively encourages the sharing of all infrastructure in its portfolio which is the case for this proposal also.

### **Report of the Mobile and Broadband Taskforce and Action Plan for Rural Development**

- 7.18. The purpose of the taskforce report (published by the Department of Communications, Climate Action and Environment) and the Action Plan for Rural Development (published by the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs) in 2016 is to deliver the National Broadband Plan (NBP) in the shortest time possible and to reduce Ireland's urban-rural divide.
- 7.19. There are 40 actions contained within the taskforce report which require the co-operation of multiple stakeholders from government departments to industry providers. The actions contained within the report serve to eliminate barriers to the timely development of communications infrastructure in advance of, and in tandem with NBP State-led intervention.
- 7.20. The Section 254 licensing process emerged from this taskforce to help deliver broadband infrastructure more quickly by removing barriers to its deployment. It differs from the Planning and Development Regulations 2001 (as amended), Schedule 2, Class 31 Telecommunications, in that Section 254 licensing relates solely to public roads and not to other property under the Regulations. Section 254 requires high standards of design and adherence to the proper planning and sustainable development of the area which this proposal full complies with as is set out within this document.

## 8. Conclusions

- 8.1. Taking into consideration all the relevant factors set out here in this document, it is considered that this proposed telecommunications pole is the optimum solution in terms of providing the required technology coverage, minimising any adverse impacts on local amenity and the surrounding townscape. The site is considered to be appropriately located as it is not located within any sensitive landscape designation. The site location of the proposed development benefits from the presence of mature and semi-mature trees as well as streetlights along Church Road and is located where it will have the least possible impact on residential amenity locally, following a rigorous site search. It is considered that the proposal is at the minimum height possible for the co-location of two separate operators on the same pole to be able to 'see' above the surrounding trees, is able to be absorbed comfortably by its host environment as it is similar in design to existing roads vertical infrastructure including street lighting poles. This means that the proposed development will not be seen as the dominating structure in the area and will not have a negative impact upon the streetscape or character of the surrounding area.
- 8.2. The height proposed at 18m is the lowest possible height for two operators to be co-located on the same pole to provide the required technology coverage by having 'line of sight' above the immediate built form and vegetation.
- 8.3. It has been shown in section 6 of the document, that there are *No Significant Environmental Impacts* predicted as a result of the Proposed Development. The attached photomontage report demonstrates that there will not be any significant visual impacts as a result of this proposal, however, that there are *Significant Benefits* to be provided by the Proposed Development for the local community by having access to the most up to date wireless broadband and data services, to be provided by a national mobile broadband operator on a slender structure, and making provision for another operator, thus obviating the need for up to two separate structures in the same area and the environmental damage it would cause, which it is considered should be considered carefully in determining the planning 'balance' by the Planning Authority.
- 8.4. In addition, a Cultural Heritage Impact Report has also been submitted in support of the proposed development which assessed the potential for impact on the Church north of the site. As noted in this statement and the attached Cultural Heritage Impact Report the Church and associated buildings have undergone modern interventions and as such are considered significantly less sensitive to changes in their setting, given that the proposal is consistent with the baseline character of the R118 Road it is considered a minor alteration to the setting would arise. In this regard the report findings show that the impact on the church would be minor, considering that the pole is similar in style to existing structures, streetlights, already visible from the church and as such do not have any significant impact on views of the church or views from it. In this context permission should be granted to support future capacity building in this suburban setting.
- 8.5. Broadband is now considered an essential public service like water and electricity and the applicant urges the Planning Authority to assess the planning balance carefully here in terms of the public benefits associated with the proposal as opposed to the limited dis-benefits (limited visual impact) which are considered to be far outweighed in accordance with national and local policy.
- 8.6. As has been demonstrated in section 7 of this document, this proposal is in full accordance with the aforementioned policies and guidance, including the 1996 Government Guidelines and Development Plan, with regards to the sequential approach to locating telecommunications equipment and which actively encourages co-location, to prevent the proliferation of masts, which this application proposes.

- 8.7. Therefore, in the absence of any significant harm to the site and its surrounds and in view of supporting policy at national and local level in favour of this proposal, the applicant therefore respectfully asks the Local Authority to grant a license for this proposal.





**CourtneyDeery**  
ARCHAEOLOGY & CULTURAL HERITAGE

Cultural Heritage Impact Assessment

Proposed Telecommunications Development

Wyattville Road, Killiney, County Dublin

---

For

Phoenix Tower International

---

[Redacted]

[Redacted]

14th November 2023

## CONTENTS

EXECUTIVE SUMMARY.....	1
1. Introduction .....	1
1.1. General.....	1
1.2. Study Area.....	2
1.3. Methodology.....	2
1.4. Development Description .....	3
2. Archaeological and Historical Background .....	6
2.1. Prehistory.....	6
2.2. Early Medieval Period .....	6
2.3. Post-Medieval Period.....	7
2.4. Cartographic Sources .....	7
2.4.1. Down Survey .....	7
2.4.2. Rocque’s ‘An Actual Survey of the County of Dublin’ .....	8
2.4.3. Ordnance Survey Mapping .....	9
2.5. Previous Archaeological Investigations.....	12
3. Archaeological Heritage .....	12
3.1. Designated Sites.....	12
4. Architectural Heritage.....	12
4.1. Designated Sites.....	12
5. CURRENT SITE CONDITION.....	14
6. Impact Assessment and conclusions.....	18
7. REFERENCES.....	22
7.1. Online Sources .....	23
APPENDIX 1 SUMMARY OF RELEVANT LEGISLATION.....	24

### List of Figures

Figure 1 Site location, showing protected structures to the north-west.....	1
Figure 2 Layout of proposed development .....	4
Figure 3 Elevation of proposed monopole .....	5
Figure 4 Down Survey map of the parish of Killiney, c. 1656 .....	8
Figure 5 Rocque’s map of County Dublin (1760), with approximate site location in red .....	9
Figure 6 Ordnance Survey First Edition six-inch map (1843), showing approximate site location in red .....	10

Figure 7 Ordnance Survey 25-inch map (1907), showing approximate site location in red .....	11
Figure 8 Revised edition Ordnance Survey six-inch map, 1937, showing approximate site location .....	11
Figure 10 Proposed site location and protected structures in proximity on current aerial imagery (Google Earth Pro 2023) .....	15

#### List of Plates

Plate 1 St Matthias’s Church, facing SSW, from east side of Church Road .....	16
Plate 2 View SSE towards proposed monopole location from inside churchyard of St Matthias’s Church .....	16
Plate 3 St Matthias’s Church (left) and Parochial Hall (right) from within churchyard, facing WSW .....	17
Plate 4 View of rooftop of Rectory (Woodfield) from roadside, at church boundary wall, facing SW.....	17
Plate 5 Gates and boundary to Rectory (Woodfield), facing NNW .....	18

#### List of Images

Image 1 Existing view SSW from east side of Church Road, opposite entrance to St Matthias’s Church (VP1, Photomontage Report, Entrust Planning & Environmental) .....	19
Image 2 Proposed view SSW from east side of Church Road, opposite entrance to St Matthias’s Church (red line indicates monopole) (VP1, Photomontage Report, Entrust Planning & Environmental) .....	19
Image 3 Existing view S from entrance to St Matthias’s Church (VP2, Photomontage Report, Entrust Planning & Environmental) .....	20
Image 4 Proposed view S from entrance to St Matthias’s Church (red line indicates monopole) (VP2, Photomontage Report, Entrust Planning & Environmental) .....	20
Image 5 Existing view NNE from east side of Church Road, looking towards St Matthias’s Church (VP4, Photomontage Report, Entrust Planning & Environmental) .....	21
Image 6 Proposed view NNE from east side of Church Road, looking towards St Matthias’s Church (red line indicates monopole) (VP4, Photomontage Report, Entrust Planning & Environmental) .....	21

## EXECUTIVE SUMMARY

This report provides a cultural heritage impact assessment for the erection of a monopole at a site on Wyattville Road, Loughlinstown, County Dublin. It has been prepared for Entrust Planning and Environment on behalf of Phoenix Tower International.

The report includes a visual impact assessment with regard to St Matthias's Church, which is located c. 75m north-west of the proposed telecommunications tower (Figure 1). The church is a protected structure in the Record of Protected Structures (RPS) of the Dun Laoghaire Rathdown County Development Plan (2022-28) (RPS No. 1686). It forms the principal building of an associated group of protected structures, which includes the parochial hall to the north-west (RPS No. 1986) and the rectory to the south-east (RPS No. 1887; Woodfield House). All three buildings are also listed in the National Inventory of Architectural Heritage (NIAH).

No designated archaeological or architectural heritage sites will be negatively affected by the proposed telecommunications development.

The protected structures located in proximity to the proposed monopole location (St Matthias's Church and associated parochial hall and rectory) sit within a modern streetscape, beside a busy dual-carriageway road, in a built-up residential suburb. Their original 19<sup>th</sup> century setting, at the side of a relatively narrow road, in a part agricultural / part residential area, has long been lost. More recent changes to the structures or their immediate environs include substantial extensions to the parochial hall, which is now a child education centre, and antennae on the church roof. These have not negatively affected the historic character, context and setting of the structures and so demonstrate their ability to absorb changes in their environment.

The protected structures are located just beyond a curve in the road and this, combined with the existing mature boundaries, renders the proposed monopole location invisible from the structures. The height of the monopole means that the top of it will be visible, though as demonstrated by the photomontages, this will be largely indistinguishable from the existing metal poles of the street lights that line either side of the dual-carriageway road (Image 1 to Image 6 of this report, after Entrust Planning & Environmental Photomontage Report, October 2023).

It is considered that the proposed monopole will blend with the existing modern street furniture and will not compromise the setting of the protected structures.

## 1. INTRODUCTION

### 1.1. General

This report provides a cultural heritage impact assessment for the erection of a monopole at a site on Wyattville Road, Loughlinstown, County Dublin. It has been prepared for Entrust Planning and Environment on behalf of Phoenix Tower International.

The report includes a visual impact assessment with regard to St Matthias's Church, which is located c. 75m north-west of the proposed telecommunications tower (Figure 1). The church is a protected structure in the Record of Protected Structures (RPS) of the Dun Laoghaire Rathdown County Development Plan (2022-28) (RPS No. 1686). It forms the principal building of an associated group of protected structures, which includes the parochial hall to the north-west (RPS No. 1986) and the rectory to the south-east (RPS No. 1887; Woodfield House). All three buildings are also listed in the National Inventory of Architectural Heritage (NIAH) (see section 4).

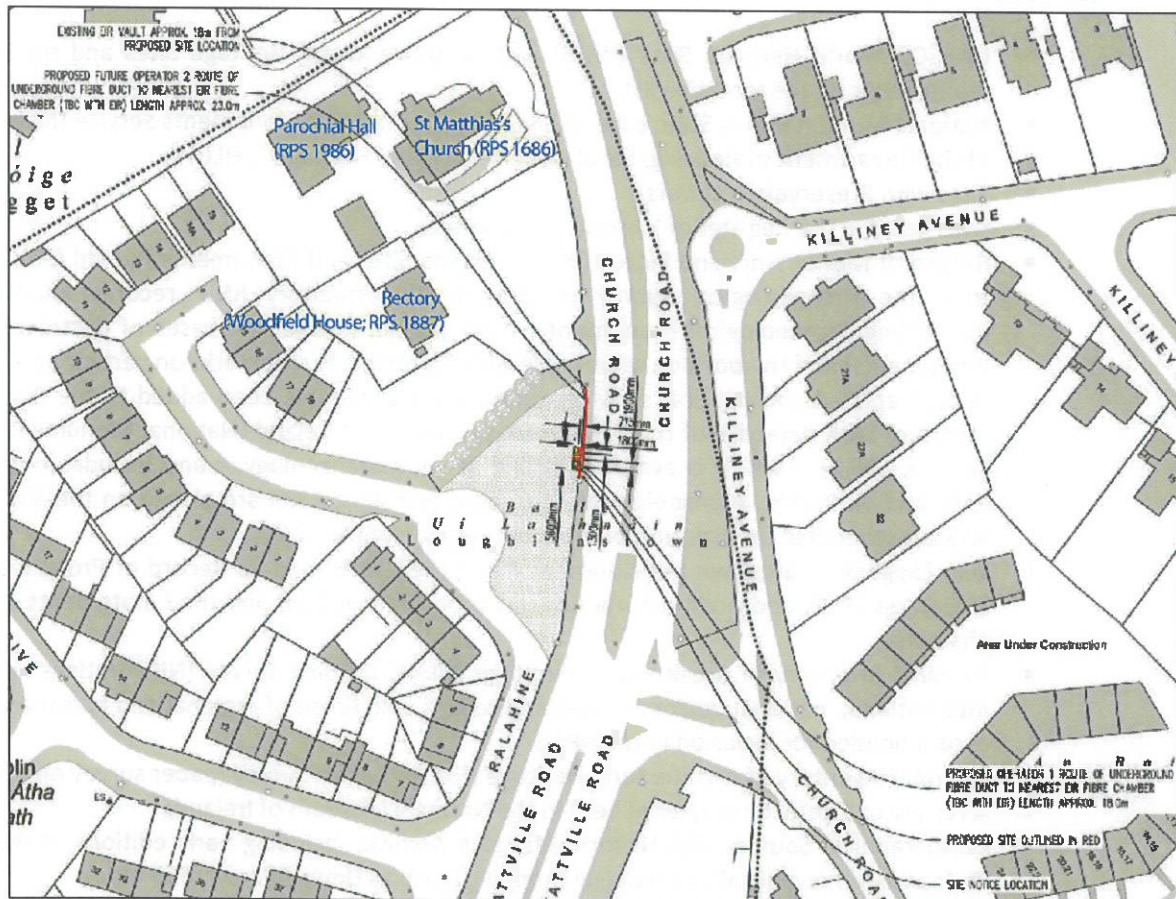


Figure 1 Site location, showing protected structures to the north-west

## 1.2. Study Area

The proposed development is located in the townland of Loughlinstown, in the civil parish of Killiney and the barony of Rathdown. It lies on the west side of a dual-carriageway road, Church Road, where it continues northwards from Wyattville Road. This is a built-up residential location that forms part of the Ballybrack / Killiney / Loughlinstown suburban area. The protected structures group consisting of the early 19<sup>th</sup> century St Matthias's Church, later 19<sup>th</sup> century rectory, and the early 20<sup>th</sup> century parochial hall occupy two adjoining plots on the west side of the dual-carriageway, further north. There are no designated archaeological heritage sites in the vicinity of the proposed development.

## 1.3. Methodology

A review of the following information took place in order to inform the cultural heritage impact assessment report:

- UNESCO World Heritage Sites (WHS) and Tentative World Heritage Sites and those monuments on the tentative list;
- National Monuments in State care, as listed by the National Monuments Service (NMS) of the Department of Housing, Local Government and Heritage (DHLGH);
- Sites with Preservation Orders;
- Sites listed in the Register of Historic Monuments;
- Record of Monuments and Places (RMP) and the Sites and Monuments Record (SMR) from the Archaeological Survey of Ireland; The statutory RMP records known upstanding archaeological monuments, their original location (in cases of destroyed monuments) and the position of possible sites identified as cropmarks on vertical aerial photographs. Archaeological sites identified since 1994 have been added to the non-statutory SMR database of the Archaeological Survey of Ireland (National Monuments Service, DHLGH), which is available online at [www.archaeology.ie](http://www.archaeology.ie) and includes both RMP and SMR sites. Archaeological sites identified since 1994 are placed on the SMR and are scheduled for inclusion on the next revision of the RMP;
- Dun Laoghaire Rathdown Development Plan (2022-2028) and its Record of Protected Structures (RPS) and Architectural Conservation Areas (ACAs) and their statements of character;
- National Inventory of Architectural Heritage (NIAH) Building Survey (NIAH ratings are international, national, regional, local and record, and those of regional and above are recommended for inclusion in the RPS);
- National Inventory of Architectural Heritage (NIAH) Garden Survey (paper survey only);
- A review of artefactual material held in the National Museum of Ireland;
- Cartographical Sources, OSi Historic Mapping Archive, including early editions of the Ordnance Survey including historical mapping (such as Down Survey 1656 Map);
- The Irish archaeological excavations catalogue i.e., Excavations bulletin and Excavations Database;
- Place names; Townland names and toponomy ([loganim.ie](http://loganim.ie));
- National Folklore Collection ([Duchas.ie](http://Duchas.ie));
- A review and interpretation of aerial imagery (OSi Aerial Imagery 1995, 2000, 2005, Aerial Premium 2013-2018, Digital Globe 2011-2013, Google Earth 2001–2023, Bing 2023) to be used in combination with historic mapping to map potential cultural heritage assets.
- A review of existing guidelines and best practice approaches.

A bibliography of sources used is provided in the References section.

#### **1.4. Development Description**

The proposed development will consist of the construction of a 18m multi-operator monopole telecommunications pole with together with antennas, dishes, equipment cabinets, fencing and all associated site development works for high-speed wireless data and broadband service. Access to the monopole site will be along Wyattville Road (Figure 2, Figure 3).

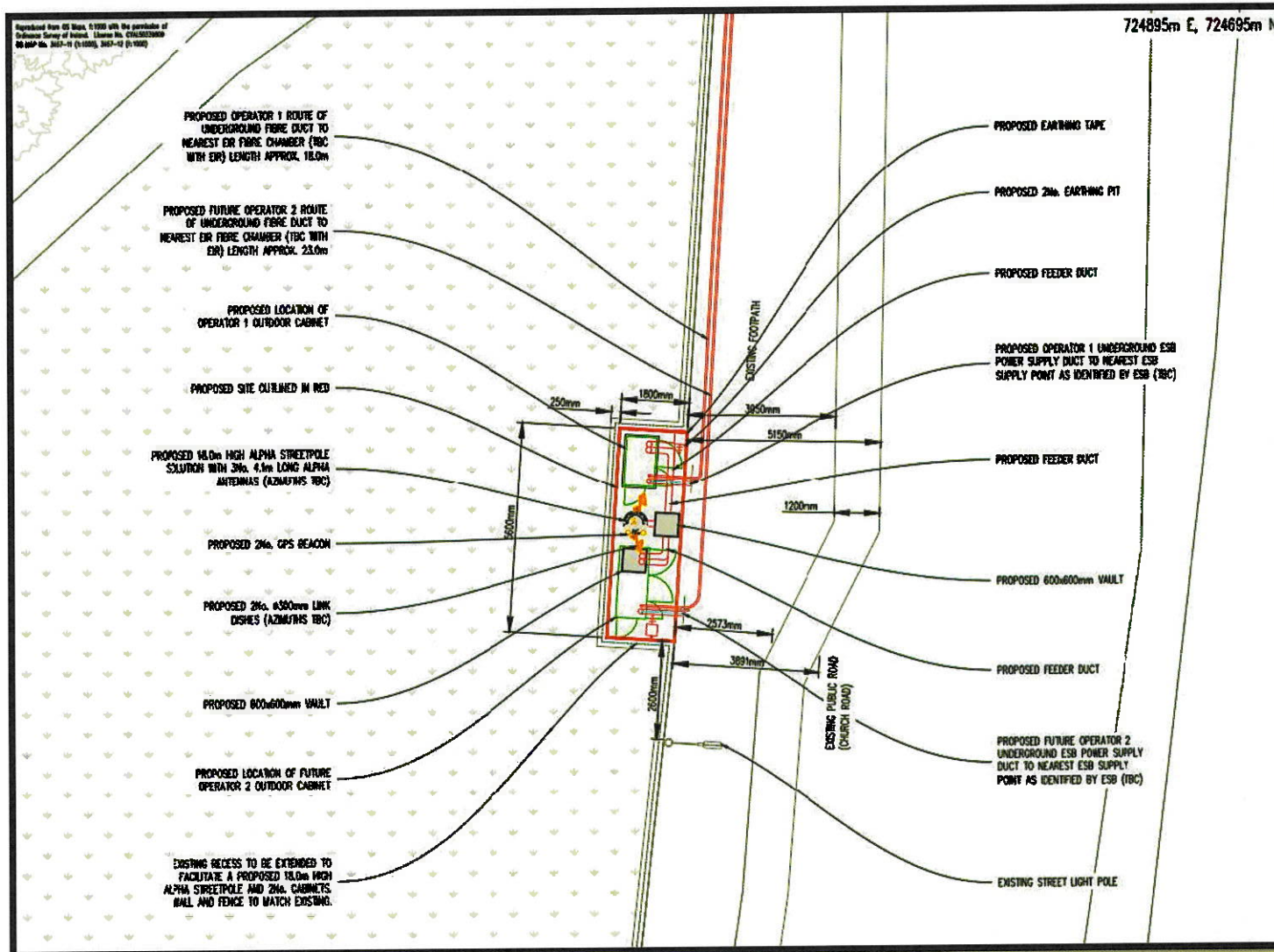


Figure 2 Layout of proposed development



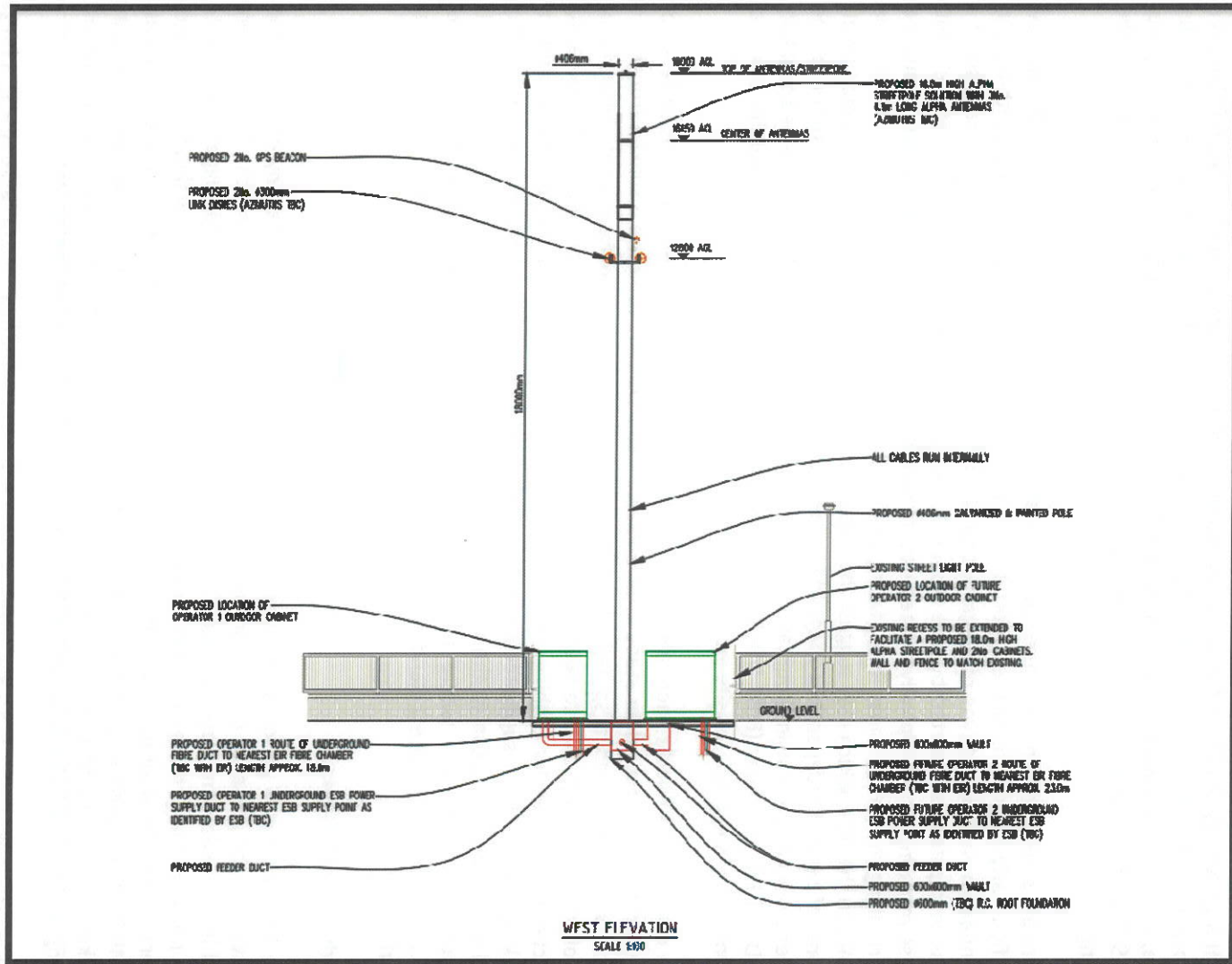


Figure 3 Elevation of proposed monopole

## 2. ARCHAEOLOGICAL AND HISTORICAL BACKGROUND

### 2.1. Prehistory

Comparatively little is known of prehistory in this locality. In Loughlinstown townland, a flint tool (NMI Reg. No. 1967:137) of Mesolithic or Neolithic date, and Late Mesolithic 'Bann flakes', are recorded as stray finds (Corlett 1999, 10). Stray finds have also been recovered from the wider area, including four worked flints (NMI Reg. No. 1958:59-62) and 22 flint flakes (NMI Reg. No. 1959:714-734) from gardens on Rochestown Avenue and 21 flints from a garden at Kill of the Grange.

There are some other indications of early prehistoric activity in the wider landscape. The nearest verified early prehistoric site is a portal tomb (RMP DU026-007), c. 2km to the south-west in Brennanstown. This is a type of megalithic tomb, dating to the Early Neolithic, and consists of a massive capstone supported by side stones, a back stone and two 'portal' stones at the front. These monuments are typically located next to water features, and this one similarly is situated overlooking the Carrickmines River, facing upstream to the west. It has an additional set of side stones to the rear, which may suggest the presence of a second burial chamber. This monument is one of several independent megalithic tombs which make up the Rathdown Group of the lower slopes of the Dublin Mountains (Powell 1941). It is also possible that a post-medieval folly on Druid Hill in Killiney (RMP DU026-010) is built from another destroyed megalithic tomb, c. 540m east of the proposed site location.

The remains of a fulacht fiadh, also in Brennanstown (RMP DU026-159), represent evidence of later prehistory in the wider study area. Fulachta fiadh typically comprise a sunken trough in a water-logged area and a spread of burnt stone around it, derived from waste material of pyrolithic technology used to heat water. While these sites are sometimes interpreted as having functioned as sites for bathing, brewing or dyeing, they are typically interpreted as outdoor cooking sites, and it is suggested by Hawkes (2015) that they were related to open-air feasting and social bonding. Close to the fulacht, further evidence of occupation in the Bronze Age is indicated at Cabinteely where two copper alloy flat axes were recovered (NMI Reg. No. 2011:262-263) and where a standing stone (RMP DU026-118) appears to have served as a burial marker.

### 2.2. Early Medieval Period

The Early Medieval period in this area appears to have been characterised by early Christian activity, as the presence of townlands with the 'Kill' prefix (*cill* meaning church), both adjacent and in the wider landscape, indicates the foundation of early churches. Kilbogget townland to the north, is one of these, although no early church site has been detected within the townland. There is the site of an early church in the neighbouring townland of Killiney to the south-east (RMP DU026-013001 to -013008), which is dedicated to the daughters of the 6<sup>th</sup> century St Lein. Wakeman recorded that the cemetery was originally surrounded with an earthen bank before being replaced with the stone wall which now surrounds it ([www.archaeology.ie](http://www.archaeology.ie)).

The most significant Early Medieval site in the wider area is a burial ground (RMP DU026-119) at Mount Offaly in Loughlinstown, c. 1.1km west / south-west of the proposed monopole site. Excavations in 1995 and 1998 uncovered over 1500 individual human burials, dating from the 5<sup>th</sup> / 6<sup>th</sup> century up to the 11<sup>th</sup> / 12<sup>th</sup> century (Licence Nos 95E0131 & 98E0035). A large assemblage was recovered including bone beads, glass beads, shroud pins, stick pins, possible ring pins, iron knives, shears, gouges, buckles and bone combs. Leinster Ware was recovered, as well as

Imported wares such as Phocaean red slipware, Bi amphorae, D-ware and E-ware. Apart from the use of this site for burial, a number of industrial features such as a furnace, hearths and a millstone indicate further secular functions to this important site. It is proposed by Cahill and Sikora (2011) that there may be further features associated with this site, such as a church, ancillary buildings, workshops and more burials in situ. It has been speculated that this is the Cill site to which Kilbogget refers.

By the Late Medieval period this area would have been under Anglo-Norman control, but there remained a strong religious control in the area, with tithes devoted to the Priory of the Holy Trinity. Portions of the Pale Ditch, the boundary which delimited areas under Anglo-Norman control, have been identified over 3km south-west in Carrickmines. While there were castles at Carrickmines, Laughanstown and Cornellscourt, there were none within 2km of the proposed monopole site, possibly indicating that the site was sufficiently removed from the 'frontier' that a castle was not necessary. [REDACTED] were probably instated at Loughlinstown (of which Kilbogget was a part) at that time as warders of the Pale.

### 2.3. Post-Medieval Period

Ball (1902) records that the lands of Loughlinstown originally formed part of the possessions of the [REDACTED] who owned neighbouring Rochestown. In the middle of the 16th century, the lands were held by [REDACTED] who in 1547 was given a grant of land in County Wicklow. Following his death in 1575 [REDACTED] was buried, as were all [REDACTED] in the parish church of Killiney. [REDACTED] forfeited their lands after the rebellion of 1641. After the Restoration in the later 17<sup>th</sup> century, the lands came into the possession of [REDACTED] who was appointed Attorney General of Ireland during the reign of Charles II.

[REDACTED] would retain ownership of the land for the ensuing centuries. By the end of the 17<sup>th</sup> century, [REDACTED] had replaced the medieval castle with a manor house (RMP DU026-029001 & -029002, c. 1.2km south / south-west of the proposed site). This was replaced by an 18<sup>th</sup> century country house, Loughlinstown House, around which the landscaped demesne would evolve during the 18<sup>th</sup> and 19<sup>th</sup> centuries.

### 2.4. Cartographic Sources

#### 2.4.1. Down Survey

The Down Survey of the 1650s was at the time the most coherent mapping project ever undertaken in the world. The aim was to measure lands forfeited by the Catholic Irish in order to redistribute it to Merchant Adventurers and English soldiers. Maps were produced for baronies and parishes, and where maps and terriers (text records) for the latter survive, they can provide additional detail.

Both the map of Rathdown barony (not shown) and that of Killiney parish (Figure 4) name Loughlinstown townland ('Loughnanstowne'). The townland boundaries are similar to the present ones, though the neighbouring townland of Ballybrack is not distinguished from Killiney and neither are named. The parish terrier describes the parish, noting that Loughlinstown contained a 'verry ffayre Castle and Bawne in repaire and a Corn Mill in repayre through which there runs a verry ffayre pleasant river and runs into the sea' (<https://downsurvey.tchpc.tcd.ie>). The Civil Survey also records the castle and a 'strong' bawn, with an orchard and garden, and details that the mill was worth ten pounds in 1640 (Simington 1945). These structures are depicted at the southern boundary of the townland and are likely to relate to the remains of Shanganagh Castle (RMP DU026-031001), c. 1.8km south of the proposed development site.

The land of Loughlinstown is indicated on the parish map as forfeited by [REDACTED] which the Civil Survey records as an Irish Papist who acted in the Irish Army as Provost Marshall and who had inherited the land in 1641 (Simington 1945). No structures or features are indicated at the approximate location of the study area.

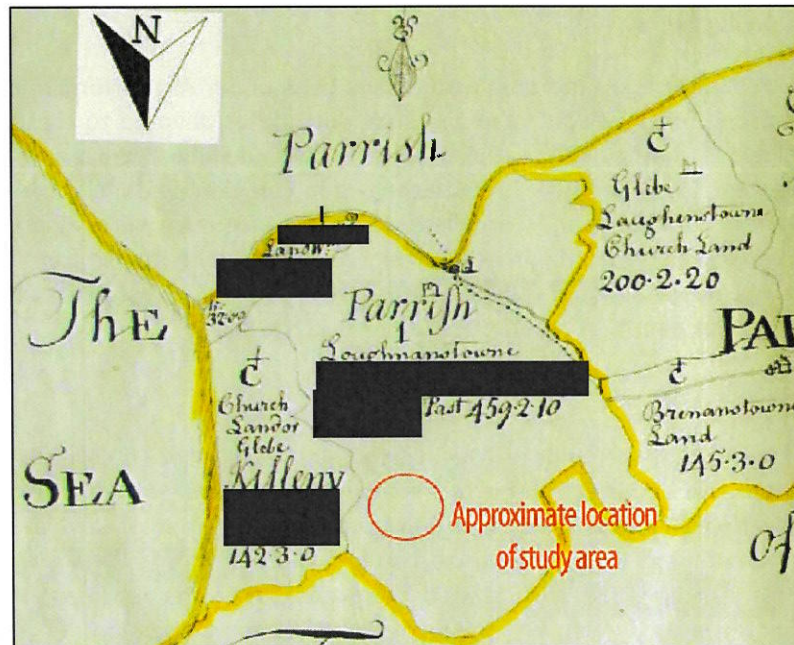


Figure 4 Down Survey map of the parish of Killiney, c. 1656

#### 2.4.2. Rocque's 'An Actual Survey of the County of Dublin'

Rocque's map is the earliest detailed cartographic source for the study area (Figure 5). Although the scale of the map and its proportions are not accurate, the site location can be approximated using features depicted: Rochestown Hill to the north-east, Rochestown House to the north, Cabinteely village to the west, Killiney Church 'in ruins' to the south-east, and the surrounding road network and stream to the south-west. The location of the site is shown as agricultural fields. The forerunner of Church Road had not been built; there is no road depicted connecting Ballybrack in the south with Rochestown demesne to the north.



Figure 5 Rocque's map of County Dublin (1760), with approximate site location in red

#### 2.4.3. Ordnance Survey Mapping

The Ordnance Survey (OS) six-inch maps are the first accurate and detailed cartographic source available. The first edition map of 1843 (Figure 6) shows the road running north / north-west from Ballybrack, with the recently built St Matthias's church occupying a rectangular plot on its western side. With the exception of the houses to the south close to Ballybrack, the land surrounding the church was still predominantly agricultural. By the time of the 25-inch OS map of 1907, the simple rectilinear church building shown on the first edition map had been enlarged to a cruciform plan. The Parochial Hall and rectory (named 'Glebe House') are both depicted and named. The surrounding area, both to the north and south was becoming noticeably more developed, with residential development following the introduction of the railway line, and a station at Killiney / Ballybrack, in the second half of the 19<sup>th</sup> century.

The revised edition of the six-inch map from 1937 shows further development in the area, with new houses to the south-east and increasing development around Ballybrack and Killiney. Electricity wires can be seen crossing the fields to the south of the church and rectory (named 'Killiney Rectory'), near to the present location of the proposed monopole.



Figure 6 Ordnance Survey First Edition six-inch map (1843), showing approximate site location in red



## 2.5. Previous Archaeological Investigations

There have been no archaeological investigations at the proposed monopole location or in proximity to it. Of those undertaken in the vicinity of Church Road and Wyattville Road (within a c. 500m radius), none found anything of archaeological significance (Excavations Bulletin Refs 2007:458, 2018:005, 2019:127; Licence Nos 07E1058, 18E0070, 19E0324).

## 3. ARCHAEOLOGICAL HERITAGE

### 3.1. Designated Sites

There are no recorded monuments (RMP / SMR sites) at the proposed monopole site or in its vicinity, which is a densely built-up suburban area. The nearest is an earthen mound excavated in 1975, the site of which now lies beneath a housing development, c. 415m to the north-west (RMP No. DU026-009). No other recorded monuments are located within a 500m radius of the proposed monopole location.

## 4. ARCHITECTURAL HERITAGE

### 4.1. Designated Sites

Three protected structures are recorded within 100m of the proposed monopole site (Table 1) (Figure 1 and Figure 9). St Matthias's Church of Ireland Church is located c. 75m north-west of the proposed monopole location (RPS No. 1686). The church forms the principal building of an associated group of protected structures, which includes the parochial hall to the north-west (RPS No. 1986) and the rectory to the south-east (RPS No. 1887; Woodfield House). All three buildings are also listed in the National Inventory of Architectural Heritage (NIAH Reg Nos 60260254 to 56).

There is also a cluster of houses farther afield, all protected structures, dotted through the residential streets to the north of the church. These were predominantly country villas constructed in the mid to late 19th century, probably owing in part to the proximity to St Matthias' Church and as part of the burgeoning suburban development. This community included

Table 1 Descriptions of RPS sites in proximity to the proposed monopole location

St Matthias's Church			
RPS No.	1686	NIAH Reg. No.	60260255
NIAH Description (summary)	Detached five-bay double-height Church of Ireland church, designed 1834; built 1835; dated 1835, on a cruciform plan originally four-bay double-height single-cell on a rectangular plan comprising four-bay double-height nave with single-bay (single-bay deep) double-height lower transepts centred on single-bay double-height chancel to crossing (west); single-bay three-stage tower to entrance (east) front on a square plan. "Improved", 1879-80, producing present composition. Set in landscaped grounds with repointed granite ashlar piers to perimeter having cut-granite shallow pyramidal capping supporting cast-iron double gates.		
NIAH Appraisal	A church erected to designs by [REDACTED] Architect to the Archdiocese of Dublin (fl. 1833-43), representing an important component of the early 19th-century built heritage of south County Dublin with the architectural values of the composition, 'a chapel of ease...in the later		





<p>English style built of the white granite that is found in great abundance on the spot' (Lewis 1837 II, 149), confirmed by such attributes as the cruciform plan form; the slender profile of the openings underpinning a "medieval" Gothic theme with the chancel defined by a cusped "Trinity Window"; and the polygonal pinnacles embellishing the tower as a picturesque eye-catcher in the landscape: meanwhile, aspects of the composition clearly illustrate the continued development or "improvement" of the church to designs by [redacted] '[who was] presented with a gold watch for having given his services gratuitously as architect' (Irish Ecclesiastical Gazette 3rd April 1880, 280). Having been well maintained, the form and massing survive intact together with substantial quantities of the original fabric, both to the exterior and to the interior where contemporary joinery; stained glass by [redacted] of London and [redacted] of Dublin; encaustic tile work; a "Last Supper"-detailed reredos; and the Stark Symes Memorial "Trinity Window" signed (1880) by [redacted] of Munich and London, all highlight the artistic potential of the composition: meanwhile, an exposed timber roof construction pinpoints the engineering or technical dexterity of a church forming part of a self-contained group alongside the adjacent rectory and parochial hall with the resulting ecclesiastical ensemble making a pleasing visual statement in Church Road.</p>			
<b>Parochial Hall</b>			
<i>RPS No.</i>	1986	<i>NIAH Reg. No.</i>	60260255
<i>NIAH Description (summary)</i>	<p>Detached three-bay single-storey parochial hall, built 1911, on a T-shaped plan centred on single-bay single-storey gabled projecting lower porch. Extended, 1970, producing present composition. Pitched slate roof on a T-shaped plan centred on pitched (gabled) slate roof (porch). Square-headed central door and window openings with red brick block-and-start surrounds with cut-granite lintels. Set in grounds shared with St Matthias' Church.</p>		
<i>NIAH Appraisal</i>	<p>A cottage-like parochial hall representing an integral component of the early 20th-century built heritage of south County Dublin with the architectural value of the composition suggested by such attributes as the compact plan form centred on an expressed porch; the construction in a silver-grey granite with red brick dressings producing a pleasing two-tone palette; and the high pitched roof. Having been well maintained, the form and massing survive intact together with quantities of the original fabric, thus upholding the character or integrity of a parochial hall forming part of a self-contained group alongside the adjacent church and rectory.</p>		
<b>Rectory (Woodfield House)</b>			
<i>RPS No.</i>	1887	<i>NIAH Reg. No.</i>	60260254
<i>NIAH Description (summary)</i>	<p>Detached two-bay (two-bay deep) two-storey over part raised basement double gable-fronted Church of Ireland rectory, built 1877, on an L-shaped plan with single-bay two-storey gabled projecting end bay. Occupied, 1901; 1911. Pitched double gable-fronted (M-profile) and hipped (north) slate roof.</p>		
<i>NIAH Appraisal</i>	<p>A rectory representing an integral component of the later 19th-century built heritage of south County Dublin (Irish Ecclesiastical Gazette 1st November 1877, 345) with the architectural value of the composition, one erected with the financial assistance of a loan of £900 from the Commissioners of Public Works in Ireland under the Glebe Loan (Ireland) Act, 1870, suggested by such attributes as the deliberate alignment maximising on scenic vistas overlooking gently rolling grounds with the Dublin Mountains as a picturesque backdrop in the distance; the compact plan form; the diminishing in scale of the openings on each floor producing a graduated visual impression with the principal "apartments" defined by coupled or multipartite openings; and the decorative timber work embellishing the roof. Having been well maintained, the form and massing survive intact together with substantial quantities of the original fabric, both to the exterior and to the interior where contemporary joinery; restrained chimneypieces; and sleek plasterwork refinements, all highlight the artistic potential of a rectory forming part of a self-contained group alongside the church and parochial hall.</p>		

## **5. CURRENT SITE CONDITION**

The location proposed for the monopole is a lay-by at the side of a busy dual-carriageway road (Wyattville Road / Church Road) that runs through a built-up residential area (Figure 9). The introduction of the dual-carriageway road and the growth of the large-scale residential estates in the second half of the 20<sup>th</sup> century brought significant change to the landscape around the church.

The street furniture lining the road comprises tall modern street lights and road signage. From within the churchyard of St Matthias's (in use as a car park for the church and the parochial hall), some of these street lights are visible and overhead utility wires cross above the church. There are also four Vodafone antennae that were attached to the roof in 2007. The church is otherwise screened well by its enclosed setting of stone boundary walls and mature trees (Plate 1 and Plate 2).

The parochial hall to the rear of the churchyard is set back a good distance from the churchyard gates to the rear of the plot (Plate 3). It is in use as a Montessori school and has been refurbished, with substantial extensions to the rear and an additional two single-storey buildings to the south-east.

The rectory, in the adjacent plot to the south, is almost entirely screened from view by the tall mature hedging and trees that line its boundaries, with only the rooftop partly visible from the roadside to the north (Plate 4 and Plate 5).



Figure 9 Proposed site location and protected structures in proximity on current aerial imagery (Google Earth Pro 2023)



Plate 1 St Matthias's Church, facing SSW, from east side of Church Road



Plate 2 View SSE towards proposed monopole location from inside churchyard of St Matthias's Church



Plate 3 St Matthias's Church (left) and Parochial Hall (right) from within churchyard, facing WSW



Plate 4 View of rooftop of Rectory (Woodfield) from roadside, at church boundary wall, facing SW



Plate 5 Gates and boundary to Rectory (Woodfield), facing NNW

## 6. IMPACT ASSESSMENT AND CONCLUSIONS

No designated archaeological or architectural heritage sites will be negatively affected by the proposed telecommunications development.

The protected structures located in proximity to the proposed monopole location (St Matthias's Church and associated parochial hall and rectory, RPS Nos 1686, 1986, 1887) sit within a modern streetscape, beside a busy dual-carriageway road, in a built-up residential suburb. Their original 19<sup>th</sup> century setting, at the side of a relatively narrow road, in a part agricultural / part residential area, has long been lost. More recent changes to the structures or their immediate environs include substantial extensions to the parochial hall, which is now a child education centre, and antennae on the church roof. These have not negatively affected the historic character, context and setting of the structures and so demonstrate their ability to absorb changes in their environment.

The protected structures are located just beyond a curve in the road and this, combined with the existing mature boundaries, renders the proposed monopole location invisible from the structures. The height of the monopole means that the top of it will be visible, though as demonstrated by the photomontages, this will be largely indistinguishable from the existing metal poles of the street lights that line either side of the dual-carriageway road (Image 1 to Image 6). The images below have been taken from the Photomontage Report prepared by Entrust Planning & Environmental (VP1, VP2 and VP4), in which they appear to full scale.

It is considered that the proposed monopole will blend with the existing modern street furniture and will not compromise the setting of the protected structures.



Image 1 Existing view SSW from east side of Church Road, opposite entrance to St Matthias's Church (VP1, Photomontage Report, Entrust Planning & Environmental)



Image 2 Proposed view SSW from east side of Church Road, opposite entrance to St Matthias's Church (red line indicates monopole) (VP1, Photomontage Report, Entrust Planning & Environmental)



**Image 3 Existing view S from entrance to St Matthias's Church (VP2, Photomontage Report, Entrust Planning & Environmental)**



**Image 4 Proposed view S from entrance to St Matthias's Church (red line indicates monopole) (VP2, Photomontage Report, Entrust Planning & Environmental)**





Image 5 Existing view NNE from east side of Church Road, looking towards St Matthias's Church (VP4, Photomontage Report, Entrust Planning & Environmental)



Image 6 Proposed view NNE from east side of Church Road, looking towards St Matthias's Church (red line indicates monopole) (VP4, Photomontage Report, Entrust Planning & Environmental)

## 7. REFERENCES

- Ball, F.E. 1902. *A History of the County Dublin*. Volume 1. Alex. Thom & Co. Ltd.: Dublin.
- Byrne, M. 2006. *Silver Slope, Bray Road, Cabinteely, Co. Dublin*. 06E1077. Unpublished report: Byrne Mullins & Associates.
- Byrne, M. 2010. *'Sayjip', Old Bray Road, Cabinteely, Co. Dublin*. 10E0308. Unpublished report: Byrne Mullins & Associates.
- Cahill, M. & Sikora, M. *Breaking ground, finding graves: reports on the excavations of burials by the National Museum of Ireland, 1927-2006*. Dublin: Wordwell
- Corlett, C. 1999 *The Antiquities of Rathdown*. Wordwell: Dublin.
- Dominic Delany & Associates 2002. *Report of Archaeological Monitoring at Rochestown Lodge Hotel, Rochestown Avenue, Dun Laoghaire, Co. Dublin*. 02E1128. Unpublished report: Dominic Delaney & Associates.
- Dún Laoghaire-Rathdown County Council 2011. *Street Names and Placenames*. Dún Laoghaire-Rathdown County Council: Dublin.
- Elder, S. 2003. *Archaeological Assessment at Brennanstown, Cabinteely, Co. Dublin*. 03E1494. Unpublished report: Irish Archaeological Consultancy Ltd.
- Halpin, B. 2003. *Archaeological Excavation of Development at Brennanstown, Cabinteely, Co. Dublin*. 03E1681. Unpublished report: Irish Archaeological Consultancy Ltd.
- Hanley, K. 1999. *A Report on the Archaeological Excavation and Monitoring at "The Bungalow", Ards, Cabinteely, Co. Dublin*. 98E0582. Unpublished report.
- Harrison, D. & O'Donovan, E. 2006. *Archaeological Assessment Report, Cabinteely, Co. Dublin*. 06E0828. Unpublished report: Margaret Gowen & Co. Ltd.
- Hawkes, A. (2015) *Fulachtaí Fia and Bronze Age Cooking in Ireland: Reappraising the Evidence in Proceedings of the Royal Irish Academy: Archaeology, Culture, History, Literature*, vol. 115C, 2015, 47-77.
- Lasron, E. & Gowen, M. 1999. *Archaeological Monitoring at the Bank of Ireland Operations Centre, Cabinteely, Co. Dublin*. 99E0162. Unpublished report: Margaret Gowen & Co. Ltd.
- Margaret Gowen & Co. Ltd. 1995. *Archaeological assessment of a proposed service station development site at Mount Offaly, Cabinteely, Co. Dublin*. 95E0131. Unpublished report: Margaret Gowen & Co. Ltd.
- Margaret Gowen & Co. Ltd. 1995. *Archaeological Assessment of a proposed domestic dwelling at 'Abbeylands Cottage', Marino Road, Killiney, Co. Dublin*. 05E0153. Unpublished report: Margaret Gowen & Co. Ltd.
- Moraghan, M. 2012. *Archaeological Monitoring at Amgen Technology (Ireland) site, Pottery Road, Dun Laoghaire, Co. Dublin*. 12E0025. Unpublished report: Courtney Deery Heritage Consultancy.
- O'Carroll, E. 2004. *Archaeological Testing at Ard Einin, Marino Avenue East, Killiney, Co. Dublin*. 05E0100. Unpublished report: The Archaeology Company.
- Phelan, S. 2005. *Monitoring Report. Pfiser Pharmaceuticals, Pottery Road, Dun Laoghaire, Co. Dublin*. 05E0018. Unpublished report: Margaret Gowen & Co. Ltd.

Powell, T.G.E 1941 Megalithic Tombs in South-Eastern Ireland *JRSAI*, Vol. LXXI - Vol. XI, 9-23.

Simington, R.C. 1945. *The Civil Survey A.D. 1654-56*. Volume VII, County of Dublin. Dublin: The Stationary Office.

### **7.1. Online Sources**

[www.archaeology.ie](http://www.archaeology.ie)

[www.downsurvey.tcd.ie](http://www.downsurvey.tcd.ie)

[www.excavations.ie](http://www.excavations.ie)

[www.heritagemaps.ie](http://www.heritagemaps.ie)

[www.osi.ie](http://www.osi.ie)

## **APPENDIX 1      SUMMARY OF RELEVANT LEGISLATION**

### **National Monuments Legislation (1930-2004)**

The National Monument Act, 1930 (as amended) provides the formal legal mechanism to protect monuments in Ireland. Protection of a monument is provided via:

Record of Monuments and Places (RMP);

National Monument in the ownership or guardianship of the Minister for Arts, Heritage, Regional, Rural & Gaeltacht Affairs or a Local Authority;

National Monument subject to a Preservation Order (or temporary Preservation Order);

Register of Historic Monuments (RHM).

The definition of a monument is specified as:

any artificial or partly artificial building, structure or erection or group of such buildings, structures or erections;

any artificial cave, stone or natural product, whether forming part of the ground, that has been artificially carved, sculptured or worked upon or which (where it does not form part of the place where it is) appears to have been purposely put or arranged in position;

any, or any part of any, prehistoric or ancient tomb, grave or burial deposit, or (ii) ritual, industrial or habitation site; and

any place comprising the remains or traces of any such building, structure or erection, any cave, stone or natural product or any such tomb, grave, burial deposit or ritual, industrial or habitation site.

Under Section 14 of the Principal Act (1930):

It shall be unlawful...

to demolish or remove wholly or in part or to disfigure, deface, alter, or in any manner injure or interfere with any such national monument without or otherwise than in accordance with the consent hereinafter mentioned (a licence issued by the Office of Public Works National Monuments Branch),

or

to excavate, dig, plough or otherwise disturb the ground within, around, or in the proximity to any such national monument without or otherwise than in accordance...

Under Amendment to Section 23 of the Principal Act (1930):

A person who finds an archaeological object shall, within four days after the finding, make a report of it to a member of the Garda Síochána...or the Director of the National Museum...

The latter is of relevance to any finds made during a watching brief.

In the 1994 Amendment of Section 12 of the Principal Act (1930), all the sites and 'places' recorded by the Sites and Monuments Record of the Office of Public Works are provided with a new status in law. This new status provides a level of protection to the listed sites that is equivalent to that accorded to 'registered' sites [Section 8(1), National Monuments Amendment Act 1954] as follows:

The Commissioners shall establish and maintain a record of monuments and places where they believe there are monuments and the record shall be comprised of a list of monuments and such places and a map or maps showing each monument and such place in respect of each county in the State.

The Commissioners shall cause to be exhibited in a prescribed manner in each county the list and map or maps of the county drawn up and publish in a prescribed manner information about when and where the lists and maps may be consulted.

In addition, when the owner or occupier (not being the Commissioners) of a monument or place which has been recorded, 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.

The National Monuments Amendment Act enacted in 2004 provides clarification in relation to the division of responsibilities between the Minister of Environment, Heritage and Local Government, Finance and Arts, Sports and Tourism together with the Commissioners of Public Works. The Minister of Environment, Heritage and Local Government will issue directions relating to archaeological works and will be advised by the National Monuments Section and the National Museum of Ireland. The Act gives discretion to the Minister of Environment, Heritage and Local Government to grant consent or issue directions in relation to road developments (Section 49 and 51) approved by An Bord Pleanála and/or in relation to the discovery of National Monuments.

14A. (1) The consent of the Minister under section 14 of this Act and any further consent or licence under any other provision of the National Monuments Acts 1930 to 2004 shall not be required where the works involved are connected with an approved road development.

14A. (2) Any works of an archaeological nature that are carried out in respect of an approved road development shall be carried out in accordance with the directions of the Minister, which directions shall be issued following consultation by the minister with the Director of the National Museum of Ireland.

Subsection 14A (4) Where a national monument has been discovered to which subsection (3) of this section relates, then the road authority carrying out the road development shall report the discovery to the Minister subject to subsection (7) of this section, and pending any directions by the Minister under paragraph (d) of this subsection, no works which would interfere with the monument shall be carried out, except works urgently required to secure its preservation carried out in accordance with such measures as may be specified by the Minister.

The Minister will consult with the Director of the National Museum of Ireland for a period not longer than 14 days before issuing further directions in relation to the national monument.

The Minister will not be restricted to archaeological considerations alone, but will also consider the wider public interest.

**Architectural Heritage (National Inventory) and Historic Monuments (Miscellaneous Provisions) Act, 1999**

This Act provides for the establishment of a national inventory of architectural heritage and historic monuments.

Section 1 of the act defines “architectural heritage” as:

- (a) all structures and buildings together with their settings and attendant grounds, fixtures and fittings,
- (b) groups of such structures and buildings, and,
- (c) sites

which are of architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest.

Section 2 of the Act states that the Minister (for Arts, Heritage, Gaeltacht and the Islands) shall establish the NIAH, determining its form and content, defining the categories of architectural heritage, and specifying to which category each entry belongs. The information contained within the inventory will be made available to planning authorities, having regard to the security and privacy of both property and persons involved.

Section 3 of the Act states that the Minister may appoint officers, who may in turn request access to premises listed in the inventory from the occupiers of these buildings. The officer is required to inform the occupier of the building why entry is necessary, and in the event of a refusal, can apply for a warrant to enter the premises.

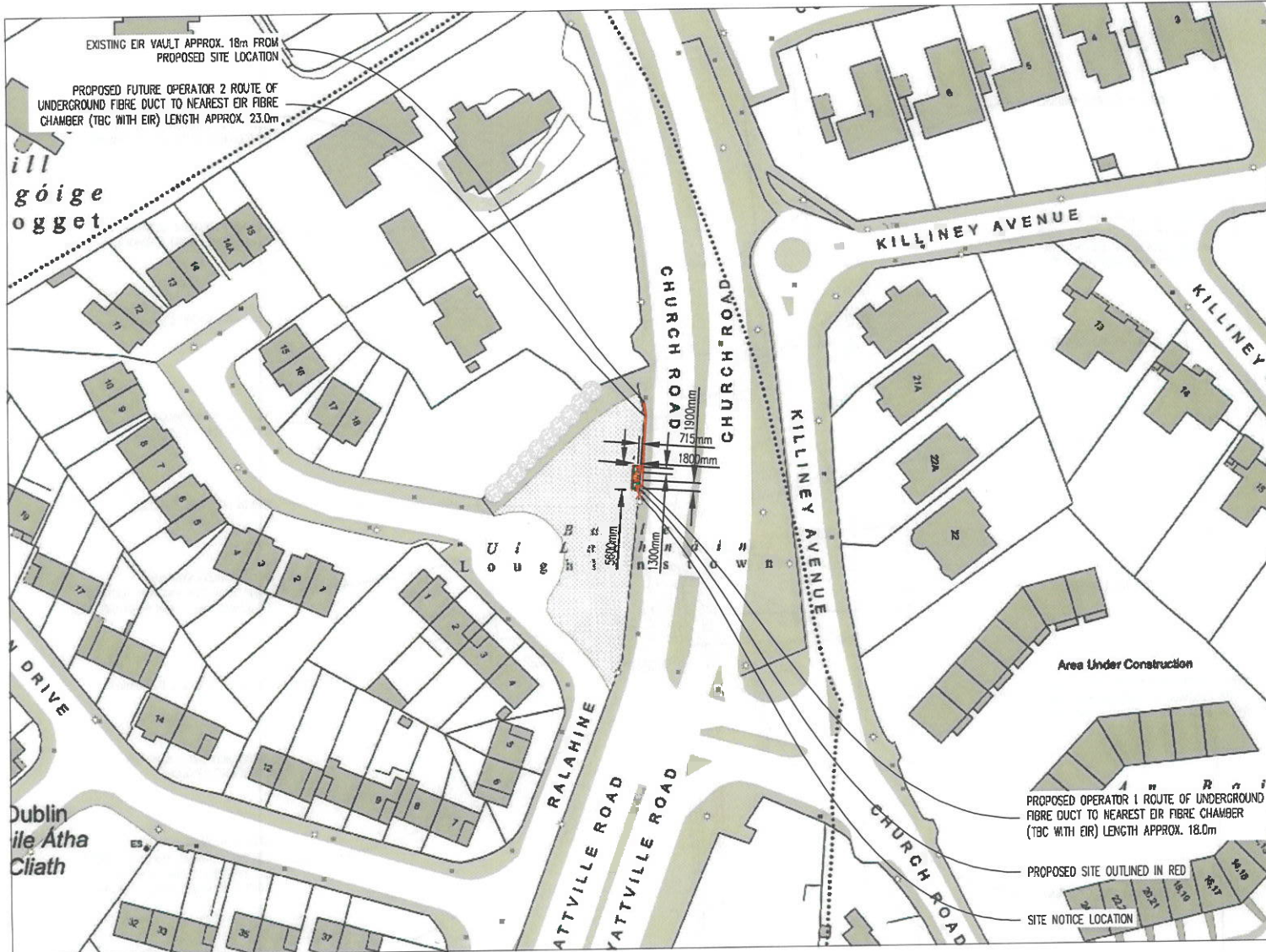
Section 4 of the Act states that obstruction of an officer or a refusal to comply with requirements of entry will result in the owner or occupier being guilty of an offence.

Section 5 of the Act states that sanitary authorities who carry out works on a monument covered by this Act will as far as possible preserve the monument with the proviso that its condition is not a danger to any person or property, and that the sanitation authority will inform the Minister that the works have been carried out.

The provisions in the Act are in addition to and not a substitution for provisions of the National Monument Act (1930–94), and the protection of monuments in the National Monuments Act is extended to the monuments covered by the Architectural Heritage (National Inventory) and Historic Monuments (Miscellaneous Provisions) Act (1999).



725025m E, 724789m N



724732m E, 724572m N

OVERVIEW MAP  
SCALE 1:1000

Reproduced from OS Maps, 1:1000 with the permission of Ordnance Survey of Ireland. License No. C19L20338000  
OS MAP No. 3457-11 (1:1000), 3457-12 (1:1000)

SITE COORDINATES

LATITUDE:	53° 15' 28.000" N	IC EASTING:	324955	13M EASTING:	724877
LONGITUDE:	007° 07' 42.000" W	IC NORTHING:	224653	13M NORTHING:	724811

---	LDKSE DRAWINGS	06.10.23		
No.	Revision	Date	By	Ckd



Drawings prepared by [Redacted]  
ENTRUST LTD. Unit 10, Deepport, Business Centre, Grangemore,  
Co. Galway, H91 X599, TEL: +353 (0) 91 342 310  
contact@entrust-services.com

Disclaimer: Information on this map is reproduced from digital material from OSI and land direct portfolio. This plan should be used for identification purposes only, unless specifically stated above or in accompanying documents. Entrust takes no responsibility for the accuracy of the data provided by third parties. Site development boundary is highlighted in red.



SECTION 254

Site Code:	DN-2939-01
S.P. Ref:	N/A
Site Address	R118 ROAD, LOUGHLINSTOWN, KILLINEY, CO. DUBLIN IRELAND

Title  
SITE LOCATION MAP  
1:1000 MAP

Designed	Date	06.10.2023
Drawn	Scale	AS SHOWN
Dwg No.	DN-2939-01-PD-01	Rev. --

Reproduced from OS Maps, 1:1000 with the permission of Ordnance Survey of Ireland. License No. 0145032000  
 OS MAP No. 3457-11 (1:1000), 3457-12 (1:1000)

724895m E, 724695m N

**SITE COORDINATES**

LATITUDE:	53° 15' 28.000" N	IG EASTING:	328353	11M EASTING:	724877
LONGITUDE:	06° 07' 42.000" W	IG NORTHING:	224553	11M NORTHING:	724681

**LEGEND**

- LICENSE DRAWINGS		06.10.23	
No.	Revision	Date	By / Ckd



Drawings prepared by  
 ENTRUST LTD, Unit 10, Deerpark Business Centre, Dranmore, Co. Galway, H91 X599, TEL: +353 (0) 91 342 510  
 contact@entrust-services.com

Disclaimer: Information on this map is reproduced from digital material from OSI and land direct portal. This plan should be used for identification purpose only, unless specifically stated above or in accompanying document. Entrust takes on responsibility for the accuracy of the data provided by third parties. Site development boundary is highlighted in red.



**SECTION 254**

Site Code: DN-2939-01

S.P. Ref: N/A

Site Address  
 R118 ROAD,  
 LOUGHLINSTOWN, KILLINEY,  
 CO. DUBLIN  
 IRELAND

Title  
 PTI SMART STREETPOLE  
 SITE LAYOUT PLAN

Designed	Date	06.10.2023
Drawn	Scale	A5 50MM Rev. -
Dwg No.	DN-2939-01-PD-02	

PROPOSED OPERATOR 1 ROUTE OF UNDERGROUND FIBRE DUCT TO NEAREST EIR FIBRE CHAMBER (TBC WITH EIR) LENGTH APPROX. 18.0m

PROPOSED FUTURE OPERATOR 2 ROUTE OF UNDERGROUND FIBRE DUCT TO NEAREST EIR FIBRE CHAMBER (TBC WITH EIR) LENGTH APPROX. 23.0m

PROPOSED LOCATION OF OPERATOR 1 OUTDOOR CABINET

PROPOSED SITE OUTLINED IN RED

PROPOSED 18.0m HIGH ALPHA STREETPOLE SOLUTION WITH 3No. 4.1m LONG ALPHA ANTENNAS (AZIMUTHS TBC)

PROPOSED 2No. GPS BEACON

PROPOSED 2No. #300mm LINK DISHES (AZIMUTHS TBC)

PROPOSED 600x600mm VAULT

PROPOSED LOCATION OF FUTURE OPERATOR 2 OUTDOOR CABINET

EXISTING RECESS TO BE EXTENDED TO FACILITATE A PROPOSED 18.0m HIGH ALPHA STREETPOLE AND 2No. CABINETS. WALL AND FENCE TO MATCH EXISTING.

PROPOSED EARTHING TAPE

PROPOSED 2No. EARTHING PIT

PROPOSED FEEDER DUCT

PROPOSED OPERATOR 1 UNDERGROUND ESB POWER SUPPLY DUCT TO NEAREST ESB SUPPLY POINT AS IDENTIFIED BY ESB (TBC)

PROPOSED FEEDER DUCT

PROPOSED 600x600mm VAULT

PROPOSED FEEDER DUCT

PROPOSED FUTURE OPERATOR 2 UNDERGROUND ESB POWER SUPPLY DUCT TO NEAREST ESB SUPPLY POINT AS IDENTIFIED BY ESB (TBC)

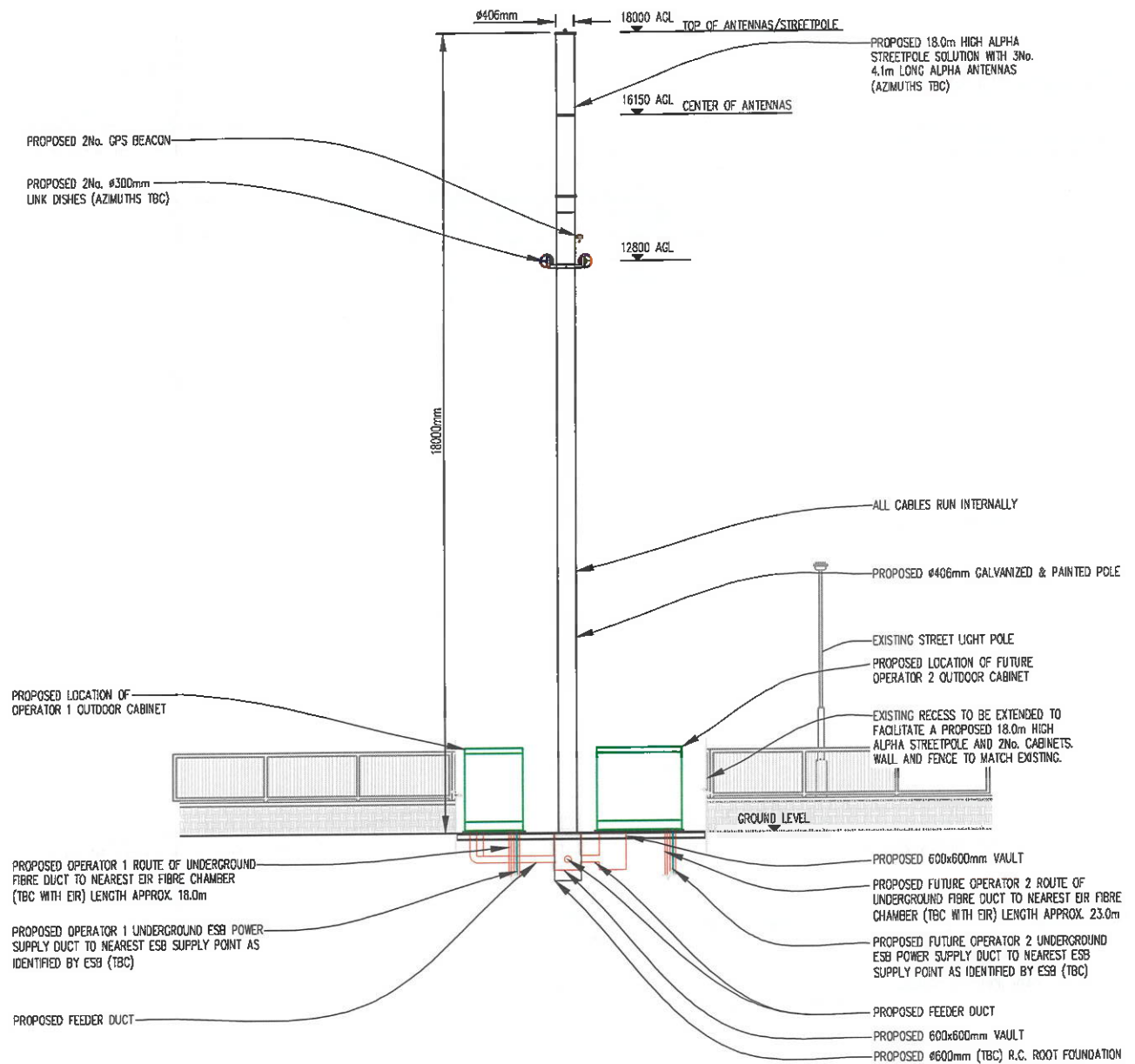
EXISTING STREET LIGHT POLE

**SITE LAYOUT PLAN**  
 SCALE 1:100



724861m E, 724667m N





**WEST ELEVATION**  
SCALE 1:100

**SITE COORDINATES**

LATITUDE:	35° 15' 28.000" N	12 EASTING:	224535	174 EASTING:	728377
LONGITUDE:	06° 07' 42.000" W	12 NORTHING:	224535	174 NORTHING:	728377

- LODGE DRAWINGS		06.10.23	
No.	Revision	Date	By Ckd

**entrust**  
planning & environmental

Drawings prepared by [Redacted]  
 ENTRUST LTD, Unit 10, Deepcreek Business Centre, Ordmore,  
 Co. Galway, H91 X599, TEL: +353 (0) 91 342 510  
 contact@entrust-services.com

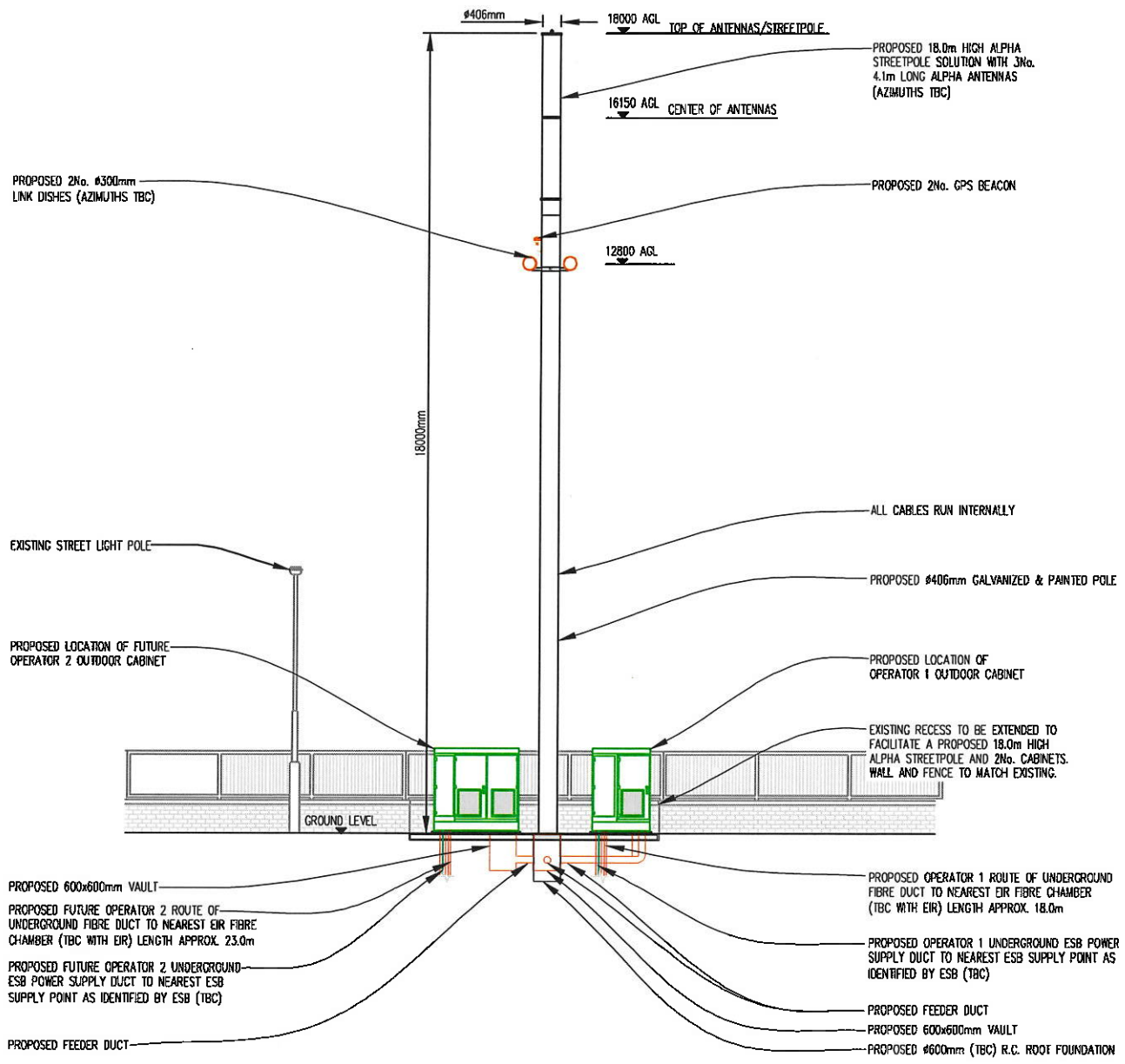
Disclaimer: Information on this map is reproduced from digital material from OSI and Land Ordnance Survey. This plan should be used for identification purposes only, unless specifically stated above or in accompanying document. Entrust takes on responsibility for the accuracy of the data provided by third parties. Site development boundary is highlighted in red.

**PHOENIX TOWER INTERNATIONAL**

**GLENLINE telecoms**

**SECTION 254**

Site Code:	DN-2939-01
S.P. Ref:	N/A
Site Address:	R118 ROAD, LOUCHLINTOWN, KILLINEY, CO. DUBLIN IRELAND
Title:	PTI SMART STREETPOLE WEST ELEVATION
Designed:	Date 06.10.2023
Drawn:	Scale AS SHOWN Rev. --
Dwg No. DN-2939-01-PD-03	



**EAST ELEVATION**  
SCALE 1:100

**SITE COORDINATES**

LATITUDE:	53° 15' 28.000" N	IG EASTING:	324555	11M EASTING:	724877
LONGITUDE:	07° 07' 42.000" W	IG NORTHING:	224555	11M NORTHING:	724877

- LUCRUM DRAWINGS		08.10.23	
No.	Revision	Date	By Ckd

**entrust**  
planning & environmental

Drawings prepared by [Redacted]  
ENTRUST LTD. Unit 10, Deep Park Business Centre, Dranmore, Co. Galway, H91 X599, TEL: +353 (0) 91 342 510  
contact@entrust-services.com

Disclaimer: Information on this map is reproduced from digital material from OS and land direct portals. This plan should be used for identification purposes only, unless specifically stated above or in accompanying documents. Entrust takes on responsibility for the accuracy of the data provided by third parties. Site development boundary is highlighted in red.

**PHOENIX TOWER INTERNATIONAL**

**GLENLINE**  
telecoms

**SECTION 254**

Site Code: DN-2939-01

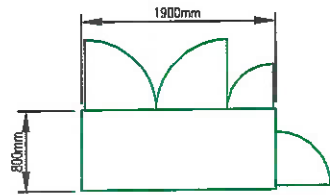
S.P. Ref: N/A

Site Address  
R118 ROAD,  
LOUGHLINSTOWN, KILLINEY,  
CO. DUBLIN  
IRELAND

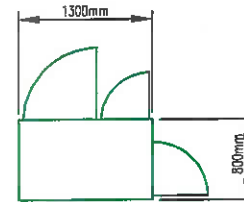
Title  
PTI SMART STREETPOLE  
EAST ELEVATION

Designed	Date	08.10.2023
Drawn	Scale	A5 50MM
Dwg No.	Rev.	-

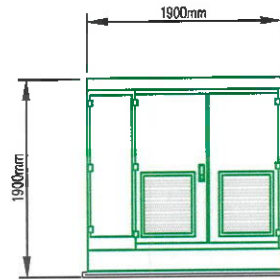
Dwg No. DN-2939-01-PD-04



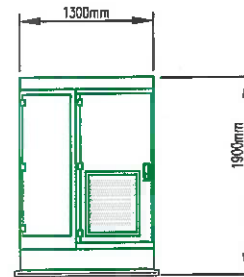
Top View



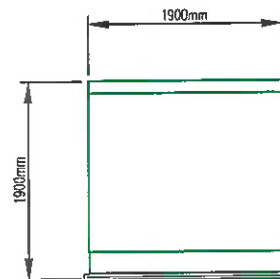
Top View



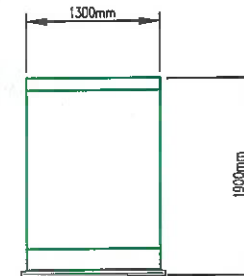
Front View



Front View



Back View



Back View

**EQUIPMENT DETAILS**  
SCALE 1:50

**SITE COORDINATES**

LATITUDE:	53° 15' 28.000" N	IG EASTING:	324933	104 EASTING:	724877
LONGITUDE:	00° 07' 42.000" W	IG NORTHING:	226455	104 NORTHING:	724891

- LICENSE DRAWINGS		06.10.23	
No.	Revision	Date	By Ckd



Drawings prepared by [Redacted]  
 ENTRUST LTD. Unit 1D, Deep Park Business Centre, Oranmore,  
 Co. Galway, H91 X599, TEL: +353 (0) 91 342 510  
 contact@entrust-services.com

Disclaimer: Information on this map is reproduced from digital material from OS and land direct portal. This plan should be used for identification purpose only, unless specifically stated above or in accompanying document. Entrust takes on responsibility for the accuracy of the data provided by third parties. Site development boundary is highlighted in red.



**SECTION 254**

Site Code: DN-2939-01

S.P. Ref: N/A

Site Address  
 R118 ROAD,  
 LOUGHLINSTOWN, KILLINEY,  
 CO. DUBLIN  
 IRELAND

Title  
 PTI SMART STREETPOLE  
 EQUIPMENT DETAILS

Designed		Date	06.10.2023
Drawn		Scale	A5 3/1000 Rev. -
Dwg No. DN-2939-01-PD-05			

**Telecommunications Development Photomontage Report**

**Report Date: 23/10/2023**

**Project: DN\_2939\_Wyatville Road**

**Surveyed by:** [REDACTED]

**Created by:** [REDACTED]

**Approved by:** [REDACTED]

**Client:**



**Provided by:**





Wyatville Road

Viewpoints Map

Legend

-  PTI Site Location
-  Viewpoints

Constraints: Data collected from heritage Ireland, buildings of Ireland  
 Basemap: Bing  
 Projection: UTM, EPSG:2157  
 Disclaimer: Information on this map is reproduced from digital and other material from different sources. Minor discrepancies may therefore occur. This plan should be used for identification purpose only, unless specifically stated above or in accompanying documentation. Entrust takes no responsibility for the accuracy of data provided by third parties.



Scale @A3: 1:2,000

Date: 24/10/2023

Revision: V 1.0

Created by: [Redacted]

Verified by: [Redacted]

Approved by: [Redacted]

Contact Details:



Entrust Ltd.  
 Unit 1D, Deerpark Business Centre  
 Oranmore  
 Co. Galway  
 T: 091 342 510  
 e: [contact@entrust-services.com](mailto:contact@entrust-services.com)  
 w: [www.entrust-services.com](http://www.entrust-services.com)



View Point Name		Existing View of Viewpoint 1				
Site ID	Viewpoint No.	Easting	Northing	Elevation (AOD)m	Direction-Degrees(N)	Distance (m)
DN_2939	VP1	724885	724798	54.9	-174.910003	116
Viewing Distance: 300mm			Height above ground: 1.5m			
Page size: A3			Camera & Lens: Canon 6D - 50mm Focal Length			

**entrust**  
planning & environmental

Provided by:  
[www.entrust-services.com](http://www.entrust-services.com)  
Unit 1D, Deerpark Business  
Centre, Oranmore, Co.  
Galway, H91 X599

Surveyed by: [REDACTED]  
Created by: [REDACTED]  
Approved by: [REDACTED]



View Point Name		Proposed View of Viewpoint 1				
Site ID	Viewpoint No.	Easting	Northing	Elevation (AOD)m	Direction-Degrees(N)	Distance (m)
DN_2939	VP1	724885	724798	54.9	-174.910003	116
Viewing Distance: 300mm			Height above ground: 1.5m			
Page size: A3			Camera & Lens: Canon 6D - 50mm Focal Length			



Provided by:  
[www.entrust-services.com](http://www.entrust-services.com)  
 Unit 1D, Deerpark Business  
 Centre, Oranmore, Co.  
 Galway, H91 X599

Surveyed by: [REDACTED]  
 Created by: [REDACTED]  
 Approved by: [REDACTED]



View Point Name		Existing View of Viewpoint 2				
Site ID	Viewpoint No.	Easting	Northing	Elevation (AOD)m	Direction-Degrees(N)	Distance (m)
DN_2939	VP2	724862	724796	54.6	171.378793	113
Viewing Distance: 300mm			Height above ground: 1.5m			
Page size: A3			Camera & Lens: Canon 6D - 50mm Focal Length			



Provided by:  
[www.entrust-services.com](http://www.entrust-services.com)  
 Unit 1D, Deerpark Business  
 Centre, Oranmore, Co.  
 Galway, H91 X599

Surveyed by: [Redacted]  
 Created by: [Redacted]  
 Approved by: [Redacted]





View Point Name		Proposed View of Viewpoint 2				
Site ID	Viewpoint No.	Easting	Northing	Elevation (AOD)m	Direction-Degrees(N)	Distance (m)
DN_2939	VP2	724862	724796	54.6	171.378793	113
Viewing Distance: 300mm			Height above ground: 1.5m			
Page size: A3			Camera & Lens: Canon 6D - 50mm Focal Length			



Provided by:  
[www.entrust-services.com](http://www.entrust-services.com)  
 Unit 1D, Deerpark Business  
 Centre, Oranmore, Co.  
 Galway, H91 X599

Surveyed by: [REDACTED]  
 Created by: [REDACTED]  
 Approved by: [REDACTED]



View Point Name		Existing View of Viewpoint 3				
Site ID	Viewpoint No.	Easting	Northing	Elevation (AOD)m	Direction-Degrees(N)	Distance (m)
DN_2939	VP3	724998	724744	57.3	-127.0517835	137
Viewing Distance: 300mm			Height above ground: 1.5m			
Page size: A3			Camera & Lens: Canon 6D - 50mm Focal Length			

**entrust**  
planning & environmental

Provided by:  
[www.entrust-services.com](http://www.entrust-services.com)  
Unit 1D, Deerpark Business  
Centre, Oranmore, Co.  
Galway, H91 X599

Surveyed by: [REDACTED]  
Created by: [REDACTED]  
Approved by: [REDACTED]



View Point Name		Proposed View of Viewpoint 3				
Site ID	Viewpoint No.	Easting	Northing	Elevation (AOD)m	Direction-Degrees(N)	Distance (m)
DN_2939	VP3	724998	724744	57.3	-127.0517835	137
Viewing Distance: 300mm			Height above ground: 1.5m			
Page size: A3			Camera & Lens: Canon 6D - 50mm Focal Length			

**entrust**  
planning & environmental

Provided by:  
[www.entrust-services.com](http://www.entrust-services.com)

Unit 1D, Deerpark Business  
Centre, Oranmore, Co.  
Galway, H91 X599

Surveyed by: [REDACTED]

Created by: [REDACTED]

Approved by: [REDACTED]



View Point Name		Existing View of Viewpoint 4				
Site ID	Viewpoint No.	Easting	Northing	Elevation (AOD)m	Direction-Degrees(N)	Distance (m)
DN_2939	VP4	724889	724606	47.8	-11.150160	80
Viewing Distance: 300mm			Height above ground: 1.5m			
Page size: A3			Camera & Lens: Canon 6D - 50mm Focal Length			



Provided by:  
[www.entrust-services.com](http://www.entrust-services.com)  
 Unit 1D, Deerpark Business  
 Centre, Oranmore, Co.  
 Galway, H91 X599

Surveyed by: [REDACTED]  
 Created by: [REDACTED]  
 Approved by: [REDACTED]



View Point Name		Proposed View of Viewpoint 4				
Site ID	Viewpoint No.	Easting	Northing	Elevation (AOD)m	Direction-Degrees(N)	Distance (m)
DN_2939	VP4	724889	724606	47.8	-11.150160	80
Viewing Distance: 300mm			Height above ground: 1.5m			
Page size: A3			Camera & Lens: Canon 6D - 50mm Focal Length			



Provided by:  
[www.entrust-services.com](http://www.entrust-services.com)  
 Unit 1D, Deerpark Business  
 Centre, Oranmore, Co.  
 Galway, H91 X599

Surveyed by: [REDACTED]  
 Created by: [REDACTED]  
 Approved by: [REDACTED]

END OF REPORT



2022 Bianconi Avenue  
Citywest Business Campus  
Dublin 24 D24 HX03  
T +353 1 671 4444  
eir.ie

## Radio Emissions Statement

As an operator of a Mobile Telecommunications Network *Eir Ltd* is aware of its requirements in relation to management of electromagnetic field radiation and are committed to management of risk to our employees, members of the public and any other groups who may be affected by our networks. All of the radio equipment on our network and our radio base stations are "Safe by Design" and are designed to meet international health and safety standards and best practice, including the relevant guidance from International Commission on Non-Ionizing Radiation Protection (ICNIRP) and from the Communications Regulator in Ireland.

*Eir Ltd* own and operate mobile telecommunications sites across Ireland. These sites are built and managed to operate within the limits for exposure to Electromagnetic Fields which are set by the Communications Regulator and are based on guidance from the International Council for Non-Ionising Radiation Protection (ICNIRP) and meet the requirements of directives from the European Commission. The issue of radiation from Mobile Phones has been a concern for many people since the introduction of this technology significant numbers of studies have been performed and have been reviewed by international experts. The World Health Organisation in their fact sheet on Electromagnetic fields and public health: mobile phones have stated that "A large number of studies have been undertaken on both acute and long-term effects from HF (High Frequency EMF Radiation) exposure typical of base stations. Research at these levels of exposure has provided no conclusive evidence of any related adverse health effects". (Ref; <http://www.who.int/mediacentre/factsheets/fs193/en/>). In their on line Q&A on Mobile Phones and Cancer the WHO also states "Studies to date provide no indication that environmental exposure to RF fields, such as from base stations, increases the risk of cancer or any other disease." (<http://www.who.int/features/qa/30/en/>)

The International Council on Non Ionising Radiation Protection, who are the lead independent agency on non-ionising radiation safety have stated "A large number of studies have been undertaken on both acute and long-term effects from HF (High Frequency Non Ionising Radiation) exposure typical of base stations. Research at these levels of exposure has provided no conclusive evidence of any related adverse health effects." (<http://www.icnirp.org/en/applications/base-stations/index.html>) in late 2015 The European Commission's Scientific Committee on Emerging and Newly Identified Health Risks published a "[Final Opinion on the Potential health effects of exposure to electromagnetic fields \(EMF\)](#)" The expert opinion is based on the latest scientific studies and expert review. In its summary the Scientific Committee state that "The results of current scientific research show

Directors:

eir is a trading name of eircom Limited,  
Registered as a Branch  
in Ireland Number 907674  
Incorporated in Jersey Number 116389

Branch Address: 1 Heuston South Quarter,  
St. John's Road, Dublin 8  
VAT registration: IE 3286434NH

that there are no evident adverse health effects if exposure remains below the levels recommended by the EU legislation.

Our antennae are well below this level) Overall, the epidemiological studies on radiofrequency EMF exposure do not show an increased risk of brain tumours. Furthermore, they do not indicate an increased risk for other cancers of the head and neck region.”

The maximum exposure levels that are set by ICNIRP for Public exposure to radiation in the mobile phone frequency range is 28 V/m. All of our sites are designed and maintained to operate well within these guideline limits. Independent compliance inspections that are carried out for our company and are published by the Communications Regulator on their website ([www.siteviewer.ie](http://www.siteviewer.ie)) show that the levels of EMF radiation from mobile telecoms masts in Ireland ranges between 0.5-3V/m, well within the safe exposure limits advised by international experts.

We continue to monitor the advice and guidance given by Government, international experts and equipment manufacturers to ensure that the sites that we operate continue to operate well within the limits set for exposure of members of the public and for our employees and contractors who will work at your location.

**Internal Documentation References:**

Meteor Mobile Communications Design and Build Specification and Guidelines  
Standard Safe Operating practices - Mobile Network

**Statement Prepared By:** [REDACTED]eir Group Head of Environment, Health and Safety

**Date:** 12/07/17



**PHOENIX TOWER  
INTERNATIONAL**

Date: 25/05/2022

**To whom it may concern,**

I can confirm that Emerald Tower Limited (and its group companies; Phoenix Ireland HoldCo Limited and Phoenix Tower Ireland Limited) has a current Safety Statement in place.

The registered office of Emerald Tower Limited is 10 Earlsfort Terrace, Dublin D02 T380.

If I can be of any further assistance, please do not hesitate to contact me.

Yours faithfully

[Redacted Signature]  
Senior Operations Manager, Ireland

Phone: [Redacted]

Email: [Redacted]

**Emerald Tower Limited, First Floor, 3013, Marketing Suite Building,  
Lake Drive, Citywest Business Campus, Dublin 24, D24 YXW2  
Registered Office: 10 Earlsfort Terrace, Dublin 2  
Private Company Limited by Shares, Incorporated in Ireland Company No 669209  
Directors: [Redacted]**



Date: 26/04/2023

Client Code: [REDACTED]

To Whom It May Concern,

**Re: Insured - Emerald Tower Limited and/or Phoenix Ireland HoldCo Limited and/or Phoenix Tower Ireland Limited**

**Business Description:** Owning, leasing and management of wireless infrastructure

We confirm we act as insurance brokers for the above-mentioned client and set out on the attached details of the insurances we have arranged on their behalf:

Policy Type:	Combined Liability
Name of Primary Insurer:	Chubb Insurance Co.
Primary Policy Number:	[REDACTED]
Cover Period:	23 <sup>rd</sup> April 2023 to 22 <sup>nd</sup> April 2024 both days inclusive
Name of Policyholder:	Emerald Tower Limited and/or Phoenix Ireland HoldCo Limited and/or Phoenix Tower Ireland Limited
Insured Business Description:	Owning, leasing and management of wireless infrastructure
Name of Excess Insurer:	Convex Insurance UK Ltd
Policy Number:	[REDACTED]
Policy Period:	23 <sup>rd</sup> April 2023 to 22 <sup>nd</sup> April 2024 both days inclusive

**O'LEARY INSURANCES LTD.**

*is regulated by the Central Bank of Ireland.*

*Lough Mahon House, Blackrock, Cork, T12 C43C, Tel: 021 4536800, Fax: 021 4536801, Email: info@oli.ie, Website: www.olearyinsurances.ie.*

*Telephone calls are recorded for training quality and verification purposes.*

**Directors:** [REDACTED]



# O'LEARY

INSURANCE GROUP

Insurance Brokers & Consultants Est. 1961

**Total Limit of Indemnity:**

- Public/Products Liability: €6,500,000  
any one occurrence unlimited any one period of insurance but in the aggregate in respect of Products Liability.

---

**O'LEARY INSURANCES LTD.**

*is regulated by the Central Bank of Ireland.*

Lough Mahon House, Blackrock, Cork, T12 C43C, Tel: 021 4536800, Fax: 021 4536801, Email: [info@oli.ie](mailto:info@oli.ie), Website: [www.olearyinsurances.ie](http://www.olearyinsurances.ie)

*Telephone calls are recorded for training quality and verification purposes.*

**Directors:**



Registered in Ireland, Company Registration No. 18930, Registered Office: Lough Mahon House, Blackrock, Cork, T12 C43C, Ireland.



# O'LEARY

INSURANCE GROUP

Insurance Brokers & Consultants . Est. 1961 .

**Extension:**

Specific Indemnity to each of the below has been included on the policy:

Dublin City Council  
Dun Laoghaire Rathdown County Council  
Fingal County Council  
South Dublin County Council  
Limerick City Council  
Limerick County Council  
Galway City Council  
Galway County Council  
Waterford City and County Council  
Meath County Council  
Cork City Council  
Cork County Council  
Louth County Council  
Monaghan County Council  
Longford County Council  
Kerry County Council  
Carlow County Council  
Cavan County Council  
Clare County Council  
Donegal County Council  
Kildare County Council  
Kilkenny County Council  
Kilkenny City council  
Laois County Council  
Leitrim County Council  
Mayo County Council  
Offaly County Council  
Roscommon County Council  
Sligo County Council  
Tipperary County Council  
Wexford County Council  
Wicklow County Council  
Westmeath County Council

**O'LEARY INSURANCES LTD.**

*is regulated by the Central Bank of Ireland.*

*Lough Mahon House, Blackrock, Cork, T12 C43C, Tel: 021 4536800, Fax: 021 4536801, Email: info@oli.ie, Website: www.olearyinsurances.ie.*

*Telephone calls are recorded for training quality and verification purposes.*

**Directors:**



*Registered in Ireland, Company Registration No. 18930, Registered Office: Lough Mahon House, Blackrock, Cork, T12 C43C, Ireland.*



**O'LEARY**

INSURANCE GROUP

Insurance Brokers & Consultants . Est. 1961 .

**Subject to policy terms, conditions and exclusions.**

Trusting this is the information you require.

Yours sincerely,



**Commercial Account Director**

**Email:**

**Tel.**

---

**. O'LEARY INSURANCES LTD. .**

*is regulated by the Central Bank of Ireland.*

*Lough Mahon House, Blackrock, Cork, T12 C43C, Tel: 021 4536800, Fax: 021 4536801, Email: info@oli.ie, Website: www.olearyinsurances.ie.*

*Telephone calls are recorded for training quality and verification purposes.*

**Directors:**





**O'LEARY**

INSURANCE GROUP

Insurance Brokers & Consultants . Est. 1961 .

Date: 26/04/2023

Client Code: [REDACTED]

To Whom It May Concern,

**Re: Insured - Emerald Tower Limited and/or Phoenix Ireland HoldCo Limited and/or Phoenix Tower Ireland Limited**

**Business Description:** Owning, leasing and management of wireless infrastructure

We confirm we act as insurance brokers for the above-mentioned client and set out on the attached details of the insurances we have arranged on their behalf:

**Subject to policy terms, conditions and exclusions.**

Trusting this is the information you require.

Yours sincerely,

[REDACTED]

**Commercial Account Director**

**Email:** [REDACTED]

**Tel.** [REDACTED]

---

**O'LEARY INSURANCES LTD.**

*is regulated by the Central Bank of Ireland.*

*Lough Mahon House, Blackrock, Cork, T12 C43C, Tel: 021 4536800, Fax: 021 4536801, Email: info@oli.ie, Website: www.olearyinsurances.ie.*

*Telephone calls are recorded for training quality and verification purposes.*

*Directors:* [REDACTED]



# O'LEARY

INSURANCE GROUP

Insurance Brokers & Consultants . Est. 1961 .

**Policy Type:**

**Combined Liability**

**Policy Holder:**

Emerald Tower Limited and/or Phoenix Ireland HoldCo Limited  
and/or Phoenix Tower Ireland Limited

**Insurer & Policy  
Number:**

[REDACTED]

**Policy Period:**

23<sup>rd</sup> April 2023 to 22<sup>nd</sup> April 2024 both days inclusive

**Insurer & Policy  
Number:**

[REDACTED]

**Policy Period:**

23<sup>rd</sup> April 2023 to 22<sup>nd</sup> April 2024 both days inclusive

**Total Limits of  
Indemnity:**

- Employers Liability: €13,000,000  
any one occurrence / unlimited in the period of insurance.
- Public/Products Liability: €6,500,000  
any one occurrence unlimited any one period of insurance but in  
the aggregate in respect of Products Liability.

**Extension:**

Indemnity to Principals

**Subject to policy terms, conditions and exclusions.**

**O'LEARY INSURANCES LTD.**

*is regulated by the Central Bank of Ireland.*

Lough Malon House, Blackrock, Cork, T12 C43C, Tel: 021 4536800, Fax: 021 4536801, Email: info@oli.ie, Website: www.olearyinsurances.ie

*Telephone calls are recorded for training quality and verification purposes.*

Directors:

[REDACTED]



**O'LEARY**  
INSURANCE GROUP  
*Insurance Brokers & Consultants . Est. 1961 .*

Date: 26/04/2023

Client Code: [REDACTED]

To Whom It May Concern,

**Re: Insured - Emerald Tower Limited and/or Phoenix Ireland HoldCo Limited and/or Phoenix Tower Ireland Limited**

**Business Description:** Owning, leasing and management of wireless infrastructure

We confirm we act as insurance brokers for the above-mentioned client and set out on the attached details of the insurances we have arranged on their behalf:

**Subject to policy terms, conditions and exclusions.**

Trusting this is the information you require.

Yours sincerely,

[REDACTED]

**Commercial Account Director**

**Email:** [REDACTED]

**Tel.** [REDACTED]

---

**O'LEARY INSURANCES LTD.**

*is regulated by the Central Bank of Ireland.*

*Lough Malon House, Blackrock, Cork, T12 C43C, Tel: 021 4536800, Fax: 021 4536801, Email: info@oli.ie, Website: www.olearyinsurances.ie.*

*Telephone calls are recorded for training quality and verification purposes.*

**Directors:**

[REDACTED]

*Registered in Ireland, Company Registration No. 18930, Registered Office: Lough Malon House, Blackrock, Cork, T12 C43C, Ireland.*



# O'LEARY

INSURANCE GROUP

Insurance Brokers & Consultants - Est. 1961

<b>Policy Type:</b>	<b>Combined Liability</b>
<b>Policy Holder:</b>	Emerald Tower Limited and/or Phoenix Ireland HoldCo Limited and/or Phoenix Tower Ireland Limited
<b>Insurer &amp; Policy Number:</b>	[REDACTED]
<b>Policy Period:</b>	23 <sup>rd</sup> April 2023 to 22 <sup>nd</sup> April 2024 both days inclusive
<b>Insurer &amp; Policy Number:</b>	[REDACTED]
<b>Policy Period:</b>	23 <sup>rd</sup> April 2023 to 22 <sup>nd</sup> April 2024 both days inclusive
<b>Total Limits of Indemnity:</b>	<ul style="list-style-type: none"><li>• Employers Liability: €13,000,000 any one occurrence / unlimited in the period of insurance.</li><li>• Public/Products Liability: €13,000,000 any one occurrence unlimited any one period of insurance but in the aggregate in respect of Products Liability.</li></ul>
<b>Extension:</b>	Indemnity to Principals  <b>Subject to policy terms, conditions and exclusions.</b>

## O'LEARY INSURANCES LTD.

is regulated by the Central Bank of Ireland.

Lough Malton House, Blackrock, Cork, T12 C43C, Tel: 021 4536800, Fax: 021 4536801, Email: info@oli.ie, Website: www.olearyinsurances.ie.

Telephone calls are recorded for training quality and verification purposes.

Directors:



Registered in Ireland, Company Registration No. 18950, Registered Office: Lough Malton House, Blackrock, Cork, T12 C43C, Ireland.