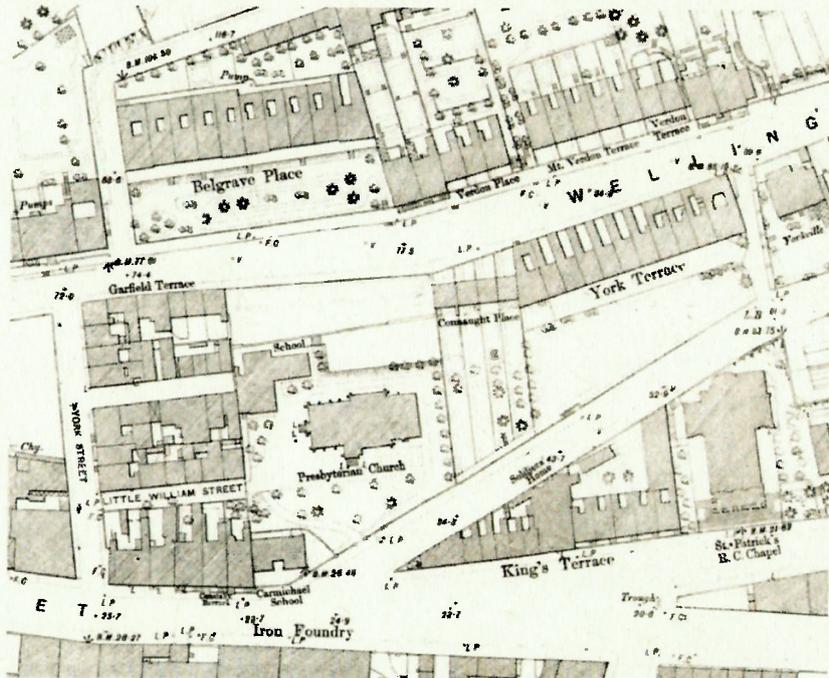


**Appendix 3 – Architectural Heritage Impact Assessment, prepared by JCA**



# JCA Architects



## Proposal at Wellington Road, Cork

## Architectural Heritage Impact Assessment Report

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Feb 2025





## 1.0 Landscape and Visual Impact

### 1.1 Introduction

This Architectural Heritage Impact Assessment has been prepared by Gareth O'Callaghan, RIAI Grade 1 accredited architect, of JCA Architects to assess the Architectural Heritage Impact of a Proposed Development which includes the placement of a new telecoms mast at Eir Telephone Exchange, Wellington Road, Cork. The report assesses the visual extent of the proposed development and its visual effects on the study area. It describes the landscape character of the application site, together with the visibility of the site from significant viewpoints. The report summarises the impact of the proposed development on the visual and landscape amenity of the application site and the contiguous, adjoining area of the site within an Architectural Conservation Area and relating to Protected Structures and makes recommendations to lessen and correct the environmental impact of the proposed facility.

### 1.2 Assessment Method

#### 1.2.1 Desktop Study

A site visit was made in December 2024. A desktop study evaluates the existing site conditions such as topography, settlement patterns, vegetation, contiguous (adjoining) land use, landscape character as well as overall visibility of the site from surrounding areas. Information is also gathered on but not limited to special and protected status and with the assistance of local knowledge.

#### 1.2.2 Definition of Impact Significance Criteria

The document refers in part to impact significance rating criteria as outlined in the Environmental Protection Agency guidelines, modified to take account of other references used in the assessment methodology, (see Table 1.1.). This table is a guide to impact significance. The assessor also uses professional judgement informed by additional considerations (including the Planning Act 2000 and amendments), their expertise and experience to arrive at a classification of significance.



		Existing Environment: Significance / Sensitivity			
		High	Medium	Low	Negligible
Magnitude of Change	High	Profound	Very Significant	Significant / Moderate	Moderate / Slight
	Medium	Very Significant / Significant	Significant / Moderate	Moderate	Slight / Not Significant
	Low	Significant / Moderate	Moderate / Slight	Slight / Not Significant	Not Significant / Imperceptible
	Negligible	Slight / Not Significant	Not Significant	Not Significant / Imperceptible	Imperceptible

**Table 1.1 Classification of Significance of Impacts**

The significance of impacts, which in quality may be positive, neutral or negative/adverse, are described as follows:

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

**Table 1.2 Description of Significance of Impact**

In terms of duration, impacts are considered as follows:

Significance of Impact	Proposal: Impact Duration
Brief	Up to one day
Temporary	Up to one year
Short Term	One to seven years
Medium Term	Seven to fifteen years
Long Term	Fifteen to fifty years
Permanent	Over sixty years

**Table 1.3 Duration of Significance of Impact**



Impacts are considered for completion stage including do-nothing, worse-case, cumulative, interactive, indirect and residual impacts, where appropriate, in the assessment.

### 1.2.3 Definition of Visual Impacts

The following terms, used in the heritage assessment, are defined as follows:

**Visual Intrusion:** Where a Proposed Development intrudes in an existing view without obstructing the view

**Visual Obstruction:** Where a Proposed Development causes obstruction or completely obscures an existing view

**Sensitivity and Significance:** The significance of impacts on the perceived environment depends partly on the number of people affected, but also on judgment of how much the proposed change would matter. In this respect it is important to identify actual visual and physical connections between the site, its adjacent occupiers/land owners and those who interact with it from further afield, in the context of the existing and the proposed impact.

**Non Visual Impact & Significance:** While our visual sense is generally acknowledged to represent the dominant contribution to our perception of place and its context, other factors also contribute. Hearing/sound, smell and a variety of social/cultural factors relating to a land-use, function or business conducted on the land (or indeed, memory) can sometimes over-rule or outweigh the visual aspects of impact and lead to individual perceptions which could be described as relatively subjective. The purpose of this report is to objectively examine and assess the nature and extent of the visual impact created as a result of the development proposal acknowledging by raising the issue that other impacts may affect those associated with or using a place with different connections and durations of time associated.

### 1.2.4 Choice of Views

Views have been chosen to accurately and evenly represent the likely visual impact of the proposal from different locations or as presented for consideration. Views are from the public domain, particularly those from main roads and access routes and from the grounds and setting of relevant places which have regular and defined public access. The views submitted are considered to be the most important and representative of the requirement to examine the most likely impacts.

### 1.2.5 Photomontages

Photomontages provided by client: Images 1-5 Proposed Monopole, OpenEir Wellington Exchange, Wellington Road, Cork.







residents. The Posts and Telegraph service built a telephone exchange building on the site of the garden in the late 1960s altering the ground to facilitate an access from Wellington Road and a one storey building with basement under. The land is leasehold to the building owners Eir from Trinity Presbyterian Church.

The building of the telephone exchange took advantage of the sloping site by the creation of a two story building against Wellington Road which raised the level of the site to Wellington Road by about 1m. The alterations required the construction of a new retaining wall between the lower grounds of the church building and the upper garden site. The garden had a central path running east west and paths leading to the church grounds, towards Connaught place and to Wellington Road to the west as seen in the 1892 town plan.

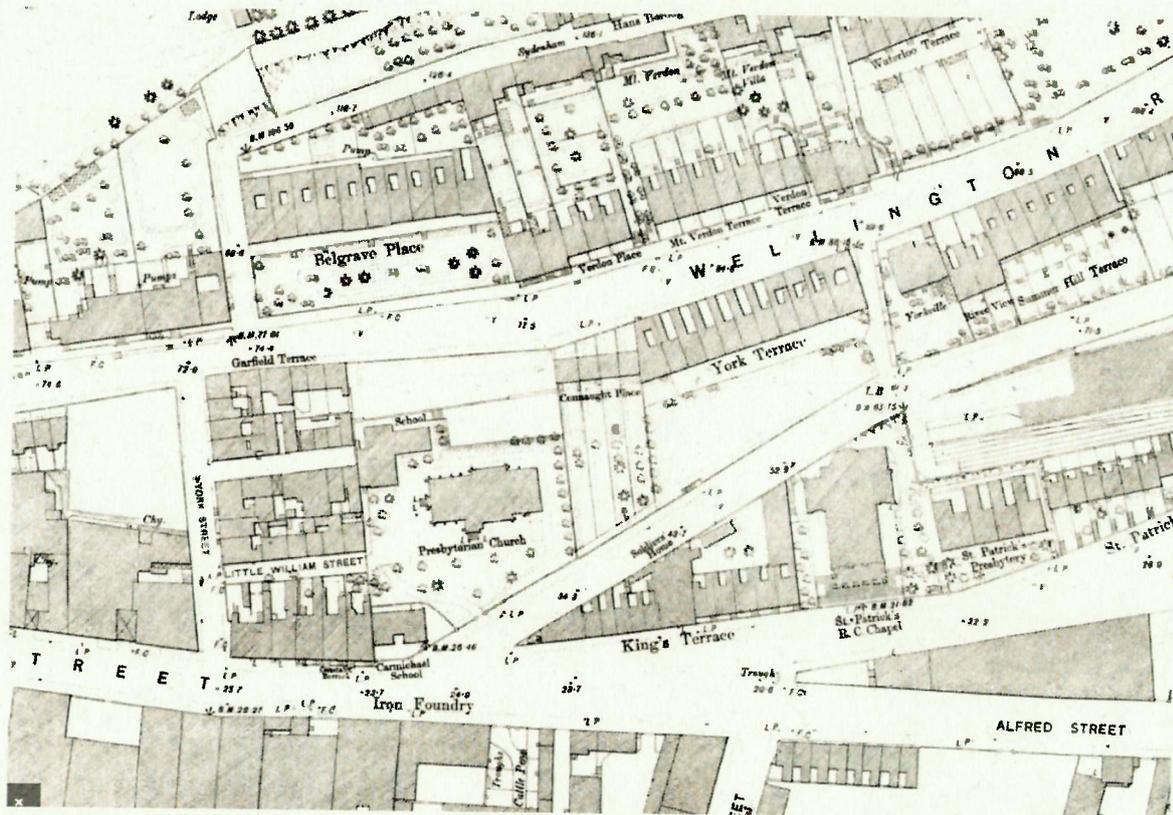
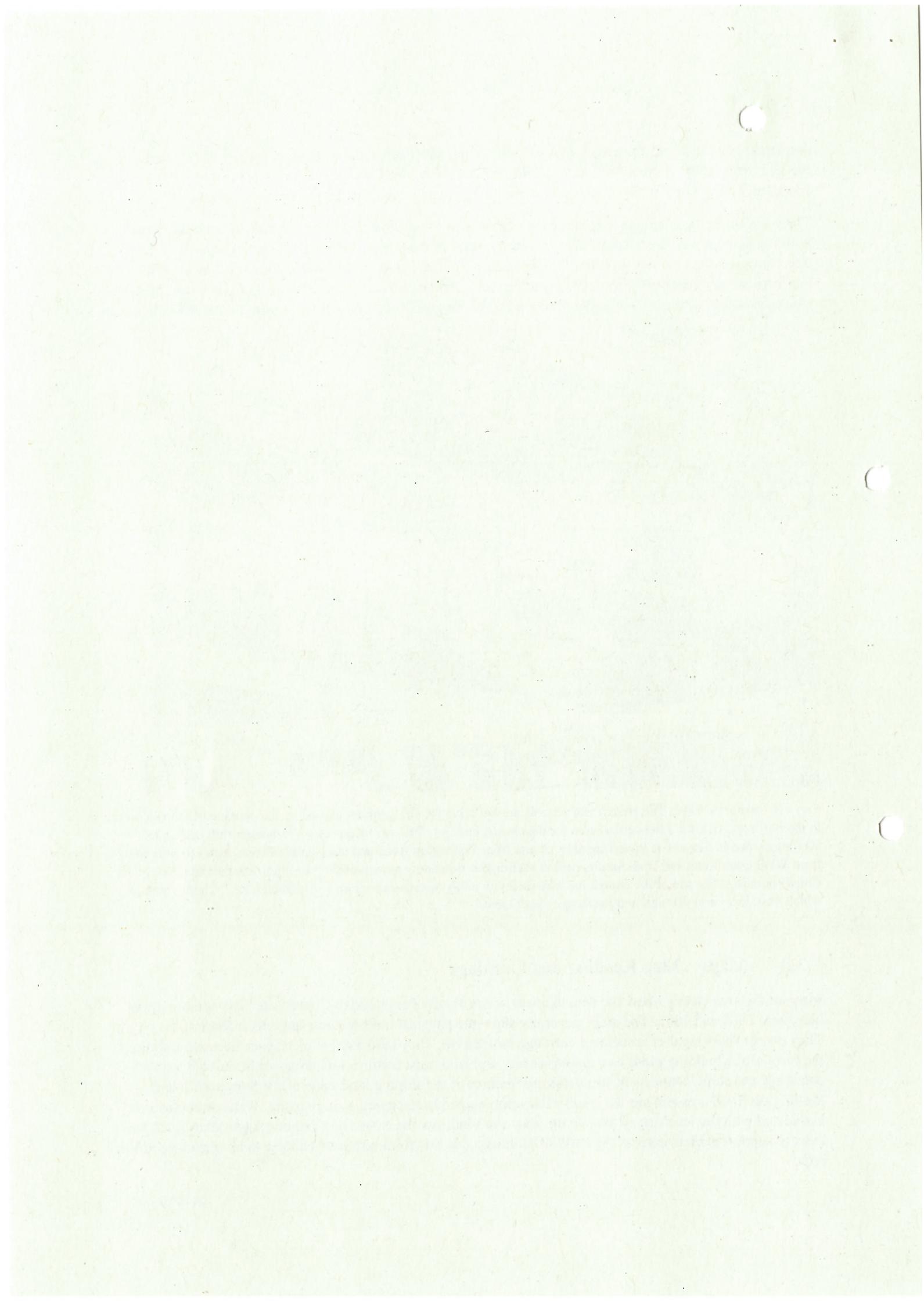


Fig. 1.2 Town Plan 1892. The church and schools are built and the site gradient altered by the creation of embankments to the north and east for a flat central area for the church building. The site slopes down to Summerhill and up to Wellington Road. The site is linked spatially to and from Wellington Road and to Belgrave Place. Views to Summerhill from Wellington Road and from Summerhill to Wellington Road now punctuated by the significant architecture of the church building, The site of the church has afforded new public access and views to St Patricks R.C. Chapel both of which have local architectural and landscape significance.

### 1.3.2 Maps – Map Reading and Curtilage

Maps of the area clearly show the development of the Trinity Presbyterian Church site. Two are presented here from 1834 and 1892. The maps generally show the physical built features and urban form of the city. They do not show legal or associated curtilage boundaries. They indicate the open space between buildings, the form of the building plans two dimensionally and landscape features including walls, embankments, pathways and steps. Many such structures are features of the sloping landscape of the Summerhill and Wellington Road area and are the result of developing and landscaping a sloping site. Walls or enclosures associated with the levelling of sites in the area don't indicate the extent of a site curtilage. Many such walls exist to support garden areas to the north of buildings and this form represents a longstanding pattern in the area.



The original change in level between the church and subsequent garden to Wellington Road is a physical feature within the curtilage of the original site. This feature historically was lower than what exists today as the ground was lower and as a garden may have sloped to the south. The pattern of sites extending from Wellington Road to Summerhill is well established. The curtilage of the Trinity Presbyterian Church stretching to Wellington Road is part of living memory. It is also the case that historically the entire site was owned and developed by the Trinity Presbyterian Church before the Telephone Exchange building was constructed and this is reflected in the legal status of the site and it is associated with the site locally.

### 1.3.3 Protected Structures

The Eir Exchange was constructed on the grounds of the Trinity Presbyterian Church, a Protected Structure, (Ref. No PS425) which includes two former original school buildings. It is also prominent within the setting of additional Protected Structures of: No. 23 Connaught Place (Ref. No PS457), No. 22 Connaught Place (Ref. No PS456) and No. 21 Connaught Place (Ref. No. PS455).

Trinity Presbyterian Church and its curtilage and attendant grounds are of architectural, historical, artistic, cultural, technical and social interest. The building has particular significance because of its prominent position on its sloping site, which is visible from many parts of the city.

No 23 Connaught Place is understood to be the former home of a Minister of the Trinity Presbyterian Church in the 19th Century.

Within view of the site and part of the setting are significant Protected Structures including St Patricks Church including a notable belfry of landscape importance and Thompsons Bakery which has a significant brick chimney.

Cork City Development Plan 2022 – 2028 Chapter 8 Heritage Arts and Culture 8.22 Protected Structures states on designation of Protected Structures that:

*The effect of the designation of Protected Structure status is to ensure that any changes or alterations to the character of the building are carried out in such a way that the existing special character is retained and enhanced. Therefore, works that have a material effect on the character of the structure, require planning permission.*

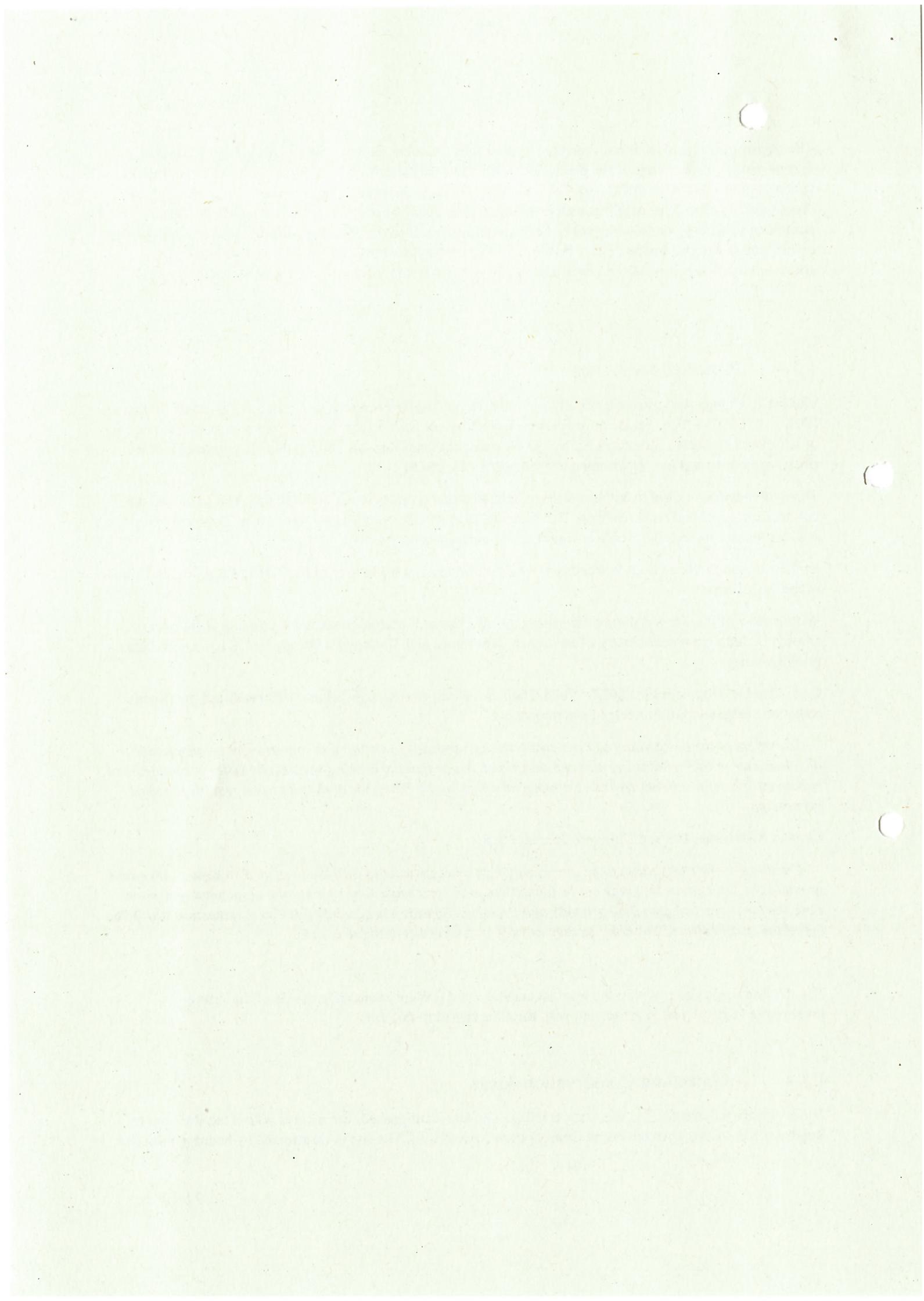
Chapter 8 Heritage Arts and Culture 8.26 states that:

*Curtilage is normally taken to be the parcel of grounds associated with the protected structure. Attendant grounds are those areas that may not be immediate to the protected structure but are associated with them. Both the curtilage and attendant grounds of a Protected Structure are included for their protection within the definition of a Protected Structure as they are defining elements of the structure.*

The Eir Exchange site is within the original curtilage and present attendant grounds of the Trinity Presbyterian Church and is associated with the Church site to this day.

### 1.3.4 Architectural Conservation Areas

The properties adjacent to the site, their curtilage and attendant grounds are located within the Wellington Road and Saint Luke's Architectural Conservation Area (ACA). The site is surrounded by housing from the



late 18<sup>th</sup> to mid. 19<sup>th</sup> Century which includes terraces and villas some of which create dramatic visual landscapes and parklands in the urban landscape of the area.

The designation of an area as an Architectural Conservation Area (ACA) protects the special characteristics and distinctive features of a designated landscape area while facilitating suitable contemporary development. Works that represent a material change in an Architectural Conservation Area, that may normally be exempted development require planning permission.

The physical expression of the significance of an area may consist of building lines and heights, patterns of materials, construction systems, or architectural elements that are repeated within the area and give it a sense of harmony or unique character. Protected Structures of note within an ACA landscape significantly add to the protection status of the landscape or setting.

In the Cork City Development Plan, 3.7 Development Control in Architectural Conservation Areas 3.7.1 states that:

*In an ACA, the carrying out of works to the exterior of a structure will be exempted development only if those works would not materially affect the character of the area. For works to be exempted, they must be consistent with the appearance of the structure itself and neighbouring structures.*

3.7.4 On Development Objectives item (e.) calls for recommendations on *criteria for the design and location of advertising hoardings, signage, awnings, canopies, flagpoles, banners, satellite dishes, masts and pylons, and item (h.) states the creation of policy by the planning authority in relation to enforcement and restoration of the character of the area.* This is important as it states a recognised objective of *restoration* of the character of an area.

It is worth noting that Ireland as stated in the Cork City Development Plan *Heritage Arts and Culture* Section has signed and ratified the European Landscape Convention, 2000 – the Florence Convention (ETS No. 176) This Convention defines landscape as ‘...an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors’ and applies to both rural and urban landscapes.

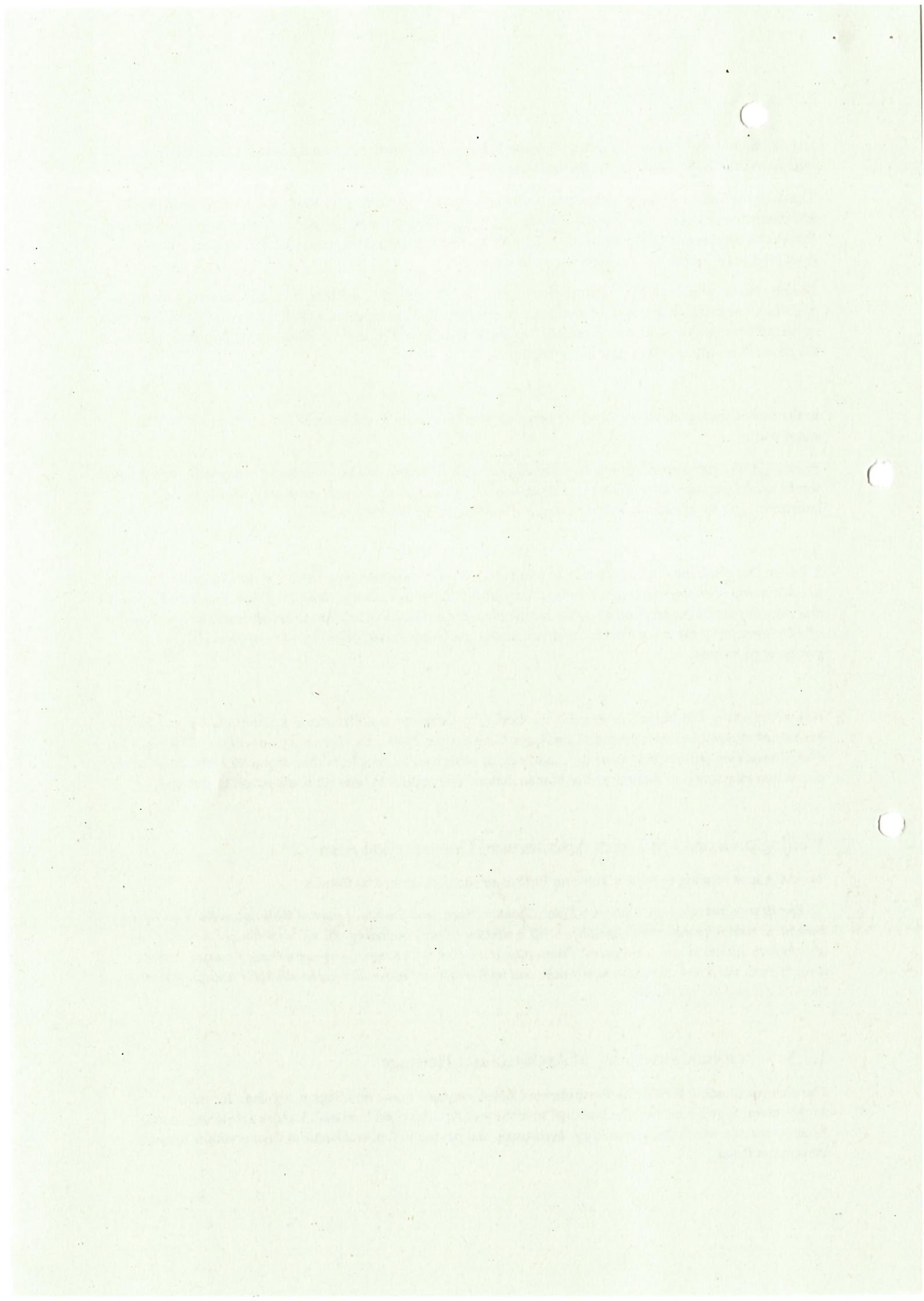
## Wellington Road / St Lukes Architectural Conservation Area

The ACA area relating to the Eir Telecom Exchange site is described as follows:

*The first section from St. Patrick's Place, Sydney Place, and the lower part of Wellington Road as far as York St. is more city-centre in character, with a mixture of uses including offices, warehouses, schools, and apartments, aimed at city-wide users. Physically, it is older, with large Georgian terraced houses entered directly from the street along the north side, and with a mixture of smaller generally later buildings facing the street along the south side.*

### 1.3.5 National Inventory of Architectural Heritage

The area surrounding the Trinity Presbyterian Church contains many buildings recognised for their Architectural Significance by the National Inventory of Architectural Heritage. Landscape items are also listed as notable which include railings, kerbstones and paving in the Architectural Conservation Area on Wellington Road.



The NIAH appraisal of the church describes it as an, *Ashlar limestone Gothic-revival church with fine cut stone details, tracery and leaded glass windows and retaining interior elements such as gallery and open timber roof structure. Built on an elevated site, it is visible from many parts of the city and has a number of associated buildings in its environs. Design attributed to an English architect J. Tarring.*

### 1.3.6 Topography

The site slopes from Wellington Road down to Summerhill. The new mast is proposed at Wellington Road on a concrete pad placed at circa 20.14m (survey by Focus Surveys, Cork 2024). The church building sits on a flat area of the site which has been created from what was a slope that originally followed the approximate line of the garden of no 23 Connaught Place to the east and sloped down to the west from this eastern side as well as down to the south at Summerhill from Wellington Road. The hillside landscape crosses Wellington Road and rises up to a 19<sup>th</sup> C raised footpath and ultimately to the retaining wall of Belgrave Place and the parkland space in front of it. The site slopes from east to west from Connaught Place gardens on Summerhill to McCurtain Street where there is a pedestrian entrance to the church grounds.

The site was originally sloped from Wellington Road to Summer Hill with a more sudden drop in level towards the front of the site as indicated on the 6inch map of pre 1834. The development of the site as a telephone exchange seems to have raised the level at Wellington Road by approximately 1m. The original lower level can be seen today against No 23 Connaught Place where a retaining wall contemporary with the exchange building allows for the change in level. This indicates the historic change in level between the garden site of the Eir Exchange was less than seen today on the eastern side.

### 1.3.7 Vegetation

The 1892 Town Plan indicates tree planting around the church building but doesn't indicate street tree planting on Wellington Road.

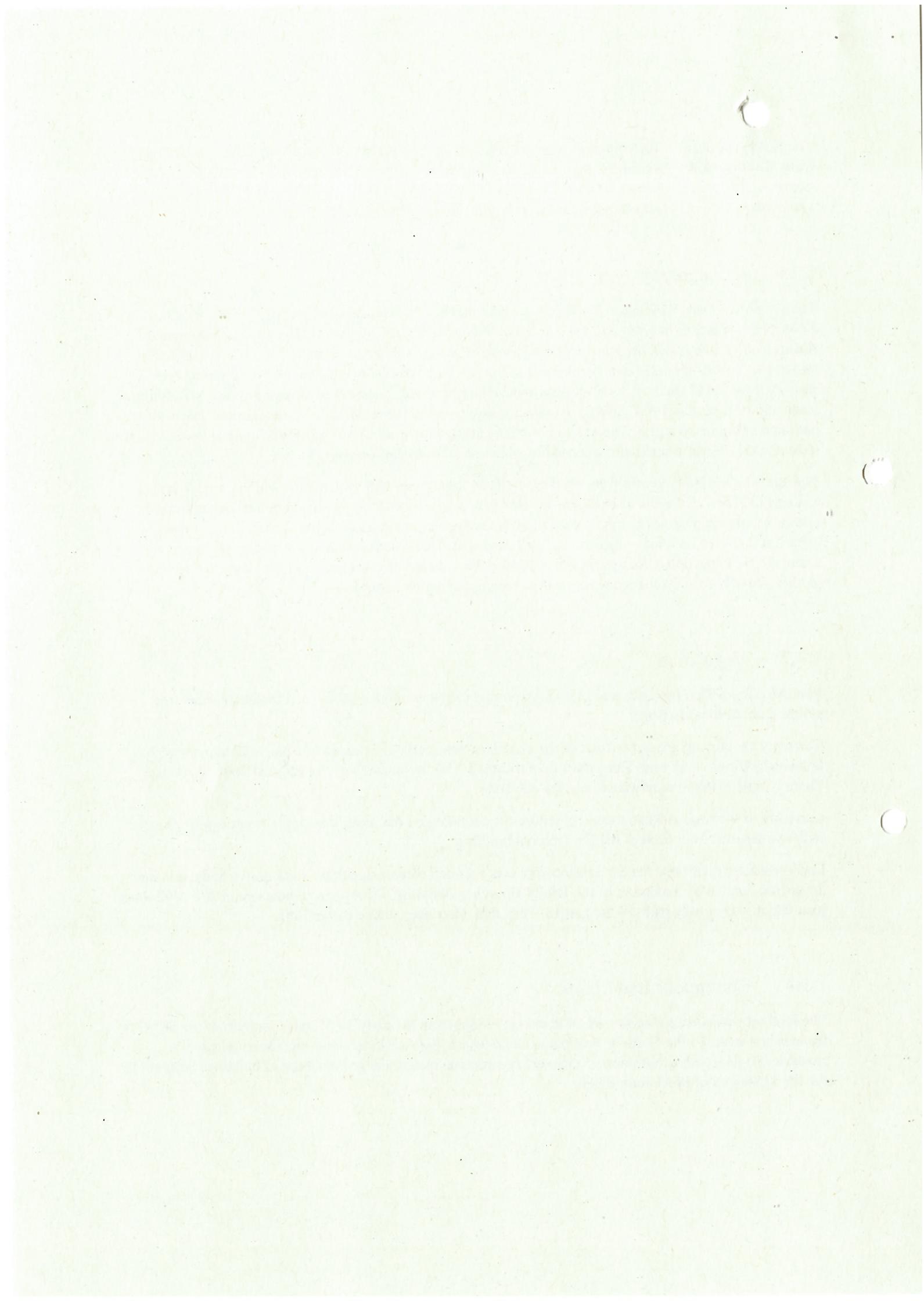
Currently the sloping ground in front of the church to Summerhill is planted in a parkland manner with a lawn and various small trees and shrubs kept trimmed. This is indicated on the original Town Plan map. There is little planting otherwise to the site currently.

Currently to Wellington Road there are mature trees running on the south side of the street against the site with two large trees in front of the Eir Telecom building.

Local residents recall that the Eir Telecom site was a garden where vegetables were grown and that it had apple trees tended by a member of the Trinity Church community. Trees are not indicated on the 1892 town plan which shows only paths in the garden. They may have been planted after 1892.

### 1.3.8 Contiguous Land Uses

The land uses adjacent to the site are of domestic houses from the early 19<sup>th</sup> C with some from the 18<sup>th</sup> C to the east and west. To the North is Wellington Road where there are large domestic houses across the roadside. To the south at Summerhill there are commercial uses to the ground floor of buildings adjacent to the site at the end of McCurtain Street.



### 1.3.9 Visual Analysis

There are two major view locations towards the site. One is from Wellington Road and one other is directly from Summerhill. There are also significant views from higher up on Summerhill, from York Terrace and from Woods Place as well as from within the site itself.

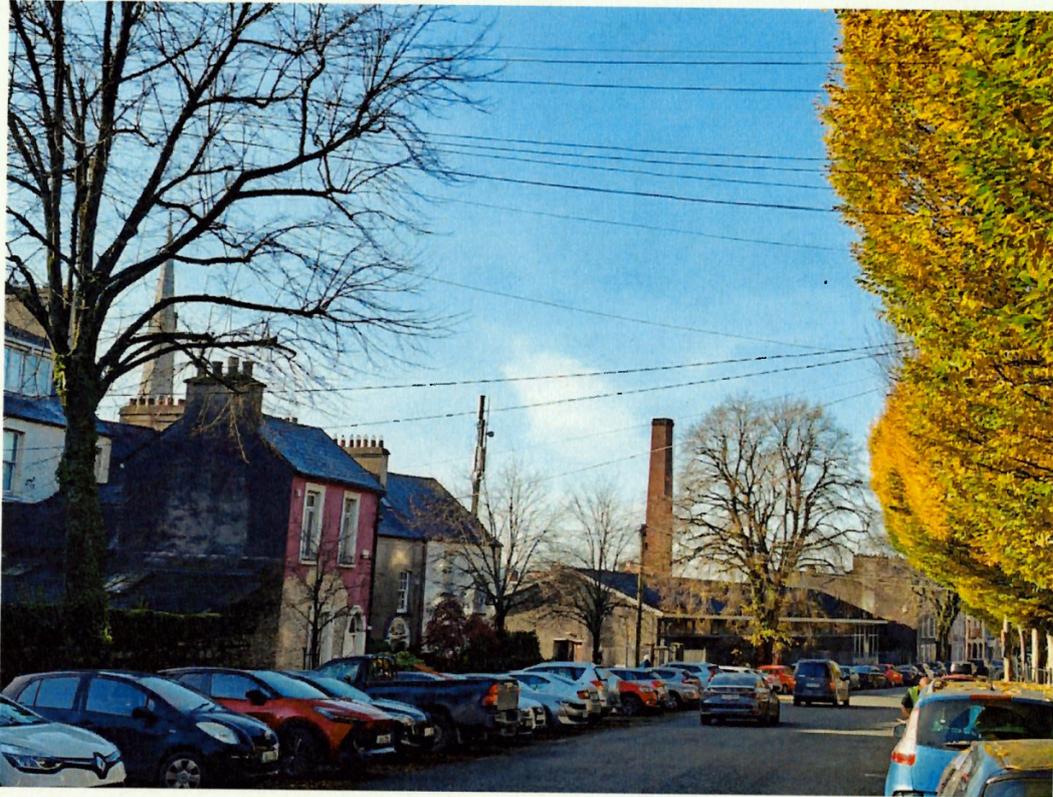


Fig. 1.3 Wellington Road looking west showing the spire of Trinity Church and the current telegraph pole. The chimney of Thompsons Bakery is in the background.

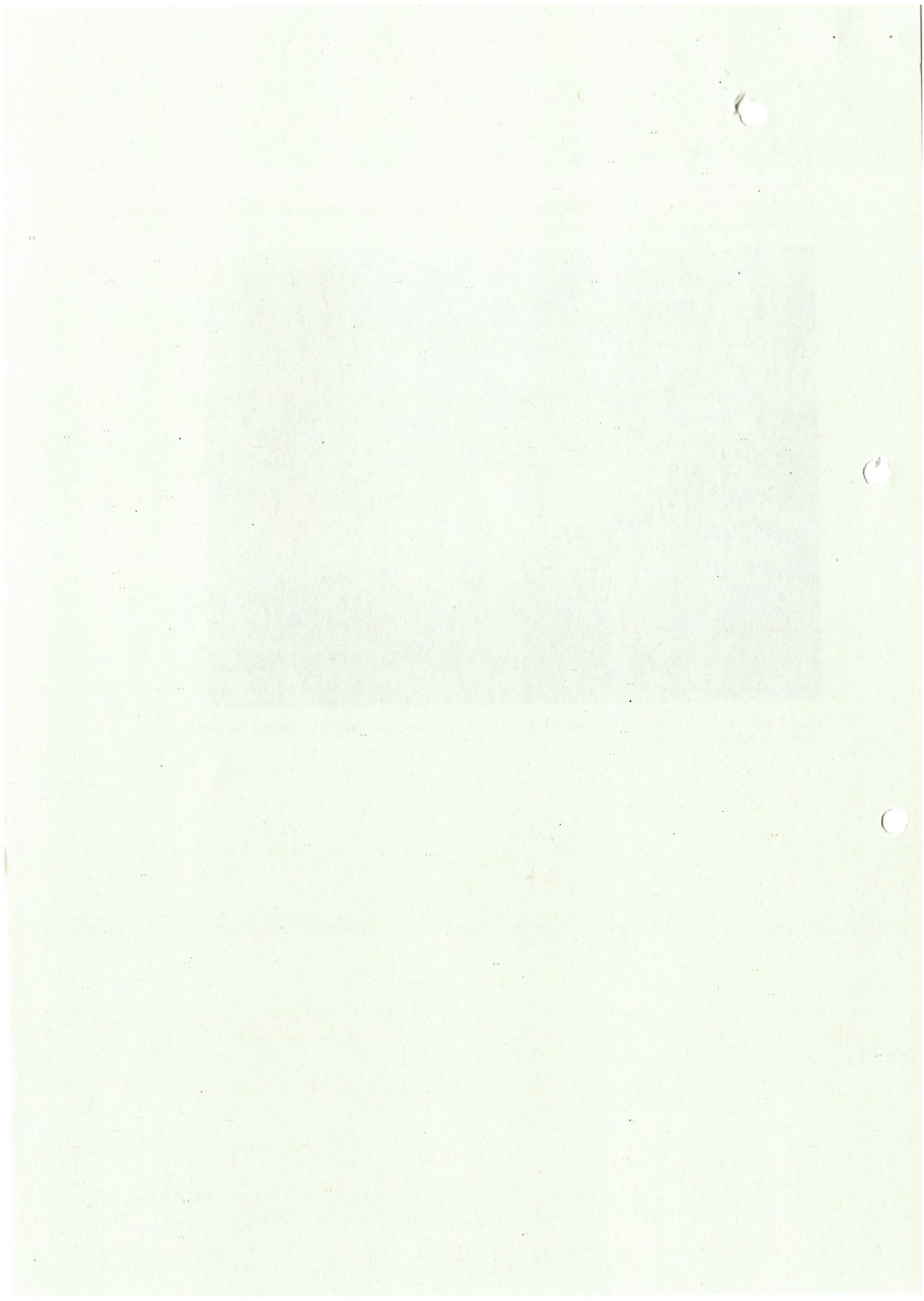




Fig. 1.4 Wellington Road looking south west showing the spire of Trinity Church behind Connaught Place and the current telegraph pole with antennae noting the street telegraph pole, trees and the Eir Exchange building.

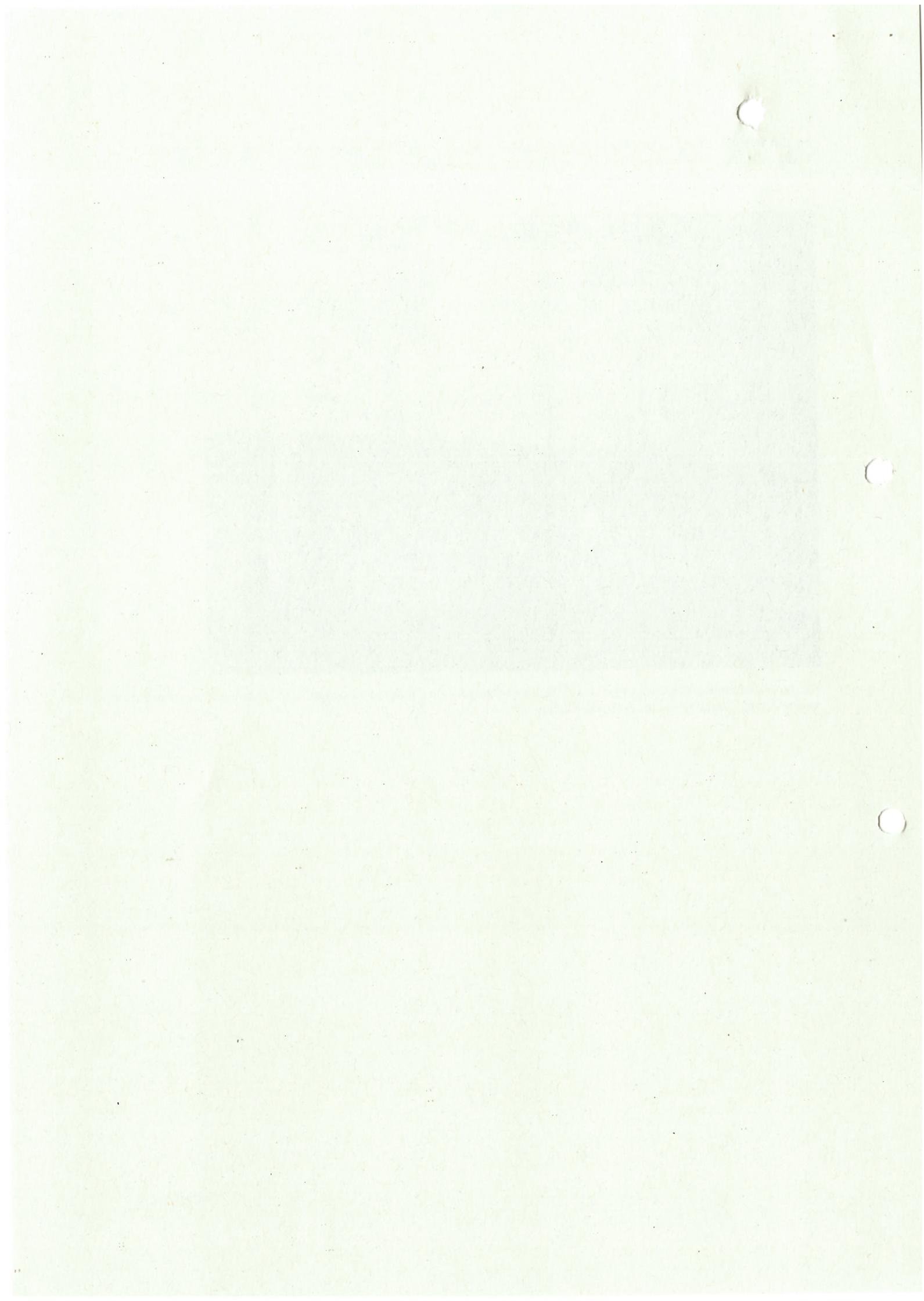




Fig. 1.5 Wellington Road looking south east showing the belfry of St Patricks Church between Connaught Place and the Eir Exchange building. The current telegraph pole with antennae rises behind the exchange building.



Fig. 1.6 Wellington Road looking south towards the Eir Exchange building showing the current telegraph pole and antennae and the spire of Trinity Church behind the exchange building.



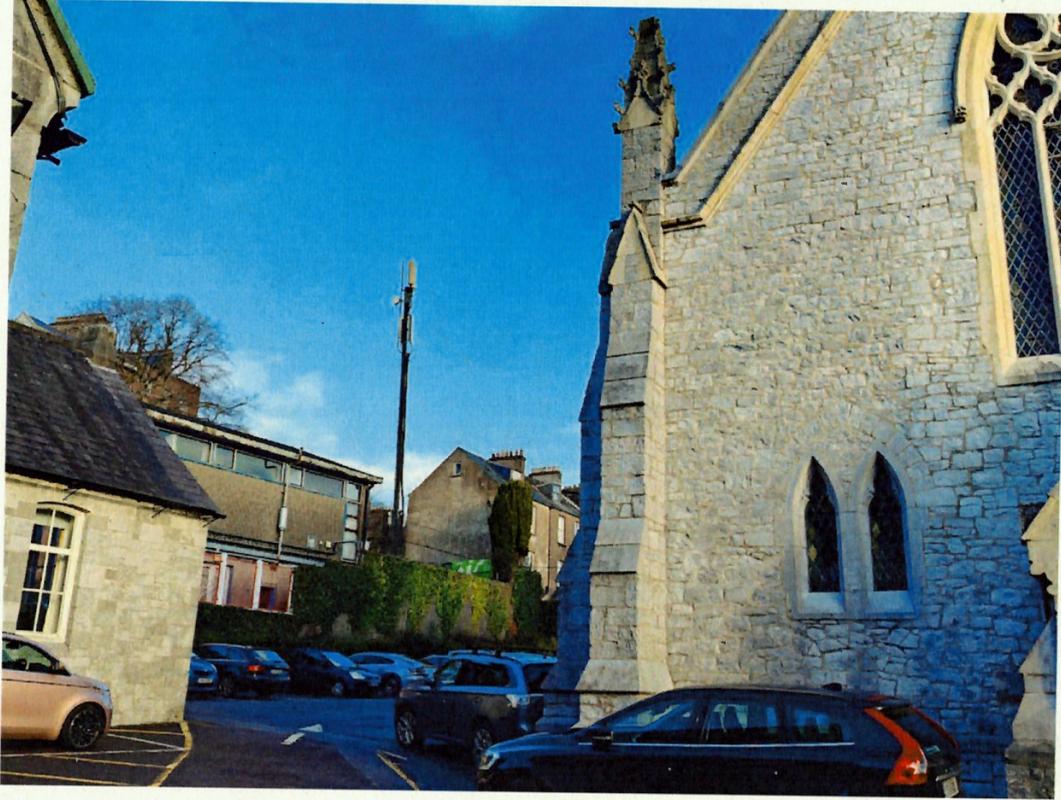


Fig. 1.7 At the entrance to Trinity Church with the church building to the right and school to the left showing the current telegraph pole and antenna at the Eir Telecom building.





Fig. 1.8 Trinity Church building to the right and the Eir Exchange building to the left from the church car park. Original ground levels can be seen below Connaught Place boundary wall in the background of the image.



Fig. 1.9 Trinity Church building to the left and Connaught Place to the right from the church car park. Original ground levels can be seen below Connaught Place to the right. The significance of the gap between the Eir Exchange building and Connaught Place can be appreciated as can the placement of the existing telegraph pole against the Eir Exchange building.

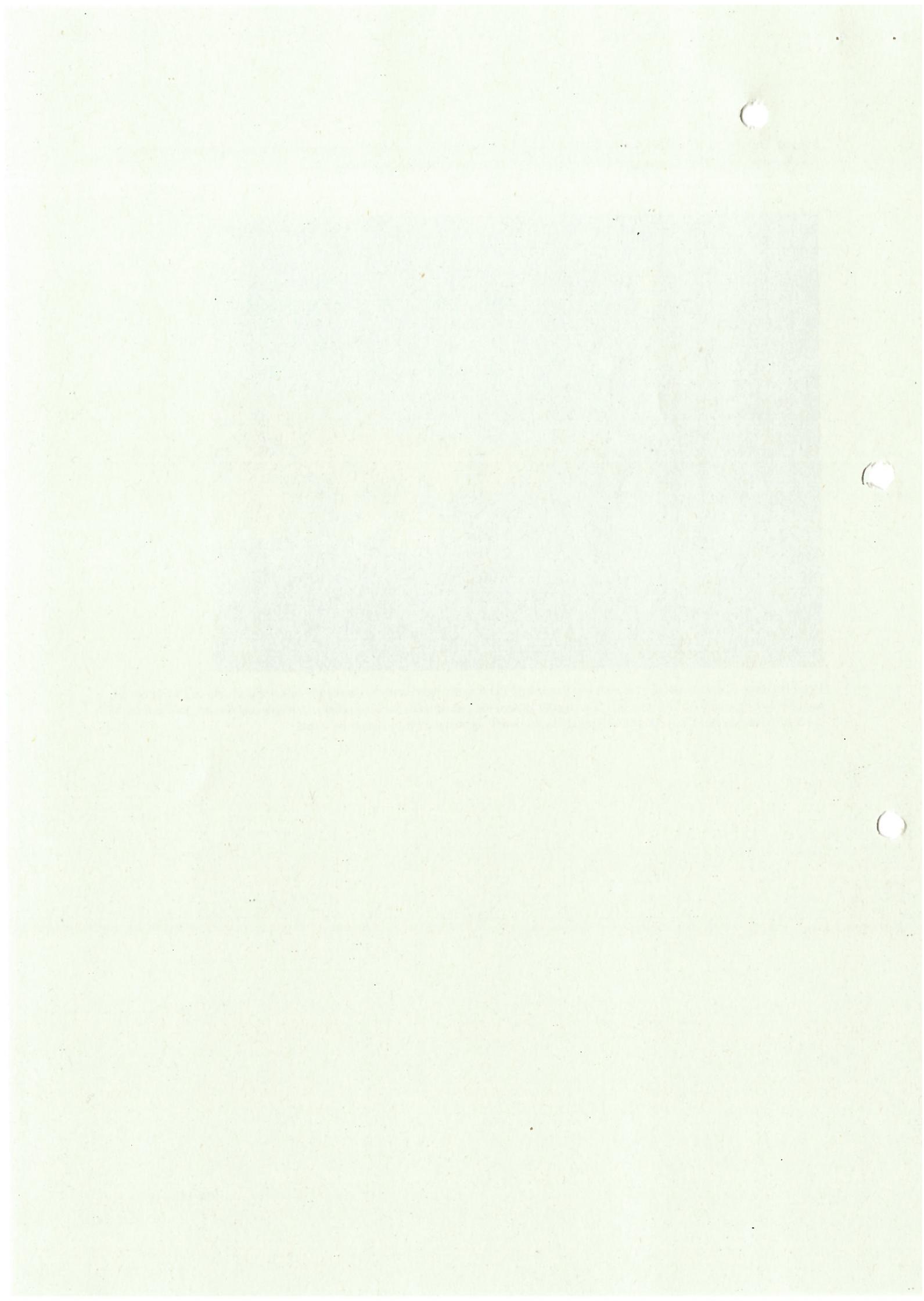




Fig. 1.10 Eir Exchange building from the carpark of trinity Church. The significance of the gap between the Eir Exchange building and Connaught Place can be appreciated as can the placement and height of the existing telegraph pole in the space.

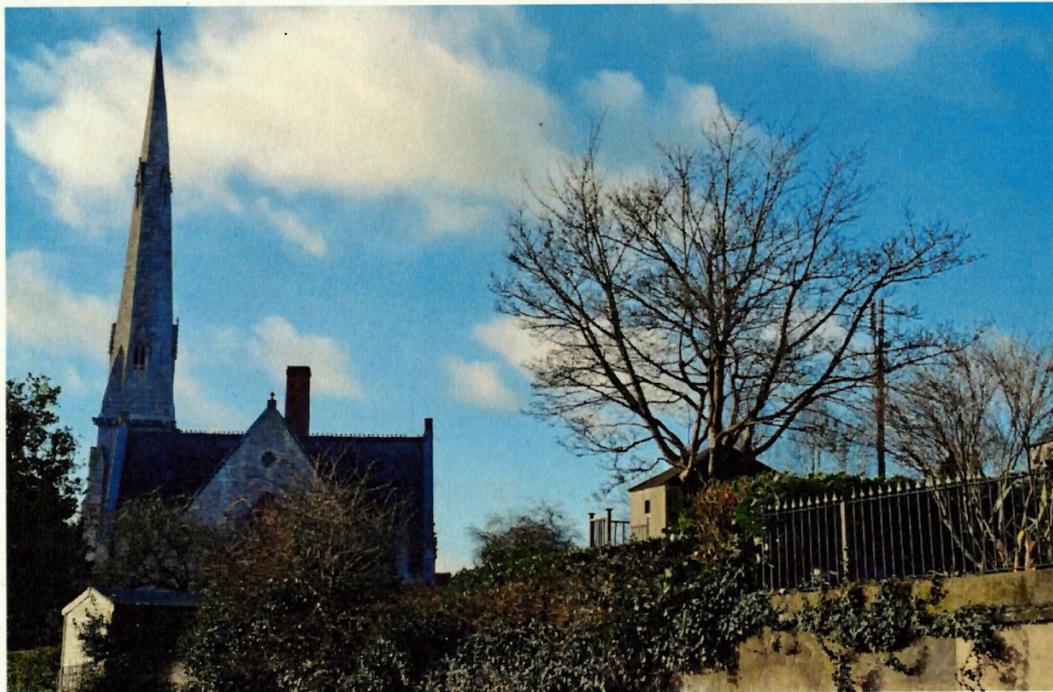


Fig. 1.11 Trinity Church from Summer Hill with telegraph pole and antenna to the right of the image.





Fig. 1.12 Trinity Church from Summer Hill looking north with telegraph pole and antenna to the right behind the church building and houses visible on Wellington Road through the remaining gap between the Eir Exchange building and Connaught Place.



Fig. 1.13 View of the telegraph pole and antenna behind the Trinity Church School from Woods Place.



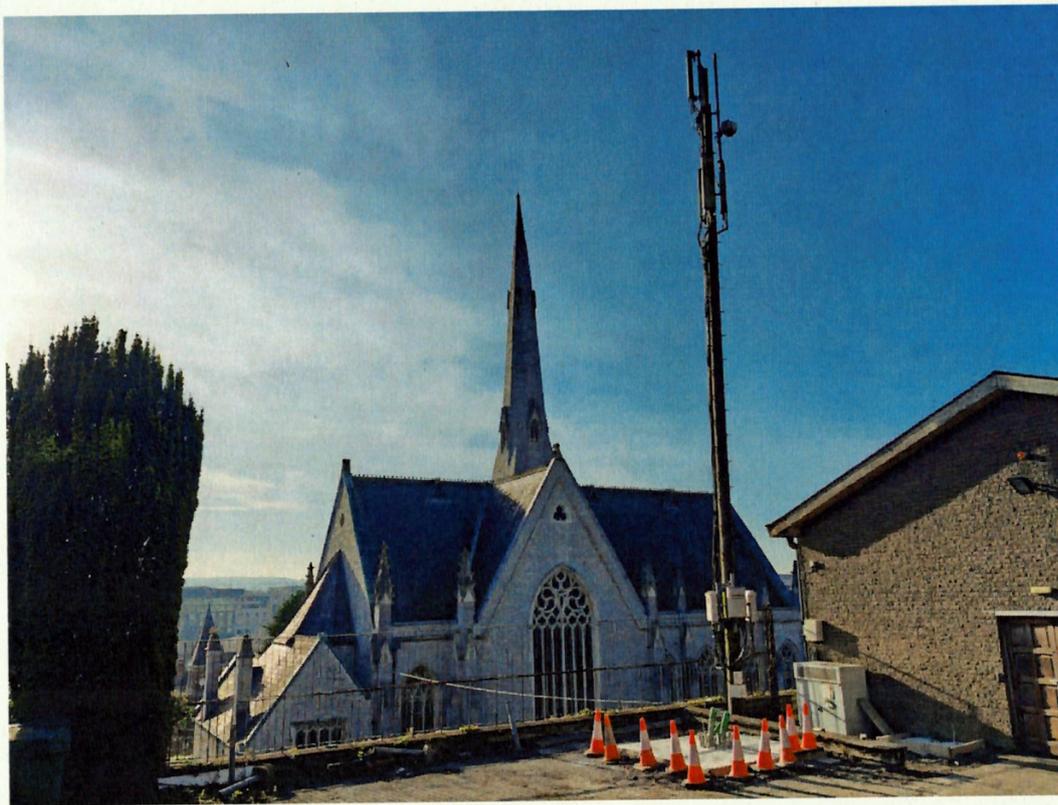
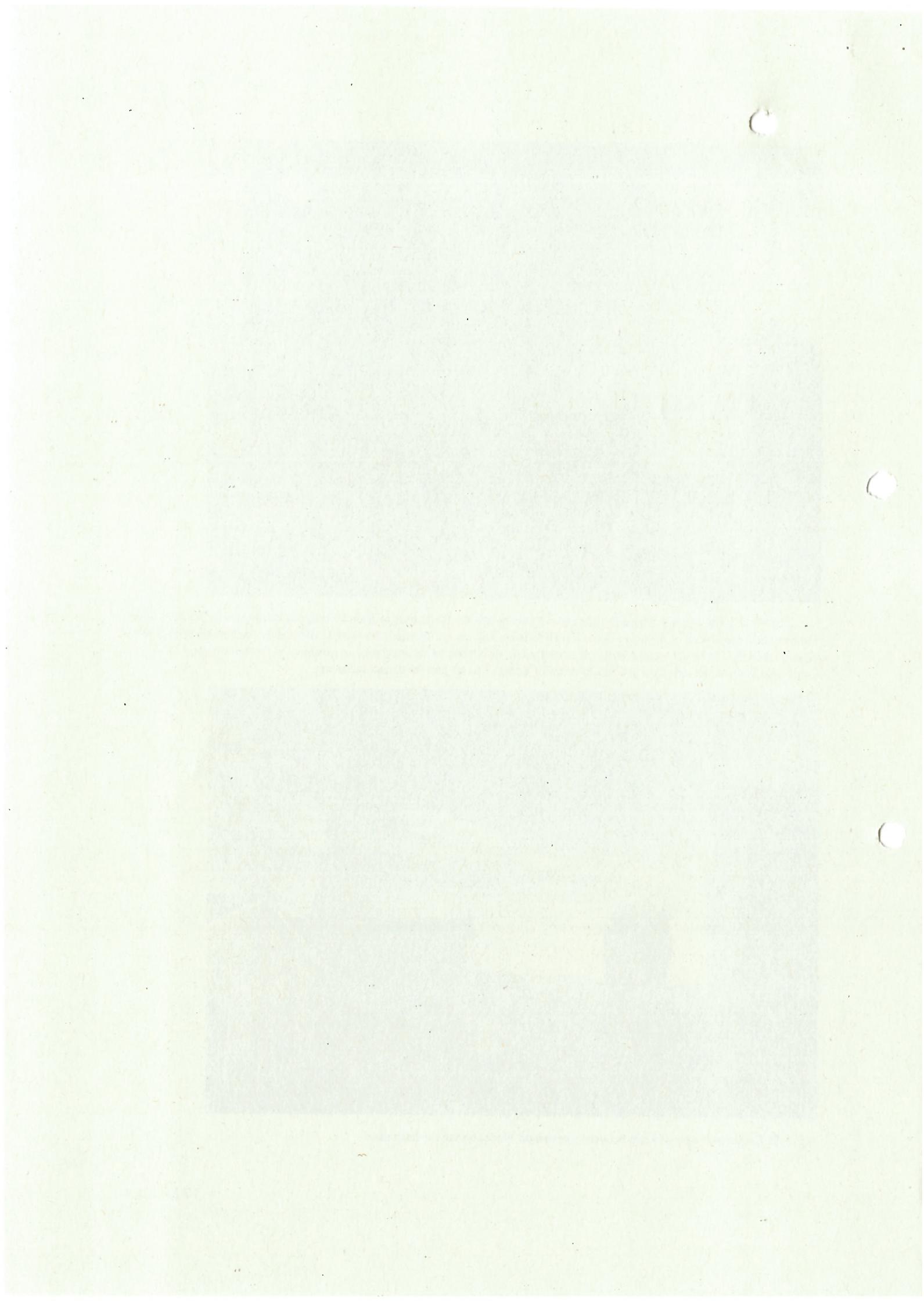


Fig. 1.14 View of the existing telegraph pole and antenna beside the Eir Exchange from Wellington Road towards Trinity Church. The proposed foundation of the new mast is shown indicated by cones. Although the view is affected by the historic raising of the ground when the Eir Exchange was built it has been made significant to the area by being confined to the current gap beside Connaught Place which affords a spectacular view of Trinity Church and the distant landscape.



Fig. 1.15 Contextual view of a gap between Connaught Place and the Eir Exchange.



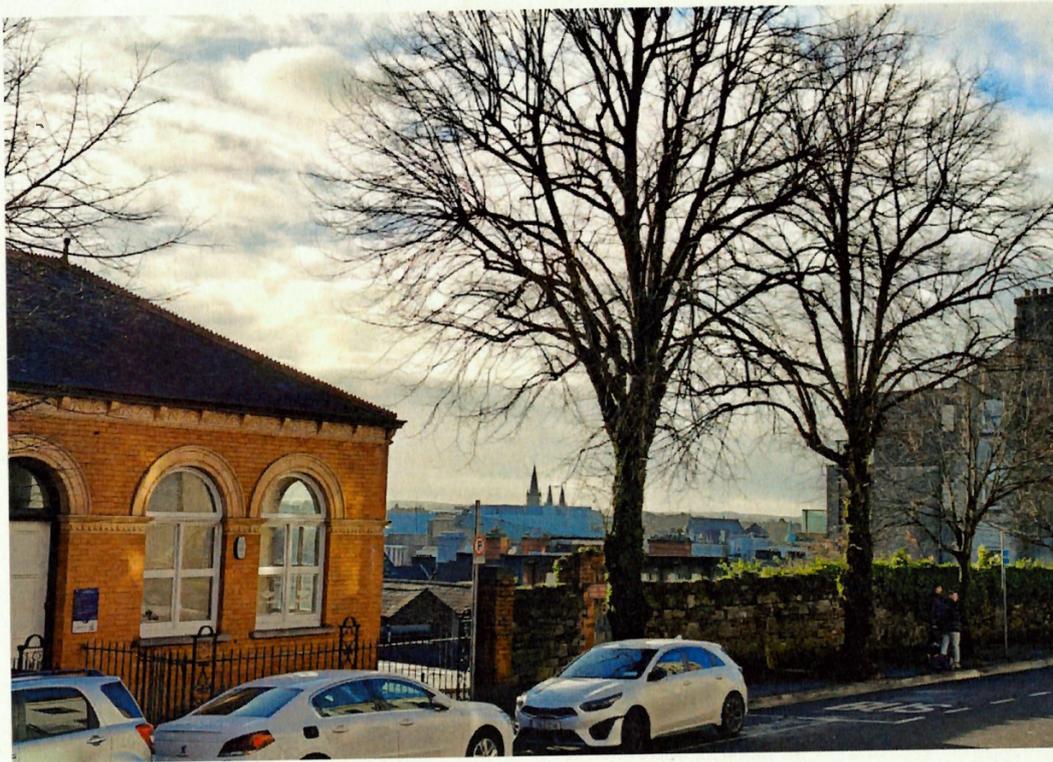


Fig. 1.16 Contextual view of a gap in the built form of Wellington Road at Sidney Place with distant view including St Finbarr's Cathedral.

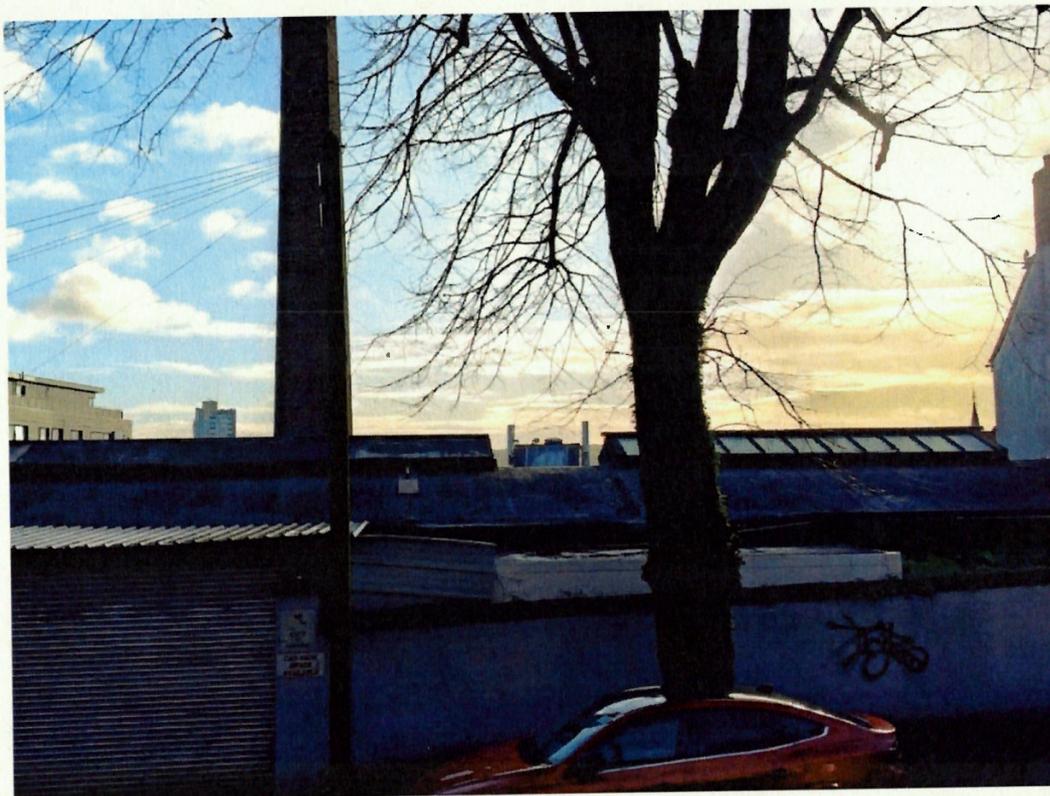


Fig. 1.17 Contextual view of Wellington Road at Sidney Place / Thompsons Bakery site with antennae at 4m above street level of Wellington Road.





Fig. 1.18 2008 Contextual view of Wellington Road at Connaught Place with 2 antennae on the telegraph pole of Eir Exchange (residents image).



Fig. 1.19 2024 Contextual view of Wellington Road at Connaught Place with multiple antennae added to telegraph pole of Eir Exchange



## 1.4 Planning Context

The area surrounding the site is designated as an *Architectural Conservation Area* (ACA). It is within a *City Centre Neighbourhood* designation. Connaught Place and Trinity Church are Protected Structures. Almost all surrounding buildings are recognised on the National Inventory of Architectural Heritage. (See 1.3.3, 1.3.4 and 1.3.5 above).

### 1.4.1 Landscape & Planning Policy

Cork City Development Plan Volume 2 Mapped Objectives designates the area around the Eir Exchange as a *Sustainable Residential Area & Conservation Area* – Map 01 City Centre / Docklands. The Maps also identify Trinity Presbyterian Church and St Patricks Church as a *Local Landmark Building* (Map 02 Cork City Development Plan View Management Framework).

Strategic Objective 7 of the Core Strategy in the Cork City Development Plan, is to:

*“Protect and enhance the unique character and built fabric of the city, its neighbourhoods, urban towns and settlements by caring for Protected Structures, archaeological monuments and heritage, Architectural Conservation Areas and intangible heritage.”*

Objective 2.13 of Core Strategy in the Cork City Development Plan states that:

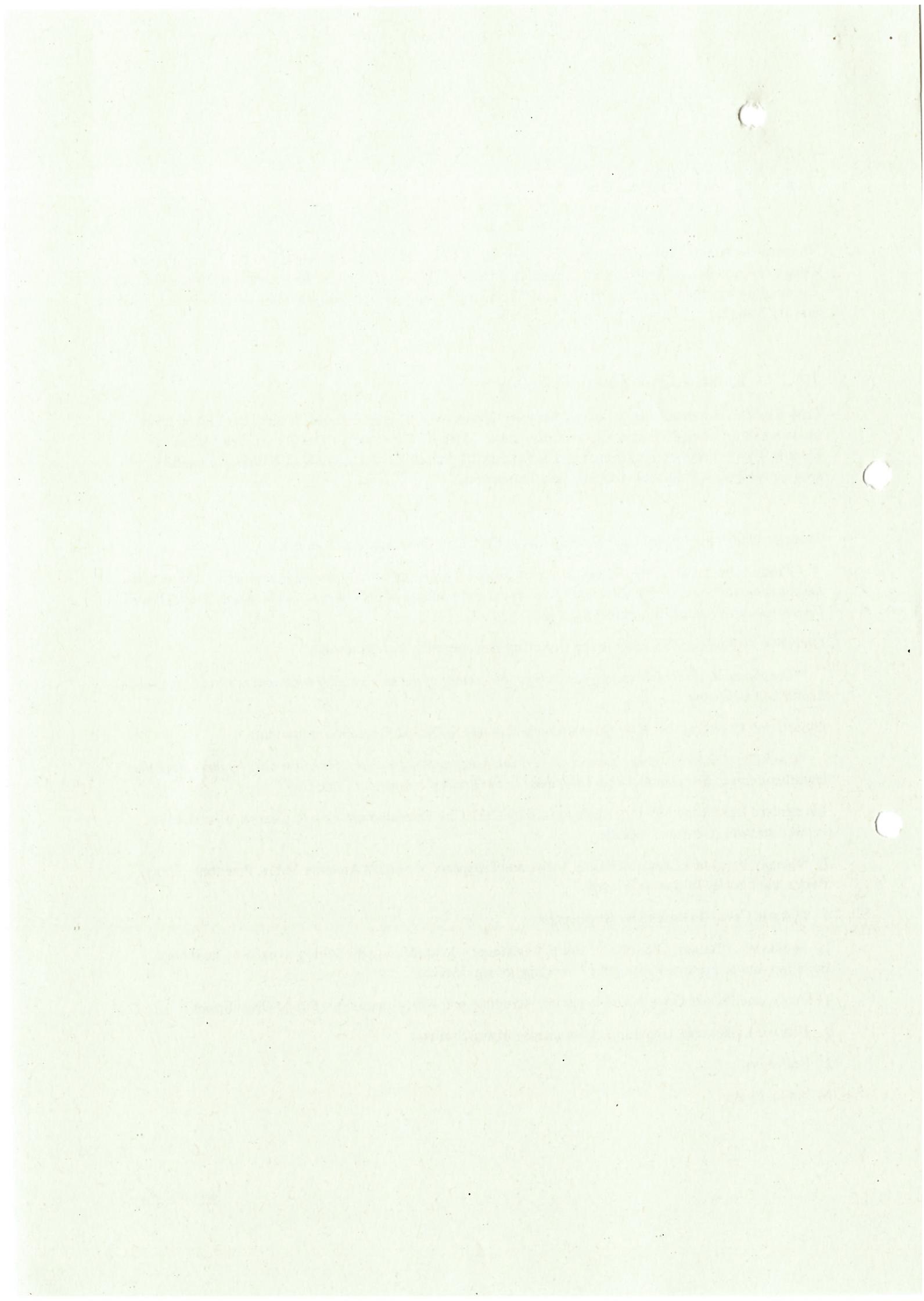
*“Development shall contribute positively to the quality of the surrounding built and natural environment, health and wellbeing.”*

Objective 6.17 of the Cork City Development Plan on Landscape Protection states that:

*“Cork City Council seeks to protect and enhance the landscape character of the City by protecting the significant landscape elements that contribute to the general amenity of Cork City.”*

Recognised Landscape Assets are categorised by Cork City Development Plan in Chapter 6 Landscape Protection from A to S and include:

- E Visually Important Land (including Views and Prospects of Special Amenity Value, Potential Vantage Points and Locally Important Views)
- F Historic Core / Townscapes / Streetscapes
- G Landmarks / Natural Features / Cultural Landscape – land forming the setting to existing landmark buildings and/or protected structures / buildings of significance
- H Public and Private Open Space footprint, including land with potential for Public Open Space
- J Historic Landscapes (including monuments / historic routes)
- L Built Form
- M Public Realm



Chapter 8 of the Cork City Development Plan, 8.27, Heritage Arts and Culture states that:

*“Historic landscapes and gardens associated with Protected Structures are also an important amenity and contribute to the setting and character of Protected Structures.”*

Chapter 10 of the Cork City Development Plan defines a Revitalisation Action Plan area of the centre of Cork City which includes The Trinity Presbyterian Church Site with the Eir Exchange noting that *“city centres are increasingly sought after as locations of choice for investors”* (10.6) and that its *“success is vital to the entire wellbeing of the city.”* (10.3) and recognising ways to capitalise on this aim which include the aim to *“Celebrate the rich built heritage of the City Centre.”* (10.6).

Chapter 11 of the Cork City Development Plan Placemaking and Managing Development states the: *“Overarching Development Principles”* for *“All development in Cork City”* (11.5), that development should: *“Not have detrimental impacts on the receiving environment.”*

11.6 states that:

*“Placemaking is about creating quality places and communities where people want to live, work and play”*

11.7 states that:

*“Placemaking is a central focus of this Plan and is key to releasing the vision for Cork City set out throughout this Plan.”*

11.9 states:

*“The following applies to all development proposals in Cork City to ensure that placemaking is at the heart of all development:*

- 1. Build on the distinctive character of Cork City and our shared cultural heritage by developing the City using place-based contemporary architecture and best practice urban design and conservation;*
- 2. Reinforce the uniqueness and identity of Cork city’s streets, neighbourhoods, towns and communities. Build on local character to reinforce diversity and unique neighbourhoods and respecting cultural historical value in the built environment of the local area and city;”*

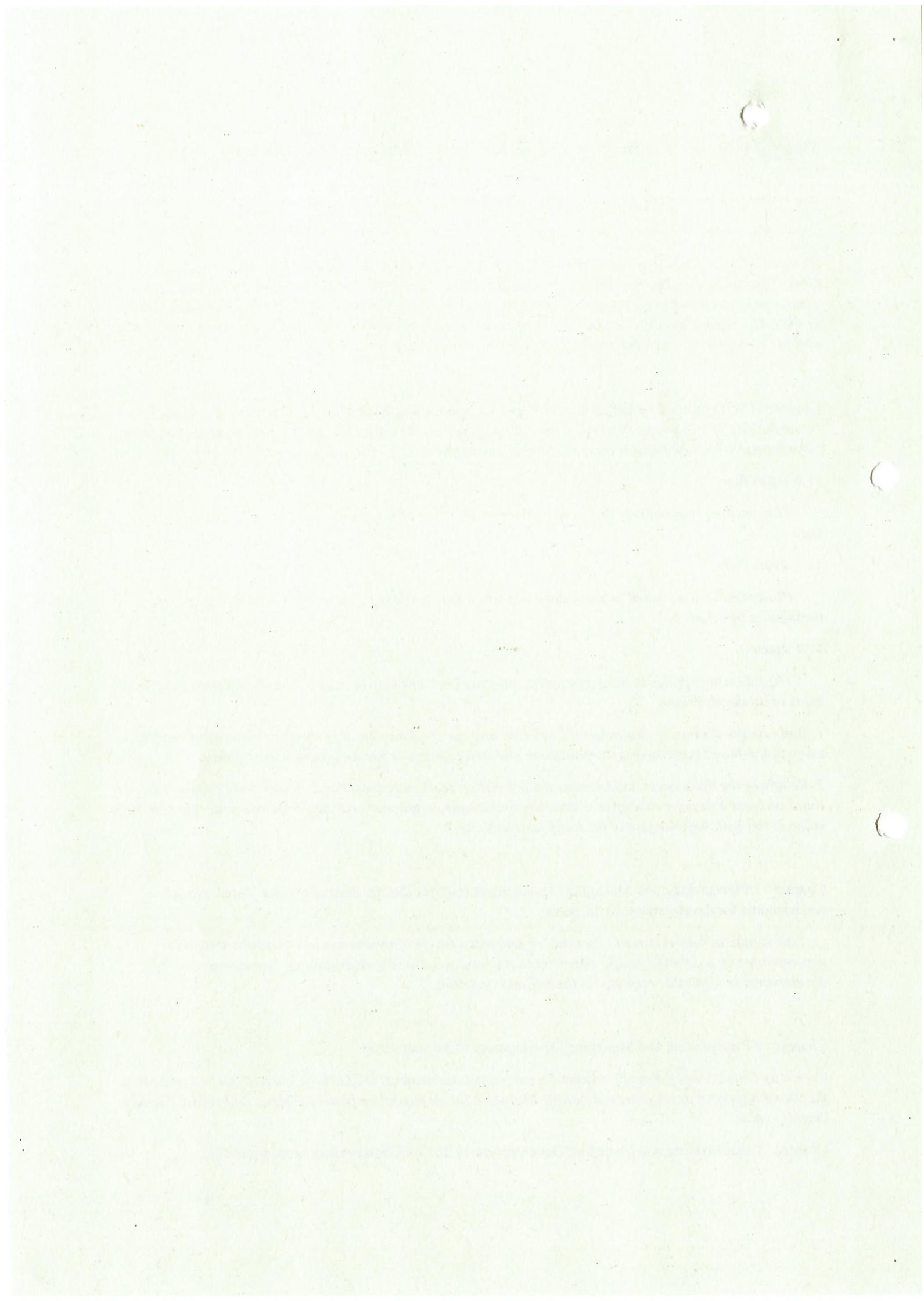
Chapter 11 Placemaking and Managing Development requires Design Statements and Visual Impact Assessments for development. 11.15 states:

*“All significant development proposals or proposals for development in sensitive areas should be accompanied by a detailed design statement that provides a framework explaining how a proposed development is a suitable response to the site and its setting.”*

Chapter 11 Placemaking and Managing Development 11.16 states that:

*Cork City Council will generally require Visual Impact Assessments (VIAs) to be carried out to demonstrate the visual impact of development proposals likely to have an impact on protected views and views of special amenity value.*

Chapter 11 Placemaking and Managing Development 11.201 on Conservation Areas states that:



*“The overall guiding principle is positive enhancement of the special character of a Protected Structure.”*

Chapter 11 Placemaking and Managing Development 11.202 on Conservation Areas states that:

*“The overall guiding principle is positive enhancement of the unique qualities that make a place special because of its particular character.”*

The publication *Criteria for Residential Development in Urban Areas* referenced in the Cork City Development Plan in Chapter 11 Placemaking and Managing Development states 12 key Design Criteria for residential areas including:

*01 Context. How does the development respond to its surroundings? – Requirement: The development positively contributes to the character and identity of the neighbourhood.*

*06 Distinctiveness – How do the proposals create a sense of place? Requirement: The place has recognisable features so that people can describe where they live and form an emotional attachment to the place - The scheme is a positive addition to the identity of the locality - The proposal successfully exploits views into and out of the site.*

Replacement of an existing telecommunications mast can be Exempted Development under Class 31 (j) of the Planning & Development Regulations. To be exempted development must not materially affect the character of an ACA or Protected Structure. Development in an ACA that materially affects the character of the ACA is not Exempted Development. Development that may materially affect Protected Structures is also not exempted.

Section 13.8 of the Architectural Heritage Guidelines for Local Authorities relates to development affecting the setting of a Protected Structure or an architectural conservation area. 13.8.1 states:

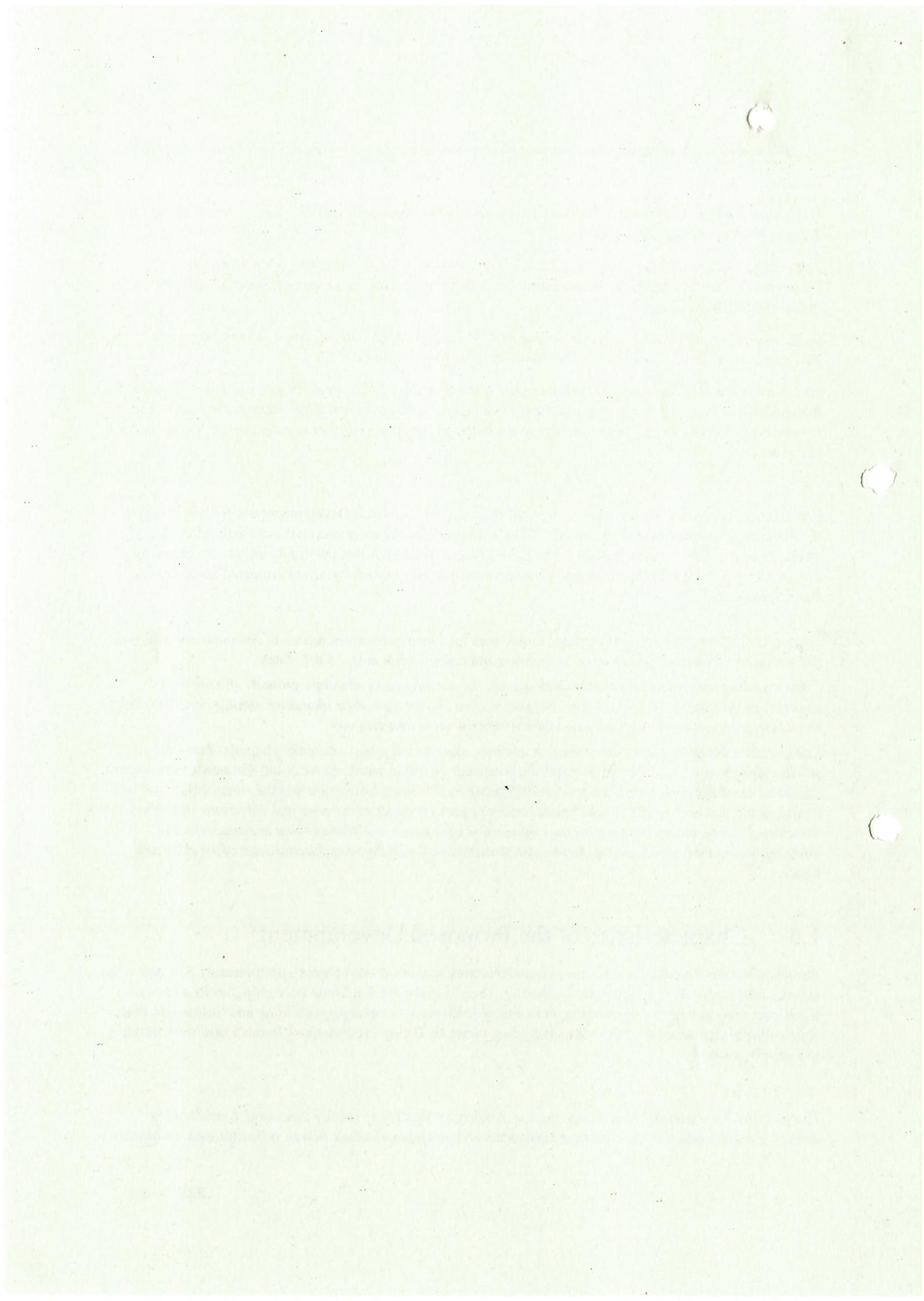
*“When dealing with applications for works outside the curtilage and attendant grounds of a protected structure or outside an ACA which have the potential to impact upon their character, similar consideration should be given as for proposed development within the attendant grounds.”*

The guidance document notes *advertising hoardings, signage, awnings, canopies, flagpoles banners, satellite dishes, masts and Pylons* as requiring particular attention within an ACA and that new development should be carefully considered, the relationship between a Protected Structure and the street should not be damaged and that new works should not adversely impact on views of the principal elevations of a Protected Structure. Policies are encouraged for *the replacement of structures or features that are unacceptably intrusive, where their replacement or substantial alteration would improve the character of the area as a whole.*

## 1.5 Characteristics of the Proposed Development

The proposed development is for a new, larger telecommunications mast placed approximately 3 m east of an existing telegraph pole with antennae on the site. The site at the Eir Exchange on Wellington Road has a significant view at a gap of open space on its east side between the exchange building and Connaught Place which affords significant amenity views including views of Trinity Presbyterian Church a landmark building in a sensitive area.

The proposal for a telecommunications mast at Wellington Road may require functional consideration including consideration of the direction of the mast and antennae and their power, reflection and absorption



which suggests that the design height of the mast proposed is influenced by a desire for antennae placement above the height of the church building.

The development proposes a new telecommunications mast in steel that is taller and wider than the current timber telegraph pole. The new mast location is proposed closer to the centre of the significant view and on higher ground than the current telegraph pole. There is a revised concentration of antennae far above the current base level with a new material quality of the structure in comparison to the current telegraph pole. No accurate drawings of the proposal have been provided to the author of this report so assessment of impact is based on information provided to local residents.

The existing telegraph pole and extension is 16.8m high from the current location. It is 15.5m above the footpath at Wellington Road. It stands 22mm above the average ground level at the church building. It is over 6m above the church building ridge line and 6.2m above Connaught Place ridge line. It is 30m above the road level at Summerhill in front of the site and 32m above the street at the junction of MacCurtain Street and Lower Glanmire Road. The proposal is for increased height.

## 1.6 Potential Impact of the proposed Development

### 1.6.2 Development Site and Impact

The significant view at the east end of the Eir Exchange site is through an historic part of the attendant grounds and curtilage of the Trinity Presbyterian Church. The view is heightened in significance by its reduced form due to the construction of the Eir Exchange building which has altered and reduced the character of views and open space in the area. The historic reduction of the important view raised the importance of the remaining gap, views and setting in the built landscape which addresses the significant landmark and Protected Structure of Trinity Presbyterian Church and beyond.

### 1.6.2 Development Impact on Landscape Character

The proposed mast has potential for significant visual impact from different locations within the ACA based on its size, height and location within the space between 23 Connaught Place and The Eir Exchange building on Wellington Road.

The character of the ACA is based on the historic built landscape within the topography which is predominantly of the 19th Century. There is a clear requirement for sensitivity to the character of the landscape when considering development. Proposals that may have a negative visual impact cannot be justified by the presence of existing visually intrusive development. Items such as the Eir Exchange building or current masts and poles in the area may not contribute to or recognise the unique character relevant to the ACA or setting of Protected Structures. There is an obligation when carrying out development to *protect and enhance the unique character and the landscape character, contribute positively, protect locally important views, reinforce uniqueness and create positive enhancement of special character* as stated in the Cork City Development Plan.

Development must be fully considerate of the protected or special status of a site and consider all opportunity to enhance special character by whatever means including restoration of character.



It is central to the function of an ACA that development does not materially affect the character of the ACA in terms of landscape and setting within the built environment. It is central to a Protected Structure that development does not materially affect the character of the Protected Structure or its curtilage, attendant grounds or setting. The proposal requires a demonstrable attempt to limit impact on the setting and landscape. No circumstance exists within current legislation where development may be justified due to the existence of historic development which may negatively affect this character.

## 1.7 Potential Impact of the Proposed Development

### 1.7.1 Character of the Proposal & Impact

The development proposal of a new telecommunications mast would have significant visual impact on the character of the setting of the ACA and of the Protected Structures. The proposal is within the former curtilage and present attendant grounds of a Protected Structure and is subject to landscape protection policy of the Cork City Development Plan. The significance and sensitivity of the environment that would be affected by the development is High.

The proposal would have Very Significant or Profound Long Term impact on the setting. The magnitude of change is considered High due to the increased scale of the proposed mast, its industrial nature and aesthetic quality in a new location. This assessment is due to the impact of increased size and height of the mast, the number and placement of antennae, the proposed location and the significance of the views, setting and protected buildings. It also takes into consideration the quality of the site at Wellington Road in a reduced and thus rarefied historic view and requirements for development in these circumstances.

### 1.7.2 Views & Impact

The site is viewed from Wellington Road and from Summerhill as well as from Little William Street and Woods Place and from within its own grounds. The impact is assessed here from five separate locations.

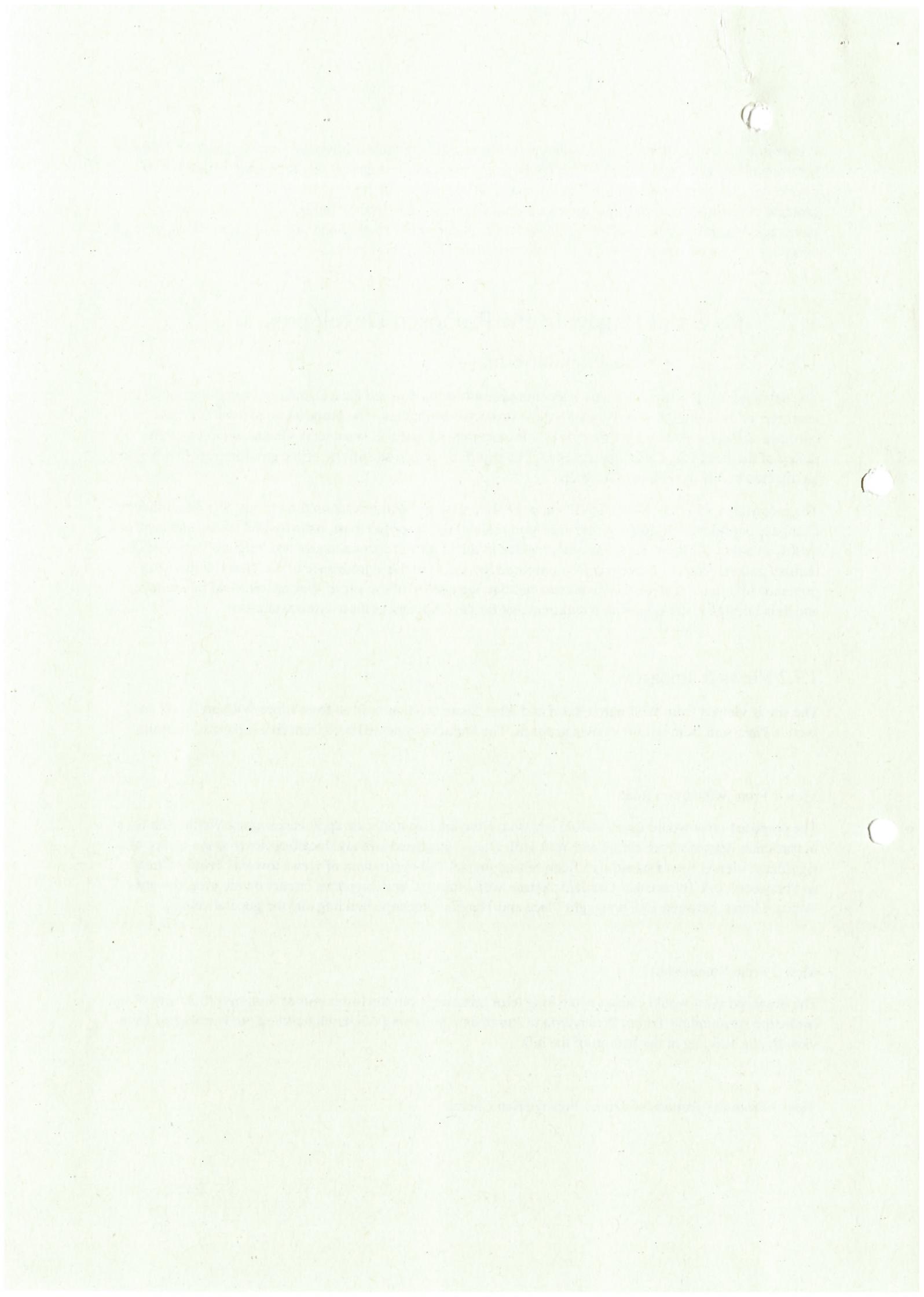
#### View 1 From Wellington Road

The proposed mast would cause visible intrusion from the east and west approaches along Wellington Road in particular between York Street and York Hill. Due to increased size and location closer to the centre of a significant view it would cause significant visual impact and obstruction of views towards Trinity Church and between York Terrace and Garfield Terrace with profound and long term impact on the view towards Trinity Church between 23 Connaught Place and The Eir Exchange building and the general setting.

#### View 2 From Summerhill

The proposed mast would cause visible long term intrusion from the lower part of Summerhill as part of the landscape surrounding Trinity Presbyterian Church and the setting of church building but is screened from view by the building at the bottom of the hill.

#### View 3 From the grounds of Trinity Presbyterian Church



The proposed mast would cause negative long term visual impact with obstruction of views towards Wellington Road from within the grounds of Trinity Church in particular from the entrance to the site, the east side of the building and from the rear of the building.

#### View 4 From York Terrace / York Hill

The proposed mast would cause negative long term visual impact with obstruction of views towards Trinity Church.

#### View 5 From Woods Place

The proposed mast would cause negative long term visual impact of views towards the skyline.

### 1.8 Do Nothing Impact

The current telegraph pole and attachments has a significant impact on the ACA and setting of the Protected Structures. The planning status of the pole given the cumulative additions of attachments including to height is not clear. The impact of the pole could be mitigated against by planting, to some extent.

### 1.9 Predicted Impacts of Proposed Development

The significance of the current environment is High and sensitivity of the environment is High.

Left unaltered the proposal would have Very Significant Long Term Impact.

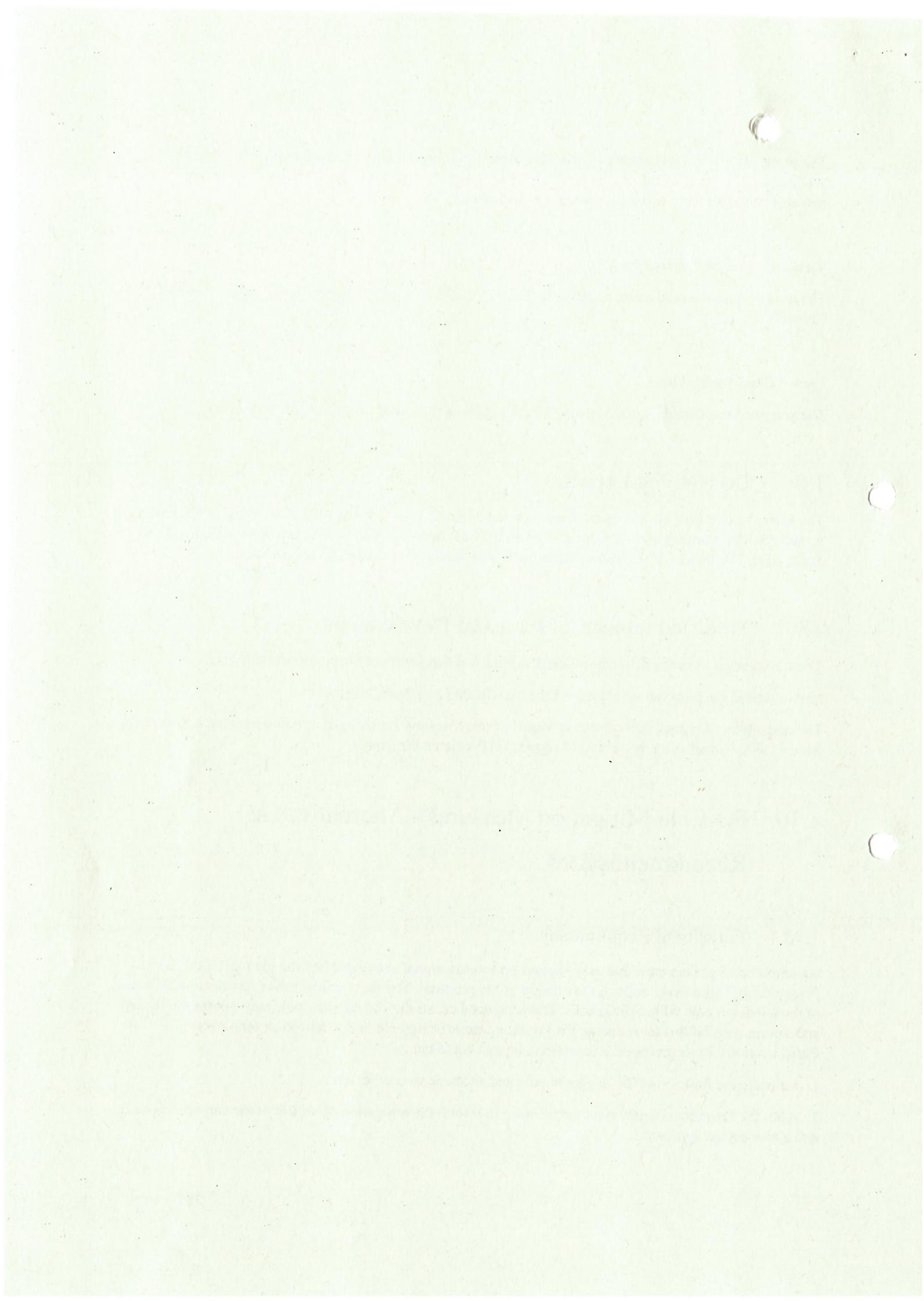
The magnitude of change is High due to Visual Obstruction and Intrusion of and into a setting and landscape within the ACA including the setting of significant Protected Structures.

### 1.10 Possible Mitigation Measures - Alternatives & Recommendations

#### 1.10.1 Functional Requirement

An ambition to place a mast that may support an antenna signal above and beyond the roof of the Trinity Presbyterian Church may underpin the height of the proposal. The requirement of the functional efficiencies of the telegraph pole within the specific environmental constraints of the site / pole may inform the facility and inform possibilities for reducing the impact of the existing pole or any new mast proposals. Considerations for the proposal's function to be met could be:

1. Relocate the function of the telegraph pole and antennae to another site.
2. Alter the functional requirement for the mast to inform the mitigation of impact of the current proposal and a new design approach.



### 1.10.2 Mast Proposal - Design & Location - Reducing Impact

The significant impact of the current proposal on the Protected Structures and the ACA landscape may be managed and reduced to address the material impact. Options include to:

1. Reduce the impact of the current telegraph pole by removing its extended height and antennae.
2. Lower and relocate the antennae and support, for reduced impact, behind the Telecom building and lower.
3. Place two antennae facilities behind the Telecom building or attached to the Telecom Building.

Option 3 is proposed to substantially reduce the size / height of any mast or structure concentrated in one area and thus reduce impact.

### 1.10.3 Landscaping Benefit / Planting - Reducing Impact

Landscaping / Planting possibilities may reduce the impact of the proposal with some limited success in improving the setting of heritage structures and the impact of telecom facilities as part of a process to mitigate for undesirable impact. Options include:

1. Landscaping the Telecom Site with a tree or hedges to reduce impact and enhance the setting and views.
2. Landscape the Church Carpark with selected planting of trees and shrubs or hedges to reduce impact

## 1.10 References

Cork City Council Development Plan 2022 - 2028

Ordinance Survey Ireland Tailte Éireann - Interactive Mapping and Aerial Photography

Planning 7 Development Act 2000 as amended

Revised Guidelines on the Information to be contained in Environmental Impact Statements. Draft 2015;

Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment

August 2018 Guidelines for Landscape and Visual Impact Assessment, The Institute of Environmental Assessment / Landscape Institute.

The Convention for the Protection of the Architectural Heritage of Europe, 1985 - the Granada Convention

Government Policy on Architecture 2009-2015

The Architectural Heritage Protection Guidelines 2011

The Burra Charter 1999: The Charter for Places of Cultural Significance, ICOMOS, 2000.

Architectural Heritage Protection: Guidelines for Planning Authorities. The Stationery Office, 2011.

Urban Design Manual Best Practice Guide, Environment Heritage and Local Government

National Planning Framework 2009

Southern Regional Assembly – Regional Spatial and Economic Strategy

