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South Dublin County Council
County Hall Tallaght
Dublin 24
D24 A3XC

14th July 2021

RE: SUBMISSION TO PLANNING APPLICATION BY ONTOWER IRELAND LIMITED AT BALLYROAN COMMUNITY & YOUTH CENTRE, MARIAN ROAD, RATHFARNHAM, DUBLIN 14 TO REPLACE EXISTING 12M DECOMMISSIONED CHIMNEY FLUE WITH A 20M MULTI-USER TELECOMMUNICATIONS SUPPORT STRUCTURE TO INCLUDE ANTENNAS AND DISHES AND ALL ENCLOSED WITHIN A SHROUD TO MATCH THE EXISTING DECOMMISSIONED CHIMNEY FLUE; 2 OUTDOOR CABINETS AND ASSOCIATED SITE WORKS AND A PROPOSED NEW FLUE TO REPLACE AN EXISTING FLUE ON AN EXISTING PERMITTED BUILDING AND ACCESSED VIA THE EXISTING PERMITTED ACCESS (PLANNING REFERENCE NUMBER SD21A/0155).

A Chara,

Towercom Limited (Usher House, Main Street, Dundrum, Dublin 14) wish to lodge a submission to the proposed development by Ontower Ireland Limited as outlined above at Ballyroan Community Centre & Youth Club, Marian Road, Rathfarmham, Dublin 14.

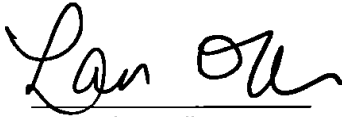
Towercom manage an existing mast network in Ireland and facilitate the co-location of multi-operator infrastructure to a wide range of clients including national mobile operators, national and local broadband providers, national broadcasters and national and local emergency services for both the public and private sector. With this service, Towercom reduce the demand and proliferation of telecommunications structures throughout the country.

In this regard, Towercom, on behalf of Vodafone Ireland Limited, obtained planning permission in October 2020 for an extension of an existing telecommunications lattice tower (South Dublin Planning Reference Number: SD20A/0042, An Bord Pleanála Case Reference: ABP-307377-20) at an Eir Exchange on Scholarstown Road, Ballyboden, Dublin 16. As such, this telecommunications site, located approximately 1km south of the subject application, at newly extended height of 20m has capacity to carry the existing antennas and additional new antennas; dishes and associated equipment together with new ground equipment cabinets.

The structure at the Eir Exchange on Scholarstown Road is an established telecommunications site in the area and with the extension provides capacity to accommodate additional telecommunications equipment as needed. Ontower Ireland Ltd, in their current planning application, failed to consider the existing telecommunications structure and its recent extension at the Eir Exchange, which is approximately 1km away. The applicant has not demonstrated that co-location on this extended structure would not achieve the required coverage. As such, it is considered that the applicant has not met the requirements and standards in relation to sharing facilities and co-location of telecommunications equipment as outlined in the Telecommunications Antennae and Support Structures Guidelines (1996).

We respectfully ask South Dublin County Council to consider this submission in relation to existing telecommunications sites in the area, such as the extended telecommunications support structure at the Eir Exchange, Scholarstown Road, available for co-location and sharing for multiple operators.

Yours sincerely,



Laura O'Connell

Towercom Limited
Usher House
Main Street
Dundrum
Dublin 14



Towercom Ltd
c/o Laura O'Connell
Usher House
Main Street
Dundrum
Dublin 14

Date: 14-Jul-2021

Dear Sir/Madam,

Register Ref: SD21A/0155
Development: Replace existing 12m decommissioned chimney flue with a 20m multi-user telecommunications support structure to include antennas and dishes and all enclosed within a shroud to match the existing decommissioned chimney flue; 2 outdoor cabinets and associated site works and a proposed new flue to replace an existing flue on an existing permitted building and accessed via the existing permitted access; the development will provide improved wireless broadband services in the area.
Location: Ballyroan Community & Youth Centre, Marian Road, Rathfarnham, Dublin 14
Applicant: Ontower Ireland Limited
Application Type: Permission
Date Rec'd: 10-Jun-2021

I wish to acknowledge receipt of your submission in connection with the above planning application. The appropriate fee of €20.00 has been paid and your submission is in accordance with the appropriate provisions of the Planning and Development Regulations 2001(as amended). The contents of your submission will be brought to the attention of the Planning Officer during the course of consideration of this application.

This is an important document. You will be required to produce this document to An Bord Pleanála if you wish to appeal the decision of the Council when it is made. You will be informed of the decision in due course. Please be advised that all current applications are available for inspection at the public counter and on the Council's Website, www.sdblincoco.ie.

You may wish to avail of the Planning Departments email notification system on our website. When in the *Planning Applications* part of the Council website, www.sdblincoco.ie, and when viewing an application on which a decision has not been made, you can input your email address into the box named "*Notify me of changes*" and click on "*Subscribe*". You should automatically receive an email notification when the decision is made. Please ensure that you submit a valid email address.

Please note: If you make a submission in respect of a planning application, the Council is obliged to make that document publicly available for inspection as soon as possible after receipt. Submissions are made available on the planning file at the Planning Department's public counter and with the exception of those of a personal nature, are also published on the Council's website along with the full content of a planning application.

Yours faithfully,

Mary Crowley
for **Senior Planner**