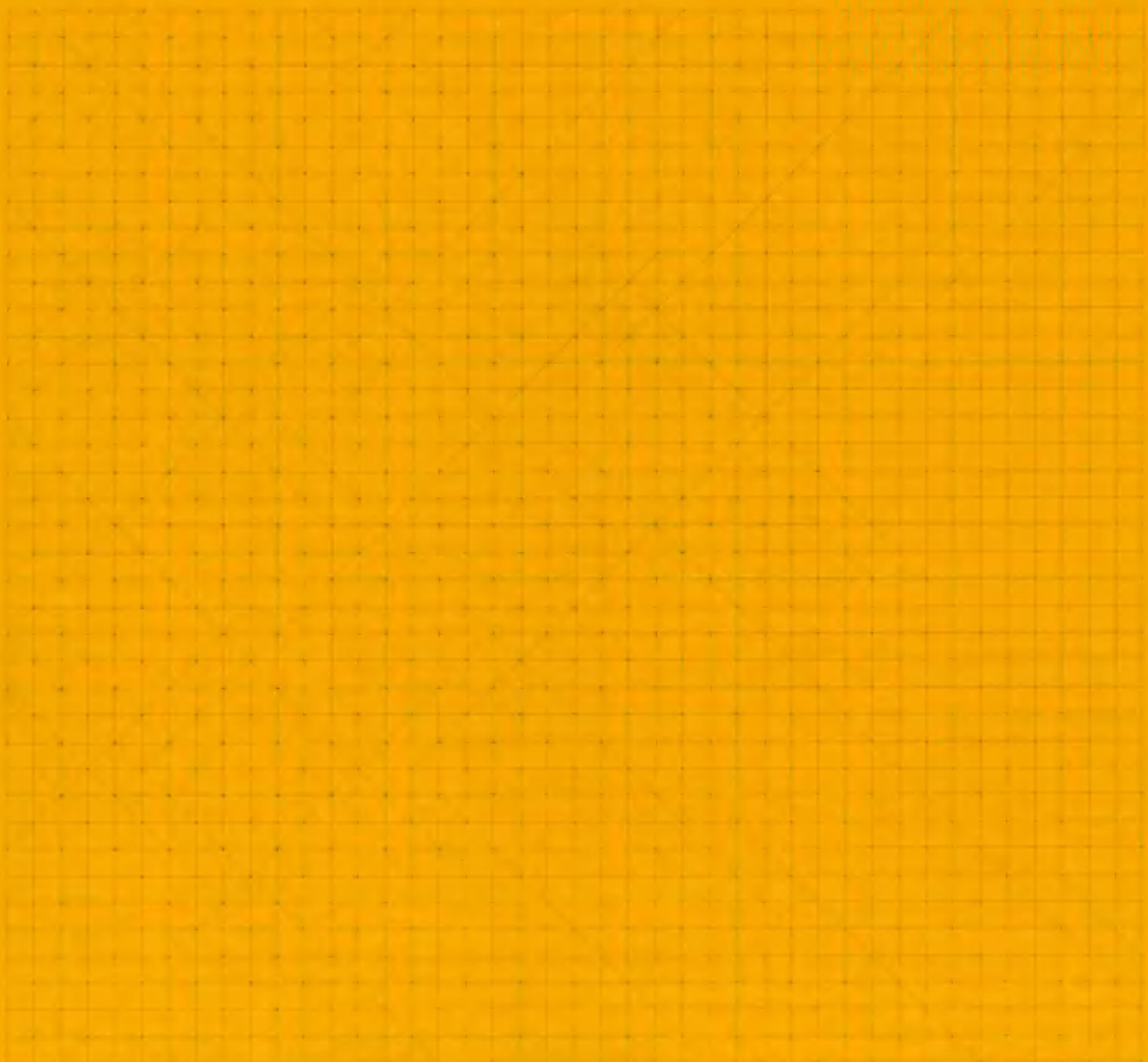




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ADDITIONAL INFORMATION - SD21A/0155  
Ballyroan Community and Youth Centre, Marian  
Road, Rathfarnham, Dublin 14  
On Behalf of Ontower Ireland Limited

innovation engineered



Planning Department  
South Dublin County Council  
County Hall  
Town Centre  
Tallaght  
Dublin 24  
D24 A3XC

12 October 2021

**Re: Permission to replace an existing 12m decommissioned chimney flue with a 20m multi-user telecommunications support structure to include antennas and dishes and all enclosed within a shroud to match the existing decommissioned chimney flue and 2No outdoor cabinets and associated site works and a proposed new flue to replace an existing flue on an existing permitted building and accessed via the existing permitted access at Existing Yard at Ballyroan Community and Youth Centre, Marian Road, Rathfarnham, Dublin 14**

**ADDITIONAL INFORMATION**

**Name of Applicant: Ontower Ireland Limited**

**Reference number of the application: SD21A/0155**

A Chara,

4Site Telecoms, on behalf of Ontower Ireland Limited, hereby respond to the request from South Dublin County Council ('the Planning Authority') dated 4 August 2021 for Additional Information ('AI') to be submitted in respect of planning application SD21A/0155. On behalf of Ontower Ireland Limited, I respond as follows.

**1. *Technical Justification***

In the AI letter dated 4 August 2021, the Planning Authority detailed its concern regarding the quality and completeness of the Technical Justification as submitted at Appendix 5 in the supporting planning application pack dated 9 June 2021.

Please therefore find attached 6No. copies of an updated Technical Justification report (dated 4 October 2021) which is in line with the requirements detailed in the AI letter dated 4 August 2021 includes the following:

- a) In the particular circumstances of this application, and as detailed at Section 3 of the Technical Justification dated 1 August 2019 as undertaken by Three and as submitted at Appendix 5 in the supporting planning application pack, the specific target area for Three is a site at Ballyroan/Ballyboden, Rathfarnham as this will provide Three with sufficient overlap of the coverage footprint to adequately serve the town and surrounding environs. In particular the overlap will counteract the reduced cell shrinkage affect that occurs during high customer data usage at peak times as the bandwidth reduces and contention rate increases.

Section 4 of the Technical Justification dated 1 August 2019 as undertaken by Three, goes on to detail the existing indoor coverage to the target area and subsequently if the proposed development is granted permission, the predicted coverage of the new site in isolation and also the indoor coverage to both the target area and the overlapping of this with the existing coverage to the north west of Ballyroan/Ballyboden arising from the existing approved Three development in that area (Site ID: DUO631). However, as confirmed in the Technical Justification dated 1 August 2019 as undertaken by Three, this site unable to cover the target area with acceptable voice and data requirements as this site is low in height such that coverage is limited to the target area.

Having regard to the foregoing, the 'search ring' to identify a new site in respect of the current target area is c. 500m diameter and as is clear from the aforementioned coverage maps it mainly comprises low rise suburban residential housing, schools/colleges and associated playing pitches. There are no ESB substations in which to erect a new structure in the 'search ring' nor are there any tall buildings or other structures in the 'search ring' upon which to erect the proposed equipment. In respect of existing commercial/retail areas, it is accepted that the Rosemount Shopping Centre, Marion Road is both within the 'search ring' and within the immediate vicinity of the proposed application site but a rooftop location would fail to improve service for the target area. This is why the existing 7m high Vodafone site at Rosemount Shopping Centre was discounted as being suitable upon which to co-locate – as confirmed at Section 3.2 of the Technical Justification dated 1 August 2019 as undertaken by Three. In the updated Technical Justification report as attached, this is further qualified in so far as it confirms that the 7m high Vodafone site at Rosemount Shopping Centre is too low and will need extra height to cover the target areas as the Church (14m) and Ballyroan Community & Youth Centre buildings are blocking coverage. Having regard to this, the updated Technical Justification report at Section 3.2 goes on to confirm that the proposed site at the Ballyroan Community & Youth Centre and which will be 20m in height, will clear the buildings in the area and in particular the main section of the church and so will improve coverage to the target area.

I trust the aforementioned details the siting/design/coverage rationale for the current proposed development at the Existing Yard at Ballyroan Community and Youth Centre, Marian Road, Rathfarnham, Dublin 14.

- b) The existing Vodafone infrastructure (Site ID: DNBLB) approved under SD20A/0042 is sited approximately 1.07km from the target area at Eir, Scholarstown Road, Ballyboden, Dublin 16. As detailed in the attached updated Technical Justification, Three has confirmed that this installation is too far from the target area and even with available slots it is still too low such that by reason of the intervening clutter in the urban/ suburban environment, it will not serve into the target areas.
- c) As detailed at the outset to this section, and on behalf of the planning applicant (Ontower Ireland Limited), please find attached 6No. copies of an updated Technical Justification report (dated 4 October 2021).
- d) On behalf of the planning applicant (Ontower Ireland Limited), it can be confirmed that the shroud will be manufactured from GRP (glass reinforced plastic). It is a composite material made of a polymer matrix reinforced with fibres which is strong, extremely light and highly versatile and importantly will be colour-matched to that of the colour of the existing decommissioned chimney flue.

## **2. Visual Impact Assessment**

In the AI letter dated 4 August 2021, the Planning Authority detailed its concern regarding the lack of information submitted in relation to the protected structure (RPS Ref. 264).

Please therefore find attached 6No. copies of an updated Visual Impact Assessment report (dated 24 September 2021) which is in line with the requirements detailed in the AI letter dated 4 August 2021. In particular:

- (a) On behalf of the planning applicant (Ontower Ireland Limited), it can be confirmed that the updated Visual Impact Assessment report which provides a detailed assessment of how the proposal responds to the setting, character and appearance of the Protected Structure is prepared by ACP - Architectural Conservation Professionals a longstanding and professionally recognised Landscape Architect/Conservation company who are experts in this field. In particular, the report author is Mr David Humphries, BAgrSc (Landscape), MSc, PGDipBAdmin(Project Mgmt), DipBldgCons(RICS), C.Build.E., FCABE, BCAS, CMLI, MILI, MAPM, MIPM, IHBC, MRICS, MSCSI, MICRI who is a RICS Certified Historic Building Professional, SCSI Building Conservation Accredited Surveyor, Chartered Building Engineer, Chartered Building Surveyor, Chartered Landscape Architect, Chartered Project Manager and Chartered Environmentalist Director Ireland. To that end, it can be confirmed that in the opinion of the planning applicant (Ontower Ireland Limited), Mr Humphries is clearly a suitably qualified individual for the purposes of undertaking the requested detailed assessment.
- (b) On behalf of the planning applicant (Ontower Ireland Limited), it can be confirmed that the updated Visual Impact Assessment report provides a detailed analysis of the visual impact of the structure on the Protected Structure and which provides long and short views of the impact, if any.

**It is important to state that this updated Visual Impact Assessment report is read in full and alongside the Visual Impact Appraisal/Assessment as submitted at Appendix 7 in the supporting planning application pack dated 9 June 2021.**

## **3. Co-Location of Equipment for others**

In the AI letter dated 4 August 2021, the Planning Authority requested clarification as to:

*'...whether the co-location of equipment with other providers is possible on the proposed structure'*

In response, and on behalf of the planning applicant (Ontower Ireland Limited), I would respectfully direct the Planning Authority in particular to the planning drawings as submitted at Appendix 6 in the supporting planning application pack.

On drawings numbers P-07 – P-10 in particular, you will note that the proposed structure is described as a '20m **multi-user (emphasis added) lattice tower**'. As such, it can be confirmed that the proposed structure will facilitate the co-location of other providers equipment onto the structure. Should planning permission therefore be forthcoming, it can be confirmed that the planning applicant will market the site to other providers to further enhance the provision of services to the area.

#### **4. Wayleaves**

In the AI letter dated 4 August 2021, the Planning Authority requested clarification as to:

*'... the purpose of the wayleaves and whether the proposed structure or any ancillary equipment including the cabinets would create any obstruction'.*

In response, and on behalf of the planning applicant (Ontower Ireland Limited), I would state that a wayleave is a contractual agreement between a landowner and a telecommunications provider, where the landowner grants the network provider a licence with the right to access land and/or property, to install and/or maintain electronic communications apparatus. To that end, and in the particular circumstances of this application, the delineation of the wayleaves on the respective planning drawing(s) detail and confirm the right of access that Ontower Ireland Limited/Three has over the land within the ownership of Ballyroan Parish Church to both the existing telecommunications structure and the proposed telecommunications structure in the event that permission is granted under the current application SD21A/0155 for a 20m multi-user telecommunications support structure to include antennas and dishes and all enclosed within a shroud to match the existing decommissioned chimney flue and 2No outdoor cabinets and associated site works.

Furthermore, as the purpose of the wayleaves is to grant a right to access land to install and/or maintain electronic communications apparatus, on behalf of the planning applicant (Ontower Ireland Limited), it can be confirmed that the proposed structure and ancillary equipment including the cabinets will not obstruct the aforementioned wayleaves.

#### **Conclusion**

In modern Ireland, the availability of high-quality telecommunications services is considered to be an essential part of a modern, innovative and business-centred capital city. Unfortunately, access to good coverage in this part of County Dublin 14 for Three customers is deficient. For that reason, the provision of these mobile and data services requires the installation of communications structures if customer demands are to be met.

Three has aimed to meet this demand with an installation suitable for deployment in this landscape in compliance with the aims and objectives of the South Dublin County Council Development Plan 2016-2022 and also which provides for the needs of local residents and businesses. In doing so, Ontower Ireland Limited is making a positive contribution to the area by enhancing the social and economic life of the local residential, civic and business communities through the provision of mobile and broadband services. The provision of this service assists in attracting new investment to the area, in line with the aims and objectives of the current South Dublin County Council Development Plan 2016-2022.

The availability of high-quality telecommunications services is an essential part of an area's amenity. The demand for additional telecommunication services has increased with advances in technology and data usage. The provision of mobile and data services requires the installation of communications structures if customer demands are to be met. The subject application seeks to address the current lack of a base station site in the area and the consequential lack of coverage on mobile and broadband networks.

In summary, we contend that the proposed development is in line with the aims and objectives of the Development Plan, the National Broadband Strategy and the requirements of the Department of Communications, Energy and Natural Resources and EU Directives. By approving this proposal, the Authority will be fulfilling its objective,

*"...to support a programme of improved high-speed broadband connectivity throughout the County and implement the National Broadband Strategy in conjunction with the Department of Communications, Marine & Natural Resources". For this reason, we respectfully request that the Authority grants permission for this worthwhile development.*

Thank you for your assistance in this matter.

Is mise le meas,

A rectangular area containing a handwritten signature in black ink on a light-colored background. The signature is cursive and appears to read 'K Gillespie'.

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K Gillespie MRTPI

4Site Telecoms, agents for Ontower Ireland Limited