

Planning Department,
South Dublin County Council,
County Hall,
Tallaght,
Dublin 24,
D24 A3XC

2nd December 2021

Re: Permission to replace an existing 15m telecommunication structure with a new 21m monopole structure carrying antenna and dishes enclosed within an extended 2.4metre high palisade fence compound together with associated ground equipment cabinets and associated site works at Sureweld International Ltd., Fonthill, Lucan, Co. Dublin. The proposed development is within the curtilage of a protected structure.

Dear Sir/Madam

Indigo on behalf of Ontower Ireland Limited wish to apply to South Dublin County Council to erect the above-mentioned development at Sureweld International Ltd., Fonthill, Lucan, Co. Dublin.

The development has been designed in reference to stated strategies, objectives and policies contained in the following documents;

- Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities issued by the Department of the Environment (1996)
- Ministerial Circular PL07/12 – Revision to Guidelines (October 2012)
- Architectural Heritage Protection- Guidelines For Planning Authorities 2011
- Development Contributions Guidelines for Planning Authorities (January 2013)
- South Dublin County Development Plan 2016-2022

The operator Three require modifications to their equipment on the site to facilitate an improvement in the coverage in the wider area and in particular for three to deploy advanced 4G quadband antennas which the current monopole structure cannot accommodate. Ontower Ireland Limited wishes to develop the site by adding a 6m extension in order to facilitate Eir to co-locate on the structure.

The proposed development solution provided to the operator's is in line with Ontower's commitment to further develop the site by providing additional capacity and space to existing and future wireless broadband providers.

We respectfully request that South Dublin County Council grant permission for this development.

Yours faithfully,

Ella O'Brien
Agent on behalf of Ontower Ireland Ltd

Documents included in the Planning Application

- Application Form and cheque in the sum of €80.00 (Class 13 Application)
- Cover Letter
- Applicants Authorisation
- Newspaper Notice (The Irish Daily Star)
- Site Notice
- Planning Drawings
- Comreg Map
- Technical Justification from Eir and Coverage Plots
- Letter of Support from Eir

Schedule of Drawings: 6 No. Copies of the Following Drawings are included in the submission.

Drawing No.	Drawing Title
CIG_02499 / 101 PA	O.S. Location Map & Photos
CIG_02499 / 102 PA	Site Location Map O.S._1:10560
CIG_02499 / 103 PA	Site Location Map O.S._1:1000
CIG_02499 / 104 PA	Site Location Plan 1 :500
CIG_02499 / 105 PA	Existing Site Layout Plan
CIG_022499 / 106 PA	Proposed Site Layout Plan
CIG_02499 / 107 PA	Existing South-West Elevation
CIG_02499 / 108 PA	Proposed South-West Elevation
CIG_02499 / 109 PA	Structure Elevations
CIG_02499 / 110 PA	Proposed Future Operator (02) Cabinet Details
CIG_02499 / 111 PA	Proposed Future Broadband Operator (3) Cabinet Details
CIG_02499 / 112 PA	Proposed MMU Cabinet Details

**Planning Application at Sureweld International
Ltd., Fonthill, Lucan, Co. Dublin.**

For

Ontower Ireland Limited

We, Ontower Ireland Limited intend to apply for Permission to replace an existing 15m telecommunication structure with a new 21m monopole structure carrying antenna and dishes enclosed within an extended 2.4metre high palisade fence compound together with associated ground equipment cabinets and associated site works at Sureweld International Ltd., Fonthill, Lucan, Co. Dublin. The proposed development is within the curtilage of a protected structure.

PREPARED BY THE AGENT:



FOR THE APPLICANT:

Ontower Ireland Limited

Introduction to Ontower Ireland Limited:

Ontower Ireland Limited is a company of Cellnex, which is a European Telecommunications infrastructure provider, providing telecommunications infrastructure services and support to Irish mobile and other telecommunications service providers.

Ontower Ireland Limited was established following the purchase CK Hutchison Networks (Ireland) Limited portfolio by Cellnex in November 2020. Ontower is the legal entity or trading name for the organisation in Ireland. The organisation has significant commercial relationships with each mobile network operator in the State namely Three, Vodafone and Meteor/eir in addition to radio, broadband and emergency communication service providers. The local management of Ontower brings together a wealth of experienced telecommunications infrastructure professionals with expertise spanning engineering, site acquisition, estates management and planning.

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

This planning application represents an investment commitment by Ontower to continue to maintain and operate the telecommunications sites at Sureweld International Ltd. Fonthill, Lucan Co Dublin which is currently providing space to the operator Three Ireland (Hutchison) Limited. The purpose of this application is to develop the site by adding a 6m extension in order to facilitate Eir to co-locate on the structure. Ontower wishes to facilitate other operators' to co-locate on this site thereby providing a choice of good quality wireless mobile and broadband telecommunications infrastructure to the local community.

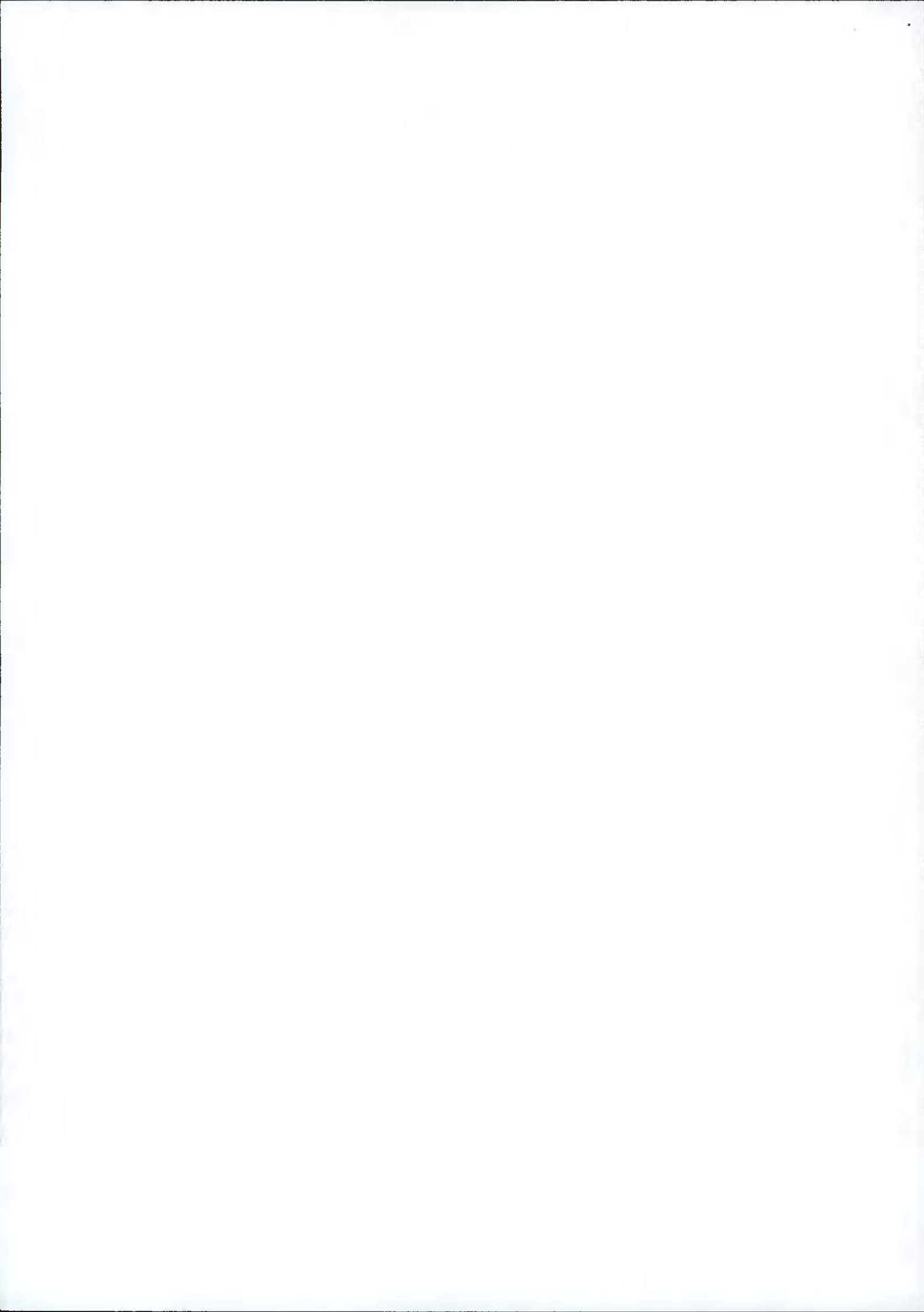
Planning Application at Sureweld International Ltd., Fonthill, Lucan, Co. Dublin.



November 2021

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1. Site Location

The subject site is located in the southwest portion of an overall site containing the Former Tram Depot & Power Station, Lucan Road. This site is designated as a Protected Structure (Ref 0:36) under the South Dublin County Development Plan 2016-2022 and is currently in use as Sureweld International Ltd engineering Hardware Supplies showroom, shop and ancillary storage unit. The site is situated off the N4 Lucan Road circa 300m to the west of Exit 2. The site is situated approximately 2km to the east of Lucan Village and 10km to the west of Dublin City Centre. Settlement patterns in the wider area can be generally described as residential housing estates to the south of the N4 with amenity and agricultural land located to the north. There is an existing residential development located approximately 50m to the west of the site but is well screened from the proposed site from mature trees. The Hermitage Golf Course is located to the north of the site while the Hermitage Clinic Private Hospital is situated c. 260m to the east. A residential housing estate is situated to the immediate south of the site but is well screened from the site. Mature hedgerows and trees in the surrounding area restrict views of the existing installation, however the structure is partially visible from wider distant views along the N4. The existing development comprises of a 15m shrouded monopole with communications and ancillary equipment located within a secure compound on the grounds of an industrial site. Access to the site is directly from the N4. Cabinets and related ancillary equipment including power meters, cabling management system and other related equipment are all contained within the site making it a relatively compact site.



Figure 1: View of existing telecommunication installation



Figure 2: Aerial view of existing installation from the north



Figure 3: Aerial view of existing installation from the east

2. Description of Development

Permission is sought to replace the existing 15m monopole structure with a new 21m monopole structure within an extended compound. The proposed compound extension will measure 9m² in total in order to accommodate the new structure and concrete plinth which will be contained within a new 2.4m high palisade fenced compound. The new support structure will result in an increase in height and width of the structure than currently exists however this is considered to be an effective engineered solution to meet the requirements of the network operators while also reducing the impact of the development on the surrounding amenities. This planning application represents an investment commitment by Ontower to continue to maintain and operate the telecommunications sites at Sureweld International Ltd. Fonthill, Lucan Co Dublin which is currently providing space to the operator Three Ireland (Hutchison) Limited. The purpose of this application is to develop the site by adding a 6m extension in order to facilitate Eir to co-locate on the structure.



Figure 4: Existing entrance to subject site accessed from the N4 Lucan Road

2.1 Access to Proposed Development

The proposed development will utilize an existing entrance to the site accessed from the N4 Luan Road. The existing entrance to Sureweld International Ltd shall also provide access to the proposed telecommunications site.

The proposed development is an unmanned telecommunications installation which is remotely monitored and controlled via the communications network. Once operational, operation and maintenance engineers will visit the site on average 2-8 times per year. The visit typically involves a small van with a 2-man maintenance crew and works will be normally undertaken during regular working hours of between 9-5pm. The development will therefore cause a minimal increase in traffic movements on the road calculated on a yearly basis. Overall the additional traffic and turning movements on the road is unlikely to cause a substantial effect on the safety of the road subject to the appropriate design considerations entering and accessing the site.

During the construction phase which will be over a period of 2-4 weeks additional vehicles will use the road entrance and so the appropriate Temporary Traffic Management Plan (TTMP) will be put in place during that timeframe. As part of the Pre-Construction Phase it is a requirement that the contractors undertaking the works will assess safe access and egress to the site and put in place safe systems of work in accordance with current Safety, Health and Welfare at Work Act 2005 and the Safety, Health and Welfare at Work (Construction) Regulations 2013 and Road Traffic Acts and Traffic Signs Manual. Accordingly, an appropriate traffic control system will be put in place during the construction phase that will ensure the appropriate health and safety measures are followed to ensure the safety of the workers and members of the public working in the vicinity of the site.

3. Nature and Purpose of Proposed Development

Permission is sought for the erection of a 21m multi-user monopole carrying telecommunications equipment. The telecommunications equipment that will be installed on the support structure will comprise of antennas, transmission dishes including radio units and associated cabling and supporting fixtures. Cabinets and related ancillary equipment including power meters, cabling management system and other related equipment will be contained within a 2.4m palisade fenced compound making it a relatively compact site. The proposed 6m addition will allow the provider Eir to co-locate on the structure with Three Ireland (Hutchison) Limited.

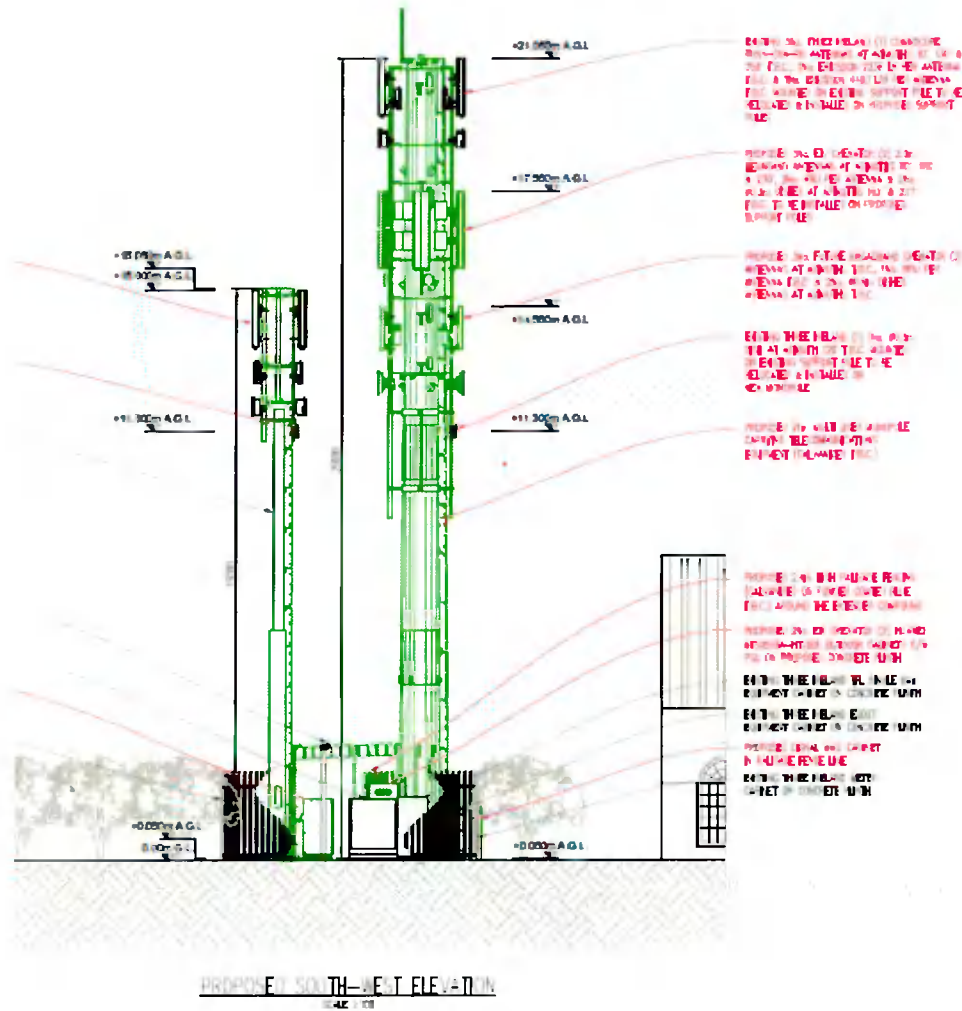


Figure 5: Proposed south-west elevation

4. Planning History

Telecommunications development has been granted on this site on 4 separate occasions – see planning file details in table 1 below. Taking account of relevant policies and guidelines pertaining to telecommunications development, as well as Government policy aimed at accelerating the delivery of telecoms infrastructure, the proposed modification to enable a permitted development to continue to operate to optimum standard is considered acceptable. This also aligns with the Governments policy to streamline the administrative processes involved in technological changes inherent in telecoms infrastructure.

TABLE NO. 1 PLANNING HISTORY

File No.	Applicant	Development Description	Decision
SD99A/0504	Esat Digifone,	Erect a 10 metre high, free standing 'unipole' structure to carry (a) GSM antennas and link dish in an enclosed housing and (b) a suspended identification sign for Sureweld International Ltd., to form part of the cellular digital mobile telecommunications network	Refused by South Dublin Co. Co. Granted by ABP 08/05/00
SD04A/0275	Hutchison 3G Ireland Limited	Erect a 15m slim line shrouded monopole containing 3 no. antenna, 2 no. dishes, associated equipment, ground based cabinets and fencing within the curtilage of a Protected Structure for a new 3G broadband network	Granted 18/06/2004
SD10A/0265	Hutchison 3G Ireland Limited	Retention permission for a 15 metre slim line shrouded monopole containing 3 no. antennae, 2 no. dishes, associated equipment ground based cabinets and fencing within the curtilage of a Protected Structure and forms part of their 3G communications network as previously granted under planning reference SD04A/0275	Granted 07/12/2010
SD16A/0034	Three Ireland (Hutchison) Ltd.	Retain existing 15m slim line shrouded monopole (previously granted planning under reference SD10A/0265 which was a temporary permission for a period of 5 years which has expired) containing 3 antennae, 1 dish, associated equipment ground based cabinets and fencing. The proposed development is within the curtilage of a Protected Structure. No works proposed will directly affect this structure	Granted 01/04/2016

5. Visual Impact

As part of the design process a visual impact appraisal was undertaken at the site to assess the changes that would arise from the development on available views in the area. The appraisal takes into account baseline information about the local landscape characteristics of the area including topography, built forms, settlement patterns, land-use, scenic views, road views as well as screening provided from trees and vegetation in the environment. The impact considers a number of factors, such as scale, setting and the nature of the viewing experience from public viewpoints as well as an anticipated impact from private viewpoints from residences in the area. The result or impact is then assessed against the sensitivity of the area against the magnitude or degree of change which would result from the proposed development if constructed. The impact appraisal considered development policy contained in the South Dublin Development Plan 2016.

4.1 Zone of Visual Influence

Given the nature of the development, it is considered that 12 viewpoints taken at eye level at various viewpoints within a 500m radius is sufficient to illustrate the visual impact of the proposed development in this area.

A photomontage with associated viewpoint map is also included in the application pack documents, for review. Impacts are based on a site visit as well as an assessment of the photomontage provided.



Figure 6: Location of viewpoints used in Visual Impact Assessment

4.2 Landscape/Impact Sensitivity

The subject site is designated as the Liffey Valley and Dodder Valley within the Landscape Character Assessment (2015) within the South Dublin Development Plan 2016-2022. A summary of this landscape is as follows:

"The Landscape characteristics and landscape value of this LCA confer on it a distinct sense of place. The elements that are key include historic and cultural heritage exemplified by Lucan and Palmerstown, and the variety of preserved naturalistic and rural landscapes in the area. This sense is potentially at risk due to urbanisation. Recommendations are thus made aimed at preserving that sense of place and relate to conservation, protection and enhancement where possible of those key landscape elements and values."

The Landscape Character Assessment identifies the likely perceived impact of a particular development on the landscape. As stated within the Plan; *Key Characteristics of the landscape are highly vulnerable to development. Development would result in a significant change in Landscape character and should be avoided if possible.* As planning permission has been granted at this site on 4 separate occasions, we believe that the minimal increase in height will not result in a negative impact on the Liffey Valley and Dodder Valley Landscape. The Visual Impact Assessment that has been included as part of this planning pack outlines the non-intrusive nature that the proposed site will have on the surrounding area. The slight increase in height will result in a minimal impact on the surrounding area. Furthermore, there are no scenic routes or viewpoints situated within the vicinity of the proposed site. The proposed development is situated within the curtilage of an industrial building and would not result in a negative impact on same. Therefore, it can be determined that the proposed structure can be deployed without seriously injuring the amenities or character of the area.

5.3 Viewpoint Analysis

Viewpoints 1-12 listed in the following page outline the likely visual effects that can be predicted using the photomontage imagery as an indicator as well as taking into account the sensitivity of the site as already described. Terms used in the impacts are described using accepted terminology guidance in visual impact assessments. Photographs used in the photomontage were taken in October 2021 at eye level using a 36mm focal length camera in bright weather conditions.

Duration of Impact: Impact is considered to be permanent on the basis that structure will have a lifetime of c. 20years						
Quality of the impact on landscape is described as;						
<ul style="list-style-type: none"> ▪ Neutral - neither enhance or detract from the visual or landscape character. ▪ Positive - improve or enhance the visual or landscape character. ▪ Negative - reduce or have an adverse effect on the visual or landscape character. 						
Significance of impacts are described as						
<ul style="list-style-type: none"> ▪ Imperceptible – an impact without noticeable consequences. ▪ Slight – causing noticeable changes in the visual or landscape character without affecting its sensitivities. ▪ Moderate – alters the visual or landscape character in a manner that is consistent with emerging trends or where an important element is affected. ▪ Significant – an impact which by its magnitude, duration or intensity alters sensitive aspects of the visual or landscape character. ▪ Profound – an impact which obliterates sensitive characteristics 						

<u>PHOTO NO.</u>	<u>DISTANCE FROM SITE</u>	<u>VIEWPOINT</u>	<u>IMPACT</u>	<u>SENSITIVITY</u>	<u>IMPACT QUALITY</u>	<u>IMPACT SIGNIFICANCE</u>
1	20m	View c. 20m south west of the site location	Structure fully exposed on skyline from close view as expected. The effect on amenities is considered a moderate negative effect due to change to existing view.	High	Neutral	Moderate
2	85m	View c. 85m south west of the site location	Structure fully exposed on skyline from close view as expected. The effect on amenities is considered a moderate	Medium	Negative	Moderate

			negative effect due to change to existing view.			
3	82m	View c. 82m south west of the site location	Structure visible within skyline, Trees assist in reducing dominance of structure within skyline.	Moderate	Negative	Moderate
4	100m	View c. 100m south west of the site location	Distant view. Structure visible within skyline. Street lights assist in reducing dominance of structure within skyline. The effect on amenities is considered a moderate negative effect due to change to existing view	Moderate	Negative	Moderate
5	128m	View c. 128m south west of the site location	Structure slightly visible within skyline. The effect on amenities is considered a moderate negative effect due to change to existing view.	Moderate	Negative	Moderate
6	50m	View c. 50m south of the site location	Structure fully exposed on skyline from close view as expected. The effect on amenities is considered a moderate negative effect due to change to existing view. Trees and Street Lights help to reduce the dominance of the structure	Moderate	Negative	Moderate
7	54m	View c. 54m south east of the site location	Structure visible within skyline, Trees as well as existing vertical elements within skyline help to reduce dominance of structure within skyline.	Moderate	Negative	Moderate
8	115m	View c. 115m south east of the site location	Structure slightly visible within skyline. The effect on amenities is considered a moderate negative effect due to change to existing view	Moderate	Negative	Moderate
9	104m	View c. 104m west of the site location	The structure will not be visible from this location due to being well screened by trees.	Moderate	Negative	Negative
10	52m	View c. 52m east of the site location	Structure slightly visible within skyline as a result of being screened by trees. The effect on amenities is considered a moderate negative effect due to change to existing view.	Moderate	Negative	Moderate
11	166m	View c. 166m east of the site location	Distant view. Structure visible within skyline. Trees assist in reducing dominance of structure within skyline. The effect on amenities is considered a moderate negative effect due to change to existing view	Moderate	Negative	Moderate
12	295m	View c. 295m east of the site	Structure slightly visible within skyline as a result	Moderate	Negative	Moderate

		location	of being screened by trees. The effect on amenities is considered a moderate negative effect due to change to existing view.			
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4.4 Impact Mitigation

Following a review of available sites and the overall topography of the area, it was determined that the proposed telecom structure would be acceptable in this location considering it does not negatively impact the public and private views in the area. As demonstrated in the photomontage provided, it is predicted that by utilising this proposed structure there will be minimal impact on the amenities of the area and is deemed an appropriate solution to meet the coverage objectives identified.

4.5 Conclusions/ Summary of Visual Impact

The proposed development will be visible over a certain area owing to the location of the sight and height of the proposed structure. The highest level of visual impact will be views within the immediate vicinity of the proposed site. Wider and more distant public views are restricted towards the site due to distances involved, extensive foliage and trees in the surrounding area as well as the topography of the area as illustrated in the photomontage provided all help screen the proposed development. Overall, considering telecommunications coverage in the area, the proposed development will be in a location whereby equipment can be deployed without seriously injuring the amenities or character of the area.

6. Designated Sites

The proposed development is not located within any designated areas – Special Area of Conservation (SAC), Special Protection Area (SPA), Natural Heritage Area (NHA) or proposed Natural Heritage Area (pNHA). The Liffey Valley Proposed NHA (Site Code 000128) is located 393m to the north of the site. The Royal Canal Proposed NHA (Site Code 002103) is located c.2.4km north of the site. Considering separation distances and the scale of the development, there are no anticipated or expected impacts on the conservation objectives of these designated sites. As a precautionary measure and in line with good practises during the construction period, the development will be strictly contained to the proposed development area.



Figure 7: Designated Sites in the vicinity of the area (Source: EPA Maps)

7. Heritage / Conservation Impact Assessment

7.1 Scope

The detail and extent of the assessment has been informed by Architectural Heritage Protection- Guidelines For Planning Authorities 2011. The installation is located on the curtilage of a protected structure and so the impact assessment is limited to those parts of the curtilage which will be impacted upon.

General photographs of the structure have been provided in the photomontage and within this cover letter to illustrate and describe the context of the development. A visual impact assessment has also been provided to describe how the proposals would affect the character of the protected structure particularly from street views in the local area. We have also included a description of how any potential adverse impact on the architectural heritage is to be mitigated.



Figure 8: Protected Structures within the vicinity of the proposed site

7.2 Significance of Buildings/ Protection / Policy

A desktop survey was undertaken to determine the cultural heritage and conservation status of the protected structure located at Sureweld International Ltd as indicated in Table 2 below.

Table no. 2 Heritage in the surrounding area				
Class	Rating (Local, Regional, National)	Ref No.	Description	Distance
Sureweld	Regional	11202012	Detached seven-bay double-height former factory, c.1895, now in use as a store building. Yellow brick walls with red brick semi-circular arches and impost course. Replacement metal and timber windows. Large door openings inserted to three sides. Entirely clad and roofed with green-painted corrugated iron, c.1950, with brick chimney stack and monitor section to roof. Simple mid twentieth-century storage building to immediate north also clad in corrugated iron	26m northeast

The subject site is situated within the curtilage of a protected structure. 26m to the northeast of the proposed site is the Sureweld or otherwise known as the Former Tram Depot & Power Station Lucan Road. General details are contained in the National Inventory of Architectural Heritage (NIAH) which is shown in the map inserted above.

7.3 Assessment of Impacts

7.3.1 Physical Impacts

The installation comprises of a 21m multi-user monopole carrying telecommunications equipment with cabinets and related ancillary equipment including power meters, cabling management system and other related equipment will be contained within a 2.4m palisade fenced compound. The 2.4m extended palisade fenced compound will be painted in blue as a mitigation measure. Despite a 3m² extension to the existing compound, there will be no negative impact on the protected structure itself.

It is considered due to the nature and type of development within an already developed site there will be no adverse impacts on the integrity or setting of these structures. Furthermore, planning permission has been granted on 4 separate occasions by both South Dublin County Council as well as An Bord Pleanála which would ensure that the proposed development would not result in a negative impact on the protected structure located to the northeast of the site.

7.4 Heritage Impact Assessment Conclusion

The proposed development's predicted effects on the character and setting of the protected building and the surrounding area have been assessed and the significance ranges from imperceptible to moderate. The existing 15m structure has remained in situ since 2000 and has been granted permission on 4 separate occasions by South Dublin County Council as well as An Bord Pleanála. The proposed 6m extension will not result in any physical work being undertaken on the protected structure.

An assessment of the potential impact of the proposed development has been undertaken which assessed that the development will have no significant adverse impact on the building or area and as such the impact was deemed as acceptable.

8. Zoning

The proposed Land Use at Sureweld International Ltd is zoned HA-LV under the South Dublin County Council Development Plan 2016-2022. The Plan specifically states that the land zoned HA-LV is as follows;

“To protect and enhance the outstanding character and amenity of the Liffey Valley.”

It is considered that the installation of telecommunications infrastructure on the subject site will not impact the zoning of the area, where there is a requirement for high-speed data services. A telecommunications structure has been in place at this site since 2000 and the minimal increase in height will not result in a overall impact on the surrounding Lucan area. The site provides the best possible solution to addressing a level of service and coverage which at present is below expected standards.

It is considered that the development is in accordance with the policies objectives of the development plan and in line with the government guidelines on siting telecommunications infrastructure. The existing sites in the wider area do not meet the technical requirements of the operator and so the site is justified to meet the coverage objectives and long term requirements of the area.

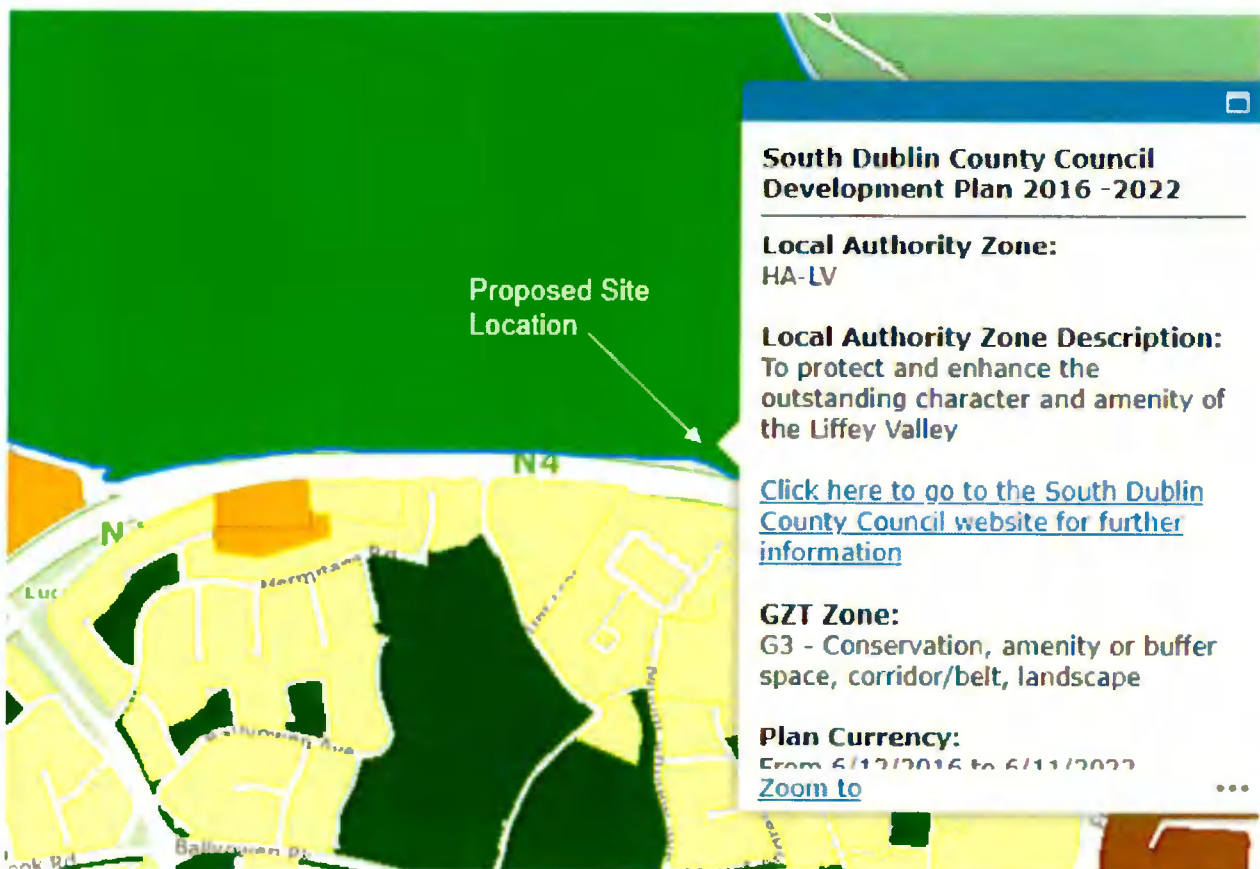


Figure 9: Zoning Map of proposed site as annotated in the South Dublin County Council Development Plan 2016-2022

9. Planning Policy

7.1 Project Ireland 2040 (National Planning Framework and National Development Plan 2018-2027)

The National Planning Framework provide a basis for long-term co-ordination on infrastructure development, including transport, energy and communications and social and community infrastructure. In the Communication Section on Investment in Infrastructure it is recognized that in the information age, telecommunications networks play a crucial role in enabling social and economic activity in tandem with other transnational communications infrastructure links. Further action to strengthen communications links in an island and border context will support the National Planning Framework, such as further enhancement of links between the North American continent and the island of Ireland and Europe, direct access to international backbone data systems and the roll-out of appropriate public policy and investment interventions such as the National Broadband Plan.

7.2 Mobile Phone and Broadband Taskforce. Department of Communications, Climate Action and Environment and The Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs 2016

The Mobile Phone and Broadband Taskforce, established in July 2016, is an initiative of the Department of Communications, Climate Action and Environment and the Department of Rural and Community Development.

The terms of reference of the Taskforce were to;

- To identify and recommend practical actions that can be taken in the short-term to improve mobile reception and broadband access in Ireland, in consultation with Government Departments, Local Authorities, ComReg, State agencies, industry and other key stakeholders; and,
- To report to Government by the end of 2016 with a set of recommendations and actions to improve mobile reception and broadband access. The report will set out proposed timelines, and the legislative, budgetary or other implications for the prompt delivery of the recommendations and actions.

TASKFORCE MEMBERS (CURRENT)

- Department of Rural and Community Development (DRCD)
- Department of Communications, Climate Action and Environment (DCCAE)
- Department of Transport, Tourism and Sport (DTTAS)
- Department of Housing, Planning and Local Government (DHPLG)
- Transport Infrastructure Ireland (TII)
- Local Government Management Agency (LGMA)
- County and City Management Association (CCMA)
- Commission for Communications Regulation (ComReg)
- Advertising Standards Authority for Ireland (ASAI)
- ESB Networks
- Office of Public Works (OPW)

The Taskforce is also supported in its work by Ibec, representing the Telecommunications Industry.

The Taskforce published its final report titled Report of the Mobile Phone and Broadband Taskforce in December 2016. The Taskforce report addresses a wide range of issues impacting on broadband and mobile services. The report contains 40 actions aimed at accelerating the delivery of telecoms infrastructure by commercial operators and also to facilitate the rollout of the State led Intervention under the NBP. Actions relevant to Planning legislation, policy and guidelines include;

- Planning and Development (Amendment) (No. 3) Regulations 2018 has amended Part 1 (Exempted Development — General) of Schedule 2 to the Principal Regulations by amending aspects of Class 31 relating to exemptions from the requirement to obtain planning permission for certain works undertaken by a statutory undertaker authorised to provide a telecommunications service. The amendment has successfully enabled a broader range of telecommunications equipment to be installed under the provisions of exempted development.
- Review the statutory planning guidelines (Telecommunications and Antennae and Support Structures Guidelines (1996) – updated October 2012), in conjunction with telecoms industry representatives and other relevant stakeholders. Currently under way and expected to provide consistency in interpretation and implementation of guidelines by local authorities to keep a pace with newer forms of technology.

In line with the Taskforce's actions and recommendations the application is required to facilitate the reposition of operator's equipment. By adding 6m to this support structure the Operator's will be in a position to improve existing services in the area and extend the services in the future thereby future proofing the installation for any future upgrades which are inevitable as wireless technology continue to advance. Network improvement is of fundamental importance to the level and quality of service provided by the operators to consumers now and into the future. Optimising performance to take account of changing demands, weather conditions, line problems and available relevant data are key factors in ensuring that the ongoing increase in demand on the networks can continue to be met. It is imperative that operators actively manage their networks through constant evaluation and optimisation and to have in place regulatory conditions to deploy newer technologies coming on-stream. This will ultimately enable enhanced coverage for the delivery of telecommunication services, while still respecting the principles of proper planning and sustainable development

7.3 Ministerial Guidance

In July 1996 the Department of the Environment and Local Government issued "Telecommunications Antennae and Support Structures - Guidelines for Planning Authorities" and in October 2012 the Department issued updated guidance for local authorities in relation to telecommunication infrastructure in the form of Circular PL07/12.

7.4 Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities issued by the Department of the Environment (1996)

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 exchange and mobility. (Section 1.2 Telecommunications Guidelines). In Section 4.5 (Sharing Facilities and Clustering) it states that; where it is not possible to share a support structure the applicant should, where possible, be encouraged to share a site or to site adjacently so that masts and antennae may be clustered.

The structure is an existing monopole structure which has been in place for over a decade. The Guidelines acknowledge that there is "limited flexibility as regards location, given the constraints arising from radio planning parameters" (Section 4.3) The existing trees helps to absorb the installation into the landscape which in general restricts and softens the impact of the structure on views towards the site from the wider area. The design and condition on the structure including foundations is suitable to install the equipment with minimal disruptions during installation. The applicant's engineers have fully appraised the structure in its current condition and at this juncture there is no requirement to further modify the design from an operations point of view. While there has been significant improvement in the technologies to provide advanced broadband services, the advances in the design of antenna support structures is limited. The requirement to position telecommunications transmission and receiving equipment above obstructions remains unchanged, in fact given the sensitivity of 3G, 4G equipment there is less tolerance to obstructions so that even tree foliage has a degrading effect on the signal. Monopole type structures with headframes are an industry standard method of support as they are structurally capable of supporting significant loads of both the equipment and environmental loads without movement. It is important that the support structures are rigid so that movement is prevented to within > 0.5 of a degree otherwise it is likely that there will be signal loss in transmission and would be unacceptable to network operations.

7.5 Development Contributions Guidelines for Planning Authorities

The 2013 Development Contribution Guidelines for Planning Authorities states that *"subject to the overriding principles of proper planning and sustainable development, adopted development contribution schemes should contribute to the promotion of sustainable development patterns, economic activity and to securing investment in capital infrastructure and economic activity"* (Ch. 2, pg.10).

The vital services provided to the area by telecommunication infrastructure is often overlooked with developments of this nature vastly improving commercial prospects in the area and assisting in implementing Council policy for social inclusion. The Guidelines explicitly state that *"planning authorities are required to include waivers for broadband infrastructure (masts and antennae)"* (Chapter 2, pg.11).

In addition, the Department of Communications, Climate Action and Environment published a Report of the Mobile Phone and Broadband Taskforce in December 2016 which states in its key messages on page 6 of the report that *"the application of development contributions to telecommunications infrastructure will cease in every local authority area from early 2017"*. Page 21 of the report details how *"the Taskforce is of the view that development contributions should be waived by all local authorities to allow for appropriate placement of telecommunications infrastructure to address rural mobile coverage and welcomes the intention of the remaining five local authorities to apply the waiver. This approach is fully in line with the 2013 Guidelines. The Taskforce is of the view that all remaining local authorities should immediately bring themselves into full compliance with the 2013 Guidelines in relation to development contributions"*. It further reiterates on page 64 that *"no development contributions will be charged for the placement of telecommunications infrastructure. This frees up capital, enabling further investment in infrastructure"*.

The upgrading of the site will provide for increased coverage including broadband services to customers in the area as shown in the coverage maps in the accompanying technical justification and so meets the requirements as outlined above.

7.7 South Dublin County Development Plan 2016-2022

Chapter 7 outlines planning policy relating to Infrastructure & Environmental Quality in which it states:

"The availability of high-quality infrastructure networks and environmental services is critical to securing economic investment, creating sustainable and attractive places, in ensuring health and wellbeing and in safeguarding the environment".

Objectives relating to telecommunications development are contained in subsection 7.4 – Information and Communications Telecommunications in which it states, *It is the policy of the Council to promote and facilitate the sustainable development of a high quality ICT network throughout the County in order to achieve balanced social and economic development, whilst protecting the amenities of urban and rural areas.*

The Council recognises the importance of a high-quality telecommunications service and will seek to achieve a balance between facilitating the provision of telecommunications services in the interests of social and economic progress and sustaining residential amenities and environmental quality.

In section 7.4 Information and Communications Technology Policies and Objectives, it states that when considering proposals for telecommunications masts, antennae and ancillary equipment, the Council will have regard to the following:

Section 7.4 Information and Communications Technology Policies and Objectives. South Dublin County Development Plan 2016 - 2022

- IE4 Objective 1: To promote and facilitate the provision of appropriate telecommunications infrastructure, including broadband connectivity and other innovative and advancing technologies within the County.
- IE4 Objective 2: To co-operate with the relevant agencies to facilitate the undergrounding of all electricity, telephone and television cables in urban areas wherever possible, in the interests of visual amenity and public health.
- IE4 Objective 3: To permit telecommunications antennae and support infrastructure throughout the County, subject to high quality design, the protection of sensitive landscapes and visual amenity.
- IE4 Objective 4: To discourage a proliferation of telecommunication masts in the County and promote and facilitate the sharing of facilities.
- IE4 Objective 5: To actively discourage the proliferation of above ground utility boxes throughout the County and to promote soft planting around existing ones and any new ones that cannot be installed below the surface to mitigate the impact on the area.
- IE4 Objective 6: To require the identification of adjacent Public Rights of Way and established walking routes by applicants prior to any new telecommunication developments (including associated processes) and to prohibit telecommunications developments that impinge thereon or on recreational amenities, public access to the countryside or the natural environment.

This site is located within an area zoned to “*protect and enhance the outstanding character and amenity of the Liffey Valley*”. The installation accords with the current development standards of the development plan and national policy of telecommunications installations and has been granted on 4 previous occasions by the planning authority and An Bord Pleanála respectfully since 2000. The structure has capacity to allow future operator’s to co-locate equipment at the site also. In relation to visual impact the site while visible from distance is located just off the N4, away from residences and the more populated areas in the area and so impact on residential and the surrounding amenities is reduced.

In summary the development is consistent with objectives contained in the development plan by maintaining and improving the provision of mobile and wireless broadband communications infrastructure in a sustainable manner by utilising existing structures and sites in the area as well as providing and supporting site sharing of telecommunications infrastructure. It is therefore submitted that the development is in accordance with the policies and objectives of the development plan and in line with the government guidelines on siting telecommunications infrastructure.

Details contained within this cover letter and supported by a Technical Justification compiled by Eir demonstrates the requirement for this site and so is considered to be consistent with policies and in compliance with the Development management standards as outlined.

Co-location and sharing of existing sites are apparent given that the tower has the capacity to allow future operators co-locate equipment at the site. In relation to visual impact the site while visible from distance is well screened and set away from residences and the more populated areas in the area so impact on residential and the surrounding amenities is reduced. The impact of the development is considered to be acceptable taking in context and character of the area and given the fact that a structure has been in place at this site since 2000.

In summary the development is consistent with objectives contained in the development plan by maintaining and improving the provision of mobile and wireless broadband communications infrastructure in a sustainable manner by utilising existing structures and sites in the area as well as providing and supporting site sharing of telecommunications infrastructure. It is therefore submitted that the development is in accordance with the policies and objectives of the development plan and in line with the government guidelines on siting telecommunications infrastructure.

10. Summary

The proposed development has been assessed in terms of its impact on the environment and most importantly its visual impact on the wider area. In providing the proposed communications infrastructure, Ontower Ireland Limited is making a positive contribution to the region by improving the availability of telecommunications infrastructure in the area. The demand for additional telecommunications services has increased with advances in technology and data usage on personal communications devices and so there is a corresponding demand on the infrastructure to provide the service. Next generation telecommunications technology will put even more pressure on existing communications infrastructure within populated areas as everyday items and equipment will require connectivity to a communication network. The provision of mobile and wireless data services requires the installation of elevated communications structures and equipment to function, this inevitably means that there is a greater visual impact on the environment in which they are positioned. There are however indirect benefits that can be associated with an improvement in telecommunications services, including the option to work remotely in a globally connected work environment, the ability to work from or nearer to home with the associated environmental and social benefits and an overall increase in sustainable work and travel patterns.

In Summary, it is maintained that the proposed development is in line with national, regional and local planning policy, actively assisting in achieving the aims and objectives of the Development Plan and it is respectfully requested that permission is granted for the development as proposed.

Yours Sincerely,

Indigo.

