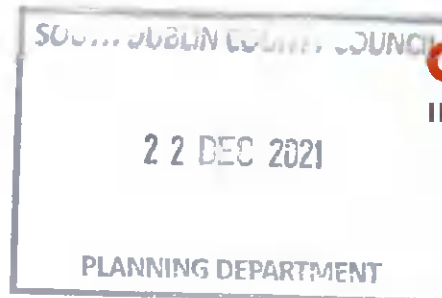


South Dublin County Council,  
County Hall,  
Tallaght,  
Dublin 24



**charterhouse**  
INFRASTRUCTURE CONSULTANTS

21<sup>st</sup> December 2021

**RE: OnTower Ireland application for retention of a 12m guyed pole, together with antennas, dishes and associated telecommunications equipment at Bailey House, Fonthill Business Park, Clondalkin, Dublin 22.**

A Chara,

On behalf of OnTower Ireland Ltd, we wish to submit a planning application for the above development. In this respect we detail the purpose and reasoning for the application below.

## **1 Applicant Introduction**

### **1.1 OnTower Ireland**

OnTower Ireland is part of Cellnex formally known as Cignal. It currently owns, operates and manages over 550 towers across Ireland. Its ongoing investment programme means OnTower will continue to provide the necessary infrastructure supporting the improvement and availability of high-speed wireless broadband in rural areas, and helping mobile phone operators address coverage blackspots.

The digital market is expanding and growing at exponential rates. Today mobile phones are only one component of a digital world inhabited by a wide range of communications services including wearable technology and IoT. OnTower Ireland benefits from resources and investment to provide the fabric for an emerging market across the country to meet the increasing demand for faster, greener, more reliable, more secure and more efficient connectivity for a variety of operators.

### **1.2 Operator Requirement**

The existing structure today forms an integral part of the portfolio and is essential for the telecommunications network with established links and coverage. It is able to meet ongoing improvements in technology and meet the increased demand for services.

## **2 Justification for the Structure**

### **2.1 Coverage**

The structure provides coverage for businesses located within Fonthill Industrial Estate and residents in the surrounding housing estates. The structure is essential in providing high-quality coverage, especially to this largely developed area on the outskirts of Dublin city.

## **3 The Existing Development**

### **3.1 Site Location**

The site is located approximately 1.8km west of the M50 motorway on the rooftop of Bailey House, located in the Fonthill Industrial Estate.

**HEAD OFFICE:** Unit 2, Listowel Business Centre, Clieveragh Industrial Estate, Listowel, Co. Kerry, V31 DY72  
**T:** 068 57463 **E:** info@chtc.ie **www.chtc.ie**

The surrounding area comprises warehouses, factories and housing estates.

### **3.2 Existing Structure**

The development consists of a 12m guyed pole with antennas and dishes attached to it, placed on the roof of Bailey House, a two-storey building in Fonthill Business Park.

Three Ireland currently transmit from this structure.

### **3.3 Site Purpose**

This base station's primary role is to provide mobile and data coverage to Three Ireland customers in the western outskirts of Dublin. The station is essential in providing high-quality coverage, to an area with a high level of residential and commercial development including; Fonthill Business Park, Liffey Valley Shopping Centre, and Liffey Valley Park housing estate.

### **3.4 Planning History**

#### **Planning Ref: SD05A/0009**

Permission for the existing 12m guyed pole was refused by South Dublin County Council on the 27/04/2005. This decision was subsequently overturned by An Bord Pleanála after an appeal was lodged by OnTower Ireland.

#### **Planning Ref: SD10A/0350**

Retention of the existing development was granted by South Dublin County Council on the 18/01/2011. The planners' report concluded that *"the telecommunications development proposed to be retained would not seriously injure the visual amenities of the area, and would not be contrary to the proper planning and sustainable development of the area"*.

## **4 Planning Policy**

### **4.1 South Dublin County Development Plan 2016-2022**

Both the current and draft Development Plans in their policies and objectives in relation to telecommunications infrastructure. Both plans highlight that widespread availability of high-quality information and communications technology is critical to the social and economic development of the County.

IE4 Objective 3 outlines that The Council will *"permit telecommunications antennae and support infrastructure throughout the County, subject to high-quality design, the protection of sensitive landscapes and visual amenity"*.

Under the zoning of the current County Development Plan, the site falls under *Objective EE – To provide for enterprise and employment related uses*. According to the zoning matrix, which lists telecommunications under *"public services"*, this type of development is permitted in principle in this area.

The current Development Plan also states it will have regard to the Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities 1996 when making decisions in relation to telecommunications infrastructure.

### **4.2 Telecommunications Antennae & Support Structures – Guidelines for Planning Authorities 1996**

The guidelines state that under the Local Government Act an obligation is imposed on Planning Authorities ..... *"To have regard to policies and objectives of the Government or any Minister in so far as they relate to their functions. Government policy on the availability of top-quality telecommunications services throughout the State should therefore be taken into consideration ..."*

The Guidelines were published by the Department of Environment in 1996 and one of the aims of which is to establish Guidelines for Local Authorities on appropriate Development Plan factors to consider in the assessment of telecommunications infrastructure. Section 4 outlines the assessment requirements.

#### **4.2.1 Design & Siting**

Design and Siting fall within 4.2 of the Guidelines. The structure is a 12m slimline pole, coloured grey located on the roof of a two-storey office building. There are guyed wires attached to the pole which offer additional support.

The surrounding area comprises a number of warehouses, factories and office buildings which make up Fonthill Business Park. Beyond this surrounding the site are large housing estates, parks and the Liffey Valley Shopping Centre.

Considering the high level of both residential and commercial development in the area, the site is suitably located to provide high-quality coverage to a large customer base. As a result, the retention of the structure at this location is essential to ensure the continued provision of high-speed mobile and data services for Three Ireland customers.

#### **4.2.2 Visual Impact**

The Guidelines indicate that visual impact is one of the most important considerations when dealing with telecommunications structures. As stated in Section 4.3 of the Guidelines some masts will remain visible despite measures taken to minimise visual impact.

The site, located within a business park is surrounded by robust taller buildings including warehouses and factories. As a result, the surrounding area is not a visually sensitive area. This is highlighted in the planners report included in the most recent planning application related to the site which states *"the development for retention does not significantly impact on the visual amenity of the existing industrial estate"*.

At 12m high, the structure is not overly robust. It is also a slim pole in rather than a more robust lattice structure. The surrounding landscape is also accepting of telecommunications infrastructure due to the industrial style development in the immediate environs.

It is respectfully submitted the retention of the existing structure will not result in the landscape or visual amenity of the area being changed or impacted.

#### **4.2.3 Site Sharing and Clustering**

Section 4.5 of the Guidelines refer to site sharing and clustering. OnTower Ireland purchased the portfolio of masts from Three Ireland. As an independent provider of infrastructure OnTower Ireland has a facility sharing policy. There is a second similar style structure located on the roof of Bailey House. As a result, the site is facilitating clustering.

#### **4.2.4 Request For Permanent Permission**

This structure forms an integral part of the overall digital network and shared services for OnTower Ireland and its operators. Due to its importance and as referred to in the Development Plan and following publication of PL07/12 dated 19th October 2012 by the Environment, Community and Local Government updating planning guidelines relating to the Telecommunications Antennae and Support structures, with particular reference relating 2:2 Temporary Permissions, it is requested that a permanent grant of permission is given for this application.

#### **4.2.5 Health And Safety**

We wish to confirm and reassure that OnTower Ireland has stringent Health and Safety policies and codes for its maintenance crews and for the public, both for physical safety and for standards set by the International Non-Ionising Radiation Committee. Health and safety are a priority and regular checks are undertaken.

#### **4.3 Circular Letter: PL 03/2018**

This circular refers to Revision of Development Contribution Guidelines in respect of Telecommunications Infrastructure. The proposed structure will provide both mobile coverage and broadband services from the Three Ireland network and in this respect, we wish to remind the Council it is now a requirement that waivers for broadband infrastructure (masts and antennae) be extended to include mobile phone infrastructure. This was recently highlighted under appeal reference ABP.308859-21 with the removal of a condition requiring contribution payment.

#### **4.4 Project 2040**

Several objectives are contained in these planning framework documents aimed at supporting broadband rollout, including support for the National Broadband Plan (2012). Project 2040 incorporates the National Planning Framework and the National Development Plan 2018-2027.

#### **4.5 National Planning Framework**

The National Planning Framework lists the following relevant objectives and commentary:

- Improving local connectivity to principal communication (broadband), energy, transport, and water networks.
- For rural Ireland, broadband is essential enabling infrastructure that affords rural communities the same opportunities to engage with the digital economy as it does to those who live in our cities and towns.
- National Policy Objective 24: Support and facilitate delivery of the National Broadband Plan as a means of developing further opportunities for enterprise, employment, education, innovation, and skills development for those who live and work in rural areas.

#### **4.6 National Development Plan 2018-2027**

Broadband is more increasingly to the fore in national planning framework documents. In the National Development Plan 2018 – 2027 paragraph 1.1 reads ...

A fundamental underlying objective of the National Development Plan is, therefore, to focus on continued investment to yield a public infrastructure that facilitates priorities such as high-speed broadband and public transport in better cities and in better communities.

It also supports Strengthened Rural Economies and Communities...

The full participation of rural communities in the strategic development as envisaged under the NPF is imperative to achieving the full potential of a broad range of strategic outcomes detailed in the National Development Plan. This applies both in terms of the traditional pillars of the rural economy, the natural resource and food sector, as well as those emerging from such developments as improved connectivity, broadband, and rural economic development opportunities.

Within the National Broadband Plan, the Government recognises that access to quality high speed broadband is essential for today's economy and society, to ensure that Ireland's citizens and businesses continue to enjoy the opportunities and benefits that flow from this transformational digital age

The application structure is pivotal in reaching the goals of the NPF and National Development Plan. As already mentioned, the proposed structure is an essential piece of communications infrastructure which will be in compliance with National, Regional and Local policy by providing high quality network coverage.

Without this infrastructure, the local community will continue to suffer from inadequate mobile phone and mobile broadband service.

#### **4.7 Covid 19 crisis.**

Ireland's National Action Plan in response to Covid 19 was approved on 16<sup>th</sup> March 2020 by the Cabinet Committee on Covid 19. One of the three aims of the Action Plan being to reduce the disruption to public health, the economy and social welfare. Due to the restrictions-imposed work, education, social interaction, and other lifestyles changed to be undertaken from home.

The digital communication economy experienced substantial demand putting pressure on services. As a result, telecommunications were designated an essential service by Government on 28<sup>th</sup> March 2020. These changes in lifestyle are expected to remain with many, and especially working from home slowly becoming a norm.

The telecommunications industry is acting to meet this demand and ensure this new developing economy is enabled. The proposed development also meets these changes in lifestyle.

#### **5 Merits of Site Location**

The existing structure today forms an integral part of the portfolio and is essential for the telecommunications network with established links and coverage. It is able to meet ongoing improvements in technology and meet the increased demand for services.

It is respectfully submitted that the proposed development meets the criteria of the Development Plans present and future. The development and its design have minimal visual impact on its surroundings and is readily absorbed into the landscape. Its purpose-built nature and suitability for site sharing shall mitigate against the need for additional structures and serve the current and future communications requirements of this area of South Dublin.

Furthermore, the site is not located within any, SPAs, SACs or NHAs. It is not located along a public road. As a result, it does not impact on the views and prospects of road-users and pedestrians.

#### **6 Consequences of not Securing the Site**

Demand has grown for services in the area for both social and business purposes. The structure enables Three Ireland to provide coverage to meet this demand and requirement for services. Failure to provide these services will have an adverse impact on the local area and its economy for both Three Ireland and other operators wishing to co-locate on the structure in the future.

#### **7 Conclusion**

##### **7.1 Demand in the area**

The demand for the services has increased since the last application resulting in a greater need for the site and services provided. To continue to meet customer demand and ensure future demand can be met, it is critical that retention of the application structure is granted.

##### **7.2 Future growth**

OnTower promotes the sharing of its infrastructure with all mobile telephone and broadband operators. Failure to secure permission for the application structure will prevent other operators from accessing key supporting infrastructure

### **7.3 Technical and Planning requirements**

The site in question forms an integral part of the network and provides important services to the surrounding area. It continues to meet the requirements of the County Development Plans past and present and the Telecoms Guidelines 1996.

Communications structures, such as the application structure, are multi-decade essential infrastructure and cater to existing and future customer needs.

With the above in mind, we respectfully request that South Dublin County Council grant planning retention of the application structure as submitted.

Yours sincerely,



Emma Breen  
Charterhouse  
Agent for OnTower Ireland