TELECOMS

PLANNING STATEMENT

In Support of a Planning Application to seek Retention Permission to allow for the continued use of the existing 25 metre high free standing monopole communication structure carrying antennae and communication dishes (total height including antennae 28 metres), within an existing 2.4 m high palisade compound previously granted temporary planning permission Ref: SD16A/0164 at ESB Telecoms Ltd Compound, Nangor Road, Clondalkin, Dublin 22

February 2022

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1. INTRODUCTION

1.1 Introduction to the Proposal

This Supporting Statement forms part of a planning application made to South Dublin County Council (SDCC) for retention permission to allow for the continued use of the existing 25 meter high free standing monopole communications structure carrying antennae and communication dishes (total height including antennae 28 meters), within an existing 2.4m high palisade compound previously granted temporary permission Ref. SD16A/0164 at ESB Telecommunications Compound, Nangor Road, Clondalkin, Dublin 22.

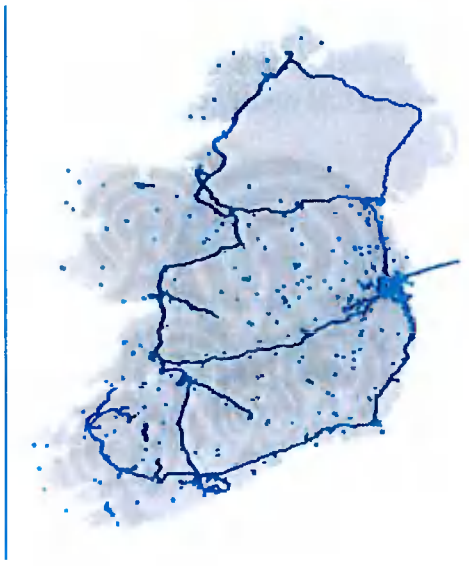
The Statement begins by introducing ESB Telecoms Ltd (ESBT), the application site, the recent planning history before detailing the proposed development. The proposal will then be considered in the context of national, regional and local planning policies as well as relevant Ministerial guidance. Against this background specific elements of the proposal will be considered in more detail including the need for the development, consideration of alternative sites, siting and design including the visual impact the proposal would have, landscaping, co-location, and the potential to deliver telecoms fibre to the site. Finally, regard will be had to wider environmental considerations. In doing so it will be demonstrated that the proposed development would comply fully with all relevant planning policy at all levels, facilitating the continuance of a robust mobile and broadband service to customers the Nangor Road area of Clondalkin and the surrounding lands, while representing proper planning and sustainable development of the area.

1.2 Creation and Function of ESB Telecoms Ltd

ESB Telecoms Ltd (ESBT) was established in early 2001 as a subsidiary company to ESB, Ireland's premier electricity supplier. Since that time ESBT has become Ireland's leading independent telecommunications infrastructure provider, delivering high quality, turnkey communication network solutions.

ESBT has grown from its original function of providing a communications system for our parent company, ESB. This communications system is called Supervisory Control and Data Acquisition (SCADA) and is still used today to monitor, control and remotely operate the ESB's complex electricity network infrastructure. The SCADA system continues to be upgraded as it is a vital part of radio and transmission communication for ESB's maintenance and repair crews.

ESBT now provides network solutions for a wide variety of mobile network operators, wireless broadband providers, as well as transferring data for the SCADA network. Over the last 2 and a half decades of operating in the Irish market, we have grown a substantial external customer base, supporting a wide range of private telecoms providers. ESBT's portfolio of sites also support a broad range of public sector telecoms activities such as council run fire departments, Enet – the national operator of local urban fibre networks, as well as Tetra who are a major customer specialising in the delivery of nationwide coverage to blue light services (Garda, Fire and Ambulance services).



Map 1: The existing ESBT fibre network is shown in blue lines with the tower infrastructure denoted with a blue dot

It is ESBTs policy to design and construct our communication structures to the highest international standards. All sites developed by ESBT are made available at market rates to our customer base, namely any registered telecommunications player in the Irish market, as points for co-location. Customers can rent space from ESBT allowing them to locate their base station equipment on ESBT sites, allowing them to provide mobile and broadband coverage from these ESBT sites, using mainly 3G and 4G networks. This policy aims to limit the number of such structures appearing in urban and rural landscapes.

ESBT built and owns a 1,600 kilometre national fibre optic network (NTFON). The NTFON is constructed in a 'Figure of Eight' around Ireland and also includes a spur from Carrick-on-Shannon to Buncrana, now connected back to Dublin via BT (NI). This network also incorporates extensive fibre ducting throughout the Dublin and Cork metropolitan areas. The NTFON enables high speed data connections to remote location that may otherwise have been overlooked. ESBT presently have approximately 150 tower sites connected directly to our NTFON network, allowing virtually limitless backhaul (data connectivity) to data centres and the wider internet.

The imminent roll-out of next generation mobile broadband services will offer more opportunities to ESBT to offer well connected, well maintained telecommunication infrastructure capable of delivering virtually limitless backhauling capacity to our customers, the network operators, via our own NTFON network.

2. SITE AND CONTEXT

2.1 Nature of the Site

The subject site is an existing enclosed compound sited on a cul de sac road between Nangor Road and the R134 New Nangor Road. The site is an irregularly shaped area of land with a total area of 1,005 sqm (0.1005 hectares). The site is accessed by an independent gated palisade fence which encloses the compound. Only authorised persons are permitted to enter the site with controlled access to the compound. The site comprises a 25m telecommunications monopole, mini pylon, a concrete foundation and slabs upon which a number of equipment cabins/cabinets are situated, surrounded by a crushed rock self-draining base.

Immediate land surrounding the compound is vacant grassland to the north, east and west. To the north is the R134 road beyond which is the residential developments of Oldcastle and Castlegrange. The R136 Outer Ring Road runs west of the subject site, beyond which is Grange Castle Golf Club, with Profile Park Business area to the northwest, beyond the R134/R136 junction. To the east of the site is land owned by ESB, beyond which is premises occupied by Spina Bifida Hydrocephalus Ireland and Scoil Mochua Clondalkin CRC. To the south there a number of detached dwellings, beyond which are extensive lands forming part of the new Kilcarbery Grange housing development that is currently under construction.

The subject site is located in an area zoned 'RES' within the current South Dublin County Development Plan that seeks to 'protect and/or improve residential amenity'. The western end of the road appears to be used for the storage of commercial vehicles and is often 'closed off' with bollards placed near the school to discourage the public from entering.

The subject site contains an existing communications structure which has been in situ since 2006 and is a successful point of co-location.

2.2 Planning History

The site has been subject to a number of planning applications:

Application SD06A/0344
On 10th August 2006 South Dublin County Council granted permission for the 'erection of a 25 metre high, free standing monopole communications structure, carrying antennae and communication dishes with associated ground-mounted equipment cabinets (exempted development) to share with other licensed operators within an existing 2.4 metre high palisade compound at ESB's existing Nangor Road telecommunications site.' Condition 2 restricted the permission to a period of five years.

Application SD11A/0093
On 19th July 2011 South Dublin County Council granted 'permission to retain the existing 24m high, free standing monopole communication structure carrying antennae

and communication dishes within an existing 2.4m high palisade fence' and 'permission to attach 3 x 1.0m antennae and 2 x0.3m dishes to allow for future third party co-location. Condition 2 restricted the permission for a period of five years. Note, it is unclear why this permission referred to a 24m structure as a 25metre monopole was erected in 2006 as per the original permission.

Application SD16A/0164

On 29th May 2016 ESBT applied to South Dublin County Council for the 'Continued use of the existing 25 meter high free standing monopole communication structure carrying antennae and communication dishes (total height including antennae 28 meters), within an existing 2.4m high palisade compound previously granted temporary permission Ref. SD11A/0093'.

Following appeal to An Bord Pleanála (ABP Ref: 06S.246944 refers) a Final Grant of Permission was issued by South Dublin County Council with 4 conditions attached. This included an amended Condition 2 that reads as follows:

> 'This permission shall apply for a period of five years from the date of issue of the final grant of permission. The telecommunications structure and related ancillary structures shall then be removed unless, prior to the end of the period, planning permission shall have been granted for their retention for a further period.
>
> REASON: In the interest of ensuring no impediment to comprehensive residential development of appropriately zoned lands and to assist in achieving the core strategy of South Dublin County Development Plan 2016 – 2022.'

Planning permission granted under planning application SD16A/0164 expired on 22nd November 2021.

Other Planning Applications in the Immediate Locality

There are a number of recent planning application that have been made in the area, these are noted. They include two applications for development for the Association for Spina Bifida & Hydrocephalus on lands to the east of the site (Application Ref.: SD07A/0492 and SD20A/0222); and a strategic housing development on lands to the south of the site made by Adwood Limited (Application Ref. SHD3ABP – 305267-19) The latter is particularly significant given the scale of development:

Application SHD3ABP – 305267-19

A Strategic Housing Development made by Adwood Limited for 1034 residential units comprising of (578 houses: 449 3-bed & 129 4-bed), 456 apartments: 142 1-bed, 224 2-bed, 90 3-bed), 2 childcare facilities (1 temporary, 1 permanent), 1 retail unit, 1 community facility and all associated site works at Lands at Kilcarbery, Corkagh Demesne, Deansrath, Nangor, Clondalkin, Dublin 22. Permission was granted on 5th December 2019.

The development of the above, known as Kilcarbery Grange is now well underway.

The significance of the Kilcarbery Grange development to the subject application is twofold. Firstly, the Kilcarbery Grange development represents a comprehensive

development of the swath of lands to the south of the subject application currently under consideration. The continued use of the base station and mast during the application process concerning Application SHD3ABP- 305267-19, has not prevented the comprehensive development of these lands currently being developed, and will not unduly impact on the amenities of those in existing properties or future occupants of the Kilcarbery Grange development. Secondly, the new residents of Kilcarbery Grange will benefit from the continued use of the telecommunications site as it enables existing operators, and potentially new operators, to serve the new development providing a robust mobile and broadband service, as well as serving existing occupants of developments in the area and those using the local road network.

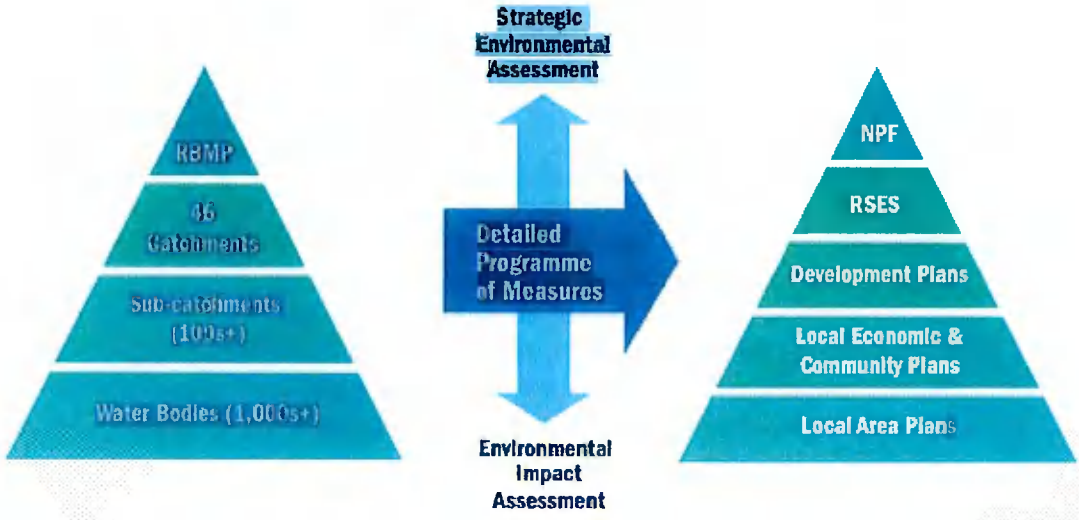
2.3 The Proposed Development

The proposed development seeks to regularise the existing situation on site by seeking retention permission of the existing 25 metre high and associated antennae and communications dishes with the existing palisaded fenced compound which is owned by ESBT.

3.0 NATIONAL, REGIONAL AND LOCAL PLANNING POLICY CONTEXT

The proposal is now set out in terms of its planning policy context from the national, regional and more local level.

Figure 9.1 | Hierarchical Structure of RBMP and Planning Policy



Picture 1: Taken from the NPF 2018-2040.

3.1 National Planning Framework (NPF) (Project Ireland 2040) & The National Development Plan (NDP) 2018-2027

The NPF was published in 2018. It is the Government's high-level strategic plan for shaping the future growth of Ireland to the year 2040. It sets out both the National Strategic Outcomes (NSOs) and National Policy Objectives (NPOs) for the future growth and sustainable development of the country to 2040.

The NSOs cover a wide range of themes such as enhanced regional accessibility, strengthened economies and communities. The proposed development would help support the likes of NSO5 that relates to a strong economy supported by enterprise, innovation and skills, and whereby sustainable full employment will be achieved in part through digital and data innovation; for example, supporting the implementation of the National Broadband Plan and promoting our cities as demonstrators of the latest information and communications technology.

NPOs support the NSOs, The NDP sets out the investment priorities that will underpin the NPF, including the latest information and communications technology.

The current proposal is in accordance with the NPF and NDP and will contribute to the overall NSOs and NPOs contained therein.

3.2 National Broadband Plan 2012

The National Broadband Plan recognises 'the importance of digital engagement for Ireland, both economically and socially' and the Government commitment to the rollout of high speed broadband.

In order to drive commercial rollout of high speed broad band:

'The Government is committed to a range of actions that will facilitate the more efficient rollout of infrastructure including addressing planning and road opening challenges, assisting getting citizens and businesses online, measures relating to spectrum technology and maximising the use of State assets where possible.'

It is envisaged that 'once completed all parts of Ireland will have access to a modern and reliable broadband network, capable of supporting current and future generations.'

In the most recent update on the National Broadband Plan roll-out map Clondalkin is shown as a 'Blue area' where commercial operators are delivering or have indicated plans to deliver high speed broadband services. Operators are continuing to enhance their services in these area to improve access to high speed broadband.'

Eir, Vodaphone and Three, currently operating from the site are three such operators delivering broadband into the Clondalkin area. The current proposal would contribute to the objectives of the National Broadband Plan.

3.3 Regional Spatial and Economic Strategy (RSES: Eastern & Midland Regional Assembly (EMRA) 2019-2031

The RSES is a strategic plan which identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives. At this strategic level it provides a framework for investment to better manage spatial planning and economic development to sustainably grow the Region to 2031 and beyond. The EMRA made the RSES ion 28th June 2019.

The principal statutory purpose of the RSES is to support the implementation of Project Ireland 2040 – National Planning Framework and National Development Plan 2019-2027 and the economic policies of the Government by providing a long-term planning and economic framework for the development of the Region.

The importance of connectivity is made throughout the RSES to realise the potential of Dublin and its wider metropolitan area, within which the application site is a part. For example, Chapter 8; Connectivity: 'Section 8.6 Communications Network and Digital Infrastructure' acknowledges that the increasing use of digital technologies is impacting on every aspect of our lives: from transport, to education, leisure and entertainment and health services. Infrastructure to deliver better connected services is vital to our continued growth, supporting businesses and enhancing our communities....'

While the RSES is a high-level strategic document, the importance of good communications of which the subject proposal is a part will contribute to the realisation of the RSES, its overall Vision and Objectives. ESBT consider that the proposed development will ensure the continued delivery of vital telecommunications infrastructure and enable the site to continue to form an integral link in the mobile operators' wireless broadband network in the locality, Clondalkin and the wider surrounding area.

3.3 South Dublin County Development Plan 2016 – 2022

The South Dublin County Development Plan (2016-2022) sets out policies and objectives to guide how and where development will take place in the county over the lifetime of the Plan. It provides an integrated, coherent spatial framework to ensure the county is developed in an inclusive way which improves the quality of life for its citizens, whilst also being a more attractive place to visit and work. The Plan was adopted by South Dublin County Council on 10th June 2016 and came into effect on 12th June 2016.

The development plan is generally positive towards the telecommunications infrastructure in appropriate locations.

Chapter 7.4 (Information and Communications Technology) recognises that 'the widespread availability of a high quality Information and Communications Technology (ICT) network within the County will be critical to the development of the County's economy and will also support the social development of the County.'

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 following Objectives are pertinent to this application:

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.

The CDP Lists the following ICT actions:

- South Dublin County Council will co-operate with service providers in securing a greater range and coverage of telecommunications services in order to ensure that people and businesses have equitable access to a wide range of services and the latest technologies as they become available.

- The Planning Authority will create and maintain a register of app telecommunications structures supported by relevant databases in coope with operators.

The subject site is not located within an Architectural Conservation Area..

In the consideration of proposals for telecommunications antennae and support structures, applicants will be required to demonstrate:

- Compliance with the Planning Guidelines for Telecommunications Antennae and Support Structures (1996) and Circular Letter PL 07/12 issued by the DECLG (as may be amended), and to other publications and material as may be relevant in the circumstances,

- On a map, the location of all existing telecommunications structures within a 2km radius of the proposed site, stating reasons why (if not proposed) it is not feasible to share existing facilities having regard to the Code of Practice on Sharing of Radio Sites issued by the Commission for Communications Regulation (2003),

- Degree to which the proposal will impact on the amenities of occupiers of nearby properties, or the amenities of the area (e.g. visual impacts of masts and associated equipment cabinets, security fencing treatment etc) and the potential for mitigating visual impacts including low and mid-level landscape screening, tree-type masts being provided where appropriate, colouring or painting of masts and antennae, and considered access arrangements, and

- The significance of the proposed development as part of the telecommunications network.

The sharing of existing communication structures is promoted by the Council. Having regard to the site's history and use as a telecommunications base station since 1996, ESBT maintain that the continued use of this site would not impact unduly negatively on the surrounding properties. IE4 Objective 4 identifies the preference of co-location. The existing site is in line with this objective as the site is shared by a number of mobile network operators.

The Development Plan in Chapter 6: Economic Development, Section 6.5: Infrastructure & Communications Technology is also supportive to ICT in general, ensuring for example communications infrastructure is widely available. While the proposed development is in a mixed use area there are residential uses nearby and likely to be more residential uses in future therefore it is also worth noting that **Objective ED108** seeks to 'Support the provision of home based economic activity that is subordinate to the main residential use of a dwelling and that does not cause injury to the amenities of the area.' This is particularly relevant in recent times where home working, along with normal usage has placed increased demands and reliance on a robust communications network.

It is noted that the application site is located within an area subject to Zoning Objective 'RES': 'To protect and/or improve residential amenity'. Public Services are permitted in principle under the zoning objective for the area.

The site is not located within or close to any Architectural Conservation Area (ACA), nor does it impact on any Protected Structures or Scheduled Monuments.

3.4 Draft South Dublin County Development Plan 2022-2028

In July 2020 SDDC announced its intention to prepare the new CDP. Preparation of the plan is well underway and following publication of the Draft CDP the period for public consultation ended on 15th September 2021. During December 2021 Councillors considered Submissions received on the Draft CDP. The new plan is due to come into effect in June 2022.

While it is acknowledged that the current proposal will be assessed against the current 2016-2022 Development Plan, due to the relatively advanced stage of the new Plan the subject application has also been prepared with regard to the provisions of the new Plan in mind.

With specific regard to Telecommunications Section 11.4 Information and Communications Technology states that 'The continued widespread availability of high-quality Information and Communications technology (ICT) networks within the County is critical to the development of the County's economy and to social progress. It will ensure that the County remains attractive to hi-tech knowledge based industries providing for high value employment. It is also a huge asset to the residents of the County encouraging home working and individual entrepreneurial activity. The following Policy and Objectives are considered to be particularly relevant: in this regard:

Policy IE5: Information and Telecommunications Technology (ICT)
Promote and facilitate the sustainable development of a high-quality ICT network throughout the County in order to achieve social and economic development, whilst protecting the amenities of urban and rural areas.

> **IE5 Objective 1:**
> To promote and facilitate the provision of appropriate telecommunications infrastructure, including broadband connectivity and other innovative and advancing technologies within the County in a non-intrusive manner.

IE5 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.

IE5 Objective 4:
To discourage a proliferation of telecommunication masts in the County and promote and facilitate the sharing of facilities.

The subject site is proposed to be zoned 'RES' 'To protect and/or improve residential amenity' where Public Services such as telecommunication sites are to be an acceptable use in principle. Importantly there is a distinction to the lands to the south (i.e. subject to planning application SHD3 ABP-305267) that is designated 'RES.N' 'To provide for new residential communities in accordance with approved local plans'. These lands are currently being developed. The subject application, being located to the north of the RES.N zoned lands, has not prevented their comprehensive development, the basis for the previous time limited grants of permission.

Having regard to the above ESBT contend that the proposed development would be in accordance with the provisions of the Draft Development Plan.

3.5 South Dublin County Local Economic and Community Plan (LECP) 2016-2021

The LECP sets out, for the period 2016-2021, the objectives and actions need to promote and support the economic development and the local and community development of the local authority area, both by itself directly and in partnership with other economic and community development stakeholders.

The continuation of service and coverage from existing mobile operators at this site will in the opinion of ESBT assist in the delivery of the overall vision and objectives of the LECP by ensuring residents, businesses and visitors to the area have the opportunity to avail of a high quality mobile and broadband network into the future.

4.0 MINISTERIAL GUIDANCE

4.1 Telecommunications Antennae and Support Structures (July 1996)

When considering proposals for new telecommunications facilities south Dublin County Council will have regard to the 'Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities'. Accordingly, this section will address the relevant issues raised by these Guidelines.

The Guidelines state that the design and siting of antennae support structures will to a large extent be dictated by radio and engineering parameters (Section 4.2 refers).

The Guidelines also state that where free-standing masts are required in the vicinity of larger towns and city suburbs, locations within commercial and retail areas should be investigated. The guidelines state that 'substations operated by the ESB may be suitable for the location of antennae support structures' (Section 4.3 refers). The subject site and proposal sit neatly into the hierarchy of appropriate location for telecommunications structures in this area, given that the site was part of the former Nangor Road 38kV substation. ESBT are not aware of any future plans ESB may have for their lands in the vicinity of the site.

It is a primary aim of these guidelines to encourage local authorities to promote clustering and shared services at telecommunication masts, especially in suburban areas, with the aim of reducing visual intrusion (Section 4.5 refers). This site provides an excellent example of co-location and shared services as it is available to all operators to co-locate.

The visual impact of the development is one of the most important factors when assessing proposals of this nature and 'will vary with the general context of the proposed development' (Section 4.3 refers). Given the nature and location of the site, as previously asserted by ESBT that the existing structure is not unduly visually obtrusive or damaging to local amenity. As the Guidelines note, 'along major routes or tourist routes or view from traditional walking routes, masts may be visible but yet are not terminating views. In such areas it might be decided that the impact is not seriously detrimental'. While this may apply to more rural areas it is contended that equally it may be applied to ore urban locations where a view of a structure is only intermittent or incidental .

4.2 Ministerial Circular PL07/12 – Revision to Guidelines (February 2018)

In 2018, against a background of the recently launched next generation broadband (4G) licenses, the Department issued updated guidance for local authorities in relation to telecommunication infrastructure.

The Guidance included advice to planning authorities to, amongst other things, cease attaching time-limited conditions to telecommunication masts as such structures will continue to play a vital role in delivering economic growth to the areas they service into the future. In addition, in general, future permissions should simply include a condition stating that when the structure is no longer required it should be demolished, removed and the site re-instated at the operators' expense. The lodgement of a bond or cash deposit is no longer required.

Health and Safety

In terms of health and safety, the Guidance advises that planning authorities are urged to concern themselves with design and siting issues only and should defer any health and safety issues and their monitoring to the relevant authorities, in this instance The Commission for Communications Regulation (ComReg). That said with many developments of this nature, there may be concerns from residents about the perceived implications of the development, primarily in relation to the adverse health effects of the installation. ESBT regards the protection of the health, safety and welfare of its staff and the general public as a core company value in all its activities. Accordingly, it is ESBT policy to continually review and update standards in light of new developments and research findings. For example, ESBT regularly undertakes radio frequency tests at all its sites. These are undertaken by certified contractors. Results consistently indicate that all ESBT sites, including the existing 25m mast at the site, operate well within the safety standards set out by ComReg. ESB telecoms sites are also available to be tested by ComReg itself. Again, where such testing has taken place results indicate that ESBT sites fall within safety standards. In this regard the proposed structure, will subject to regular safety tests, with no reason to believe the proposal will not fully comply with safety standards.

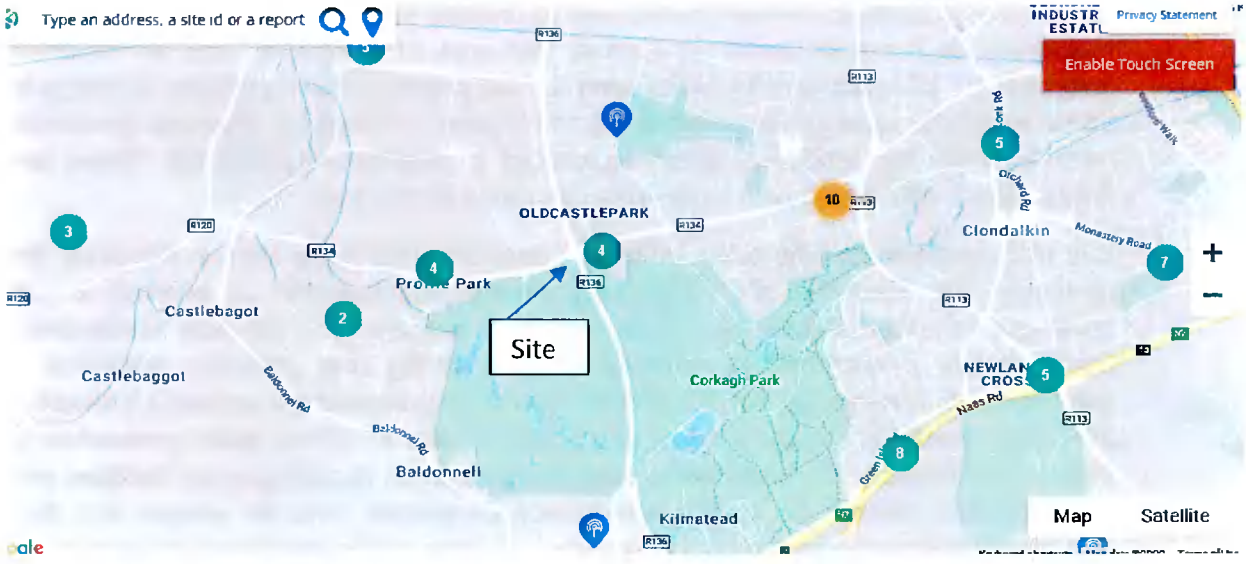
Health and safety issues are referred to further in **Appendix 1**. ESBT regularly undertakes radio frequency tests at its site. These are undertaken by certified contractors. Most recent testing was last undertaken at the Nangor Road Site in Clondalkin in 2015, 2016, 2018, 2019, and 2021. Results indicate that they were well within the safety standards set out by ComReg and are provided in the Appendix.

5.0 THE DEVELOPMENT IN CONTEXT

5.1 Need for the Proposal

The need for the proposal is apparent when considering the poor coverage that currently exists in the area for both mobile phone coverage and in particular the delivery of broadband. The existing lack of coverage can be clearly seen by assessing the site location map below and the coverage maps provided by ComReg https://coveragemap.comreg.ie/map . The map provided shows the coverage for operators on the nearest telecommunication sites in the wider area.

In addition to the above the map below taken from the ComReg site shows the location of the nearest telecommunications masts in the area, shown by the green and orange circles (with the number representing the number of operator base stations in a given compound), and blue markers.



Map from ComReg Site Viewer.

As can be seen from the above map, typical modern base stations cells (mobile tower catchment areas) are significantly smaller than 2km in diameter. The reason for this is the exponential increase in data transfer rates now expected from end users. Each base station has a finite capacity for transferring data in a given area (known as a cell) so, the level of activity in a given cell increases. Modern cells have a radii of approximately 500m which overlap to ensure continued signal coverage while end users move on their journey through the area.

There are currently 3 mobile operators located at the base station along with Tetra, who operate the Managed Digital Radio Service for the emergency services.

In terms of the mobile operators, the importance of the site is evidenced, through the signal coverage mapping available on the ComReg Site and by their long term investment in the area providing both mobile phone and broadband services, where their existing customer base is likely to grow significantly with new housing development in the locality. If the site were no longer to be available to the operators each would have to find alternative locations in the vicinity to serve their customers. This would likely mean a proliferation of sites, and likely involve new masts at a number of locations. Given recent developments in the area, particularly development of the

Kilcarbery lands for housing it is considered that suitable alternative sites would be both hard to come by and likely to be more prominent to existing developments and those currently under construction.

A letter of support for the planning application has also been received from Tetra Ireland Communications Limited. The letter outlines their intention to retain equipment on the structure as it forms part of the Managed Digital Radio Service (MNDRS) for the Emergency services and is considered an important site in the overall Emergency Services network. The letter is accompanied with details outlining the coverage the site provides, the specific advantages of the site, along with an overview of national radio requirements, and specific area requirements, and technical justification for the Nangor Road Site.

The accompanying details concludes by stating that 'This site is a critical network point of the National Digital Radio network for the Emergency Services....include the Gardai, Fire Brigade and Ambulance Services. The site meets specific coverage requirements of the local emergency services which are to provide inbuilding coverage to buildings mandated by the emergency services in this area of Dublin, as well as handheld coverage for all roads and the wider area. It also provides hand portable coverage to these areas for emergency personnel on foot plus overlapping coverage to vehicle installed units for resilience purposes should a neighbouring site fail. These are fundamental differences with a commercial mobile phone site.'

It is also pertinent to note that 'Unlike any possible third party sites in this area, the particular site meets all the emergency service requirements in addition to just coverage in terms of security – protection from unauthorised physical interference, manipulation, eavesdropping, interception, monitoring and jamming, resilience – connection to Emergency control centres via resilient eircom transmission network – 24/7 site access for the rapid repair of the site in case of failure, direct connection to high speed network for quality and speed of information to control-room facilities and for immediate access to on-site emergency personnel, and for secure and fully redundant mains and backup power supply.' A copy of the letter and accompanying details are given as **Appendix 2** to this Statement.

5.2 Siting, Design & Visual Impact

The siting and design of the structure is considered to be appropriate. The monopole is of a design that is generally preferred in urban/suburban locations mast, offering a compact structure upon which operators can attach their antennae, dishes and ancillary equipment without the overall appearance becoming unduly bulky and overloaded. In this instance the height of the monopole 25m is considered to be modest while enabling an appropriate level of signal coverage into the area. The monopole is also able to accommodate the necessary antennae to facilitate the operation of the Tetra communications system which while increasing the overall height of the facility does so without the necessity to increase the height of the monopole itself.

The monopole, and its associated base station compound is sufficiently set back from the local road network, particularly the R134, so as not to be overly dominant to those travelling along this busy road, while being sufficiently distant from the R136 and neighbouring dwellings. It is considered that the siting of the structure is acceptable, and as has been demonstrated has not prevented significant development of residential lands in the locality.

Visually, the site is well screened, particularly from the south and west with a mix of trees and mature/semi-mature bushes. While the mast is visible from the Nangor road and surrounding lands it is not considered to be unduly prominent, being set back from the Nangor Road, or out of character with the surrounding lands that are suburban in character.

The 2.4 metre high compound fence is currently finished in galvanised grey steel. While this is for the most part well screened, particularly from the south and west the fence is visible from the New Nangor Road to the north. It is therefore suggested that if it is considered that painting the palisade fence dark green colour along the northern boundary this could be stipulated in any grant of permission that may be forthcoming.

5.3 Co-Location

In line with Guidelines, ESBT makes available wherever possible all its existing structures with other licensed operators for co-location. This policy has been in place since 2001 and continues to be the case, reducing the unnecessary proliferation of such essential structures throughout the country.

The subject site at Nangor Road is a good example of co-location, where there are currently three mobile operators using the base station, along with Tetra. The current proposal would allow for the continued use of this key site that links nearby existing sites in the individual operators' networks where in the absence of any readily available alternative sites, such mobile and broadband services would otherwise be lost.

5.4 Environmental Considerations

Flooding
The OPW website, National Flood Hazard Mapping, launched in May 2018, shows that the site has not been subject to flooding. There is no record of recent of flooding within the site or the immediate locality.

Natural Heritage Designations
In terms of natural heritage designations and specific regard to the requirement of EU Habitats Directive the following sites are noted:

- Glenasmole Valley SAC (Site Code 001209) c. 9.5km south of the site.
- South Dublin Bay SAC (Site Code 00210) c. 12.5 km to the east of the site.
- South Dublin Bay and River Tolka SPA (Site Code 004024) c. 12.5 km to the east of the site.
- Rye Water Valley/Carton SAC (Site Code 001398) c. 6.5km to the north-west of the site.

Having regard to the nature of the proposed development and location of the site and/or proximity to the nearest European sites, forming part of the Natura 2000 network (Article 6 of the EU Habitats Directive refers) and their qualifying features, no appropriate assessment issues arise. It is not considered that the proposed development would likely have a significant effect on the integrity individually or in combination with other plans or projects on a European site.

5.5 Duration of Permission

Ministerial Circular PL07/12 issued guidance to Local Planning Authorities to cease attaching time limited conditions to telecommunication structures, as structures will continue to play a vital role in delivering economic growth to the areas they service in

the future. Only in exceptional circumstances where particular site or environmental conditions apply should a permission be issued with conditions limiting their life.

ESBT acknowledge that the site has previously been granted temporary permissions by South Dublin County Council, with a time constraint most recently amended by An Bord Pleanála, on the basis of the land zoning and concerns that the granting of a permanent permission would not be appropriate as it could compromise the overall development of surrounding lands. Specifically map 1.3 in Chapter 1 of the Development Pan 2016-2022.

However as has been recently demonstrated the presence of the base station and communication structure has not prevented the development of lands in the vicinity, particularly to the south, where the large residential development known as Kilcarbery Grange is currently under construction. This new development will result in a significant increase population locally that in turn will be able to avail of the mobile and broadband services offered from the commercial operators from the application site.

Having assessed the Core Strategy in the existing Development Plan 2016-2022 in light of recent housing developments, including the Adamstown and Clonburris SDZ, recent SHD applications and recent housing completion figures for the County it is considered that the presence of the subject telecommunications development has not prevented the aspirations of the Council in meeting its housing targets. Furthermore, having regard the Chapter 2: Core Strategy and Settlement Strategy of the forthcoming Development Plan 2022-2028 it is considered that this would remain the case. As such the existence of the telecommunications site would not unduly compromise future development potential in the immediate locality, and as such would not prevent the Council in attaining its future housing targets. Given this background, ESBT consider the previous reasoning for granting time limited permissions at this site can no longer be justified and that the granting of permission on a permanent basis would be fully in accordance with the proper planning and sustainable development of the area.

6.0 CONCLUSIONS

The importance of mobile and broadband infrastructure to the economic and social sustainability of South Dublin and the wider area are extensively acknowledged throughout the relevant plans and programmes, as outlined in this Statement.

Having regard to the zoning for the area, ESBT note the acceptability of public services in such zoned areas. The site has been used as a multi-operator telecoms compound delivering vital services into the area since 2006 and is well established in the area. The exponential growth in mobile data usage over the last decade requires the continuance of the physical base station infrastructure and monopole in order to ensure services can continue to be provided into this growing residential area into the future

National, regional and local policy and strategy documents are consistent in acknowledging the necessity for continued investment in telecommunications infrastructure. An efficient and cost-effective broadband network is understood to be essential if the country as a whole is to prosper and thrive in the era of the knowledge based and value-added economy **(NDP, Chapter 2, p63)**.

With mobile penetration rates nearing 100% there are increasing social benefits to be derived locally from a robust telecommunications infrastructure. Such benefits include universal access to many public services, social networking and interaction, media and broadcasting ('on-demand') and e-learning among others. A grant of permission for this application would play an active role in supporting the policies and aims of the NDP

and RSES for the area generally. Additionally, the continuance of use of this telecommunication site, would not be contrary to the policies set out in the South Dublin County Development Plan in terms of undue impacts on residential amenity and landscape.

Good telecommunications are a cost effective means of delivering support services to vulnerable groups and is increasingly popular as a means of delivering educational services and products such as distance learning along with being essential for the creation of new employment opportunities and diversifying the economic base of the county. In terms of the existing telecommunications network in the area, this site forms an important link for our customers, the network operators, and it is ESB Telecoms' contention that this strategic site will increase in importance with the rollout of next generation mobile broadband.

The Ministerial Guidelines of 1996 the Guidelines support the sharing and clustering of services via co-location, a practice promoted at all ESB Telecoms Ltd sites. In this instance the existing telecoms site forms an essential node in the respective networks for 3 commercial operators, and a grant of permission for the proposed development would avoid the need for alternative structures in the area, thus reducing the proliferation of similar type structures in the immediate vicinity.

Having regard to the importance of the site to provide a service into this part of Clondalkin including potential linkages to national fibre networks and the services that can be supplied to our customers from this location, ESBT envisages this site remaining one of significant strategic importance for its customers and reducing the need for further future telecommunication structures in the area where no alternative sites have been found. This site, located as it is in one of fastest growing areas in the Greater Dublin Area, can play a key role in the timely delivery of next generation mobile services to the area.

It is ESBTs contention that the proposed development is found to be:

- In accordance with The National Planning Framework (Project Ireland 2040) & The National Development Plan 2018-2027
- Supports the National Broadband Plan
- Is in accordance with the RSES 2019-2031
- Is in accordance with the South Dublin Development Plan 2016-2022
- Accords with the Vision, Aims and Objectives of the Draft South Dublin Development Plan 2022-2028
- Supports the overall Vision, Policies and Objectives of the South Dublin County LECP 2016-2021
- Accords with Ministerial Guidance, 'The Telecommunications and Support Structures (July 1996) and subsequent Revisions Ministerial Circular (Feb. 2018)

The proposed structure would be situated in an existing compound and ESBT contends that the continued use of the site with the monopole structure as proposed would not be unduly visually obtrusive so as to be harmful to the visual amenities or be detrimental to the amenities of the area.

Having regard to the Core Strategy in the existing Development Plan 2016-2022, and in light of recent housing developments, including the Adamstown and Clonburris SDZ, recent SHD applications and recent housing completion figures for the County it is considered that the presence of the subject telecommunications development has not

prevented the aspirations of the Council in meeting its housing targets. Furthermore, having regard the Core Strategy of the forthcoming Development Plan 2022-2028 it is considered that this is likely to remain the case.

Given the aforementioned ESBT consider the previous reasoning for granting time limited permissions at this site is no longer justified and that the granting of permission on a permanent basis would be fully in accordance with the proper planning and sustainable development of the area.

Appendix 1

Health and Safety

Introduction

With many developments of this nature, there may concerns from local residents about the perceived implications of the proposed development, primarily in relation to the adverse health effects of the installation. ESB regards the protection of the health, safety and welfare of its staff and the general public as a core company value in all its activities. It is ESB Telecoms Ltd policy to continually review and update standards in light of new developments and research findings.

International Guidelines

The International Commission for Non-Ionising Radiation Protection (ICNIRP) is an independent, scientific organisation which was established in 1992. It purpose is to advance Non-Ionising Radiation Protection for the benefit of people and the environment and in particular to provide guidance and recommendation on protection from Non-Ionising Radiation exposure.

ICNIRP is formally recognised as a non-governmental organisation and operates in co-operation with the Environmental Health Division of the World Health Organisation and the United Nations Environment Programme. In 1998 ICNIRP published "Guidelines for Limiting Exposure to Time-Varying Electric, Magnetic and Electromagnetic Fields", the main purpose of these guidelines is to limit electromagnetic field exposure in order to protect against unknown adverse health effects.

The ICNIRP guidelines limits have been adopted by a great many Countries across the world. In Ireland the Communication Regulator has adopted the 1998 guidelines outlined by ICNIRP.

Communications Regulator, Ireland

The Commission for Communications Regulation (ComReg) is the licensing authority for the use of the radio frequency in Ireland. As the licensing authority for radio communications in Ireland, ComReg is responsible for ensuring that communication operators comply with their licence condition relating to non-ionising radiation. In 2001 ComReg began the process of randomly testing communications site to ensure compliance with the adopted ICNIRP and ComReg Standards.

ComReg have continued its programme of randomly surveying site to establish the highest emission level associated with each site, including a number of sites by ESB Telecoms Ltd. The emission levels from all sites fall significantly below the ICNIRP general exposure levels. ComReg has to continued surveying sites through 2020.

Independent Research

The Department of Communications Marine and Natural Resources established a group of experts to examine the issue of the "Health Effects of Electromagnetic Fields". The results of this research were published in March 2007.

The report draws together existing scientific research in the field of Non-Ionising Radiation and compiles an informed report of the most up to date information available. The evidence contained within the report finds that "no adverse short or long term health effects have been shown to occur from exposure to the signals produced by mobile phones and base station transmitters." (Chapter 3, Question 1).

In terms of exposure to radiofrequencies from base stations, it is explained that the strength of the frequency is greatest at the source and demises quickly with distance. At or near ground level, in the vicinity of an average 25 metre high base station the level of radiofrequency exposure is much lower than that emitted from the mobile phone. (Chapter 4)

With respect to the general location of mobile base stations and in particular their location near places where children gather, the findings of the Steward Report and the precautionary principle are examined. In responding to this, the report finds that there is no data available to suggest that the use of mobile phones or exposure to mobile base stations has adverse health effects for children or adult, irrespective of the location of the phone mast. The report makes it clear that at the current time there is no evidence of adverse health effects, and states;

> "the exposure (levels) are so low as to make it immaterial where masts are located with respect to schools, playgrounds, health centres or other places where children gather"
>
> (Chapter 3, Question 4)

RADIO FREQUENCY EMISSION TEST RESULTS FOR ESBT'S SITE AT NANGOR ROAD, CLONDALKIN, DUBLIN

The Radio Frequency Emission Test Details for ESB Telecoms Site at ESB Telecommunications compound at Nangor Road, Dublin in June 2015, October 2016, April 2018, December 2019 and March 2021. The results shown on the following pages confirm that tests show that emissions were within prescribed parameters.

ESB Telecoms

Obelisk GROUP

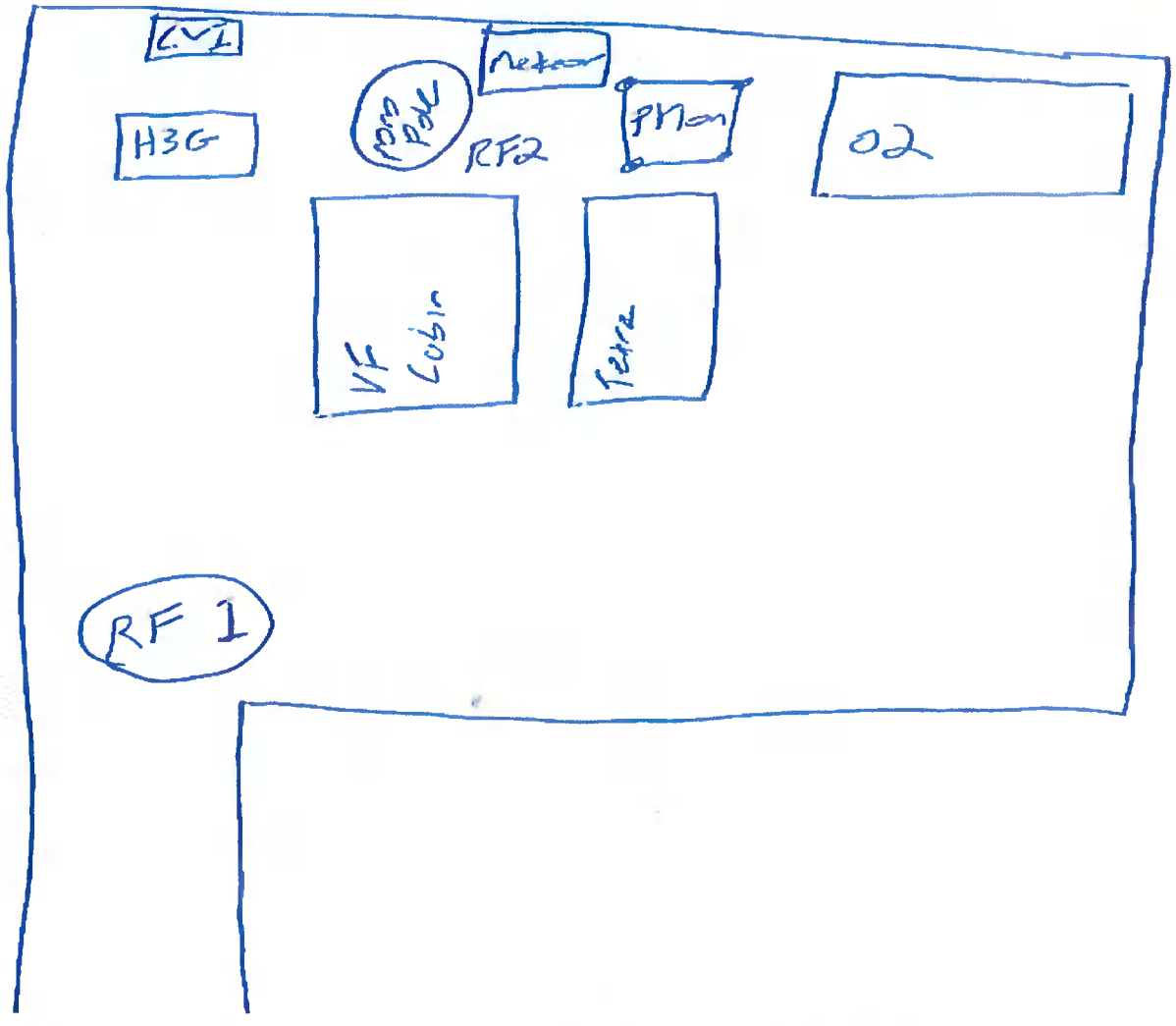
RF Emission Test

Site Name: Nangor Road No. 2

Test Date: 08-Jun-15 **Time:** 09:00

Tested By: Brian Reilly

Test No. 1	**Location**	**Main Site Entrance**	
Average Levels	0.9000	**µW/cm²**	
Test No. 2	**Location**	**Compound**	
Average Levels	0.0000	**µW/cm²**	



Obelisk GROUP

08/06/15

Emission Tests

RF Emission Test 1 (Entrance)

RF Emission Test 2 (Compound)

ESB Telecoms RF Emission Test

KTL

Client: **ESB Telecoms Ltd.**

Site Name: **Nangor Road 38kV**

Site Address: Nangor Road, Clondalkin

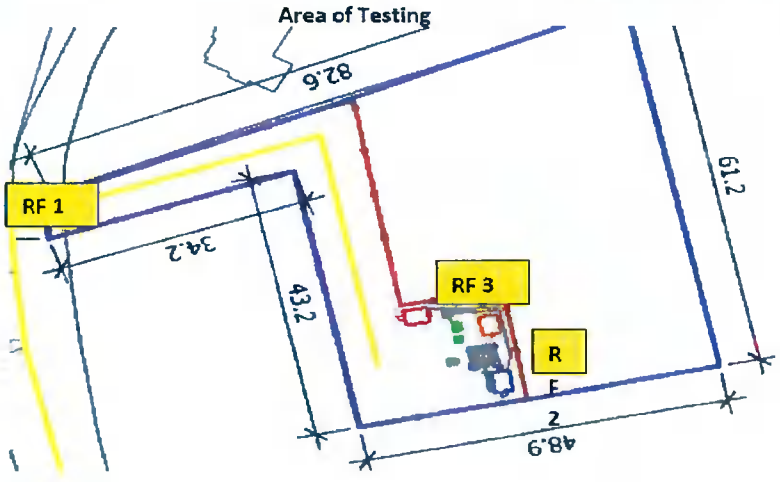
Co Dublin

Test Date: 13/10/2016

Tested by: Ollie Qualter

Test Details: Provide an RF Reading over an average 6 minutes per test

Test 1	Entrance Gate	**Test 2**	Base of Pylon	**Test 2**	Base of Pole
Average levels:	0.0039 W/M2	Average levels:	0.0073 W/M2	Average levels:	0.0019 W/M2
	1.20006 V/m		1.696 V/m		0.85079 V/m



RF Emissions Cert & Site Layout Mark Up

GRA Networks

RF Emission Test

Site:	**Nangor Road 38kV No 2**
Structure Type:	**Concrete Monopole 25m**
Date of Inspection:	**17/04/2018**
Engineer:	**Michael Ging**

Test No.1

Average Levels:	0.117 V/M
Location:	Gate

Test No. 2:

Average Levels:	0.832 V/M
Location:	Tower 1

Test No. 3:

Average Levels:	0.673 V/M
Location:	Tower 2

Signed on behalf of GRA Networks

Michael Ging

Signature: _____ **Position:** PICW Rigger

Print Name: Michael Ging

17/04/18

RF Emissions Reading No.1 Photograph - Gate

RF Emissions Reading No.2 Photograph – Tower 1

RF Emissions Reading No.2 Photograph – Tower 2

13. RF Emissions Test

- Test Certificate c/w ESBT as-built mark up of test location
- Photographs

RF Emissions Cert

GRA Networks

RF Emission Test

Site: Nangor Rd

Structure Type: 24m Monopole

Date of Inspection: 17/12/19

Engineer: Gary Monaghan

Test No.1

Average Levels: 0.297 V/M

Location: Main Site Entrance

Test No. 2:

Average Levels: 0.871 V/M

Location: Compound

Signed on behalf of GRA Networks

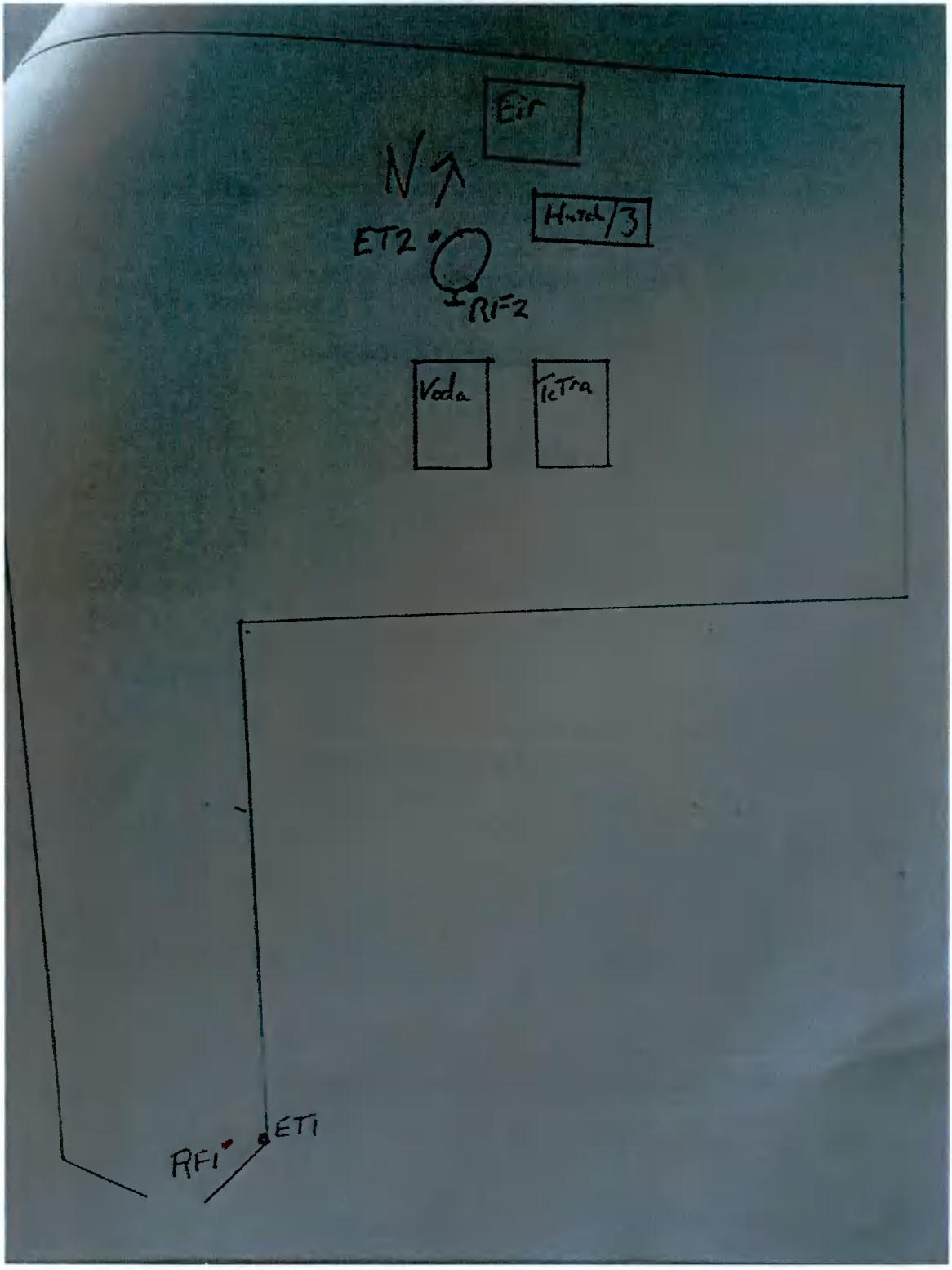
Signature: Gary Monaghan Position: PICW Rigger

Print Name: Gary Monaghan

Energy for generations

ESBT Maintenance Report

Site Layout Mark Up 17/12/14



ESB Telecoms

Obelisk

RF Emission Test

Site Name: ESB-345 ~ Nangor Road 38kV No2 Nangor Road 38kV No2

Test Date and Time: 08/03/2021, 19:31:59

Tested By: Austin Smith

Test No. 1		**Location**	**Main Site Entrance**
Average Levels	**1.5**	**µW/cm2**	
Test No. 2		**Location**	**Compound**
Average Levels	**0.2**	**µW/cm2**	

Sketch:

10. RF Emissions Test

- Photographs
- Test Certificate c/w ESBT as-built mark up of test location

RF Emissions Cert & Site Layout Mark Up

RF Emissions Reading No.1 Photograph

RF Emissions Reading No.2 Photograph

APPENDIX 2

Letter of Support and Technical Justification for the Proposal

TETRA Ireland Communications Ltd,
Block 43a, 2nd floor, Yeats Way,
Parkwest Business Park, Dublin 12.
Email:info@tetraireland.ie www.tetraireland.ie

ESB Telecommunications Limited,
43 Merrion Square,
Dublin 2,
D02 R997,
Ireland

21st of January 2022

RE: Letter of support for planning application to retain an existing antenna support structure at Nangor Road, Clondalkin, Dublin 22.

To Whom It May Concern,

We, Tetra Ireland Communications Ltd., write to confirm our intention to retain telecommunications equipment on the existing ESB Telecommunications mast at Nangor Road, Clondalkin.

Tetra Ireland Communications Ltd. confirms that it intends to retain equipment on this structure. The equipment forms part of the Managed National Digital Radio Service (MNDRS) for the Emergency Services and is considered an important site in the overall Emergency Services network.

In order to reduce the proliferation of free standing antenna support structures, Tetra Ireland Communications Ltd. is committed to using existing structures for environmental and aesthetic reasons inline with relevant Government guidelines. In the event that this installation is refused permission this equipment will need to be provided for elsewhere.

We trust that the Planning Authority takes the above into consideration when making its decision.

Yours Sincerely,

Tom Barry

Tom Barry

Asset & Infrastructure Manager, Tetra Ireland

Technical Justification for ESB Nangor Road (ES264)

Section 1

Tetra Ireland provides the National Digital Radio Service, providing nationwide radio coverage for the Emergency Services including the Gardai, Fire Brigade and Ambulance services. A network has been built that provides comprehensive radio coverage throughout Ireland to the very high standard that the Emergency Service personnel need.

The network uses Tetra technology which is being widely used across Europe and other parts of the world. Its major features and advantages are:

- ❑ Better coverage, including previously hard to reach areas
- ❑ Encryption, enabling secure communications which cannot be easily scanned or monitored by criminals etc
- ❑ Digital voice quality, with background noise filtered out
- ❑ Much faster call connection
- ❑ Multi-media terminals capable of offering simultaneous digital radio, voice and data services
- ❑ Real-time access to officers in the field to local and national databases of information
- ❑ More effective use of control room resources when dealing with complex incidents
- ❑ Automatic person and vehicle location capacity
- ❑ Simple, one-touch help button to summon immediate assistance
- ❑ Communication between the different Emergency Services on one network which at present is not possible

Overview of National Radio Requirements

The coverage specification tendered by the Emergency Services for the National Digital Radio Service requires a very high level of coverage nationwide for the Emergency Services personnel. The key features of this requirement are:

1. Outdoor coverage for hand-portable users across the country including the islands.
2. In-building coverage for hand-portable users in 2000 public buildings nationally.
3. Coverage for vehicle installed radio units in Emergency Services vehicles across the country including the islands.
4. Very high overlapping of coverage for vehicle installed radio units so that the failure of any individual site will be compensated by a neighbouring site to still allow coverage to the Emergency Service personnel in vehicles. This is a major difference to the commercial mobile telephony networks which do not have or require this facility.

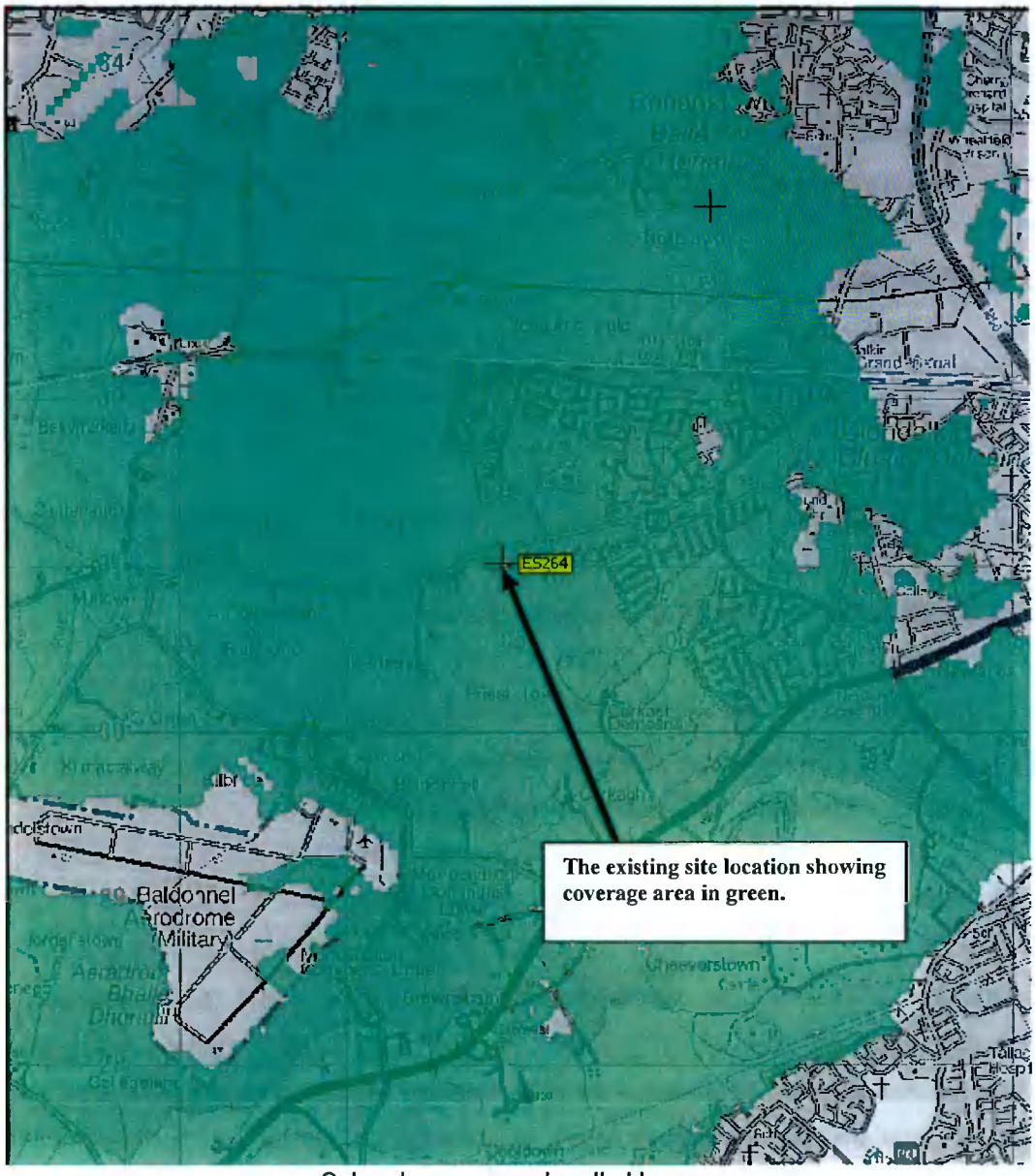
<u>Section 2</u>

Specific Area Requirements

In general, the Emergency Services users of the network expect service, i.e. coverage, to hand-portable terminals outdoors over the vast majority of the country, including inland waterways and offshore to a distance of 20 km out to sea. All cities and towns must be covered and even most villages and hamlets as well as a very high percentage of the countryside. In addition, there is a requirement for coverage inside 2000 public buildings across the country. This makes the location of sites critical as in-building coverage is often only available within 2 km of the serving site. Finally, the Emergency Services require a very high level of overlapping coverage for vehicle installed radio units for resilience purposes so that if one site fails an adjoining site can still provide sufficient coverage. This is unlike any commercial mobile phone network.

Section 3

1) Coverage provided by the Site on its own



Colour key: green = handheld coverage

All plots shown within this section use the OSi Discovery 1:250,000 raster maps as 'wallpaper' (used with permission from OSi). The OSi 20km grid lines are shown in black.

The site at **ESB Nangor Road** (ES264) is required to provide the following specific coverage as required by the specification issued by local emergency services:

- In-building coverage to buildings mandated by the emergency services
- Wide area coverage for this part of west Dublin
- Specific coverage targets include hand held portable coverage to buildings in the town of Clondalkin , and a section of the new outer ring road
- Vehicle Installed radio units coverage to the same areas as above and its surroundings
- Overlapping coverage for vehicle installed radio users for resilience should a neighbouring site fail.

Specific advantages of this site are:

- Security – protection from unauthorised physical interference, manipulation, eavesdropping, interception, monitoring and jamming
- Resilience – connection to Emergency Control Centres via resilient eircom transmission network
- Repair - 24/7 site access for the rapid repair of the site in case of failure
- Direct connection to high speed network for quality & speed of information
  - Direct connection to control-room facilities
  - Immediate access to on-site emergency personnel
- Secure and fully redundant mains and back up power supply

Alternative sites in the area have been considered but they do not meet the, security, resilience, 24/7 access, direct connection to the eircom high speed network or have a fully secure power supply required to the level required. No other site considered meets the coverage requirements of the Emergency Services without adding at least one extra site for specific site coverage and for overlapping coverage should a neighbouring site fail in the event of an emergency or natural disaster. Since the cost of the network is paid for by the users in their monthly fees, i.e. from public funds, the network has been designed to use the minimum realistic number of sites. It is not economic to replace individual sites with two alternatives except in very special cases where public safety may be a high risk.

ES264 Site Location

A specific search area cannot easily be defined, as it can for a commercial mobile phone network, because the coverage from this site must serve specific public buildings, roads and populated areas while contributing to the nationwide composite coverage plan. The location is critical as in-building coverage is often only available within 2 km of the serving site. Furthermore, the Emergency Services have a requirement for overlapping coverage so if that if one site fails another site or other surrounding sites will still provide adequate coverage. This does not exist in commercial mobile phone networks.

The network designers have endeavoured to co-locate on existing telecommunications structures wherever possible and only build new free standing support poles if no existing suitable structure is available to us. The reasons are to balance the environmental needs of the area with the technical needs of the Emergency Services so that their network have sufficient , security, resilience, 24/7 access, preferably direct connection to the eircom high speed network and a fully secure power supply.

Section 4

Details of the Proposed Emergency Services Installation

- The height of the existing ESB support structure is 25m and the Emergency Radio Aerials sit on top of this support structure.
- Equipment to be used: Three emergency radio aerials. Each emergency radio aerial is 3.9 metres high and the three aerials are spaced in a triangular arrangement; each being mounted 1.6 metres out from the support pole.

Section 5

Conclusion

This site is a critical network point of the National Digital Radio Network for the Emergency Services. The Emergency Services include the Gardai, Fire Brigade and Ambulance Services. The site at ESB Nangor Road meets the specific coverage requirements of the local emergency services which are to provide in-building coverage to buildings mandated by the emergency services in this area of Dublin, as well as hand held coverage for all roads and the wider area. It also provides hand portable coverage to these areas for

emergency personnel on foot plus overlapping coverage to vehicle installed units for resilience purposes should a neighbouring site fail. These are fundamental differences with a commercial mobile phone site.
Unlike any possible third party sites in this area, the particular site meets all the emergency service requirements in addition to just coverage in terms of security - protection from unauthorised physical interference, manipulation, eavesdropping, interception, monitoring and jamming, resilience – connection to Emergency Control Centres via resilient eircom transmission network, repair - 24/7 site access for the rapid repair of the site in case of failure, direct connection to high speed network for quality and speed of information to control-room facilities and for immediate access to on-site emergency personnel, and for secure and fully redundant mains and back up power supply.

This site is a crucial part of the digital radio network for the Emergency Services whose function is to provide a modern communications service for today's needs of the public in the event of a natural disaster or emergency situation. Given the critically important nature of the development in this planning application, we hope that the Planning Authority will accept and look favourably upon this technical justification.