JANUARY 2022 | RM | P20-3065

PLANNING APPLICATION FOR THE ERECTION OF TELECOMMUNICATIONS EQUIPMENT AT ROOF TOP LEVEL

PLANNING STATEMENT

ROSSECOURT RESOURCE CENTRE, ROSSE COURT AVENUE, BALGADDY, LUCAN, CO. DUBLIN, K78 R9C9

ON BEHALF OF SHARED ACCESS LIMITED

PLANNING AND DEVELOPMENT ACT 2000 (AS AMENDED)
PLANNING AND DEVELOPMENT REGULATIONS 2001 (AS AMENDED)

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1. INTRODUCTION

1.1 This Planning Statement supports an application for full planning permission and has been prepared by Pegasus Group on behalf of Shared Access Limited (the applicant). The application relates to the rooftop area of Rossecourt Resource Centre, Rosse Court Avenue, Balgaddy, Lucan. The Site Location Plan is provided at Appendix 1.

APPENDIX 1 – SITE LOCATION PLAN

1.2 The description of development listed on the application form, newspaper advert and site notice is:

> *"Installation of 6no. telecommunications antenna together with supporting structures, RRUs, equipment cabinet and all associated development thereto at roof top level to provide mobile electronic communications services."*

1.3 This document describes the application site, the detailed parameters of the proposal, the planning history for telecommunications development in the area and clarifies the process that has led to the development proposal. The responsibilities and ownerships of applicant, the mobile network operator (MNO) and the site provider will also be made clear. This statement provides the necessary background and justification for the technical requirement for an installation at the application site, in the context of planning policy and other relevant material considerations.

1.4 This site forms a key part of the ambitions of Vodafone to provide integrated telecommunications coverage and an improved digital communications network to enable 4G and 5G across the parts of the country that have poor mobile and wireless internet coverage. Vodafone have provided a letter of support for the improvement to coverage. There is significant pressure across Ireland for improved telecommunications generated by consistent increases in the uptake of mobile devices, data usage across the network and demand for the latest communication technologies such as 5G. This demand requires network providers to upgrade and increase the number of base stations across the country not only to provide efficient coverage and meet customer and businesses expectations, but also meet the

licencing commitments within which the network is operating set out by the Commission for Communications Regulation (ComReg)[1].

1.5 Existing radio coverage across the Vodafone network to the area surrounding the application site is provided by existing installations situated intermittently throughout the wider surrounding area. As set down within the Planning Assessment section of this document, the absence of other sites operated by any of Vodafone the vicinity of the application site means that existing coverage surrounding the application site is poor. This application is driven by the network operator's continued requirement to improve this coverage and respond to increasing demands on their communication network that have resulted from the largescale uptake of smart phone usage.

1.6 In order to establish that the chosen location meets the requirements of planning policy, notably those in the South Dublin County Council Development Plan (2016-2022) and Government published Telecommunications Guidance, a number of factors have been taken into account. These include the technical requirements for the installation, a search for alternative locations, the recent relevant planning history for the site relating to telecommunications development for eir and Three Ireland, the specific location of the installation atop a building already characterised by telecommunications equipment and the visual impact on the local area resulting from the proposal. These factors combined meet the various legislative and policy requirements and demonstrate the need and suitability of the chosen site.

[1] https://www.comreg.ie/_fileupload/MLU1005.pdf

2. APPLICATION BACKGROUND

Mobile Connectivity in the 21st Century

2.1 Mobile phones and other similar communication devices have become ubiquitous both for business and personal use. As wireless technologies have advanced, mobile connectivity has become about more than phone calls and text messaging, it involves mobile broadband and data transfer, providing services and connecting users and businesses across all parts of daily life. In 2018 some 4.5 million people in Ireland were using the 3G and 4G mobile network and data usages have increased by over to 500% since 2011[2].

2.2 It has been widely accepted that the development of mobile networks across Ireland has been inconsistent, with communities across the country excluded from modern telecommunications and the basic and complex services that they provide. This is particularly relevant to areas of commerce and business within urban areas and areas which are zoned for future growth.

2.3 Recognising the vital role of the digital sector to the economy, the Government committed to establishing a Mobile Phone and Broadband Taskforce (the 'Taskforce') in 2016. The role of the Taskforce was to identify tangible actions to address broadband/mobile phone coverage deficits and to improve the quality of broadband and mobile voice services being provided to citizens across Ireland. Numerous aspects of the Taskforce's recommendations are now coming into effect. For example, in February 2019 ComReg launched its National Outdoor Coverage Map for mobile coverage which provides an effective tool for identifying areas deficient in coverage.

2.4 The Taskforce's report sets out that over the period from 2011 to 2016 the telecoms industry has invested €3.3 billion in Ireland. They set out that this is roughly equivalent to Ireland's annual public capital programme. As a result, 1.4 million homes and businesses in Ireland can now access high-speed broadband of at least 30mbps and 4G data services are available to more than 90% of the population[3].

2.5 However, increasing consumer demand, especially for data is putting demands on mobile operators for improved connectivity and more capacity on their networks.

[2] https://www.dccae.gov.ie/en-ie/communications/publications/Documents/58/1.%20FINAL%20Assessment%20of%20Macro%20Impacts%20of%20Internet-Digital%20-%20Indecon%20Report%20-%20March%202016.pdf
[3] https://www.dccae.gov.ie/documents/Taskforce%20Report.pdf

This is driven by the widespread adoption of 4G and 5G enabled smartphones and the rapid uptake of tablet devices, and the way consumers are now using them, often choosing to do so even when they have a fixed connection available. The Government has ambitious aspirations for improving connectivity and coverage as demonstrated through the various national, regional and local policy mechanisms. All these factors result in the need to upgrade and improve mobile networks, which will not function without the necessary infrastructure on which they rely.

Shared Access Limited

2.6 Shared Access Limited are an independent owner and operator of wireless communications infrastructure. The company develops and builds conventional telecommunications installations and is a leading investor for '*In Building and Distributed Antenna Systems'*. They are at the cutting edge of telecommunications technology and roll-out across Ireland. Once developed, Shared Access manage the site ensuring maintenance, health and safety and site access are kept to the highest standards and within agreements with the site provider/landlord whilst facilitating the deployment of telecommunications equipment for all major network operators.

2.7 Alongside this they have created an attractive financial model to better enable telecommunications networks to be financed and deployed. They partner with local landowners to deploy state-of-the-art telecommunication installations. This results in improved broadband and mobile coverage, provided on site through a lease agreement with the site provider, and investment in the local community.

2.8 In order to maintain and improve the existing network coverage across the immediate area, the site subject of this application has been chosen since it falls within the cell search area defined by Vodafone Radio Planners and has been appraised by the applicant as acceptable in town planning terms. In addition, the site represents an existing telecommunications facility so the proposal will effectively result in a site sharing arrangement which is in line with National Guidance relating to telecommunications development which is set down within the policy section of this statement.

The Mobile Network Operators

2.9 Vodafone are one of the Republic of Ireland's largest mobile network operators. In this instance the operator intendeds to utilise the rooftop installation to provide a

significant uplift in their coverage networks within the vicinity of the site. The proposal will nonetheless result in a site sharing arrangement where Three and eir provide service from the site. Site sharing is supported in policy terms and is also the preferred means of deploying communications networks according to Government telecommunications network rollout guidance. By proposing to upgrade an existing telecommunications installation, the applicant is reducing the pressure for a new site to be progressed somewhere else in the immediate surrounds.

3. THE APPLICATION SITE AND WIDER CONTEXT

3.1 Centred at ITM reference X:305340 Y:233518, the application site comprises the rooftop area of Rossecourt Resource Centre at Rosse Court Avenue, Balgaddy. The subject building comprises a 3-4 storey mixed use building with a flat roof measuring 12.4m to parapet level. A plant room is situated in the centre of the roof measuring 14.9m. The building itself is of a relatively modern design being partially finished with brick and render cladding.

3.2 Rossecourt Resource Centre provides day services for people with intellectual disabilities. The building fronts onto a square with playground facilities whilst car parking is provided along the western and southern permitter of the building. The wider surrounds is characterised by the Rossecourt development, itself comprised of predominantly residential dwellings around a central open space surrounded by some retail and community uses.

3.3 The Rosewood residential estate, comprising two-storey houses is located to the west of the site and the Rosscourt residential development is located to the east/northeast. Lucan Community national School is located to the south and Stewarts School for children with special needs is situated to the northwest.

Existing Telecommunications Equipment

3.4 Recent and relevant planning history for the site shows full planning permission was granted in June 2020 to the deployment of telecommunications equipment atop the same rooftop area as the current application site on behalf of eir (LPA ref. SC20A/0056) and in April 2021 for the deployment of telecommunications equipment on behalf of Three Ireland (SD21A/0041). Following the issuing of the Final Grant, these permissions has now been implemented and the equipment approved fully installed and operational. Consequently, the rooftop is characterised by numerous pieces of telecommunications equipment which characterise the rooftop. The planning drawings accompanying the current application reflect the recently deployed equipment on site.

APPENDIX 2 – DECISION NOTICE SD20A/0056

APPENDIX 3 – DECISION NOTICE SD21A/0041

3.5 Accordingly, the rooftop area of Rossecourt Resource Centre is considered to be an existing telecommunications installation where the current proposal seeks to add

to the existing installation in a site sharing arrangement rather than propose telecommunications development on a separate greenfield site where this is not necessary. As set down within this statement, this approach aligns with Government Guidance relating to telecommunications site sharing arrangements.

3.6 The applicant notes the contents of the Case Officer's Report relating to application SD20A/0056 that states it is not considered that the telecommunications development proposed is likely to have a negative effect on a Natura site and that therefore no Stage 2 Appropriate Assessment was required. Similarly, the proposal was found to not be of a class for which a mandatory Environmental Impact Assessment Report was required and that, having regard to the distance of the site from nearby sensitive receptors, the need for environmental impact assessment was excluded at preliminary examination and a screening determination was not required. The same conclusions were reached in considering application reference SD21A/0041. The magnitude of change proposed to result from the current proposal is not considered to be significant enough such that the cumulative impacts of the three installations may trigger the requirement for an Appropriate Assessment or EIA.

3.7 Given the current application is extremely similar in terms of nature and scale, the applicant has no reasons to see why a different conclusion in respect of AA and EIA would not be reached in this instance.

Designations and Constraints

3.8 Rossecourt Resource Centre is subject to zoning objective 'RES' with the objective to *'protect and/or improve residential amenity'* in the South Dublin County Development Plan 2006-2022.

3.9 There are no heritage, cultural or landscape constraints that affect the site.

3.10 There are no protected views or prospects in this location. The proposal has been carefully designed so that it assimilates with the existing equipment situated atop the roof of the Rossecourt Resource Centre.

3.11 The nearest residential properties are situated on Rossecourt Way, approximately 60m to the northeast, these being flats above retail units which are not directly orientated toward the proposal site. The rear elevations of residential dwellings 90m to the west to the site on Rosewood Grove are orientated toward the site.

However a mature hedgerow demarcates the rear boundaries of these properties which provides partial or full screening of views of the proposal site.

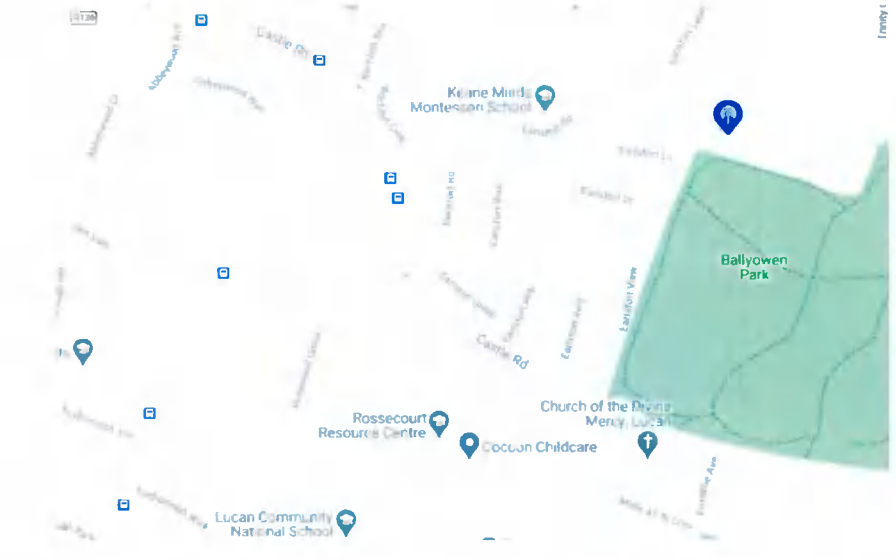
Other Planning History

3.12 Application reference ED20/0001 sought confirmation through a Section 5 submission, that the installation of telecommunications equipment was Exempted Development. The Council responded declaring in February 2020 that the equipment proposed did not benefit from Exempt Development Rights. Accordingly, application reference SD20A/0056 was submitted in order to gain planning permission for the equipment proposed.

Surrounding Telecommunications

3.13 It is acknowledged by the applicant that there is a policy preference for site sharing opportunities between operators to be identified where possible. Notwithstanding that the application site is an existing telecommunications facility, the applicant has undertaken an identification exercise to establish where existing telecommunications sites are situated in the surrounds.

3.14 A review of ComReg's Site Viewer tool[4] identifies there are no existing sites within 500m (beyond the application site itself). The below map extract shows the nearest existing site, this being an existing mast situated at Trinity Court 600m to the north east of the site providing 2G and 3G coverage.



Map 1 showing surrounding existing telecommunications mast

[4] https://siteviewer.comreg.ie/

3.15 There are numerous other masts within 2km of the site. Given the proposal site is situated in an urban area where demand for telecommunications network coverage is high, it is unsurprising that there are several existing sites in the wider surrounds. Generally, frequency of masts in urban areas is higher where masts are required to be positioned closer together than in rural areas where demand means masts must be closer together to deliver an effective mobile network. This is reflected in the distribution of surrounding masts shown in the below map extract:

Map 2 showing telecommunication installations in the wider surrounds

3.16 The application site has been assessed by Vodafone radio planners as technically capable of providing the uplift in coverage required across the target area. Each of the existing sites identified in maps 1 and 2 are assessed as too far from the target area to have any realistic prospect of providing the uplift in coverage required. In practical terms this left the applicant with two broad options:

i. The upgrade of an existing telecommunications installation atop a roof which has previously been assessed by South Dublin City Council Planning Officers as capable of accommodating telecommunications equipment without compromising surrounding visual amenity; or

ii. Progressing a new greenfield site elsewhere in the surrounds.

3.17 Give the clear policy preference for scenario i. the applicant duly submits a planning application for the installation of equipment at Rossecourt Resource Centre.

4. THE PROPOSAL

4.1 This section sets out an explanation of the parameters of the proposal. As detailed within the introduction of this statement, the development proposal has materialised due to the technical requirement on behalf of the mobile network operator (Vodafone) to improve existing network coverage through the provision of 4G and 5G coverage to the area surrounding the Rosewood residential estate and South Dublin area more generally including residents and business within sough east Lucan, along Rosse Court, Castle Road, Balgaddy Road, Foxborough Road, the L1015 Road and part of the R136 Road at the south east of Lucan.

4.2 The proposal is led by, but not limited to Vodafone's requirement for indoor coverage within the surrounding area. The proposed development at Rossecourt Resource Centre will significantly improve the wireless broadband indoor data coverage for this part of the South Dublin area. Accordingly, Vodafone have identified the need to provide an uplift in both the quality and capacity of coverage to the area where neither operator has any existing installations capable of serving the area. This is an important consideration since the proposal will deliver an important infrastructure provision that will enable the business park to have access to modern, reliable digital connectivity and access.

4.3 The application will result in a site sharing agreement where all three major network operators will be represented on the site (Three, eir and Vodafone) without the need for additional, greenfield new mast installations in the surrounds. This is a unique benefit of proposing development at Rossecourt Centre which would not be realised if the proposed were situated elsewhere.

Summary

4.4 The application proposal is to install 6no. panel antennas to be mounted on supporting poles fixed to stanchions together with RRUs, cabling and cable trays and 1no. cabinet which will be installed on a new rooftop steel grillage platform.

4.5 For the avoidance of doubt, it is confirmed that there will be no change to the existing telecommunications equipment situated atop the roof as previously approved under application refs. SD20A/0056 and SD21A/0041.

4.6 The development of the telecommunications equipment at either construction or operations phase will not prejudice the day to day function of Rossecourt Resource

Centre by virtue of the equipment's remote location atop the roof which is only accessible to staff of the building or those licenced by the mobile network operators to safely maintain and operate the communications equipment.

Telecommunication Proposal

4.7 Each of the 3no. steel support poles will be fixed directly to the flat roof of the subject building. The support poles are in three separate locations across the rooftop to allow for the antennas to be specifically orientated to where the coverage is required. The 'sectors' combine to provide 360 degree coverage from the site.

4.8 6no. panel antennas are proposed across the 3no. support poles where 2no. panel antennas will be arranged in series (one atop the other). The maximum height of the antennas is 15.5m above ground level, this being no taller than any of the existing telecommunications equipment installed at the site. The equipment will sit just over 3m above the parapet level of the roof.

4.9 One cabinet is proposed which will be installed atop a new steel grillage which is required in order to provide the structural rigidity to allow for the cabinet to be safely deployed. The cabinet is relatively modest in size measuring 2050mm (height) x 880mm (depth) x 780mm width (1.4m^2). Given the cabinet will be set back from the edge of the roof, it will not be visible from ground level.

4.10 It is proposed that the telecommunications stanchions and cabinet equipment is coloured in a galvanised finish which will assimilate with the typical sky colour in Ireland and blend in with the existing rooftop equipment thereby assisting in the ability of the proposed development to assimilate with the existing rooftop appearance and not be seen as an alien addition. The antennas themselves will be finished in an off-white colour, typical of telecommunication installations.

4.11 The proposed height to the top of the installation is 15.5m. The required height is defined by nearby trees, surrounding topography, existing buildings and urban clutter as well as the size of the area which the telecommunications proposal is designed to serve; sometimes referred to as the cell or target area. In general terms, the higher height at which the panel antennas are situated, the wider the geographic area an installation can cover. A smaller installation such as panels fixed directly to the sides of the existing building, would not provide as effective or efficient coverage because these barriers would prevent the radio signal from

propagating in an efficient manner, thereby significantly reducing the area of coverage.

4.12 The cabinet and associated equipment will produce a negligible amount of noise that will not be heard at any nearby sensitive receptor, given its siting at a distance from and typical pedestrian movements. The equipment would not be audible from inside the building itself.

4.13 The applicant has produced Computer Generated Images to show how the development will look from three separate angles. These are provided at Appendix 4.

APPENDIX 4 – COMPUTER GENERATED IMAGES

4.14 The equipment would be delivered to the site in a single HGV movement with the cabinets likely arriving separately on a second movement. Depending on weather conditions, the build period will be approximately 4-6 weeks.

4.15 The proposal will not affect any existing services to the surrounding area. Given the 2G, 3G, 4G and 5G telecommunications network operates at a different frequency than television and radio signals, the installation will not adversely affect these services.

4.16 The proposal will meet the International Commission guidelines for public exposure. Circular Letter PL/07 (October 2012) states that planning authorities should primarily be concerned with the appropriate location and design and do not have competence for health matters which are subject other legislation. Nevertheless, the attached letter from Vodafone demonstrates that the proposal meets International Commission guidelines for public exposure in accordance with this legislation.

APPENDIX 5 – ICNIRP COMPLIANCE STATEMENT

4.17 It is proposed to locate the installation at rooftop level where the backdrop to the development is already formed by existing telecommunications equipment and various other pieces of rooftop paraphernalia such as the plant room. The installation would therefore be hardly noticeable from views at ground level due to the height of the building itself and the existing equipment at roof level.

Technical Justification

4.18 A mobile phone transmitter is designed to cover a specific area and links its coverage to the next site in the network, creating a patchwork of overlapping coverage 'cells' across the country. So, if a person using a handset is on the move, the network will transfer their calls or data usage from one site to the next. However, in certain areas there will be gaps between these cells, resulting in a loss of coverage (sometimes referred to as network 'not spots'). This can be for a variety of reasons, the most common being topography or buildings which block the path of the signal. The operators' network rollout programme is designed to identify and address these gaps within their coverage and ensure that people can use their phones whenever and wherever they are.

4.19 There is a specific requirement for a new installation and associated equipment cabinets at this location to allow Vodafone to improve their 2G, 3G, 4G and 5G network coverage and capacity in and around the Rosewood Estate/Lucan area. The technology proposed will ensure high quality indoor service provision is provided. Vodafone radio planners have provided a Technical Justification document which is provided at Appendix 6.

APPENDIX 6 – VODAFONE TECHNICAL JUSTIFICATION

4.20 The dynamic nature of technological advances in the telecommunications industry coupled with ever increasing demand from subscribers dictates a continual reinvestment programme on the part of the operators. As a result, and in line with their licence requirements, mobile operators are constantly developing their networks as well as refining and modernising their infrastructure. Mobile connectivity and service is required where customers live, work and play and also the infrastructure used to move around. 4G and 5G coverage and superfast mobile broadband data capacity demand will continue to increase exponentially with the introduction of IoT (Internet of Things), machine to machine connectivity, automated transport/industry and other 'smart' applications. To this end the existing shared infrastructure within the built environment has had to be reviewed and adapted as appropriate.

4.21 An installation located outside of this search area would not allow the operator to provide their desired level of new 5G and 4G coverage or 2G or 3G service provision and therefore would not adequately fill the current coverage gap. Continuous

coverage is also required in order to ensure that calls are not 'dropped' within the operators target coverage area.

4.22 It is extremely important to remember that due to the physics of radio frequency, each base station can only provide service to a limited geographic area and this is reduced further by topography and population density, amongst other things such as 'clutter' which is a technical term referring to near or distant line of sight obstruction or 'clutter' between the base station and the areas it is trying to provide service to. This 'clutter' can take the form of high trees or buildings in the wider area which obstruct the signal and severely disrupt the service or make a base station redundant entirely.

4.23 Base stations are required where the service is required, where there is a population who demand service provision, placing an installation a distance away from a population means the installation cannot provide the service to where it is needed.

5. PLANNING POLICY

5.1 In this section, national, regional and local planning policy guidance pertinent to the application site and development proposal are identified.

5.2 The relevant national policy guidance includes;

- National Planning Framework – Project Ireland 2040 (2018);
- Department of the Environments Guidelines for Telecommunications Antennae Support Structures (July 1996); and
- Circular Letter: PL 07/12 – Telecommunications Antennae and Support Structures Guidelines (October 2012).

5.3 Relevant regional and local policy guidance includes the following;

- South Dublin County Development Plan (2016-2022); and
- Regional Planning Guidelines for the Greater Dublin Area (2010-2022).

National Policy

National Planning Framework: Ireland 2040 Our Plan

5.4 The National Planning Framework for Ireland was published in February 2018 and is a high-level plan for growth and development across the country. The Framework is supported by a companion document, the National Development Plan, a ten-year strategy for public capital investment.

5.5 The Framework identifies 10no. National Strategic Outcomes. Digital connectivity cuts across a number of these objectives and it is clear that connectivity is considered integral to the delivery of these ambitions which includes:

- Strengthened Rural Economies and Communities – *'In addition to the natural resource and food sector potential as traditional pillars of the rural economy, improved connectivity, broadband and rural economic development opportunities are emerging…'*
- A Strong Economy, supported by Enterprise, Innovation and Skills – *'Delivering this outcome will require the coordination of growth and place*

making with investment in world class infrastructure, including digital connectivity…'

5.6 These ambitions are realised through the relevant national policy objectives. **National Policy Objective 24** addressing strengthened rural economies considers that 'Connectivity in the 21st Century is of fundamental significance as the digital revolution continues to influence how our society and economy function. The provision of high speed digital infrastructure is critical to realising potential employment opportunities and facilitating innovation.'

5.7 Regarding digital and data innovation in the information age, the Framework states that telecommunications networks play a crucial role in enabling social and economic activity. **National Policy Objective 48** looks to all relevant Government Departments to develop a stable, innovative and secure digital communications and services infrastructure on an all-island basis.

5.8 the proposal would provide an essential form of telecommunication infrastructure consistent with **National Policy Objective 49** of the National Planning Framework which seeks to develop a stable, innovative and secure digital communications and services infrastructure on an all-island basis.

Department of the Environment and Local Government Guidelines for Telecommunications Antennae Support Structures (1996)

5.9 These statutory Guidelines aim to provide relevant technical information on telecommunications installations and to offer general guidance on planning considerations so that the environmental impact is minimised and to help ensure a consistent approach is adopted by the various planning authorities. The Guidelines are also intended to be of assistance to operators and to the general public in understanding how the process works.

5.10 The proposal would be in accordance with Section 1.2 of the Telecommunications Antennae and Support Structures Guidelines (1996) whereby it is the Government's telecommunication policy to place Ireland in the top quartile of OECD economies as regards the availability and quality of telecommunication services in order to promote industrial and commercial development, to improve personal and household security and to enhance social exchange and mobility.

5.11 It is acknowledged by the Government through the publication of updates in 2012 that the guidelines are dated. Nevertheless, they have not been superseded and

still provided key guidance and observe a number of important factors with regard to telecommunications development that is still relevant:

- Design and Siting - The design of the antennae support structure and to a great extent of the antennae and other "dishes" will be dictated by radio and engineering parameters. There may be only limited scope in requesting changes in design.

- Visual Impact - The visual impact is among the more important considerations which have to be taken into account in arriving at a decision on a particular application. In most cases the applicant will only have limited flexibility as regards location, given the constraints arising from radio planning parameters.

- Sharing Facilities and Clustering - Sharing of installations (antennae support structures) will normally reduce the visual impact on the landscape. The potential for concluding sharing agreements is greatest in the case of new structures when foreseeable technical requirements can be included at the design stage. All applicants will be encouraged to share and will have to satisfy the authority that they have made a reasonable effort to share.

5.12 In addition, the guidelines acknowledge that the size of a cell area can vary from 0.5km to 70km depending on the type and scope of equipment to be installed (Section 2.2). The guidelines state that factors such as the nature of terrain, extent of urban clutter and numbers of potential or actual users of any given system will influence cell size.

5.13 Section 4.5 relates to sharing facilities and clustering stating that all applicants will be encouraged to share and will have to satisfy the authority that they have made a reasonable effort to share.

<u>Circular Letter: PL 07/12 – Telecommunications Antennae and Support Structures Guidelines</u>

5.14 The DHPCLG (formerly the Department of the Environment, Community and Local Government) issued a Circular Letter (PL 07/12) in October 2012 to local authorities updating certain sections of the Telecommunications Antennae and Support Structures Guidelines (1996). Key issues clarified and updated included:-

- Planning authorities should not attach conditions limiting any permissions to a temporary period;
- Use of bonds or cash deposits in order to control the removal of installations should cease and should be controlled by way of condition; and
- Planning authorities should primarily be concerned with the appropriate location and design and do not have competence for health matters which are subject other legislation.

Local Policy

South Dublin County Development Plan (2016-2022)

5.15 Section 7.4.0 of the South Dublin County Development Plan relates to information and communications technology where it is the states 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.

5.16 Various objectives are provided as follows:

- 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.
- IE 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.
- IE Objective 4 - To discourage a proliferation of telecommunication masts in the County and promote and facilitate the sharing of facilities.
- IE Objective 5 - To discourage a proliferation of telecommunication masts in the County and promote and facilitate the sharing of facilities.

- IE 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.

5.17 Section 11.6.2 relates to information and communications technology states that in 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.

<u>Regional Planning Guidelines for the Greater Dublin Area (2010-2022)</u>

5.18 Advanced telecommunications services are critical for the attraction of foreign investment, for the development of indigenous industry and the promotion of the knowledge economy. The increasing importance of services to the economy, in particular those that are structured around electronic transactions and information flows, makes it essential that the region has access to advanced and cost

competitive communications services. Better use of ICT has been identifies as one of the key factors required to improve Ireland's productivity performance. Broadband can enable higher productivity growth by allowing firms to cast their net wider when looking or suppliers or seeking new market opportunities to increase their customer base.

5.19 Section 6.6 of the Regional Planning Guidelines states that the provision of advanced telecommunication networks and services, including Next Generation Networks, is critical to ensuring that the GDA places itself in the right position to capitalise on emerging markets, business opportunities and to attract skilled workers.

5.20 Section 6.6.3 relates to telecommunications stating that broadband infrastructure development remains an area which requires continuing ongoing investment. Broadband, and in particular next generation connectivity, are integral to further developing the competitiveness of the Irish economy.

6. PLANNING ASSESSMENT

6.1 Reflecting on the relevant policy context set out in the previous section, matters for consideration relate to:

- Demonstration of the need for telecommunications equipment in the proposed location;
- Zoning and Council Policy;
- Whether the height and form of the telecommunication equipment would have a harmful impact on the visual amenities of the surrounding area; and
- The material benefits of the scheme.

Demonstration of the need for telecommunications equipment in the proposed location

6.2 This application is driven by the requirement of Vodafone to improve network coverage and capacity in the immediate geographic area surrounding the proposal site. Vodafone radio planners have identified a specific need to deliver next generation network coverage to the area surrounding the application site as explain in the justification document provided at Appendix 6 and the accompanying radio coverage plots which demonstrably show the uplift in coverage that would result from the proposal.

6.3 Radio coverage plots together with a justification for the proposal is included. It is not the purpose of this section of the Planning Statement to repeat the contents of the Vodafone but the conclusions are noted as follows:

- The Vodafone report provides a technical justification that demonstrates the need for an installation atop Rossecourt Resource Centre to provide indoor coverage to the area surrounding the site as well as high speed broadband;
- The proposed installation forms part of an established telecommunications network system that Vodafone operators in the area and has been carefully chosen to ensure performance levels are maintained.
- The site is considered the best possible solution to meet both the existing and future demands of Vodafone customers in the area. Failure to progress this installation in the proposed location will have a negative impact on the

Vodafone network by leaving customers without acceptable 3G, 4G or 5G coverage as shown in the radio coverage plots.

6.4 When taken in isolation or together, the coverage maps, along with the capacity improvements to 4G and 5G as explained through the technical justification, demonstrate a need for improved network coverage within the vicinity of the application site. The proposal is key part of Vodafone's overall plans for the County providing coverage to existing residential and business areas as well as part of the major transport network.

Zoning and Council Policy

6.5 The Case Officer's Report for approved application SD21A/0041 considers the implications of zoning policy in the context of telecommunications development within areas zoned to protect and/or improve residential amenity. Given there has been no change in South Dublin County Council policy since the April 2021 publication of this report and the current proposed development is for a telecommunications installation which is extremely similar to that approved under SD21A/0041, the applicant sees no reason why the following conclusion would not apply to the current development:

> Public Services are defined in Schedule 5 - Definitions of Use Classes in the Development Plan 2016 - 2022 as '*A building or part thereof or land used for the provision of public services. Public services include all service installations necessarily required by electricity, gas, telephone, radio, telecommunications, television, drainage and other statutory undertakers; it includes public lavatories, public telephone boxes, bus shelters, bring centres, green waste composting facilities.* It is considered that the subject telecommunications antenna, dish and associated equipment at roof level constitutes a public service use.
>
> The use class 'Public Services' is permitted in principle with the 'RES' zoning objective subject to its design being in accordance with the relevant provisions in the Development Plan and national policy and guidelines.

Assessment of Zoning

Whether the Height and Form of the Telecommunication Equipment would have a Harmful Impact on the Visual Amenities of the Surrounding Area

6.6 The proposed equipment has been carefully sited to assimilate with the existing telecommunications equipment situated atop the roof and result in a site sharing arrangement that has no more visual impact than the existing equipment. The computer generated images provided at Appendix 4 are taken at ground level from a variety different vantage points around the site. The CGIs show that the equipment will be situated in a discreet fashion and will not appear incongruous atop the roof.

6.7 Section 7.4.0 of the South Dublin County Development Plan states under IE4 Objective 3 that it is the objective of the County to permit telecommunications antenna and support infrastructure throughout the County subject to high quality design, the protection of sensitive landscapes and visual amenity.

6.8 The proposed telecommunications infrastructure elements are located on the rooftop of an existing 3-4 storey building which provides a number of day services for people with intellectual disability operated by Stewarts Care. It is proposed to locate the installation on the rooftop of the existing building at 3.15m above parapet height level, which would give an overall height of 15.5 metres where the equipment will be viewed against the existing context which is formed of telecommunications equipment of a similar nature and scale to that proposed.

6.9 By reason of its height, design and position, the proposed telecommunications infrastructure would not have a significant negative impact on the visual amenity of the existing structures on site or the surrounding area. Having regard to the location of the subject site and context of surrounding development, the proposed telecommunications development is considered acceptable with regard to the visual amenity of the area.

The material benefits of the scheme

6.10 The proposed development will deliver a multi-operator telecommunications installation capable to providing excellent levels of 2G, 3G, 4G and 5G service in a site sharing arrangement to an area of acute demand. Reflecting on the wider benefits of the proposal these can be broken down into each of the aspects of sustainable development as understood:

- **Economic Benefits** – modern communications in all of their different and emerging forms, including mobile communications, help maintain high and stable levels of economic growth and employment. The contribution to the national economy is also significant where all businesses, from large to small, benefit from modern communications. This proposal will improve the ability of local businesses and to operate and compete effectively and improve the quality of life for local residents through access to modern communications thereby helping to maintain and increase local employment opportunities.

- **Social Benefits** - modern communications, including mobile communications, aid social progress, which recognises the needs of everyone. Connecting to the Internet via a mobile device allows people to access a wide range of central and local government services. Mobile devices enable flexible forms of working that provide opportunities to working parents or carers and help them achieve a better work life balance with both family and community benefits. By providing means of communication that improve convenience and enhance personal safety and security. This is especially important to vulnerable groups who may otherwise feel unable to participate in certain activities.

- **Environmental Benefits -** modern communications, including mobile communications, provide effective protection of the environment by helping reduce the need to travel by enabling modern working practices such as greater home working. Such practices alleviate the pressure for new commercial development such as offices, through more efficient and flexible use of existing accommodation. For the same reasons, modern communications, including mobile communications, help ensure the prudent use of natural resources.

6.11 There is clear national and local level policy support for the improvement of the telecommunications network as detailed within the policy section of this statement. These policies, together with the material benefits described above, should weigh in favour of granting planning permission.

6.12 Turning specifically to the benefits of 5G, these include:

- Helps local businesses to offer a broader range of services, boosting the local economy;
- Supports local companies by facilitating working from home;
- Promotes economic growth by attracting investment from businesses, which creates jobs and regional prosperity in line with national and local economic strategies;
- Offers social benefits such as being able to connect with vulnerable family and friends or contact the emergency services 24/7;
- Enables councils to introduce smart refuse collection services which saves costs;
- Councils can introduce technologies such as smart lighting;
- Helps local councils to offer online services such as school admissions and local information for residents;
- Faster mobile broadband and a more consistent experience in congested areas with a very high number of devices;
- Industrial applications, enabling businesses to improve their productivity, for example through predictive maintenance and real-time analytics.
- Internet of Things (IoT) services, many of which will help the Council and businesses deliver greater economic efficiency including:
  - Transport and logistics: connected parcels and fleet tracking.
  - Health and social care.
  - Environmental monitoring.
  - Connected and autonomous cars: allowing cars to communicate with each other, other road users and even road infrastructure.

6.13 This planning statement, prepared during the time of COVID-19 pandemic, stresses both national and local benefits of the infrastructure allowing people to stay connected not only when they cannot go to work, school or socialise but also when

restrictions are being eased and partially reinstated. It talks about physical infrastructure that for the last eight months or so has made it possible for people to work from home, children to continue their education and everybody to stay in touch. In times of social isolation, connectivity, including mobile connectivity, has become more important than ever as it moved many aspects of everyday life online. As social contact was restricted, people turned to face-time calls using various applications on their mobile phones.

6.14 The Government has designated the telecommunications sector as one of the critical sectors in new government regulations and legislation in response to dealing with the COVID-19 outbreak. Despite severe restrictions in other sectors, work to repair and maintain the telecommunications network was allowed to continue at that time. All four operators work hard to provide additional network capacity to allow people uninterrupted connection for whatever reason and whenever they need it. This includes allowing local planning authorities and Planning Inspectorate to drive the planning process forward ensuring it continues to operate effectively to support economic recovery. Without upgrading the network, users would not be able to rely on a high quality communications network when they need it most.

6.15 It is commonly accepted that connecting to the Internet via a mobile device allows people to access a wide range of central and local government services, to do research for a school project or apply to university, to manage their bank account and pay bills, to apply for a job; or to buy groceries. Most local authorities' services are now available online, and many councils have recognised the growth of smartphone use and introduced mobile phone applications to provide instant access to services, or to allow residents to report litter, dumped rubbish, pot holes and road repairs, or anti-social behaviour. The health services also benefit from good mobile connectivity. The advantages of being able to summon the emergency services using a mobile phone is obvious, but simply sending text messages to patients means fewer missed appointments. Consequently it is clear that without a reliable mobile connectivity, the perception of living conditions and access to services in this area will not improve significantly.

7. CONCLUSIONS

7.1 This Planning Statement has explained the proposed development, detailed applicable national, regional and local planning policy and guidance and justified the proposal against these parameters. Relevant planning history relating to telecommunications development in the immediate surrounds has been identified, firmly establishing the character of the site as in use for telecommunications development.

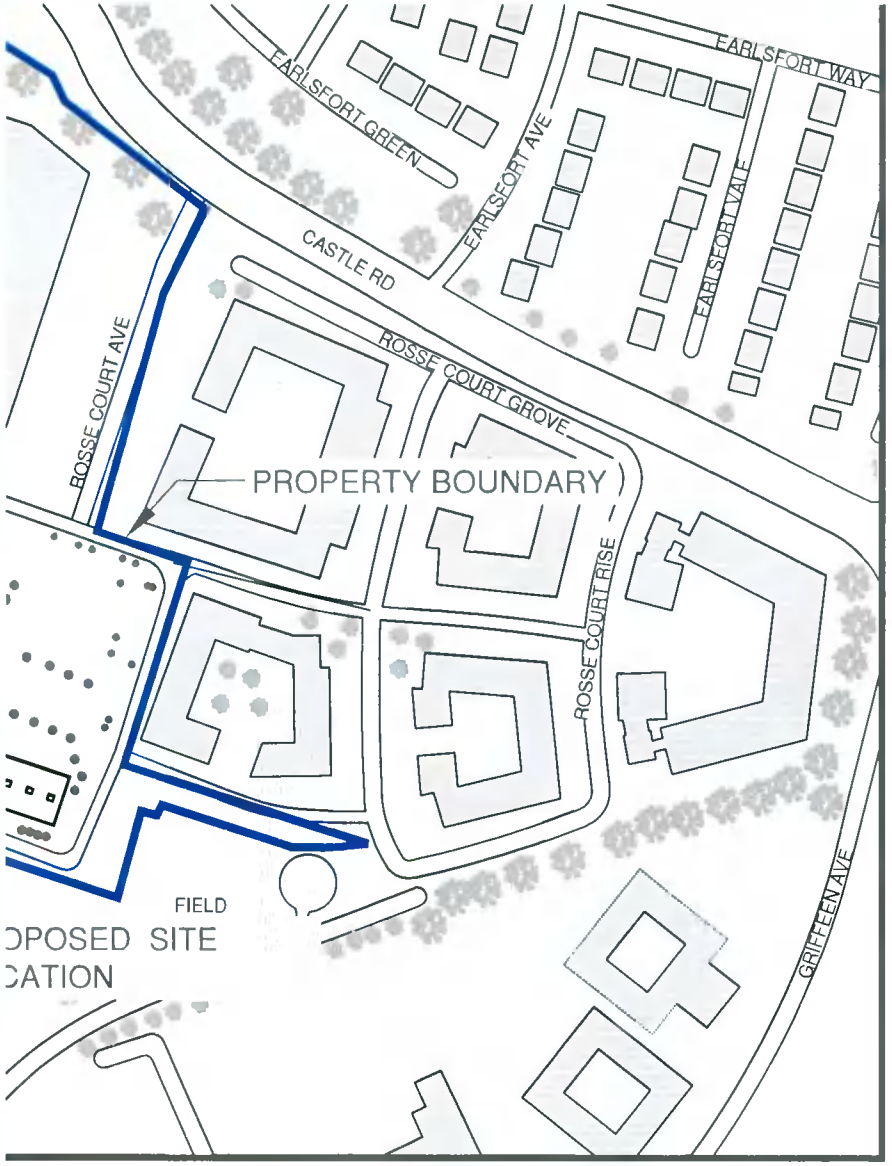
7.2 The proposal constitutes the installation of rooftop equipment in a form and scale that is extremely similar to that already deployed atop the roof. Computer Generated Imagery has been provided to support the application to demonstrate the visual impact of the proposals and assist the Council's assessment of visual impact.

7.3 A thorough technical justification for the development has been provided within this Planning Statement which should be read in conjunction with the Vodafone Radio Engineer assessment provided in support of this submission. The development has been designed with regard to relevant national, regional and local planning policy. The proposal includes numerous demonstrable benefits and would contribute towards the Government's long-standing and well-documented commitment to maintaining and improving communications networks across Ireland. The applicant has demonstrated the need for the site with suitable justification included as to why the proposal site is the optimum location. The applicant has also demonstrated that the proposal fully meets International Commission guidelines for public exposure and has detailed the numerous and extensive public benefits that are accrued through improvements to the telecommunications network.

7.4 The equipment cabinet will, for the most part, be screened from public view by virtue of the location set back from the edge of the roof. The visual impacts of the other elements of the proposal, principally the panel antennas and the supporting steel stanchions are assessed as acceptable in town planning terms and will not injure the amenity of local residential properties to an unacceptable degree.

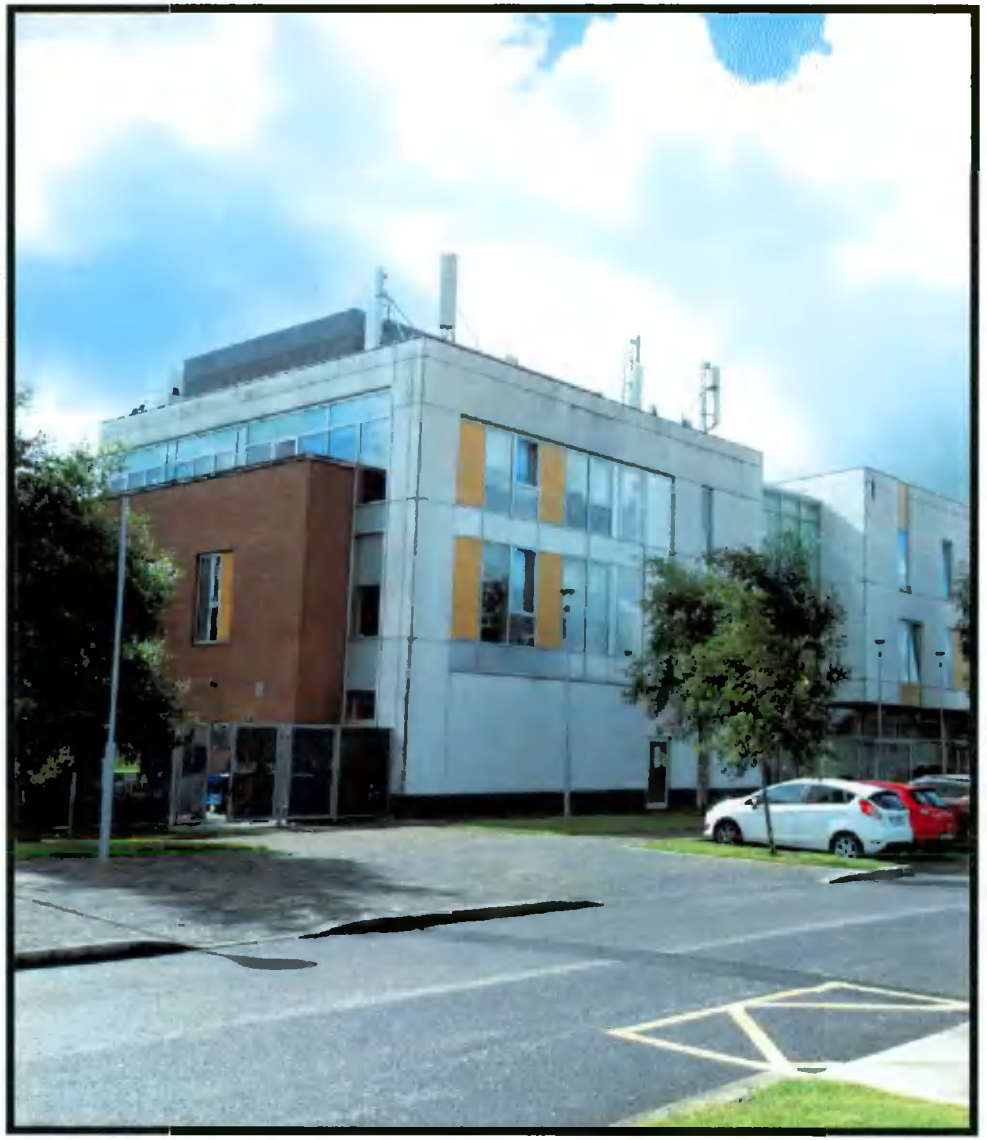
7.5 In this regard the application not only meets the ambitions of national and regional policy in improving telecommunications networks but also accords with policies of the Local Plans, namely the objectives of the South Dublin County Development Plan as well as the National Planning Guidance for Ireland. Advanced, high quality

communications infrastructure is essential for sustainable economic growth and the application scheme will provide this in a location that will be deficient in coverage while also providing 4G and 5G capacity and signal to area that was previously deficient in this technology.



SITE LOCATION

(Scale 1:2500)



SITE PHOTOGRAPH

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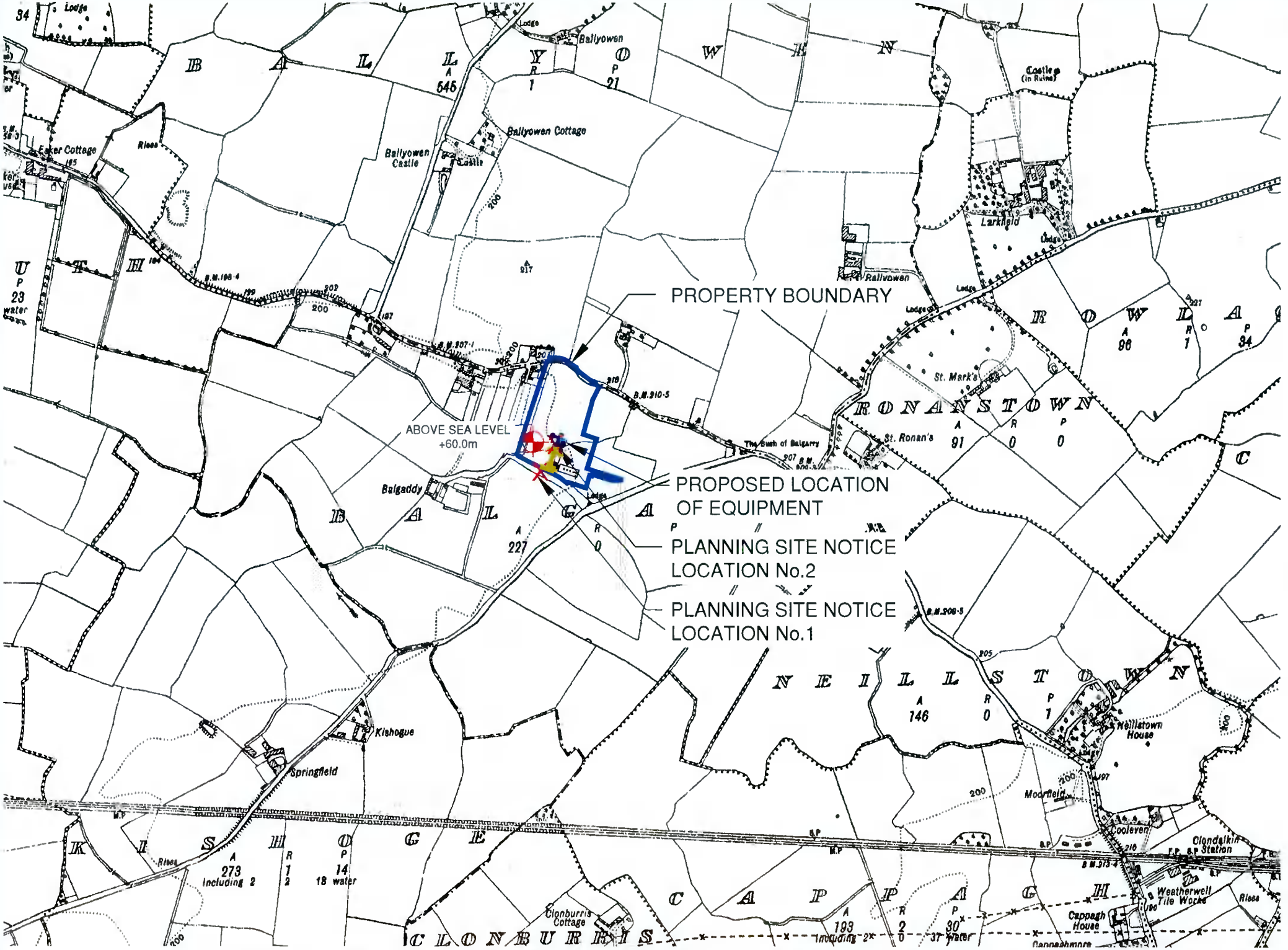
B	RE-DES
A	FIRST I
Rev	Modific



Rev	Modific
A	FIRST I
B	RE-DES

Comhairle Contae
Átha Cliath Theas
South Dublin County Council

Land Use, Planning & Transportation Department **An Rannóg Talamhúsáide, Pleanála agus Iompair**
Telephone: 01 414 9000 **Fax: 01 414 9104** **Email: planning.dept@sdublincoco.ie**

Entrust Ltd.
Unit 3F
Deerpark Business Centre
Oranmore
Co. Galway

NOTIFICATION TO GRANT PERMISSION
PLANNING & DEVELOPMENT ACT, 2000 (as amended) AND PLANNING REGULATIONS THEREUNDER

Final Grant Order No.:	**0497**	Date of Final Grant:	**08-Jul-2020**
Decision Order No.:	**0338**	Date of Decision:	**04-Jun-2020**
Register Reference:	**SD20A/0056**	Date:	**27-Feb-2020**

Applicant: Shared Access Limited
Development: Installation of 3 pole/ballast structures on the rooftop carrying telecommunications equipment including antennas, RRUs and a dish, together with associated exchange cabinets and all associated site development works; the development will provide for wireless data and broadband services.
Location: Rossecourt Resource Centre, Rosse Court Avenue, Lucan, Co. Dublin

Time extension(s) up to and including:
Additional Information Requested/Received:

A Permission has been granted for the development described above, subject to the following conditions.

Conditions and Reasons:

1. Development in accordance with submitted plans and details.
   The development shall be carried out and completed in its entirety fully in accordance with the plans, particulars and specifications lodged with the application, save as may be required by the other conditions attached hereto.
   REASON: To ensure that the development shall be in accordance with the permission and that effective control be maintained.
2. Monitoring
   Monitoring to determine the adherence to the guidelines of the International Non-Ionising Radiation Committee of the International Radiological Protection Association, under the auspices of the WHO and the European Pre standard RNV 50166-2 Human Exposure to Magnetic Fields-High Frequency (10KHz to 300GHz) promulgated by CENELEC, the European Committee for Electro technical standardisation shall be undertaken at yearly intervals by a competent authority, using up-to-date monitoring equipment. The results of all monitoring shall be available for inspection by the Planning Authority and/or other appropriate body.
   REASON: In the interest of public health.

3. Decommission
In the event of the telecommunications structure and related ancillary structures becoming obsolete and being decommissioned, the structures shall be dismantled and removed from the site at the developer's expense.
REASON: To ensure satisfactory reinstatement of the site upon cessation of the telecommunication structure and ancillary structures.

NOTES :

NOTE: The applicant is advised that under the provisions of Section 34 (13) of the Planning and Development Act 2000 (as amended) a person shall not be entitled solely by reason of a permission to carry out any development.

NOTE: The requirements of the HSE Environmental Health Officer shall be ascertained prior to the commencement of development in the interest of public health.

NOTE: The applicant or developer should ensure that all necessary measures shall be taken by the contractor to prevent the spillage or deposit of clay, rubble or other debris on adjoining roads during the course of the works and to ensure that any such instances arising are remedied immediately.

(1) All buildings must be designed and constructed in accordance with the Building Regulations 1997.
(2) Building Control Regulations require a Commencement Notice. Please log onto www.localgov.ie and click on BCMS link.
(3) A Fire Safety Certificate must be obtained from the Building Control Authority, where applicable.
(4) Free Standing Walls must be designed and constructed in accordance with IS 325: Code of Practice for use of Masonry Part 1: Structural use of reinforced Masonry. The Owner must also ensure that the construction of all walls is supervised by a competent person.

Signed on behalf of South Dublin County Council.

for Senior Planner 09-Jul-2020

Comhairle Contae
Átha Cliath Theas
South Dublin County Council

Land Use, Planning & Transportation Department **An Rannóg Talamhúsáide, Pleanála agus Iompair**
Telephone: 01 414 9000 **Fax: 01 414 9104** **Email: planning.dept@sdublincoco.ie**

Turnkey Planning & Architectural Services
c/o Ian Daniels
Richmond House
52 Clare Street
Co. Limerick

NOTIFICATION TO GRANT PERMISSION
PLANNING & DEVELOPMENT ACT, 2000 (as amended) AND PLANNING REGULATIONS THEREUNDER

Final Grant Order No.:	**0682**	Date of Final Grant:	**24-May-2021**
Decision Order No.:	**0473**	Date of Decision:	**13-Apr-2021**
Register Reference:	**SD21A/0041**	Date:	**23-Feb-2021**

Applicant: Shared Access Limited
Development: The installation of 3 roof top support platform poles to support telecommunications equipment including panal antennas, RRU's and transmission dishes together with associated exchange cabinets and all associated development there to provide mobile electronic communications services.
Location: Rossecourt Resource Centre, Rosse Court Avenue, Lucan, Co. Dublin

Time extension(s) up to and including:
Additional Information Requested/Received:

A Permission has been granted for the development described above, subject to the following conditions.

Conditions and Reasons:

1. Development in accordance with submitted plans and details.
   The development shall be carried out and completed in its entirety fully in accordance with the plans, particulars and specifications lodged with the application, save as may be required by the other conditions attached hereto.
   REASON: To ensure that the development shall be in accordance with the permission and that effective control be maintained.
2. Decommission
   In the event of the telecommunications structure and related ancillary structures becoming obsolete and being decommissioned, the structures shall be dismantled and removed from the site at the developer's expense.
   REASON: To ensure satisfactory reinstatement of the site upon cessation of the telecommunication structure and ancillary structures.
3. Within 4 weeks of the grant of this permission, a revised site layout plan, that is in adherence to the Planning and Development Regulations. 2001, as amended, i.e at a scale of not less than 1:500 and the site boundary clearly delineated in red, shall be submitted to the Planning Authority and shall be placed on file.

Reason: In the interests of clarity and in the interests of retaining an accurate planning file.

NOTES :

NOTE: The applicant is advised that under the provisions of Section 34 (13) of the Planning and Development Act 2000 (as amended) a person shall not be entitled solely by reason of a permission to carry out any development.

NOTE: The requirements of the HSE Environmental Health Officer shall be ascertained prior to the commencement of development in the interest of public health.

NOTE: The applicant or developer should ensure that all necessary measures shall be taken by the contractor to prevent the spillage or deposit of clay, rubble or other debris on adjoining roads during the course of the works and to ensure that any such instances arising are remedied immediately.

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Signed on behalf of South Dublin County Council.

for Senior Planner 24-May-2021

Rossecourt – Computer Generated Images

25th Nov 2021

Vodafone Ireland Ltd
Mountainview
Leopardstown
Dublin 18

Confidential

Our ref: DX152

Declaration of Conformity with ICNIRP Public Exposure Guidelines ("ICNIRP Declaration")

Vodafone Ireland Radio Engineering

Declares that the equipment and installation proposed for;

Rossecourt Resource Centre
Rose Court Avenue
Lucan
K78 R9C9
Co. Dublin

is designed to be in full compliance with the requirements of the radio frequency (RF) public exposure guidelines of the International Commission on Non-Ionizing Radiation (ICNIRP),

Yours sincerely

Michael Brolly
Network Engineering
Vodafone Radio Networks

Site Justification Form

Nominal ID:	DX152
Site Name:	Rossecourt Resource Centre
Site Address:	ROSSE COURT AVENUE, BALGADDY, LUCAN, Co. DUBLIN, K78 R9C9
Co-ordinates: **WGS 84**	53.341625161786034, -6.418909582151731
Technologies:	2G/3G/4G/5G
Radio Planner:	Michael Brolly
Date:	2021/11/25

Radio Engineering Site Justification:

Vodafone are proposing to co-locate a new telecommunications site on Rossecourt Resource Centre, Balgaddy, Lucan, where Three & Eir already have equipment

The driver for this is that Vodafone are currently looking to enhance coverage in the area. The proposed location is deemed to provide new or enhanced mobile communication services to the nearby residential areas, which currently have weak signal in some settings, such as indoor locations.

Figure 1: Shows the existing predicted 4G coverage in the area.

Figure 2: Shows the predicted 4G coverage with the proposed site.

Fig1: Existing 4G Coverage in the area

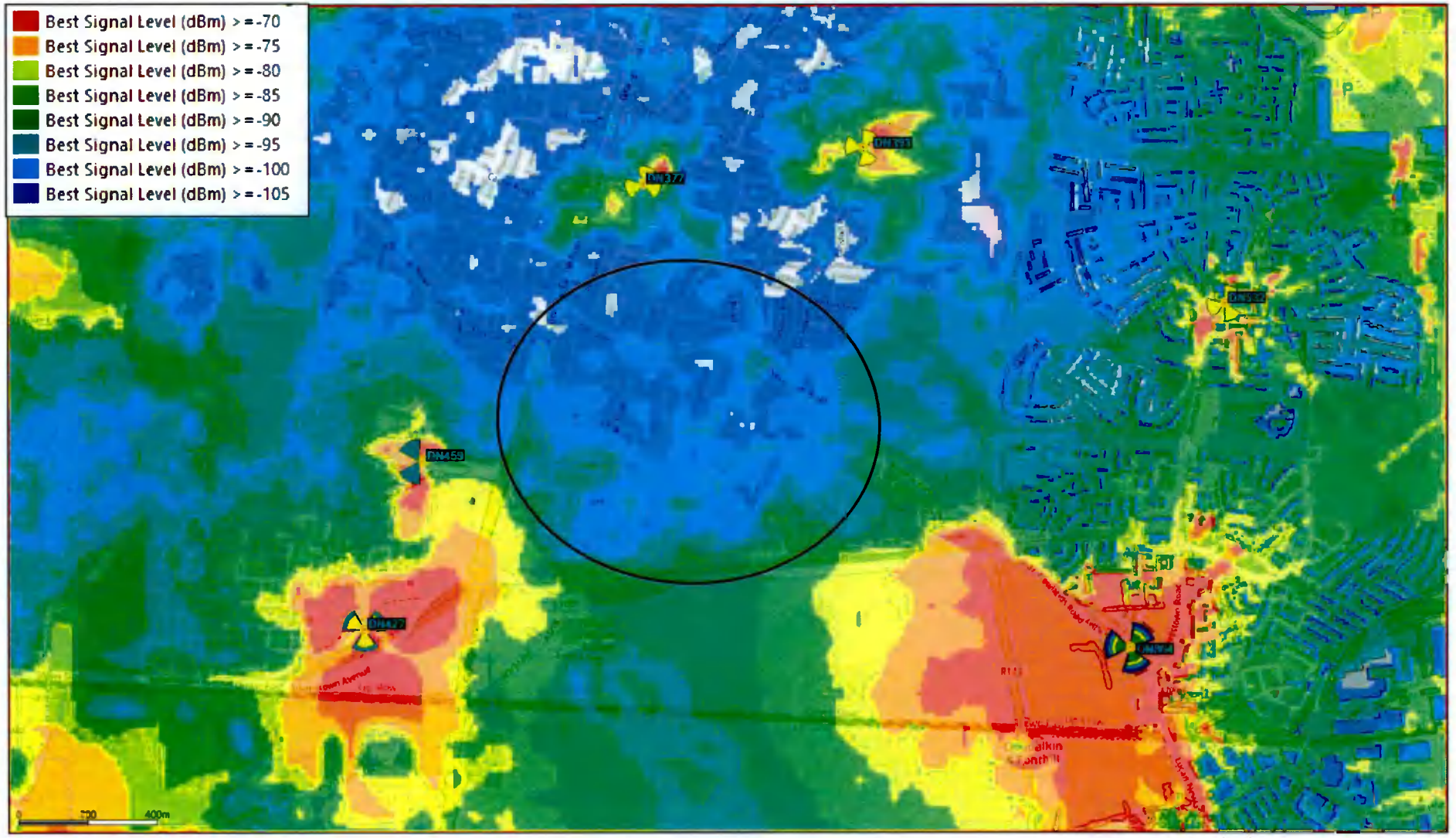

Fig2: Predicted 4G Coverage with new site on Rossecourt Resource Centre