



Coverage Predictions

DX049 - Cheeverstown Road

4th August 2022



Appendix 4 – Coverage Plots (Pre and Post structure installation)

1. Service Coverage Predictions

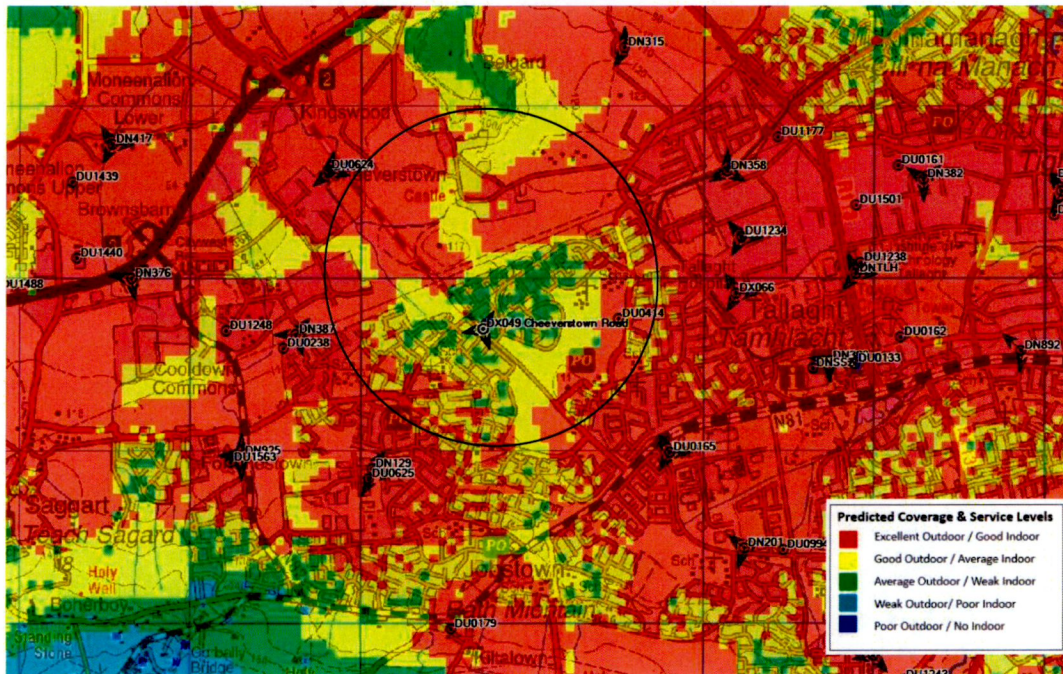


Figure 1: Existing Coverage Prediction with target areas encircled

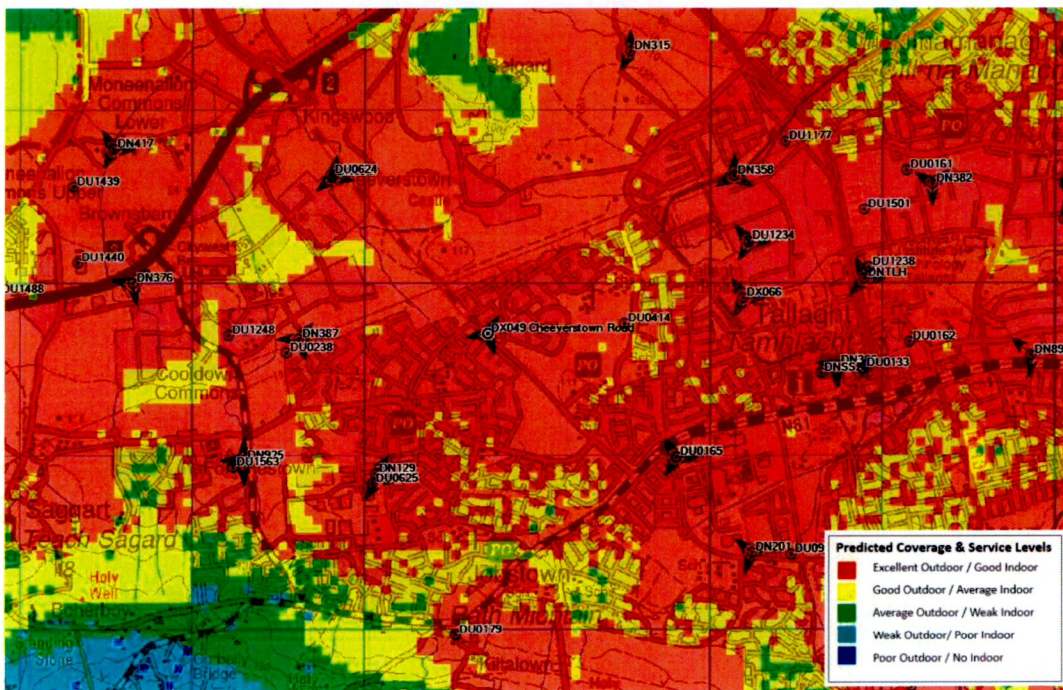


Figure 2: Coverage Prediction with proposed 15m monopole at Cheeverstown Road (DX049)

Each of these assessment criteria is addressed in turn below.

Design & Siting

Design and Siting fall within **4.2** of the Guidelines. The chosen design is a 15m slimline street work structure. The purpose of this design is to minimise visual impact and to allow the structure blend into the existing streetscape.

The siting was carefully chosen following discussions with representatives of South Dublin County Council to ensure the area was appropriate and accepting of street work structures. As a result, the application site was chosen in order to address the coverage issues currently experienced by Vodafone customers and ensure compliance with siting requirements of South Dublin County Council.

The chosen site is the only site available which will address the coverage blackspots in Cheeverstown Road, Kilmartin, Jobstown. Due to the mature nature of the Vodafone network, existing structures are not capable of addressing the ongoing coverage issues. As a result, a new structure is needed at the application site.

Visual Impact

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

At 15m high, the structure has been kept to the minimum height associated with Vodafone's technical objectives. As a result, it will not be taller than the existing street structures including a number of street lamps. It is respectfully submitted that the existing streetscape with street lamps and road traffic signs is accepting of the application structure.

There is already a high level of development within the area, including street lights, road traffic signs, housing and busy roads. It is not within a high amenity area, high value landscape or located near any protected views or structures.

Access Roads

The Guidelines refer to access roads under reference **4.4**. As the structure is located on a grass area along a footpath this is not relevant.

Site Sharing & Clustering

Section **4.5** of the Guidelines refer to site sharing and clustering. Structure design and height has been kept to a minimum. As a result, these structures are not suitable for site sharing.

Health And Safety

We wish to confirm and reassure that Vantage Towers has stringent Health and Safety policies and codes for its maintenance crews and for the public, both for physical safety and for standards set by the International Non-Ionising Radiation Committee. Health and safety are a priority and regular checks are undertaken, including surveys conducted by ComReg which monitor the non-ionising radiation emissions of structures. The results of these surveys are available to view on the ComReg website.

1.1.2 Circular Letter PL/07/12

This circular was issued by the Minister under section 28 of the Planning and Development Acts 2000-2012 to update certain sections of the Telecommunications Antennae and Support Structures Guidelines (1996)

1.1.3 Circular Letter PL/03/2018

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

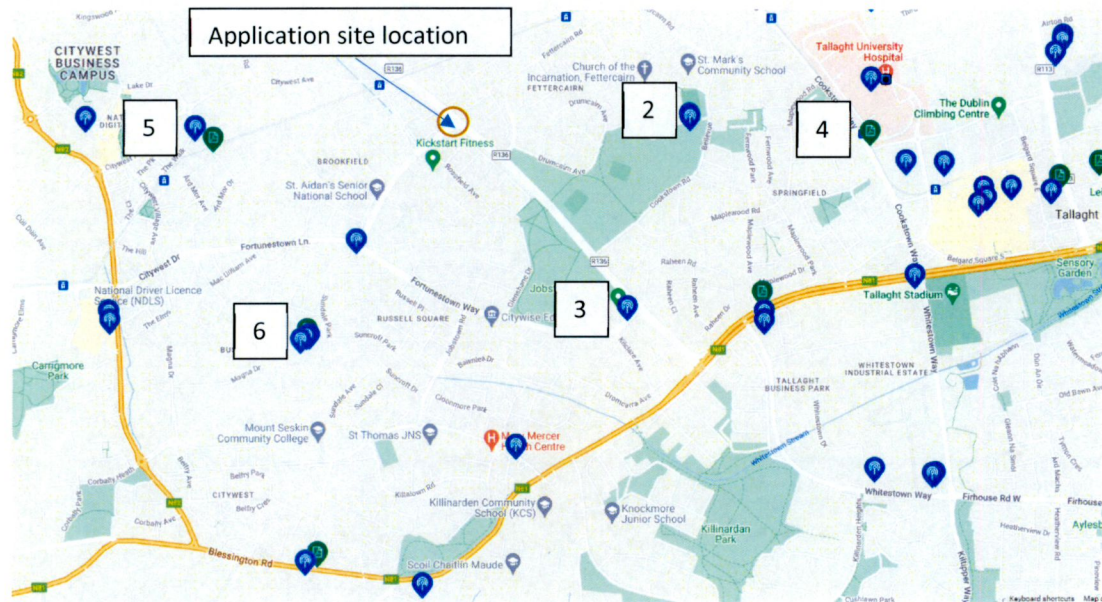
1.1.4 Guidance on the Potential Location of Overground Telecommunications Infrastructure on Public Roads

This document states 'The Plan is a framework for the provision of high-speed broadband through a combination of commercial and State investment. The Government sees high speed broadband as fundamental to Ireland's competitiveness and as a key component of modern society for the purposes of learning, health, and citizenship – and of course, entertainment. The Plan is a clear expression of the importance of quality broadband infrastructure to the achievement of Ireland's economic and social objectives. It commits to a range of actions that are facilitating the rollout of infrastructure and services including addressing planning and road opening challenges, investment focused regulation and maximising the use of State assets where possible.'

The proposed structure falls under Table A, Urban roads. It is recognised that opportunities are generally limited to locations where a wide verge or footpath allows the accommodation of small cabinets/antennae and/or the erection of stand-alone poles to accommodate telecommunications infrastructure. And comments that stand-alone poles are the preferred option in urban areas, as there are ongoing operational and maintenance issues relating to accommodating electronic equipment on lighting columns.

Vantage have met with different Authorities in respect of street design and their associated siting. A number of considerations are taken on board including drainage of paths and roads, traffic management issues and sightlines. Also, that footpaths, cycleways are not adversely affected especially for those with sight and mobility issues. In addition, structures should not necessitate the realignment of the public footpath/cycleway to allow for the circumnavigation of the structure thereby creating an obstacle. With regard to the proposed structure, it is submitted that it does not impact on any of the considerations raised and therefore is suitable in both design and location to meet planning, NRA and technological requirements to supply the services required.

1.2 Existing Telecommunications Sites Within 2km



Source: Comreg Site Viewer

1. Russell Square Shopping Centre, Fortunestown

Eir transmit from the building façade of commercial building situated within the Russell Square Shopping Centre Complex situated 610m west of the application site. Locating so far removed from the target area offers nothing to resolve Vodafone's coverage requirement centred on the application site at Brookfield.

2. St Marks GAA, Tallaght, Dublin 24

Three and Eir transmit from a floodlight monopole structure situated within the grounds of St Marks GAA. At 830m distant that structure is situated outside of the target coverage area and offers nothing to resolve Vodafone's coverage requirement at Brookfield, Tallaght.

3. Eir Streetworks, Fortunestown Way, Adjacent to R136

Eir are situated on a street works pole, very similar if not identical to that proposed in this application. That street works solution is situated approximately 900m south of Vodafone's target coverage area and this structure offers nothing to resolve Vodafone's need for increased coverage at the target coverage area.

4. Tallaght Hospital Luas Stop, Cookstown Way

The antennas located upon this Luas Pole support the running of the Luas only and is not suitable for site sharing. Aside from this the structure is located outside of Vodafone's target coverage area and is discounted on this basis.

5. ESB Decommissioned Pylon, Citywest Business Park

This decommissioned pylon is utilised by Vodafone, eir and Three. The structure plays an important role in extending all operator coverage to the CityWest Business Park area. The structure is situated 1.3km west of Vodafone's target coverage area and offers nothing to resolve Vodafone's coverage requirement at the application site.

All other sites within a 2km radius are further away from the target coverage area than those sites listed above, and all have been discounted on this basis.

The application structure is situated within the heart of the area requiring coverage. Localised coverage cannot be achieved from outside the local area. The site needs to be located at its current location.

Eir experienced a similar shortfall in coverage 900m south of Vodafone's application site and the solution there as here is to deploy a discreet telecommunications street works solution, akin to existing streetlights, camera poles, traffic light posts etc. The application structure will readily assimilate into its receiving environment.

2 Visual Impact Assessment (Query 3 (iii)):

Precision Montages have been taken from the 2 locations east and west of the application site. The visual impact of the proposed installation is undoubtedly minimal. The structure is slender, the antennas concealed, the design specifically adapted for streetworks solutions to align with the slender designs of other vertical streetworks furniture to include lighting structures, traffic lights etc. (refer Appendix 3)

3 Existing and Proposed Vodafone Coverage (Yellow, Green/Red significance) (Query 3 (i)):

Existing and proposed coverage are set out on page 2 of the attached Technical Justification (refer Appendix 4). The maps provided highlight existing coverage, both 'good' and 'bad' by way of colours imposed over mapping.

Those areas identified in yellow and green identify areas with reasonable outdoor coverage and are in need of coverage improvement. Those areas identified in red identify areas with excellent In Car/Indoor Coverage

'Red' areas experience better indoor coverage than 'blue' areas. The mapping demonstrates on Figure 2 of page 2 demonstrate how, following the positioning of the telecommunications street furniture, a widespread localised improvement in indoor coverage as evidenced by increased area of mapping coloured 'red' whereas the current mapping (Figure 1) shows a larger palate of 'yellow and green colours' indicating the substandard level of coverage currently existing in that area.


4 Conclusion

We trust that the additional information provided in this submission comprising of traffic management plan, map of underground services, visual montages together with rationale for justifying the street works solution in the context of compliance with Section 11.6.2 of the County Development Plan have satisfied the requirements of the local authority.

We would like to take this further opportunity to invite any further queries that would assist in a positive determination of this licence application

In the event no further queries are deemed necessary and that the required information is considered comprehensive and acceptable then we look forward to the receipt of the grant of licence in due course.

Yours sincerely,


John Corridan,
Charterhouse,
Agent for Vantage Towers

Appendix 1 – Traffic Management Plan

Routine Maintenance

Annual/Quarterly routine maintenance inspections will involve cabinet inspections where the operator will safely park nearby at a nearby parking location for 10-20 minutes (e.g., Orlagh Grove Spar) and walk with laptop to run tests at the equipment cabinet.

Non-Routine Maintenance

For non-routine maintenance and where access to the concealed antennas is required by way of MEWP then the traffic management plan shall follow the same management design as per the initial construction procedure (Appendix 1) and prior agreement for set up will be sought from the Roads Department of South Dublin County Council.

The applicant welcomes any Traffic Management conditions that South Dublin County Council will impose on this licence relating to traffic management.

- 2. The applicant is requested to submit a plan showing the location of undergrounds services, if any are present at the proposed development. The applicant is requested to also set out any impact the proposal would have on such services. In particular, the applicant should show in section drawings or otherwise as appropriate, the distance of the proposal from such services.**

A search of underground services indicates the presence of a Gas Networks Ireland pipeline running parallel to and approximately 1800mm from the proposed cabinet and street works cabinet. Similarly a BT services cable terminates in an underground vault situated circa 1800mm from the proposed cabinet and street works cabinet immediately underneath the proposed site location (refer Appendix 2).

In this location the street works solution follows a line similar to the existing streetlights, the cabinet doors open outwards and do not extend over the footpath when opened.

- 3. The applicant is requested to submit a report addressing Section 11.6.2 of the Development Plan. In addition to what has already been provided, this should include, but is not exhaustive:**
 - (i) A coverage map with existing and proposed coverage.**
 - (ii) A ComReg map of existing sites in the general area and a list of established sites within a 2km radius.**
 - (iii) A Visual Impact Assessment.**Please see attached Appendix 3 which contains a coverage map with existing and proposed coverage for the proposed area.

1 Report Detailing Compliance with Section 11.6.2 Information and Communications Technology

1.1 Compliance with relevant Guidelines and publications

1.1.1 Telecommunications, Antennae & Support Structures – Guidelines for Planning Authorities 1996

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

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

South Dublin County Council
County Hall
Tallaght
Dublin 24

14th September 2022

Register Reference Number: S25421/20



RE: Application for Licence under Section 254 of the Planning & Development Act (as amended) for a 15m high telecommunications street-work structure along the R136 Cheeverstown Road, Kilmartin Green, Jobstown, Co. Dublin

A Chara,

Further to your letter dated 7th March 2022 requesting further information in respect of the above application please find responses answering each question in turn as follows;

1. The applicant is requested to submit a Construction Traffic Management Plan.

(a) The Construction Traffic Management Plan shall include details on the maintenance routine during the initial and operational phase of the infrastructure, in essence, the roads department would like to see proposed parking/set down location for maintenance crews.

(b) No vehicle shall be allowed to park, intrude or obstruct public footpaths/cycle line during the construction and operational stage unless agreed through the construction and traffic management plan.

Applicant Response:

Please find attached a Construction Traffic Management Plan (Appendix 1) detailing the procedures to be followed during construction and operational phases of the infrastructure.

The plan details:

- The type and extent of signage to be deployed on both sides of the carriageway
- The positioning of roadside traffic bollards
- The Longitudinal Safety Zone
- Works area
- Parking and set down areas for crews during construction and non-routine maintenance
- Route for pedestrians and cyclists during street works construction/erection

The Standards adhered to, and Design Safety Parameters are set out on the right-hand column of the Traffic Management Plan

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