

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

14th September 2022

Register Reference Number: S25421/22

Land Use Planning & Transportati.

19 SEP 2022

South Dublin County Council

RE: Vantage Towers Ltd application for Licence under Section 254 of the Planning & Development Act (as amended) for a 15m high telecommunications street-work structure at Scholarstown Road, Scholarstown, 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

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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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 underground 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.

The initial underground services search indicated the presence of a Gas Networks Ireland pipeline immediately underneath the proposed site location (refer Appendix 2a). The applicant now proposes a minor modification to the original location by advancing the equipment position by approximately 3500mm northeast of its original positioning to a location adjacent to the primary footpath and to the left of the pathway traversing the green area (refer Appendix 2b).

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. The proposed street works solution is situated clear of pathway leading across the green area to the southeast.

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 showing 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 4 which contains a coverage map with existing and proposed coverage for the proposed area. Please also see attached appendix 3 which contains a verified photomontage of the proposed structure.

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.

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 Scholarstown. 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 streetlamps. It is respectfully submitted that the existing streetscape with streetlamps and road traffic signs is accepting of the application structure.

There is already a high level of development within the area, including streetlights, 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

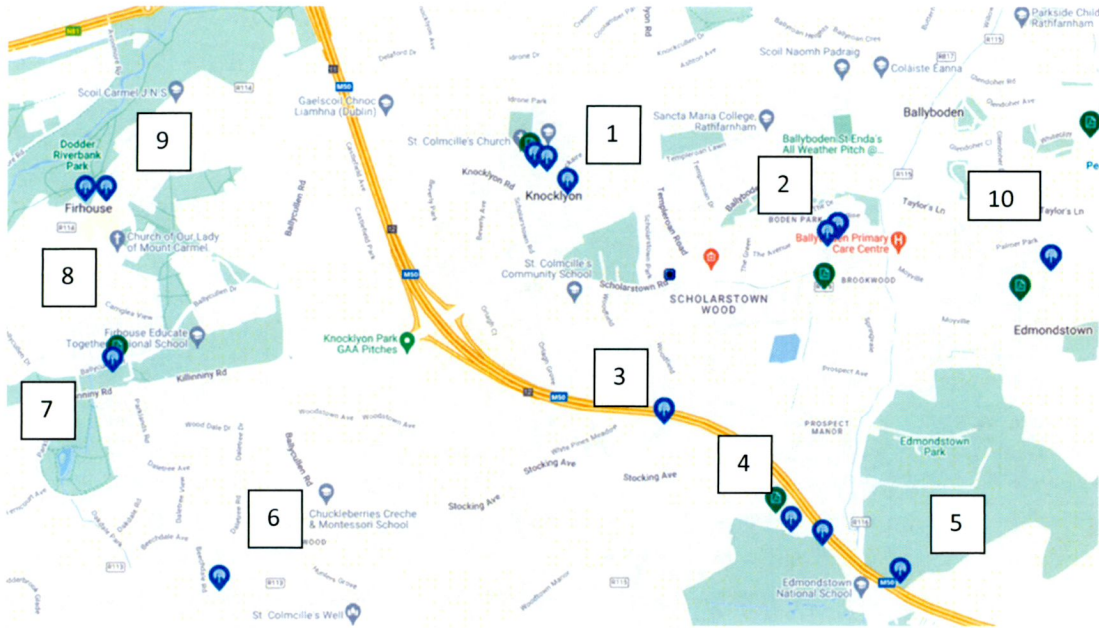


Figure 1; ComReg map of existing sites within 2km radius

ComReg operates 'site viewer', a geo-website, which identifies existing communication sites. The map above illustrates the structures within a 2km radius of the application site.

1. Supervalu Knocklyon: Vodafone, Meteor and Three Ireland currently transmit from antennas from the roof of the Supervalu in Knocklyon, approximately 390m north of the application site. As Vodafone are already present, further Vodafone equipment would not address the coverage issues in the target area. As a result, this site has been discounted.

2. Eir Exchange, Scholarstown Road: Vodafone and Meteor currently transmit from a 21.5m high lattice structure on the grounds of an eir exchange approximately 1.2km east of the application site. As Vodafone is already present here, further Vodafone equipment would not address the coverage issues in the target area. As a result, this structure has been discounted.

3. Green Acres House: Vodafone, Meteor and Three Ireland currently transmit from a 15m high monopole, approximately 750m south-east of the application site. As Vodafone is already present, further Vodafone equipment would not address the coverage issues in the target area. As result, this structure has been discounted.

4. Rathfarnham Golf Club: There are two structures located on the grounds of Rathfarnham Golf Club, approximately 1.3km from the application site. Vodafone transmit from a 24m high structure while Meteor transmit from a 20m structure. As Vodafone is already present here, further Vodafone equipment would not address the coverage issues in the target area. As a result, this structure has been discounted.

5. Edmondstown Golf Course: Three Ireland currently transmit from a 10m high timber pole located on the grounds of Edmondstown Golf Course. 10m is too low to allow Vodafone to achieve its technical objectives for the target area. The site is also located approximately 1.7km from the application site which is too far. As a result, this structure must be discounted.

6. Hunters Road: eir currently transmit from a street works structure located approximately 1.6km south-west of the application site. Street works structures are not designed for site sharing. As a result, this structure must be discounted.

7. Scholars Pub: eir currently transmit from antennae placed on the side of Scholars Pub, approximately 1.8km from the application site. This distance is too far for Vodafone to achieve its coverage objectives in the target area. As a result, this structure has been discounted.

8. Firhouse Community & Leisure Club: Vodafone currently transmit from the rooftop of a Firhouse Community & Leisure Club approximately 1.6km west of the application site. As Vodafone is already present, placing further equipment at this location would not achieve the technical objectives for the target area. As a result, this structure has been discounted.

9. Speaker Connolly: Three Ireland and Vodafone currently transmit from antennae located on the rooftop of the Speaker Connolly pub located approximately 1.6km north-west of the application site. As Vodafone is already present, placing further equipment at this location would not achieve the technical objectives for the target area. As a result, this structure has been discounted.

10. Pearse Brothers Park: eir, Three Ireland and Vodafone currently transmit from a lattice structure located 1.9km east of the application site. As Vodafone is already present, placing further equipment at this location would not achieve the technical objectives for the target area. As a result, this structure has been discounted.

1.3 Degree of Impact on Residents & Amenities

The location is not a high amenity area, high value landscape and there are no protected views or structures nearby either.

There are mature trees behind the structure, which results in significant screening in between the structure and the houses closest to it in Orlagh Crescent. The housing estates to the North also benefit from significant screening from mature trees. As a result of these mature trees, the structure will not be visible from the houses along Orlagh Crescent or the housing estates north of the application site. It is considered that the amenities of the residents will therefore not be impacted by the structure.

The structure design which is similar to the existing streetlights is unlikely to have a significant impact on the existing streetscape. It is clear Scholarstown Road is accepting of taller structures like the application structure. With this in mind, it is respectfully submitted that the chosen location is the most appropriate in order to address the coverage issues while minimising impact on residents.

1.4 Visual Impact Assessment

Please see attached appendix 3 which contains 2 photomontages surrounding the proposed site. The photomontage highlights, that although visible, the structure is absorbed by the landscape and does not result in the landscape being altered a significant amount.

Note also that these montages are entirely accurate in relation to the positioning of the proposed street works solution at the original submitted location. Following the discovery of the route of the proposed GNI pipeline and the subsequent slight modification of structure positioning those montages are slightly inaccurate as to location but entirely accurate in terms of structure appearance.

We trust that the local authority will accept the enclosed montages applying to the original location are equally acceptable for the modified location given the context of the minor change in positioning, forced by the presence of the GNI line.

4. The applicant is requested to locate the proposed 15-metre-high telecommunications street works structure so that it borders the adjoining footpath in order to facilitate grass maintenance within the wider green area.

Please see appendix 3 which contains revised site layout plans with the application structure and cabinet relocated to the edge of the grass. This change of location was also prompted by the presence of the Gas Networks Ireland gas pipeline at the original location.

5. The applicant is requested to submit an Arboricultural Impact Assessment Report for the existing trees located in the green area adjacent to this proposed 15-metre-high telecommunications street works structure. The purpose of the assessment is to provide an analysis of the impact of the proposed development on the existing trees.

It is respectfully submitted that an Arboricultural Impact Assessment Report is not necessary for the proposed site as the site is moved clear of the presence of all trees to a location adjacent to the public footpath.

6. Coverage Plots

Please find attached coverage plots, as requested, which detail both the limitations of Vodafone's existing local coverage together with the manifest coverage improvements consequent on the future erection of the proposed installation. (Refer Appendix 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