

South Dublin County Council
County Hall Tallaght,
Dublin 24,
D24 A3XC

Our Ref: DU0376 Fortfield Lane - Kimmage

21/10/2022

ON TOWER IRELAND LIMITED INTEND TO APPLY FOR RETENTION PERMISSION FOR DEVELOPMENT AT UNIT 1, FORTFIELD LANE, FORTFIELD ROAD, TERENCE, DUBLIN 6W. THE DEVELOPMENT CONSISTS OF AN EXISTING TELECOMMUNICATIONS SUPPORT STRUCTURE (PREVIOUSLY REFUSED PERMISSION UNDER PI. REF. SOUTH DUBLIN COUNTY COUNCIL SD08A/0745 AND THEN SUBSEQUENTLY GRANTED PERMISSION UNDER AN BORD PLEANÁLA PL06S.232536) TOGETHER WITH ANTENNAS, DISHES, EQUIPMENT CABINETS, FENCING AND ALL ASSOCIATED SITE DEVELOPMENT WORKS. THE DEVELOPMENT WILL CONTINUE TO PROVIDE HIGH SPEED WIRELESS BROADBAND AND DATA SERVICES.

Dear Sir/Madam,

Please find attached an application for retention planning permission submitted on behalf of the applicant, namely, On Tower Ireland Limited, Suite 311 Q-House, Furze Road, Sandyford Industrial Estate, Dublin D18 YV50, by its acting planning agent Entrust planning & environmental, Unit 1D Deerpark Business Centre, Oranmore, Co. Galway H91 X599.

The Application comprises:

- i. 2 no. copies of Application Form;
- ii. 2 no. copies of the Letter of Consent from landowner;
- iii. 2 no. copies of Site Notice;
- iv. 2 no. copies of the Newspaper Notice;
- v. Planning application fee in the sum of €240.00.
- vi. 6 no. copies of Cover Letter with Supporting Information (this document);
- vii. 6 no. copies of plans and drawings in schedule below;

Schedule of Drawings

No.	Title	Drawing No.	Scale
1	OS Location Map	DU0376-P-01	1:40000
2	Record Place Map	DU0376-P-02	1:10,560 (6")
3	Site location Map	DU0376-P-03	1:2,500
4	Site Location Map	DU0376-P-04	1:1,000
5	Site Layout Plan	DU0376-P-05	1:500
6	Site Layout Plan	DU0376-P-06	1:100
7	North-West Elevation Plan	DU0376-P-07	1:100
8	South-East Elevation Plan	DU0376-P-08	1:100
9	North-East Elevation Plan	DU0376-P-09	1:100
10	South-West Elevation Plan	DU0376-P-10	1:100
11	Equipment Details	DU0376-P-11	1:50

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1 Introduction

This planning application has been prepared by Entrust Limited, a firm of Chartered Planning Consultants, that specialises in infrastructure planning (**the Agent**), on behalf of On Tower Ireland Limited (**the Applicant**), in support of an application for retention planning permission to South Dublin County Council (**the Planning Authority**) for; an existing telecommunications support structure (previously refused permission under Pl. Ref. South Dublin County Council SD08A/0745 and then subsequently granted permission under An Bord Pleanála PL06S.232536), together with antenna and transmission dishes attached, equipment, cabinets, access track and fencing at Unit 1, Fortfield Lane, Fortfield Road, Terenure, Dublin 6W. The development will continue to provide high speed wireless broadband and data services (**the Proposed Development**).

This application has been prepared in accordance with the;

- National Planning Framework;
- Regional Planning Guidelines;
- South Dublin County Development Plan 2022-2028;
- Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities (July 1996) updated by Ministerial Circular PL07/12;
- Mobile and Broadband Taskforce, 2016.

2 Applicant

The 'Three Ireland' telecommunications sites portfolio was purchased by Cellnex Ireland Limited in late 2020, under its wholly owned subsidiary, namely, On Tower Ireland Limited.

Cellnex is the leading wireless telecommunications infrastructure operator in Europe. Cellnex has made a firm commitment to the development of its network, which currently has about 120,000 wireless sites, of which over 1,000 sites are in Ireland. It provides service in Ireland, Spain, Italy, the Netherlands, the United Kingdom, France, Switzerland, Portugal, Austria, Denmark and Sweden.

It offers its clients services aimed at ensuring the conditions for a reliable and high quality transmission for the wireless broadcasting of content, be it voice, data or audio visual. In doing so it is committed to improving the infrastructural development of wireless broadband operator's requirements to improve services to its customers throughout rural and urban Ireland which is strongly supported by government policy.

It is confirmed by Three Ireland Limited that this application made by On Tower Ireland Limited, for this existing site has for a number of years now, formed a vital part of the overall national Three Ireland radio and transmission network and will continue do so in the future. Furthermore, this particular site has provided vital high speed wireless data and broadband services for the local community by Three Ireland Limited, and is required to do so into the future.

In line with the '*Telecommunications Antenna and Support Structures, Guidelines for Planning Authorities*', 1996, which are strongly supported by the County Development Plan, Three Ireland will where possible co-locate and utilise existing telecommunications structures where possible, including this site, to prevent a proliferation of new telecommunications structures, and in doing so is fully supportive of this On Tower Ireland retention planning application being made.

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3 Site Location and Description

The existing telecommunications structure at Unit 1, Fortfield Lane, Fortfield Road, Terenure, Dublin 6W, has been in situ now for around 13 years since it was granted permission under PL. An Bord Pleanála PL06S.232536. The site location of the existing telecommunications structure is located at Unit 1, Fortfield Lane, Fortfield Road, Terenure, Dublin 6W.

This existing telecommunications site concerns a property located at Terenure, Dublin 6W. It is close to the junction of Fortfield Road and Kimmage Road West. The site is situated at Fortfield Lane and is reached from Fortfield Road. The River Poddle passes close by on the north side. Directly adjoining the site on the north is a housing estate called St. Anne's, comprising modern two-storey redbrick terraced houses. The public open space of that estate adjoins the compound boundary where the development would take place. This is a predominantly residential area. The application site provides an exception to the established pattern. It is occupied by an ESB substation and the adjoining site on the south is occupied by the local postal sorting office. Other adjoining properties include a petrol filling station at Fortfield Road. The existing development at the site includes the existing 20m monopole which is the subject of this application and two freestanding telecom antennae support structures with supporting equipment. One of these is 17m high, the other being 15m. These are clear stemmed cylindrical structures. The site area is stated at 0.0017 ha and it is bounded by a combination of high walls and metal palisade fencing.

The existing installation (proposed development) is comprised of a 20-metre-high monopole with antenna and transmission dishes attached, associated works, equipment, cabinets, access track and fencing which was initially built for the Government's National Broadband Scheme (NBS).

'The proposed development (existing structure) is located in one of the most preferred locations within the 1996 Government Guidelines pertaining to telecommunications which states that 'In the vicinity of larger towns and in city suburbs operators should endeavour to locate in industrial estates or in industrially zoned land. The possibilities offered by some commercial or retail areas should be explored whether as rooftop locations or by way of locating "disguised" masts. It should also be noted that substations operated by the ESB may be suitable for the location of antennae support structures. This possibility should also be investigated'

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Figure 1: Photo of site location

4 Planning History

Planning Ref:	Applicant	Development	Decision
SD08A/0745 (South Dublin County Council)	Hutchison 3G Ireland Limited	Erection of an 18 metre high support structure with three antennas and one dish attached (total height twenty metres), along with equipment cabinets, other associated equipment and fencing for a new 3G broadband network.	Decision date 19 Dec 2008 Decision REFUSE PERMISSION
PL06S.232536 (An Bord Pleanála)			Appeal lodged date 23 Jan 2009 Appeal decision date 27 Jul 2009 ABP Reference pl06s.232536 Appeal decision Grant Permission

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The Planning Authority refused permission for the existing structure in 2008. An appeal was subsequently lodged in 2009 and An Bord Pleanála granted permission for the then proposed structure in 2009.

An Bord Pleanála comments:

'In making its decision, the Board had regard to those matters to which, by virtue of the Planning and Development Acts and regulations made thereunder, it was required to have regard. Such matters included any submissions and observations received by it in accordance with statutory provisions.'

'Having regard to –

- (a) The national strategy regarding the improvement of mobile communications services,*
- (b) The guidelines relating to telecommunications antennae and support structures which were issued by the Department of the Environment and Local Government to Planning Authorities in July 1996 and*
- (c) The existing pattern of development in the vicinity, including other masts at this location, and*
- (d) The scale and design of the proposed development,*

It is considered that, subject to compliance with the conditions set out below, the proposed development would not seriously injure the amenities of the area, would not be prejudicial to public health and would be in accordance with the proper planning and sustainable development of the area.'

The Inspector's Report goes on to state that *'The main issues in this appeal concern the visual impact of the monopole and its antennae, the manner in which the proposed development would relate to health concerns associated with emissions and consequent reduction in property values. These matters can be assessed in the context of the Development Plan zoning and national guidance.*

The location of these telecom structures will be greatly influenced by engineering requirements. This consideration seems to have become more important with the move to the 3G network. The search area for cell bases is more restricted. This will, of itself, check the scope for screening trees or other features that reduce visual intrusion, all the time having regard to the need to avoid physical screening of the telecom signals.

In my opinion, this parcel of land offers a reasonable balance. The presence of industrial/warehouse type buildings, supplemented by trees, reduces the profile of the telecom structures seen by passers-by on the adjoining streets. Views of these structures are largely confined to the closest adjoining properties. For the most part, it is only the upper parts of the masts that are seen by casual observers. The move to 3G cells has brought refinement in the design of the masts themselves. They are generally slim and elegant. At this place, the existing masts are not very intrusive by reason of their height, form and colour. They are not out of place within this suburban location.

This mast would be erected very close to both of the existing masts. It would be 18.3m from the closest one and 24m from the other. In some views from the east and west, it would appear to be erected between them, as indicated in Site Elevation View C-C. This layout would bring clustering of the masts and the well-established line of coniferous trees immediately to the south would serve to reduce visual intrusion. Further trees on the west would also serve in this assimilation'.

It was policy at those times to grant a temporary planning permission for communications structures. Since then, the Telecommunications Antennae and Support Structures

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Guidelines for Planning Authorities (1996) have been updated. A Circular Letter: **PL 07/12** issued by the Department of the Environment, Community and Local Government addressed to An Bord Pleanála and City and County Managers in October 2012 states in paragraph 2.2 Temporary Permissions that;

'Mobile telephony, with associated ground based antennae and support structures, will remain a key feature of telecommunications infrastructure for the foreseeable future.'

'Planning authorities are therefore advised that from the date of this Circular Letter, attaching a condition to a permission for telecommunications masts and antennae which limit their life to a set temporary period should cease. Where a renewal of a previously temporary permission is being considered, the planning authority should determine the application on its merits with no time limit being attached to the permission'.

On that basis it is respectfully requested that no time limit be attached to any forthcoming grant of planning permission for this planning application.

5 Technical Justification

As can be seen in the following plots provided by the ComReg, which is the statutory body responsible for the regulation of the communications sector, Three Ireland is providing 'very good' 3G and 4G high speed wireless data and broadband services for this area and has been relied upon now by the local residential and business community for approximately 13 years and is similarly required to do so into the future. As On Tower Ireland is now the new owner of this structure, it actively promotes co-location and sharing of its infrastructure (including this existing structure) for other licensed mobile, broadband, emergency services and radio users which is in accordance with the County Development Plan and 1996 'Telecommunications Antenna and Support Structures, Guidelines for Planning Authorities'.

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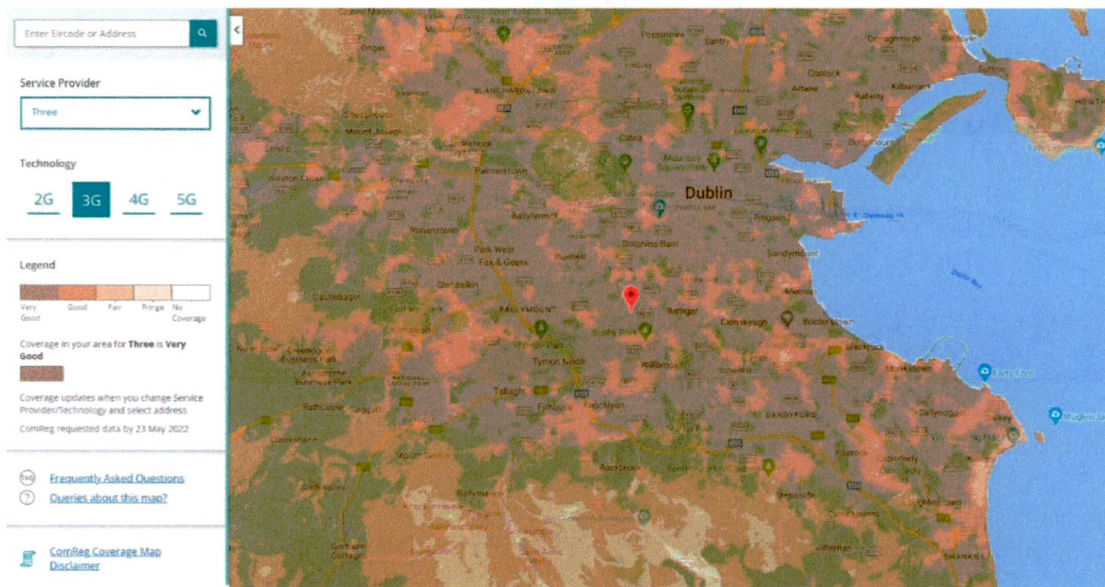


Figure 2: Existing Three Ireland 3G Broadband Coverage

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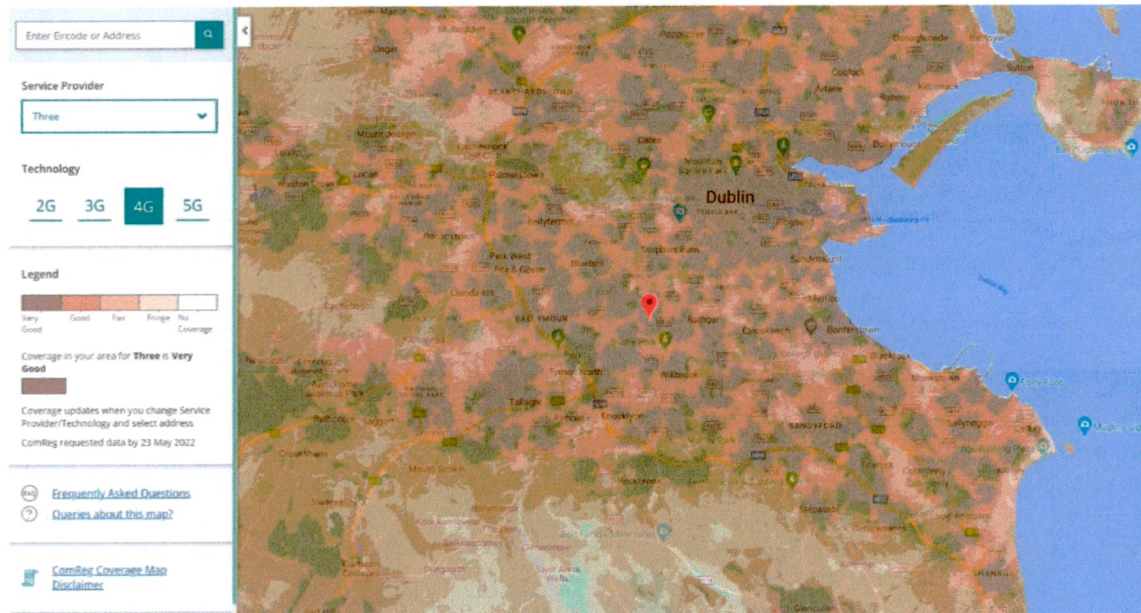


Figure 3: Existing Three Ireland 4G High Speed Broadband Coverage

Compliance with emission limits is regulated by ComReg. A license to provide services is subject to compliance with strict emission controls. The limits are specified by the International Commission for Non-ionising Radiation Protection (ICNIRP), including for this site since it was first built.

6 Relevant Planning Policies and Guidance

National Planning Framework (NPF)

Under the NPF, one of the 10 goals or national strategic outcomes is to create a strong economy that can foster enterprise and innovation and attract talent and investment. It states that delivering this outcome will require the coordination of growth and place making with investment in world class infrastructure including digital connectivity, which this application supports.

Within the NPF it is emphasised how in the information age, telecommunications networks play a crucial role in enabling social and economic activity.

In section 2.2 one of the NPF's strategies is to strengthen Ireland's rural and urban fabric by 5 measures, one of which is to improve local connectivity to principal communications (broadband) networks.

In section 5.1 regarding rural and urban development, the NPF states that a major focus will be on addressing connectivity gaps, communications infrastructure.

As set out in National Policy Objectives 6 and 7, the National Planning Framework seeks to strengthen and diversify rural areas and towns by way of digital connectivity.

Under section 5.4 Rural Job Creation, it states that the provision of high-speed digital infrastructure is critical to realizing potential employment opportunities and facilitating innovation. For rural Ireland, broadband is essential enabling infrastructure that affords rural communities the same opportunities to engage with the digital economy as it does to those who live in our cities and towns.

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Analysis; this proposal supports one of the ten goals of the NPF in improving digital connectivity for a strong economy, helps to strengthen Ireland's rural and urban fabric, enables social and economic activity and affords rural communities the same opportunities to engage with the digital economy as those who live in our urban areas.

Regional Planning Guidelines for the Greater Dublin Area 2010-2022 (RPG)

Connectivity Infrastructure – Telecommunications (Section 3.5.7)

Advanced telecommunications services are critical for the attraction of foreign direct 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. For SMEs, effective use of ICT allows them to compete more effectively with their counterparts in other markets, for example by reducing costs and improving the quality of services to their customer base.

Better use of ICT has been identified 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 for suppliers or seeking new market opportunities to increase their customer-base or to more effectively link business functions e.g. sales, design, manufacturing, supply chain, stock control and accounts.

Currently, Ireland experiences poor broadband performance in relative European terms which is an impediment to regional enterprise and performance. The rate of roll-out in some areas is also seen as an obstacle to enterprise. Within the GDA, while wireless connections permeate much of the region, wireline provisions are more confined e.g. parts of the hinterland and in particular areas of Counties Meath, Kildare and Wicklow have limited wireline connections.

The broadband offering in the GDA needs to be dramatically improved to reflect the importance of the Capital city and its hinterland as an ICT hub of European and global significance, and to keep pace with the needs of businesses and individuals. Continual future investment in connectivity and telecommunication infrastructure is required - with focus required on uptake, performance and availability. An emphasis on fibre connections, high performance infrastructure and improving existing performance in terms of speeds, costs and coverage should be prioritised in order to provide opportunities to compete with international competitors.

Energy & Communications (Section 6.6)

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. Access to advanced and cost competitive telecommunication services will help the GDA region become more competitive within global markets.

Telecommunications (Section 6.6.3)

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. In 2008, Ireland ranked 25th amongst 28 OECD countries in terms of its readiness to support next generation video and web services.

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Whereas, the previous RPGs considered the rollout of broadband and the need to provide infrastructure and services on a balanced regional basis within three years; the new wave of advancements focus on broadband uptake, performance and availability. Ireland and the GDA continue to have poor broadband performance in relative European terms. Advancement in telecommunication infrastructure and performance represents one of the most critical steps in creating a more competitive regional and national economy. As a relatively remote and currently high cost location Ireland and the GDA needs to take advantage of best available broadband technologies. The strong uptake of broadband services points up a willingness and desire across all sectors to invest in the best telecommunications available in order to gain competitive advantage. For SMEs, effective use of ICT will allow them to compete with counterparts in global markets, increase customer base and link business functions.

It is critical that as Ireland and the GDA look to market themselves as centres for creativity, innovation and enterprise, that broadband speeds and costs are competitive with international and especially European alternatives. For the GDA to meet its full potential it is essential that steps are taken to bring about improvements to current broadband offering. In so far as possible planning should facilitate future-proofing of the regions telecommunication infrastructure; and improve the availability of advanced service offerings. Broadband quality, availability and cost need to be improved to reflect the importance of the GDA and capital as an ICT hub of European and global significance. Development Plan policies should also be cognisant of the Departmental Guidelines for Planning Authorities on Telecommunications Antennae and Support Structures and any subsequent revisions or expanded Guidelines on this area published subsequent to the adoption of the RPGs.

Policy - PIR28 - To ensure that planning policy at Local Authority Level reflects and adheres to the principles and planning guidance set out within Department of the Environment Heritage and Local Government publications relating to 'Telecommunications Antennae and Support Structures', and any other relevant guidance which may be issued in relation to communications.

Analysis; This proposal ensures continued affordable and high-quality broadband is provided to the Greater Dublin Area, this is a key factor that is outlined within the RPG as it states that 'Ireland experiences poor broadband performance in relative European terms which is an impediment to regional enterprise and performance'. The RPG also states that 'advancement in telecommunication infrastructure and performance represents one of the most critical steps in creating a more competitive regional and national economy' another critical point that underlines the importance of the proposed. This proposal will continue to contribute to give the GDA and capital an increased opportunity to become an ICT hub of European and Global significance, this is further supported as On Tower Ireland will also make this existing structure available to any other licensed operator that may wish to co-locate on it as it does on all its wireless infrastructure throughout Europe.

South Dublin County Development Plan 2022-2028 (CDP)

Information and Communications Technology (Section 11.4)

The continued widespread availability of high-quality Information and Communications Technology (ICT) networks within the County is critical to the development of the County's economy and to social progress. It will ensure that the County remains attractive to hi-tech knowledge-based industries providing for high value employment. It is also a huge asset to the residents of the County encouraging home working and individual entrepreneurial activity.

Policy IE5 – Information and Communications Technology (ICT)

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It is a policy of the Council to promote and facilitate the sustainable development of a high-quality ICT network throughout the County in order to achieve social and economic development, whilst protecting the amenities of urban and rural areas.

Policy IE5 – Objective 1:

It is an objective of the Council to promote and facilitate the provision of appropriate telecommunications infrastructure, including broadband connectivity and other innovative and advancing technologies within the County in a non-intrusive manner.

Policy IE5 – Objective 3:

It is an objective of the Council to permit telecommunications antennae and support infrastructure throughout the County, subject to high quality design, the protection of sensitive landscapes and visual amenity.

Policy IE5 – Objective 4:

It is an objective of the Council to discourage a proliferation of telecommunication masts in the County and promote and facilitate the sharing of facilities.

Policy IE5 – Objective 6:

It is an objective of the Council to require the identification of adjacent Public Rights of Way and established walking routes by applicants prior to any new telecommunication developments and to prohibit telecommunications developments that impinge thereon or on recreational amenities, public access to the countryside or the natural environment.

Policy IE5 – Objective 8:

It is an objective of the Council to investigate the potential for the provision of fibre optic cables in the County to facilitate the delivery of high-speed broadband and to work collaboratively with providers in facilitating the same.

Analysis; the South Dublin CDP 2022 – 2028 highlights that telecommunication structures are vital pieces of infrastructure in the interests of sustainable social and economic progress which must be balanced with sustaining residential amenity and the protection of the built environment. The existing telecommunications structure does result in any significant visual impact as stated by the Board in its decision,. The existing telecommunications structure would reduce the need for and discourage the proliferation of more telecommunication masts in the area. Furthermore, the proposal facilitates the sharing of facilities as opposed to future proliferation of telecommunication masts within the area. The continued use and existence of this telecommunication mast will promote and facilitate the provision of appropriate telecommunications infrastructure, including broadband connectivity and other innovative and advancing technologies within the County.

Department of Environment Heritage and Local Government, Telecommunications, Antenna and Support Structures (Guidelines for Planning Authorities – 1996) and Circular PL07/12

Government policy for the development of telecommunications infrastructure is set out in the Department of Environment, Heritage and Local Government Telecommunications Antennae and Support Structures (1996) and Circular Letter PL07/12 which updated certain sections of the Guidelines.

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Paragraph 1.2 states that: *'The Government's telecommunications policy aims to place Ireland in the top quartile of OECD economies as regards the availability, price and quality of telecommunications services in order to promote industrial and commercial development, to improve personal and household security and to enhance social interchange and mobility.'*

With regards to visual impact, the Guidelines detail that: *'In most cases the applicant will only have limited flexibility as regards location, given the constraints arising from radio planning parameters, etc., already referred to.'*

The guidelines recommend a hierarchy of suitable locations for telecommunications equipment and the use of existing structures (proposed development) is the number one preferred option.

*'The proposed development (existing structure) is located in one of the most preferred locations within the 1996 Government Guidelines pertaining to telecommunications which states that 'In the vicinity of larger towns and in city suburbs operators should endeavour to locate in industrial estates or in industrially zoned land. The possibilities offered by some commercial or retail areas should be explored whether as rooftop locations or by way of locating "disguised" masts. It should also be noted **that substations operated by the ESB may be suitable for the location of antennae support structures.** This possibility should also be investigated'*

In regard to co-location and sharing, section 4.5 states that 'Sharing of installations (antennae support structures) will normally reduce the visual impact on the landscape' and 'All applicants will be encouraged to share and will have to satisfy the authority that they have made a reasonable effort to share'. It is confirmed that On Tower Ireland Limited actively encourages the sharing of all infrastructure in its portfolio which is the case for this proposal also.

As stated previously in section 4 of this document, 'Circular PL07/12' acknowledges that 'mobile telephony, with associated ground-based antennae and support structures, will remain a key feature of telecommunications infrastructure for the foreseeable future'. Accordingly, it is requested that no time limit be placed upon a forthcoming planning permission.

Report of the Mobile and Broadband Taskforce and Action Plan for Rural Development

The purpose of the taskforce report (published by the Department of Communications, Climate Action and Environment) and the Action Plan for Rural Development (published by the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs) in 2016 is to deliver the National Broadband Plan (NBP) in the shortest time possible and to reduce Ireland's urban-rural divide.

There are 40 actions contained within the taskforce report which require the co-operation of multiple stakeholders from government departments to industry providers. The actions contained within the report serve to eliminate barriers to the timely development of communications infrastructure in advance of, and in tandem with NBP State-led intervention.

The taskforce report states *'Delivering better mobile coverage to consumers means locating more masts in the most suitable locations from an engineering perspective' it continues 'Through commercial investment, we will see an expansion of fixed line networks and the provision of additional mobile infrastructure sites resulting in increased benefits for all'*. The proposed development represents industry investment in seeking to regularise this existing structure by having a permanent grant of permission to not only

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maintain existing broadband services in this rural area but to also cater for and keep pace with future and emerging technologies and network capacity demands.

7 Conclusions

- This planning application is for an existing 20 metres high monopole with antenna and transmission dishes attached, associated works, equipment, cabinets, access track and fencing as part of the existing 3G and 4G communications network, that will continue to provide vital high speed wireless broadband services for the local community into the future. This site has been in existence for 13 years and is an established part of the essential infrastructure and streetscape of the area;
- 'The proposed development (existing structure) is located in one of the most preferred locations within the 1996 Government Guidelines pertaining to telecommunications which states that 'In the vicinity of larger towns and in city suburbs operators should endeavour to locate in industrial estates or in industrially zoned land. The possibilities offered by some commercial or retail areas should be explored whether as rooftop locations or by way of locating "disguised" masts. It should also be noted that **substations operated by the ESB may be suitable for the location of antennae support structures.** This possibility should also be investigated';
- It has previously been granted planning permission by An Bord Pleanála and the location and design have not changed since then, only its importance has changed (increased) so the principle of it is considered to be accepted by An Bord Pleanála;
- In the Inspector's Report it is stated that '*In my opinion, this parcel of land offers a reasonable balance. The presence of industrial/warehouse type buildings, supplemented by trees, reduces the profile of the telecom structures seen by passers-by on the adjoining streets. Views of these structures are largely confined to the closest adjoining properties. For the most part, it is only the upper parts of the masts that are seen by casual observers. The move to 3G cells has brought refinement in the design of the masts themselves. They are generally slim and elegant. At this place, the existing masts are not very intrusive by reason of their height, form and colour. They are not out of place within this suburban location*'.
- The site location of the existing mast is located in a predominantly residential area. The application site provides an exception to the established pattern. It is occupied by an ESB substation and the adjoining site on the south is occupied by the local postal sorting office. Other adjoining properties include a petrol filling station at Fortfield Road. Consequently, Three Ireland is providing 'very good' 3G and 4G high speed wireless data and broadband services for this area and has been relied upon now by the local residential and business community for approximately 13 years and is similarly required to do so into the future which makes the site a favourable location for the existing communication structure (proposed development).
- Broadband is now considered an essential public service like water and electricity and the applicant urges the Planning Authority to assess the planning balance carefully here in terms of the public benefits associated with the proposal as opposed to the limited dis-benefits (limited visual impact) which are considered to be far outweighed in accordance with national and local policy;
- On Tower Ireland wishes to seek planning permission for the continued use of the structure by Three Ireland and will also make this existing structure available to any other licensed operator that may wish to co-locate on it as it does on all its wireless infrastructure throughout Europe;

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- It is respectfully requested that no time limit be attached as a condition to any forthcoming grant of permission (in line with Circular PL 07/12);
- The technical need for this existing structure has been demonstrated in section 5 of this document, which is to enable Three Ireland to continue to serve the local area by providing high speed broadband and data services in the future;
- As has been demonstrated in section 6 of this document, this proposal is in full accordance with the aforementioned policies and guidance, including the 1996 Government Guidelines, where the use of existing structures is the number one preferred location, to prevent the proliferation of new masts, which this application is for and is located in an ESB Substation also a favoured location in suburban areas under the said guidelines.

Due to the reasons set out herein this document and due to the strong policy support for this proposal, an existing structure, it is respectfully requested that the Planning Authority grant's permission for it.

Yours faithfully,



SEÁN GREENE BSC MSC PLANNING

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