

Planning Department  
South Dublin County Council,  
County Hall,  
Town Centre,  
Tallaght,  
Dublin 24.

21<sup>st</sup> November 2022

**RE: Vantage Towers Limited application for permission to erect a 24 metre high lattice telecommunications support structure together with antennae, dishes and associated telecommunications equipment, all enclosed in security fencing at Esker House, Esker Road, Esker, Co. Dublin. The proposed development is located within the curtilage of a Protected Structure.**

A Chara,

On behalf of Vantage Towers Ltd we wish to submit a planning application for the above development. In this respect we detail the purpose and reasoning for the application below.

## **1 Applicant Introduction**

### **1.1 Vantage Towers**

Vantage Towers is one of Europe's leading tower companies created from the Vodafone Group in 2020. As an independent Company, today Vantage owns, operates, and manages 82,000 towers across 10 countries where it is usually the leading or second largest supplier. It owns 1,300 masts in Ireland and combines the scale, stability, and quality of a leading tower network to provide infrastructure and technologies for Vodafone and other communications operators in an ever-changing and increasingly digital world.

The digital market is expanding and growing at exponential rates. Today mobile phones are only one component of a digital world inhabited by a wide range of communications services including wearable technology and IoT. Vantage Towers benefits from the resources and investment to provide the fabric for an emerging market across the country to meet the increasing demand for faster, greener, more reliable, more secure, and more efficient connectivity for a variety of operators.

### **1.2 Operator Requirement**

New infrastructure investment is directed by operator requirements, typically in areas either served with little or no infrastructure or where the current infrastructure is inadequate. Specifically, this application addresses Vodafone's requirement to significantly improve services in Lucan and the surrounding road network including sections of the N4 road sections of the R136 road.

## **2 Justification for New Structure**

### **2.1 Coverage**

Infrastructure within the area is inadequate to fulfil the current and forecast demand for new technologies and communication services. Taking into consideration technological and planning matters, Vantage has

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identified the chosen location at Lucan to meet this requirement. This is illustrated by the ComReg outdoor coverage maps below.

## 2.2 ComReg Coverage Maps

ComReg offers a public viewer enabling the public to view nationwide outdoor coverage for a range of wireless broadband operators. Below are maps showing Vodafone's 4G & 5G coverage.

The darker colours demonstrate good coverage levels, and the lighter colours demonstrate weaker coverage levels.

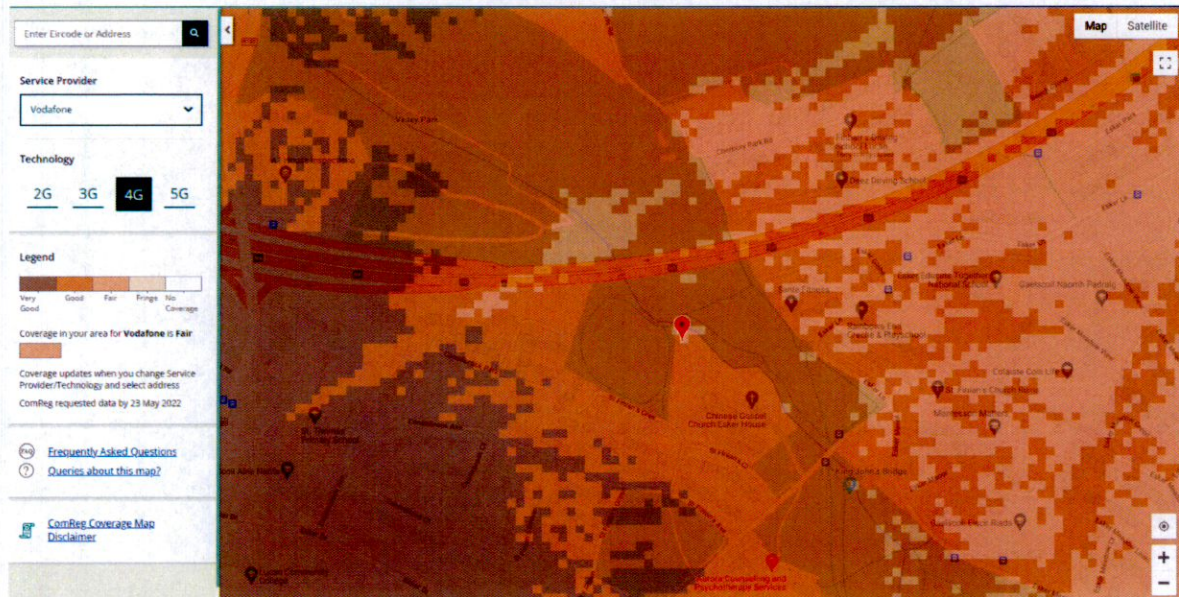


Figure 1 Current Vodafone 4G service levels in area surrounding application site

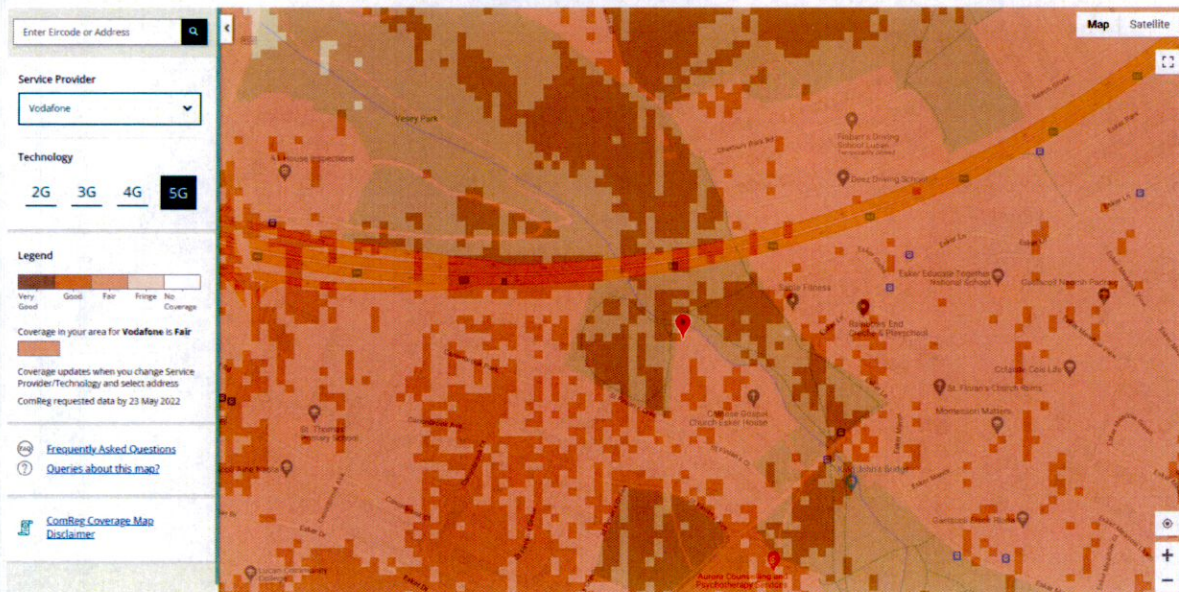


Figure 2 Current Vodafone 5G service levels in area surrounding application site

The proposed site is represented by the red marker. As can be seen by the lighter areas, coverage is very patchy with sections of fair coverage and blackspots particularly on the outskirts of Lucan.

The above coverage map clearly shows that Vodafone 4G & 5G coverage in the outskirts of Lucan is inadequate and do not benefit from the existing infrastructure within the town centre, to the southwest. As a result, an imbalance of coverage between Lucan and its environs exists. To rectify this imbalance a new structure is required. Current customer demand is not being met and significant coverage improvement is needed. It is imperative that Saint Thomas Primary School, Esker Educate Together National School, local businesses and residents in Lucan and surrounding area benefits from 'very good' 4G & 5G coverage in order that they have the capacity to access the best Information and communication technology. This is essential so that residents of Croom have the option to work from home, businesses can run efficiently and students can access cutting edge ICT services.

This installation is to improve existing Vodafone coverage in Lucan and the surrounding road network including sections of the N4 road sections of the R136 road.

Taking into consideration technological and planning matters, Vantage has identified the chosen location at Lucan to meet this requirement.

### **3 The Proposed Development**

#### **3.1 Site Location**

The application site is located on the grounds of Esker House in Lucan Village c. 80 m south of the N4 road, c. 11 km west of Dublin city centre and c. 5.70 km southwest of Blanchardstown town centre.

The application site is set back c. 210 m from Esker Road which is located southeast of the site. Adjoining the site to the north is scrubland and beyond is the N4 road located c. 80 m from the application site. Adjoining the application site to the east and west are green open spaces with existing mature vegetation including tall mature Ash and Horse Chestnut trees which measure at +16 to +19m AGL to top of crown. There is a single poplar which also measures at 24m AGL to top also. These tall mature trees will provide generous natural screening for the proposed structure.

There are housing developments located to the south, east and west of the application site which benefit from existing tall mature tree lines running along the boundaries of Esker house grounds. The closest dwelling house is located c. 100 m southwest of the application site within St Finian's Crescent which benefits from mature tree lines that also offer ample screening from the application site.

#### **NIAH Sites:**

The application site is located on the grounds of Esker House which has two protected structures:

**Esker House:** Reg No: 11204024 – Farm House (Built circa 1770 -1810) – located c. 80 m south east of the application site

**Esker Outbuildings:** Reg No: 11204025 - Out buildings - now used for residential purposes (Built circa 1800 - 1820) – located c. 120 m southeast of the application site.

Although the proposed development is within the curtilage of these buildings the existing tall mature trees will provide natural screening and eliminate any overly intrusive impact on the protected structures.

#### **3.2 The Proposed Development**

The proposed development will comprise a 24 m high multiuser lattice tower with associated equipment. The proposed structure will enable Vodafone to improve services within Lucan and introduce reliable 4G & 5G technology to the village and surrounding areas.

## 4 Discounted Structures

### 4.1 Alternative Structures

ComReg operates 'site viewer', a geo-website, which identifies existing communication sites. The map below illustrates the structures within the area.

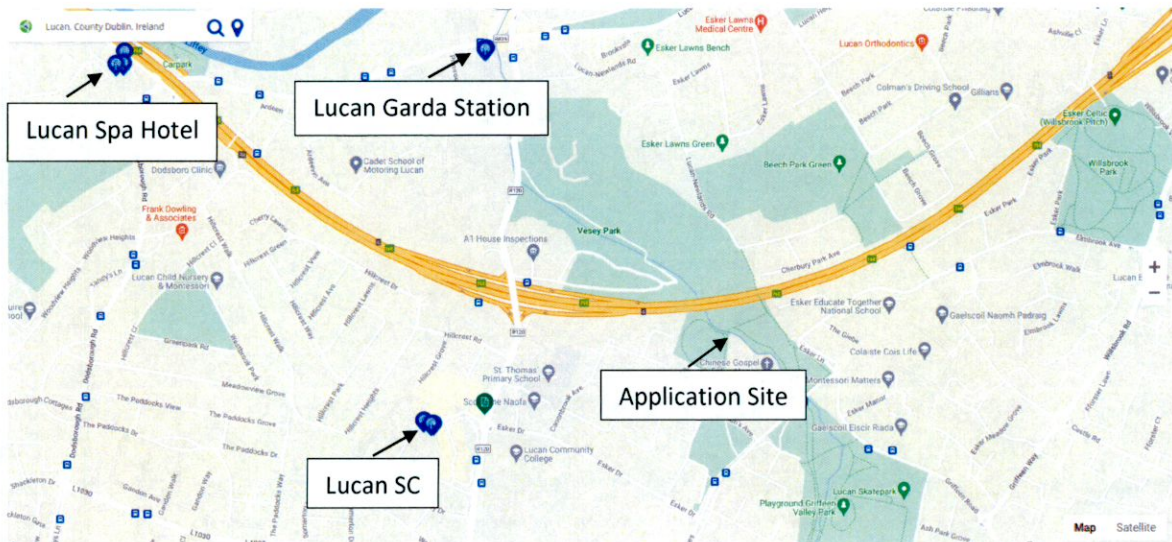


Figure 3 Map of existing sites in relation to application site

**Lucan Shopping Centre, Newcastle Road – located c. 750 m southwest of the application site:** Three Ireland, eir and Vodafone current transmit from a telecommunications structure at this location. As Vodafone is already present here, placing further equipment at this site would not improve coverage in the target area. Therefore, this structure has been discounted.

**Lucan Garda Station – located c. 850 m northwest of the application site:** Three Ireland, eir and Vodafone current transmit from a lattice telecommunications support structure at this location. Given the presence of three operators from the existing mast the available mounting heights are reduced significantly for a fourth operator to the point that the potential coverage from the mast is inadequate for the fourth operator. Also, as Vodafone is already present here, placing further equipment at this site would not improve coverage in the target area. Therefore, this structure has been discounted.

**Lucan Spa Hotel – located c. 1.60 km northwest of the application site:** Three Ireland, eir and Vodafone currently transmit from roof mounted telecommunications support structures at this location. However, this installation is too far away to provide the necessary 4G services to the village and too far for 5G. Therefore, this structure has been discounted.

Vodafone currently transmit from all three of the structures closest to the application site, and all sites were considered before submitting this application. However, all are too far away to secure the required target coverage.

A further search for telecoms, masts and towers was undertaken on the South Dublin County Council planning website, however no additional structures were identified.

### 4.2 Other Sites Considered

Due to the mature nature of the current Vodafone network both in respect of signal propagation, coverage overlap and links for line of sight, the area suitable for a new structure is very limited.

Taking the technical requirements, and linkages with existing installations combined with planning considerations, the site in question is considered to be the only site available which will achieve this. The site is ideal to meet the technological requirements for the specific target areas.

## **5 Planning Policy**

### **5.1 Local Planning Policy**

#### **5.1.1 County Development Plan**

The current South Dublin County Development Plan 2022-2028 highlights that widespread availability of a high-quality telecommunications network throughout the County is essential to the social and economic development of the County.

Under section 11.4, Objective IE5 states South Dublin County Council will *“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”*.

Also, undersection 11.4, Objective IE5 states South Dublin County Council will *“permit telecommunications antennae and support infrastructure throughout the County, subject to high quality design, the protection of sensitive landscapes and visual amenity.”*

Section 12.11.2 Information and Communications Technology relates to consideration of proposals for telecommunications antennae and support structures and states applicants will be required to demonstrate the following which are addressed below:

- Compliance with the document Telecommunications Antennae and Support Structures: Guidelines for Planning Authorities (1996) and Circular Letter PL 07 / 12 issued by the Department of the Environment and Local Government (as may be amended), and to other publications and material as may be relevant in the circumstances:

This application is fully compliant with the Guidelines and Circular Letter.

- 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:

This map is provided in section 4 of this document.

- The degree to which the proposal will impact on the amenities of occupiers of nearby properties, or the amenities of the area (for example, visual impacts of masts and associated equipment cabinets, security fencing treatment) 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:

This information is contained within section 2 & 5 of this document. These concerns are also addressed throughout this document.

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

This structure forms an integral part of the overall digital network and shared services for Vantage and its operators and its importance as such is referred to throughout this document.

The Plan also states that when making decisions in relation to telecommunications infrastructure it will have regard to the *Telecommunications, Antennae and Support Structures – Guidelines for Planning Authorities 1996*.

The Guidelines ensure a consistent approach by Planning Authorities and are considered in depth below.

#### **5.1.2 Telecommunications, Antennae and 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 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. It is noted that some amendments to these Guidelines have come into effect since the Development and Design Standards of the Kerry County Development Plan was written.

Each of these assessment criteria is addressed in turn below.

##### **Design And Siting**

Design and Siting fall within 4.2 of the Guidelines. As shown in the application plans the design is a lattice structure. The structure is specifically for the immediate use by Vodafone however is designed to accommodate other users.

The height at 24m is the lowest height Vodafone can secure the coverage and line of sight needed for links.

The site is not within a primary or secondary special amenity area, nor does it affect any protected views and prospects.

It is anticipated this design and siting will avoid the need for other antennae support structures in the immediate area.

##### **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.

The proposed development will be mostly hidden as it will be located to the rear of Esker House grounds and significantly screened by existing tall mature trees. Traffic and pedestrians using the surrounding road network will also only experience intermittent and occasional views of the structures. The many and varied existing vertical structures within proximity to the application site will help to assimilate the proposed structure into the surrounding streetscape.

Visual considerations and County Council recommendations have been considered in presenting this site for planning permission in a manner compliant with South Dublin County Council Development Plan 2022-2028 and the 1996 Guidelines.

## **Photomontage Analysis**

### **Viewpoint 1: the Glebe, Esker Lane, Lucan, Co. Dublin**

From this viewpoint the proposed structure is only partially visible and is well screened by mature tall trees. Therefore, the proposed structure will not have a significant intrusive visual impact from this viewpoint.

### **Viewpoint 2: Canonbrook Park, Lucan, Co. Dublin**

The proposed structure is fully obscured at this location by tree coverage. Therefore, the proposed structure will not have any visual impact from this viewpoint.

### **Viewpoint 3: St. Finian's Close, Lucan, Co. Dublin**

From this viewpoint only the top (c. 6 m) of the proposed structure would be visible as the structure would be almost completely screened by existing vegetation. Therefore, the proposed structure will not have a significant intrusive visual impact from this viewpoint.

### **Viewpoint 4: Chinese Gospel Church, Esker Lucan, Co. Dublin**

From this viewpoint the top section of the proposed structure would be visible. However, there is existing vegetation including tall mature trees which would offer natural screening at this location. There are also other vertical structures including light poles, buildings and rooftops which would help to assimilate the proposed structure into the surrounding landscape. Because this viewpoint location is closest to the application site it also has the greatest visibility of the application structure. This needs to be taken in the context of similar developments nationwide (e.g. communications masts situated within the grounds of protected Garda Stations throughout Ireland)

### **Viewpoint 5: Esker Road, Lucan, Co. Dublin**

From this viewpoint the proposed structure is heavily screened by dense tree coverage. Therefore, the proposed structure will not have a significant visual impact from this viewpoint.

The photomontages show that there is substantial dense tree coverage which will help to significantly screen the proposed development. Therefore, helping to reduce and visual impact that the proposed structure may have on the surrounding landscape/streetscape.

## **Access Roads**

The Guidelines refer to access roads under reference 4.4. In this instance the proposed development will be accessed via existing access and as such no changes will be necessary.

## **Site Sharing and Clustering**

Section 4.5 of the Guidelines refer to site sharing and clustering. With regard to clustering, there are no other structures within the required area. Vantage is an independent provider of infrastructure and has a facility sharing policy. With regard to the site in question, there will be space on the tower for additional services and operators if required.

### **Request For Permanent Permission**

This structure forms an integral part of the overall digital network and shared services for Vantage and its operators. Due to its importance and as referred to in the Development Plan and following publication of PL07/12 dated 19th October 2012 by the Environment, Community and Local Government updating planning guidelines relating to the Telecommunications Antennae and Support structures, with particular reference relating 2:2 Temporary Permissions, it is requested that a permanent grant of permission is given for this application.

### **Health And Safety**

We wish to confirm and reassure that Vantage 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.

Attention should also be drawn to Circular **07/12** which reiterates that *“planning authorities should be primarily concerned with the appropriate location and design of telecommunications structure and do not have competence for health and safety matters in respect of telecommunications infrastructure. These are regulated by other codes and such matters should not be additionally regulated by the planning process”*.

### **5.1.3 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 Vodafone 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.

### **5.1.4 Regional and National Supporting Guidelines and Framework Documents**

The provision of communications and its associated infrastructure has been recognised as a vital component of the Country’s economy at all levels, from home to business and local level to National level. A number of papers have been produced in this respect including the following.

### **5.1.5 Project 2040**

Several objectives are contained in these planning framework documents aimed at supporting broadband rollout, including support for the National Broadband Plan (2012). Project 2040 incorporates the National Planning Framework and the National Development Plan 2018-2027.

### **5.1.6 National Planning Framework**

The National Planning Framework lists the following relevant objectives and commentary:

- Improving local connectivity to principal communication (broadband), energy, transport, and water networks.
- National Policy Objective 24: Support and facilitate delivery of the National Broadband Plan as a means of developing further opportunities for enterprise, employment, education, innovation, and skills development for those who live and work in rural areas.

### **5.1.7 National Development Plan 2018-2027**

Broadband is more increasingly to the fore in national planning framework documents. In the National Development Plan 2018 – 2027 paragraph 1.1 reads ...



A fundamental underlying objective of the National Development Plan is, therefore, to focus on continued investment to yield a public infrastructure that facilitates priorities such as high-speed broadband and public transport in better cities and in better communities.

Within the National Broadband Plan, the Government recognises that access to quality high speed broadband is essential for today's economy and society, to ensure that Ireland's citizens and businesses continue to enjoy the opportunities and benefits that flow from this transformational digital age

The application structure is pivotal in reaching the goals of the NPF and National Development Plan. As already mentioned, the proposed structure is an essential piece of communications infrastructure which will be in compliance with National, Regional and Local policy by providing high quality network coverage.

Without this infrastructure, the local community will continue to suffer from inadequate mobile phone and mobile broadband service.

## **6 Covid 19 crisis.**

Ireland's National Action Plan in response to Covid 19 was approved on 16<sup>th</sup> March 2020 by the Cabinet Committee on Covid 19. One of the three aims of the Action Plan being to reduce the disruption to public health, the economy and social welfare. Due to the restrictions-imposed work, education, social interaction, and other lifestyles changed to be undertaken from home.

The digital communication economy experienced substantial demand putting pressure on services. As a result, telecommunications were designated an essential service by Government on 28<sup>th</sup> March 2020.

The telecommunications industry is acting to meet this demand and ensure this new developing economy is enabled. The proposed development also meets these changes in lifestyle.

## **7 Consequences of not Securing the Site.**

New technology and changes in lifestyle and the way we work, rest and play are bringing about major changes in the communications world. Demand for these new services is growing. The structure will enable Vodafone to provide immediate coverage to meet this demand and requirement for services. Failure to provide these services will have an adverse impact on the residents here, the local area and its economy.

## **8 Conclusion**

### **8.1 Demand in the area**

Vodafone's current service provision in Lucan and the surrounding area is inadequate. It requires fit for purpose supporting infrastructure from which to transmit. There is no available existing infrastructure capable of accommodating Vodafone's equipment requirements and consequently a new installation is required.

The application site is specifically targeted to provide the optimal location to provide the new Vodafone communications services.

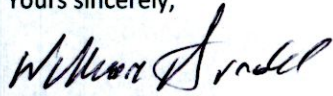
COVID-19 has also highlighted the need to create a reliable, high-speed broadband network throughout Ireland. Since remote working has become the norm, it is vital for access to high-quality services.

As recommended in the Telecoms Guidelines 1996, the 07/12 circular and in the South Dublin County Development Plan the applicant has carefully reviewed all potential site options and structure designs. The proposed development represents the minimum acceptable design consistent with effective coverage propagation with links to the network and shall not have an overly intrusive visual impact on the surrounding area.

A grant of permission will allow the much-needed technological advancements to be completed in this area. The structure will significantly improve Vodafone services, it shall help eliminate coverage blackspots and shall make a significant positive contribution to the benefit of residents, businesses, and social enterprises in Lucan and the surrounding area as well as to the local road network.

With the above in mind, we respectfully request that South Dublin County Council grant planning permission to the proposed development as submitted.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'William Arnold', written in a cursive style.

William Arnold,  
Charterhouse,  
Agent for Vantage Towers Limited

Appendix I: Vodafone Letter of Support



The Planning Department  
South Dublin County Council  
County Hall Tallaght  
Dublin 24  
D24 A3XC

21 November 2022

**RE: Vantage Towers planning application for telecommunications installation located  
at Chinese Gospel Church, Esker House, Lucan, Co Dublin**

To whom it may concern,

Vodafone understand that Vantage Towers are applying for planning permission for the location of a new multi-user telecommunications structure at the Chinese Gospel Church, Esker House, Lucan, Co Dublin.

As a result of Vodafone network requirements to provide improved mobile and wireless broadband coverage to the Lucan area. Vodafone will commit to installing equipment on the tower subject to Vantage Towers obtaining planning permission.

In line with South Dublin County Council Telecommunications guidelines and strategies, Vodafone prefer to site share on existing structures subject to them providing sufficient antenna height and rigidity for effective radio signal propagation, thereby eliminating the need for an independent site. The rollout of mobile wireless broadband services by Vodafone requires a greater number of telecommunications sites in order to meet licence obligations for coverage. This site would provide coverage to our customers living, visiting and travelling in the area. Failure to progress this installation therefore could have a negative future impact on network subscribers enjoying future technologies.

I trust that this letter is of assistance in this planning application, but please feel free to contact me should you require any more information or clarification.

Yours sincerely

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Hanél Gallogly  
Property Manager  
Vodafone Ireland Ltd  
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**Vodafone Ireland Limited**

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