

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

28/03/2023

**RE: RESPONSE TO REQUEST FOR FURTHER INFORMATION. PLANNING REF: PL:  
SD22A/0397**

**DEVELOPMENT:** Existing telecommunications support structure (previously refused under Ref: SD08A/0745 and then subsequently granted under An Bord Pleanála Ref: 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.

**Location:** Unit 1, Fortfield Lane, Fortfield Road, Terenure, Dublin 6W.

**Application Type:** Retention

Dear Sir or Madam,

I refer to the Request for Further Information dated 13<sup>th</sup> of December 2022.

*"The applicant is requested to submit a map showing 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 issues by the Commission for Communications Regulation. This is required to be demonstrated in accordance with Section 12.11.2 of the South Dublin County Development Plan 2022-2028."*

In response to the Request for Further Information, please see attached discounted options map (figure 4) and table (2); from Comreg showing the location of all

existing telecommunications structures within 2km from the proposed development to be retained, including the operators present at each site, the distance of these to the retention site in question and reasons why locating at each site would not sufficiently maintain crucial existing coverage in the surrounding area.

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.

### **Site Location**

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.

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 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 other freestanding telecom antennae support structures with supporting equipment. All three telecommunications are co-located in accordance with the 1996 Government Guidelines. 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).



Figure 1: Photo of site location

### 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

Table 1: Planning History

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 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.

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'.

[https://coveragemap.comreg.ie/map?location=53.3113257190559,-6.302069902655023&technology=3g&network=three&place\\_id=Eh1Gb3J0ZmllbGQgUmQsIERlYmxpbwGfXJlbGFuZCluKiwKFAoSCdkln5WIC2dIEem-YxrZwFQEHQKEgkvrCfagA5nSBGgcTGXqccACg](https://coveragemap.comreg.ie/map?location=53.3113257190559,-6.302069902655023&technology=3g&network=three&place_id=Eh1Gb3J0ZmllbGQgUmQsIERlYmxpbwGfXJlbGFuZCluKiwKFAoSCdkln5WIC2dIEem-YxrZwFQEHQKEgkvrCfagA5nSBGgcTGXqccACg)

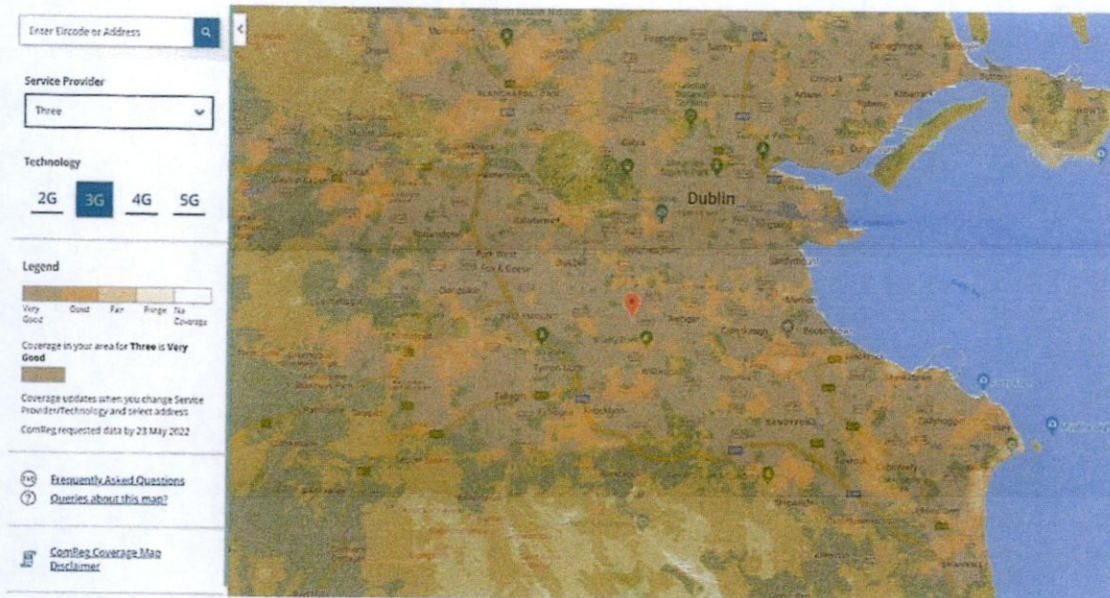


Figure 2: Existing Three Ireland 3G Broadband Coverage



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.

## South Dublin County Development Plan 2022-2028 (CDP)

**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 not 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.

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 and for new structures industrial locations (subject site location) is the number one preferred location.

'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'*.

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'. Further on page

10 of the said guidelines under section 4.5 regarding clustering, where the proposal to be retained is clustered along with two other telecommunications structures, it states that *'Where the applicant proposes to share an existing mast or to enter a clustering arrangement on an existing site a statement from the owner/landlord of the mast or site that the shared mast or cluster will continue to operate under the guidelines applicable to it should be presented to the planning authority'*.

To avoid any confusion as to why the existing telecommunications installation is required here which is a central point in this application, all the mobile operators namely Three, Eir and Vodafone have an obligation to provide 100% coverage throughout the country, including at this location in Terenure to at least maintain existing coverage. The nearest existing sites are too far away for the newer technologies to work including 4G and 5G technologies and to a large extent 3G, due to the required data speeds for applications like social media, internet browsing and downloading, the technology range which depends on the number of users at any one time can be only several hundred metres. What is required is a balance between planning requirements and people's entitlements to modern communications facilities which affects their quality of life, which is classed by the government as an essential public service like water and electricity, so these services are required in all areas. Unlike the earlier 2G technology in the late 1990's which had a range of up to 10KM and not several hundred metres for 4G and 5G technologies, so back then masts could be located miles away from their coverage target area, but that is not the case nowadays, so it is respectfully requested that the Council show's flexibility for the newer technologies with regards to siting, whilst protecting amenity, which is what the applicant considers it has done very successfully here as there are no resulting significant environmental impacts resulting from the proposed development (existing structure) as is demonstrated in this planning statement.





Figure 4: Existing Telecommunications Sites within 2KM

Site Location	Site ID	Easting/Northin g	Operator	Distanc e (km)	Reason
1	DN304	E: 312245 N: 231742	Vodafon e	1.7	Three is currently located on this structure.
1	THREE_DU0183	E: 312214 N: 231775	Three	1.7	
1	DN_1207	E: 312213 N: 231780	Meteor	1.7	
1	3_DU0183	E: 312214 N: 231775	Three	1.7	
1	DU0183	E: 312214 N: 231775	Three	1.7	
2	3_DU0108	E: 314289 N: 228970	Three	1.7	Three is currently located at this location.
2	THREE_DU0108	E: 314289 N: 228970	Three	1.7	
2	DN_1209	E: 314342 N: 228932	Meteor	1.7	
3	THREE_DU0976	E: 314174 N: 228787	Three	1.75	Three is currently

3	DN859	E: 314174 N: 228787	Vodafone	1.75	located at this location.
3	DU0976	E: 314174 N: 228787	Three	1.75	
3	3_DU0976	E: 314174 N: 228787	Three	1.75	
4	DN310	E: 313200 N: 228882	Vodafone	1.6	Three is currently located at this location.
4	THREE_DU0430	E: 313179 N: 228814	Three	1.6	
4	DN_3557	E: 313185 N: 228807	Meteor	1.6	
4	3_DU0430	E: 313179 N: 228814	Three	1.6	
5	3_DU1182	E: 312607 N: 229362	Three	1.15	Three is currently located at this location.
5	THREE_DU1182	E: 312607 N: 229362	Three	1.15	
5	DN_1741	E: 312607 N: 229362	Meteor	1.15	
5	DN951	E: 312583 N: 229329	Vodafone	1.15	
6	DN265	E: 311957 N: 228913	Vodafone	2.1	Three is currently located at this location.
6	DN_3303	E: 311955 N: 228930	Meteor	2.1	
6	THREE_DU1615	E: 311969 N: 228967	Three	2.1	
6	DU1615	E: 311969 N: 228967	Three	2.1	
6	3_DU1615	E: 311969 N: 228967	Three	2.1	
7	3_DU0158	E: 312449 N: 229940	Three	950m	Three is currently located at this location.
7	THREE_DU0158	E: 312449 N: 229940	Three	950m	
7	DN036	E: 312442 N: 229928	Vodafone	950m	
7	DU0158	E: 312449 N: 229940	Three	950m	
7	DN_1235	E: 312433 N: 229965	Meteor	950m	
8	DN_1217	E: 312124 N: 230818	Meteor	1.15	Three is currently

8	Three_DU0180	E: 312126 N: 230814	Three	1.15	located at this location.
8	DN378	E: 312163 N: 230780	Vodafone	1.15	
8	3_DU0180	E: 312126 N: 230814	Three	1.15	
8	DN_1217	E: 312124 N: 230818	Meteor	1.15	
9	DU0911	E: 312350 N: 231217	Three	1.25	Three is currently located at this location.
9	3_DU0911	E: 312350 N: 231217	Three	1.25	
9	THREE_DU0911	E: 312350 N: 231217	Three	1.25	
9	DN_1234	E: 312312 N: 231270	Meteor	1.25	
10	THREE_DU0141	E: 313245 N: 230980	Three	330m	Three is currently located at the rooftop site along Cashel Road and Stannaway Drive.
10	DN_4965	E: 313245 N: 230979	Meteor	330m	
10	DU0141	E: 313245 N: 230980	Three	330m	
10	3_DU0141	E: 313245 N: 230980	Three	330m	
10	DN301	E: 313199 N: 231099	Vodafone	330m	
11	DN_1031	E: 313990 N: 231270	Meteor	1.2	Three is currently located at this location.
11	3_DU0140	E: 313973 N: 231272	Three	1.2	
11	THREE_DU0140	E: 313973 N: 231272	Three	1.2	
11	DNSDX	E: 313987 N: 231276	Vodafone	1.2	
12	THREE_DU0096	E: 314734 N: 231296	Three	1.78	Three is currently located at this location.
12	3_DU0096	E: 314734 N: 231296	Three	1.78	
12	DU0096	E: 314734 N: 231296	Three	1.78	
12	DN900	E: 314733 N: 231295	Vodafone	1.78	
12	DN_3285	E: 314737 N: 231141	Meteor	1.78	
13	3_DU0105	E: 315067	Three	1.85	

		N: 230427			Three is currently located at this location.
13	THREE_DU0105	E: 315067 N: 230427	Three	1.85	
13	DN324	E: 315067 N: 230427	Vodafone	1.85	
13	DN_1291	E: 315066 N: 230426	Meteor	1.85	
14	DN_4967	E: 314428 N: 230521	Meteor	1.2	Three is currently located at this location.
14	THREE_DU0665	E: 314428 N: 230521	Three	1.2	
14	3_DU0665	E: 314428 N: 230521	Three	1.2	
15	THREE_DU0097	E: 314419 N: 230097	Three	1.22	Three is currently located at this location.
15	DN395	E: 314415 N: 230079	Vodafone	1.22	
15	DU0097	E: 314419 N: 230097	Three	1.22	
15	3_DU0097	E: 314419	Three	1.22	
16	DNTRE	E: 314098 N: 230108	Vodafone	950m	Three is currently located at this location.
16	DN_1372	E: 314149 N: 230185	Meteor	950m	
16	THREE_DU0951	E: 314151 N: 230184	Three	950m	
16	DU0951	E: 314151 N: 230184	Three	950m	
16	3_DU0951	E: 315151 N: 230184	Three	950m	
16	DN_1372	E: 314149 N: 230185	Meteor	950m	
16	THREE_DU0097	E: 314419 N: 230097	Three	950m	
17	DN_1332	E: 313194 N: 230314	Meteor	10m	The subject Three site is clustered at this subject site location along with the existing Eir and Vodafone structures. Please see
18	DN379	E: 313190 N: 230319	Vodafone	10m	
19	3_DU0376	E: 313212 N: 230319	Three	On Site.	

					image and reason for these separate structures below.
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Table 2: Existing Telecommunications Sites within 2KM



Figure 5 Existing Three Ireland, Vodafone and Eir Poles co-located at Fortfield Lane

The image above provides a visual representation of the site location and is numbered no. 19 in Table 2 above. All three structures (Three, Eir, Vodafone) are 'Street Poles' designed to be less visually obtrusive in an urban setting than a traditional monopole with their cylindrical antennas located on top.

None of these structures are technically designed or structurally capable of holding any additional equipment to what is already on them. As you can clearly see they are very slim and would not be able to take the wind loading if further equipment was added.

As has been shown in this document, Three Ireland is located on all 19 existing telecommunications structures within 2Km of the proposal which is an existing structure which has the benefit of a previous planning permission of the proposal where the principle is considered to be acceptable which is within an industrial setting almost completely surrounded by residential uses, which is the number one location for a new telecommunications structure under the 1996 Government Guidelines pertaining to telecommunications and where the proposal provides vital existing 3G and 4G broadband coverage to the local business and residential

dwellings here and which it is required to into the future, and it is respectfully requested that it be granted permission so that it may continue to do so in the future.

Yours faithfully

A handwritten signature in blue ink, appearing to be 'Kieran Tarpey', with a stylized flourish at the end.

**KIERAN TARPEY MIPI, MRTPI**

Entrust planning & environmental

For and on behalf of:

On Tower Ireland Limited

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**Enclosures:**

Discounted Options Map