

South Dublin County Council
Planning Department
County Hall
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Land Use Planning & Transportation

28 APR 2023

South Dublin County Council

26th April 2023

RE: RESPONSE TO ADDITIONAL INFORMATION REQUEST IN PLANNING APPLICATION (PLANNING REFERENCE NO. SD22A/0384) FOR PERMISSION FOR PROPOSED DEVELOPMENT AT EIR, ESKER LANE, LUCAN, CO. DUBLIN. THE DEVELOPMENT WILL CONSIST OF THE CONSTRUCTION OF MULTI-OPERATOR TELECOMMUNICATIONS INFRASTRUCTURE COMPRISED OF A 21M MONOPOLE (OVERALL STRUCTURE HEIGHT OF 22 METRES), ANTENNAS, DISHES AND ASSOCIATED EQUIPMENT, TOGETHER WITH NEW GROUND LEVEL EQUIPMENT CABINETS, NEW FENCING, LANDSCAPING AND ALL ASSOCIATED SITE WORKS.

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Towercom Ltd, as agent for Eir (Eircom Limited), are lodging this response to the Additional Information request by South Dublin County Council (Planning Reference No. SD22A/0384) dated 30th November 2022 in relation the proposed development for the telecommunications infrastructure at Eir, Esker Lane, Lucan, Co. Dublin.

Additional Information Request No. 1

1. *"Having regard to the reference in the Applicant's Cover Letter to antennae, dishes and equipment and the lack of such equipment shown on the accompanying plans and particulars, the Applicant is requested to provide revised plan, sectional and elevational drawings showing all antennas, dishes and associated equipment to be mounted on the proposed monopole structure."*

Response to Additional Information Request No. 1

In response to this Additional Information request, it is submitted that the drawings and photomontages of the proposed development show 2 levels of operator's equipment attached to the monopole, at approximately 16.5m and 19.5m heights (measured at centre of antenna). The supporting structure is not shown at full structural capacity with this amount of equipment attached, as this would depend on specific size and type of antenna/ dishes required by the various operators and the available heights on the tower.

The elevational drawings of the proposed 21m monopole structure submitted in the planning application include both antennas and dishes (total of 6 no. panel antennas and 2 no. dishes shown). To demonstrate this more clearly, we are providing an additional elevation drawing without the surrounds (Appendix A: North Elevation Operators Equipment – Proposed) showing the antennas,

dishes and associated equipment to be mounted on the proposed monopole structure. As the full extent, size and number of the required equipment is not yet known, the proposed new telecommunications antennas, dishes and associated equipment as shown on the drawings submitted with the planning application and Additional Information response is somewhat indicative, until such time as a final configuration of equipment is agreed with operators and subject to planning permission being granted for the new structure. The drawings submitted are indicative of the basic configuration of operator's proposed equipment that would be deployed should the proposal be granted permission and subject to operator's technological and network requirements at the time of build. This configuration can also be influenced by equipment installed on existing and new surrounding sites in the area, particularly where new link dishes are being deployed, with an ongoing process of upgrading of equipment by the various operators. It should be noted that *Class 31 (h) of Part 1 of Schedule 2, Planning & Development Regulations, 2001 (as amended)* relating to exempted development provision, allows for the attachment of additional antenna to an existing antenna support structure, the total number of antennae shall not exceed 18, of which not more than 12 antennae shall be dish type (whether shielded or not) for structures 15 metres or over in height.

We understand that the Planning Authority may also attach a condition to planning permission requiring appropriate permission to be sought for the addition of any future equipment. However, in accordance with Section 1 of the Telecommunications Antennae and Support Structures, Guidelines for Planning Authorities' Department of the Environment and Local Government 1996, Circular Letter PL07/12 and Section 12.11.2 of the South Dublin County Development Plan 2022-2028, we would consider the potential co-location opportunities on the proposed structure into the future to be welcomed by South Dublin County Council.

Additional Information Request No. 2

- 2. *"The Applicant is requested to provide a detailed Visual Impact Assessment, to include existing and proposed photomontages and verified views from all aspects to facilitate a complete assessment of the proposed development and the potential impact of the proposal on the amenities of nearby properties and the wider surrounding area."***

Response to Additional Information Request No. 2

Photomontages have been prepared of views of the proposed monopole at selected locations surrounding the subject site (see Appendix B). The photomontages show 6 no. current and proposed views at short to medium range views within the surrounding area of Lucan.

The selected viewpoints are as follows;

- Viewpoint 1: Esker Lane, approximately 114m northeast of the subject site
- Viewpoint 2: Ballydowd Grove, approximately 132m northwest of the subject site
- Viewpoint 3: Esker Lane, approximately 153m south of the subject site
- Viewpoint 4: Esker Lane, approximately 98m northeast of the subject site
- Viewpoint 5: Roselawn, approximately 333m west of the subject site
- Viewpoint 6: Woodville Walk, approximately 89m southeast of the subject site

It should be noted that the drawings and photomontages of the proposed development show 2 levels of operator's equipment attached to the monopole, at approximately 16.5m and 19.5m heights (at centre of antennas). The supporting structure is not shown at full structural capacity with this amount of equipment attached, as this would depend on specific size and type of antenna/ dishes required by the various operators and also the available heights on the monopole.

In regard to the visual impact of telecommunications infrastructure, the Telecommunications Guidelines (1996) state 'in most cases the applicant will only have limited flexibility as regards

location, given the constraints arising from radio planning parameters.’ In this case at the Eir Exchange in Lucan, it is considered that the existing utilities site has high capacity for absorbing the proposed development considering the presence of an existing exchange building (with rooftop telecommunications installation) on the property which will help screen the structure from view and the existing mature natural screening. Whilst it is acknowledged that given the proximity of some of the viewpoints to this proposal, that the new structure is visible in some of the ‘proposed’ photomontages, it is submitted however, that in most cases the existing Exchange building or rooftop telecommunications installation are also visible in the ‘current’ photomontages. Furthermore, given varying building heights, street levels and utilities context of the site, the proposed structure does not dominate the townscape. As such, it is contended that the change to what exists at present (large exchange building and telecommunications installation on rooftop) does not result in any significant visual impacts from these short to medium range viewpoints. The presence of mature natural vegetation in the surrounding area also greatly mitigates the visual impact of the proposed development.

There has been a telecommunications installation (rooftop) at the exchange property for many years, as such the existing installation has become an accepted part of the telecommunications infrastructure in the area and a familiar part of the skyline without unduly affecting the visual impact. The fact that there is an existing telecommunications installation within the Eir property indicates that there is a precedent for infrastructure and utilities in the locality.

The subject site has significant urban infrastructure present including the existing telecommunications installation on the Exchange rooftop, as well as nearby street lighting, electricity poles and transmission lines in the area which helps towards absorbing some of the visual impact of the proposal. These vertical structures, nearby vegetation and built form all help to screen the proposed development to a considerable level. The proposed monopole has been designed and located to the rear of the Exchange building with minimal 21 metre height, so as to remain partially screened by the existing buildings and vegetation and to be absorbed with the streetlights, electricity poles and transmission lines in the streetscape, mitigating the visual impact of the development.

It is evident that there would be some visual impact from the proposed structure, given its height and size, within the surrounding area, however the views of the structure are likely to be intermittent due to its location to the rear of the property and Exchange building, and given that there are currently a number of existing structures in the surrounding built environment including the rooftop installation on the subject site, streetlighting, and electricity poles within the town centre. Where the structure will be visible due to its size and height, it will generally be seen protruding over the rooftops, and through natural screening, existing buildings and general visual clutter of a suburban setting. It is submitted that the proposed structure would not have a significant or prominent visual impact at this location, set back from the nearby roads and the slender nature of the proposed structure would ensure that there would be limited visual impact from public vantage points, as shown in the attached photomontages. It is considered that a monopole (as opposed to a lattice type design) is an appropriate design at this location considering the predominantly residential surrounds.

As the proposed installation is intended to serve this part of Lucan, it therefore must be located in reasonable vicinity to the target population in these residential areas. While the proposed structure is taller than the exchange building and rooftop installation (in order to accommodate additional equipment and meet the technical requirements of operators) the location to the rear of the Exchange and surrounding streetscape environment will also assist in screening the proposed development.

It is reasonably assessed, having regard to these characteristics of the subject site, the suitability of the site from a technical perspective and noting that the proposed structure height is required to effectively function for additional equipment and operator requirements, and the location needs to be as close as possible to the geographical/population area to be served, we consider that the

magnitude of the impact of the proposed development on the visual amenities of the area would be acceptable and would not seriously injure the visual amenities of the area.

Given the nature and location of residential development within this part of Lucan, along with the aforementioned constraints involved in locating and building a suitable telecommunications installation to suit mobile network operators, acquisition, Planning and construction requirements, it is considered that the existing utilities site (with existing telecommunications installation on the rooftop) is the most suitable location for a new monopole to cluster with existing infrastructure.

Additional Information Request No. 3

- 3. *"The Applicant is requested to provide the following:***
- (i) *Submit a drawing showing the setback distance from proposed development to nearby public surface water sewers.***
 - (ii) *Submit a drawing showing the setback distance from proposed development to nearby public watermains.***
 - (iii) *Submit a letter and drawing CFRAM flood risk map.***
 - (iv) *Submit a drawing showing the setback distance from proposed development to nearby public wastewater sewers."***

Response to Additional Information Request No. 3

In response to this Additional Information request, we wish to submit the required drawing indicating the above distances from proposed development to nearby public water services (see Appendix C – Public Water Infrastructure Map). We wish to also submit a letter and CFRAM flood risk map provided by Sean Bradley, Design Manager at Towercom Ltd (see Appendix D).

Additional Information Request No. 4

- 4.**
- (i) *"Applicant to provide a detailed text rationale which describes the current on-site arrangements with regard to:***
 - a. *The "existing Towercom boundary" shown in red***
 - b. *The existing and proposed parking arrangements and how this proposal will impact same***
 - (ii) *Applicant to provide:***
 - a. *A revised layout drawing and which demonstrates how vehicular access and egress is achieved to the rear of the main building***
 - b. *AutoTRAK analysis for cars/ emergency vehicles/ refuse trucks safely accessing/ egressing the grounds.***
 - (iii) *Applicant to demonstrate that the remaining car parking provision for the telephone exchange is in line with the requirements of the South Dublin County Development Plan 2022-28 maximum parking rates with provision for mobility impaired spaces and electrical charging included.***
 - (iv) *Applicant to demonstrate through the provision of revised site layout and elevational drawings that bicycle parking for the existing telephone exchange is provided in line with the requirements of the South Dublin County Development Plan 2022-2028."***

Response to Additional Information Request No. 4

In response to 4(i)(a), it is submitted for clarification that the reference to 'existing Towercom boundary' on the 'Site Layout Plan – Existing' drawing should have stated 'Proposed site boundary' to match the 'Site Layout Plan – Proposed' drawing. This has been corrected on the revised drawings enclosed (see Appendix E).

In response to 4(i)(b), it is submitted that Section 4.5 of the 'Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities, 1996', acknowledges that it is unlikely that entrance and exit from telecommunications sites will give rise to traffic hazards as maintenance visits should not be more than quarterly. It is acknowledged, however that during the construction period, additional precautions may have to be taken in relation to traffic and parking. It is considered that there is sufficient space and parking within the subject Exchange to accommodate the required construction vehicles for the short timeframe required, in liaison with the operators and employees using/ visiting the Exchange property.

In response to 4(ii)(a), we wish to submit a revised drawing demonstrating vehicular access and egress is achieved to the rear of the main building (see Appendix F). This route will use the existing entrance at the eastern boundary of the property and continue along the existing access route to the front of the Exchange building and along the northern boundary of the property to the rear of building and proposed site.

In response to 4(ii)(b), it is submitted given the subject location at an existing large Exchange property, the use of an existing access route, and low number of visits to the telecommunications site for operational/ maintenance purposes, that an AutoTRAK analysis is not required for the proposed development.

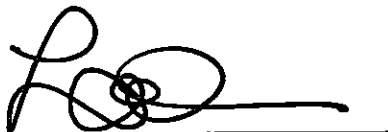
In response to 4(iii), and further to the information provided above, it is submitted that the remaining car parking provision for the Exchange property is sufficient, given the nature of the proposed development, associated trips and the established utilities use at the property, with current low level of vehicular trips/ parking required.

In response to 4(iv), it is submitted that in consideration of the nature of the proposed telecommunications development and occasional operational/ maintenance vehicle trips required, there is no need for bicycle parking at the Exchange property, associated with this development.

In conclusion, it is South Dublin Development Plan 2022-2028 policy "*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*", which we consider has been adequately demonstrated in this Additional Information response. The subject site is located at an Eir Exchange, an established utilities and telecommunications site. We submit that the proposed development will provide for improved coverage in the area without having a significant impact on the visual and residential amenity or character of the local area.

We trust this Additional Information response is satisfactory to South Dublin County Council and await the decision for the proposed telecommunications development at the Eir Exchange in due course.

Yours faithfully,



Laura O'Connell

Towercom Limited