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PLANNING DEPARTMENT

23 AUG 2023

22nd August 2023

RE: RESPONSE TO CLARIFICATION OF 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 Clarification of Additional Information request by South Dublin County Council (Planning Reference No. SD22A/0384) dated 25th May 2023 in relation the proposed development for the telecommunications infrastructure at Eir, Esker Lane, Lucan, Co. Dublin.

Clarification of Additional Information Request No. 1

1. *"The Planning Authority maintains concerns in relation to the potential impact of the proposed development and therefore it is requested that the applicant provides the following;*

- *A detailed rationale for the proposed height of the structure;*
- *Justification for the chosen location of the proposed structure;*
- *A reasoned assessment of the potential impact on the amenities of adjacent properties (Anley Court to the west and Edmundsbury Court to the north);*
- *Demonstration of the consideration of mitigation measures to soften the visual impact of the structure, having regard to the content of Section 12.11.2 of the South Dublin County Development Plan 2022-2028."*

Response to Additional Information Request No. 1

In response to this Clarification of Additional Information request, the concerns raised by South Dublin County Council and in consideration of the current needs and customer demand in the subject area, it is proposed as a further mitigation measure to reduce the monopole height to 18m (overall height 19m to top of lightning finial). This revised design is now submitted for consideration by South Dublin County Council with drawings and photomontages of the proposed development enclosed (see Appendix A and Appendix B). It is considered that these revised drawings and photomontages

will facilitate a complete assessment of the proposed development (at reduced 18m monopole height) and the potential impact of the proposal on the amenities of nearby properties and the wider surrounding area.

The photomontages show 6 no. current and proposed views at short to medium range views within the surrounding area of Lucan. The same viewpoint locations are provided as previously in photomontages for 21m monopole under the response to Further Information request in order to fairly compare both.

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 is submitted that the change (18m monopole) 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 and reduced monopole height also 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 redesigned and located to the rear of the Exchange building with reduced 18 metre monopole height, being further 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.

At 18m height, that would still 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 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 and reduced height of the proposed structure would ensure that there would be limited visual impact from public vantage points, as demonstrated in the revised photomontages. It is submitted that an 18m 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, which we consider has been

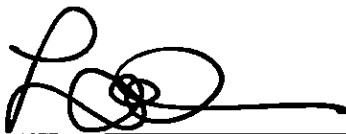
adequately demonstrated in this planning application. While the proposed structure is still taller than the exchange building and rooftop installation (in order to accommodate additional equipment and meet the technical requirements of operators) the location to the rear of the Exchange and surrounding 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. Being an established utilities setting with existing telecommunications infrastructure, with limited alternative locations, it is submitted that the Eir Exchange is the optimal solution in a residential area, which meets the technical requirements.

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 Clarification of Additional Information response and planning application. 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 Clarification to 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