



Telecommunications Report - Section 3.2 of the Building Height Guidelines (2018)

DEVELOPMENT
An Bord Pleanála – Submission
Sandford Road Development, Milltown Park, Sandford Road, Dublin 6

02 September 2021

Prepared by
Independent Site Management Limited
Christopher Plockelman
Director
✉: christopher@ismireland.com
☎: +353 (0)1 905 8800
www.ismireland.com

Table of Contents

DEFINITIONS.....	3
EXECUTIVE SUMMARY	4
ABOUT THE AUTHOR	5
DEVELOPMENT DESCRIPTION	6
SITE LOCATION/LAYOUT MAP	9
TELECOMMUNICATION CHANNELS.....	10
FINDINGS.....	13
MITIGATION MEASURES	14
APPENDICIES	15
AREA TELECOMMUNICATION ANALYSIS	16
MICROWAVE LINK ANALYSIS.....	17
WALK TEST DATA.....	18
MITIGATION MEASURES	19



DEFINITIONS

Author:	Independent Site Management Limited (hereinafter referred to as "ISM")
Mitigation Measures:	means the allowances made for the retention of important Telecommunication Channels (hereinafter referred to as "Mitigation Measures")
Planning Authority:	means An Bord Pleanála (hereinafter referred to as the "Planning Authority")
Radio Frequency:	means a frequency or band of frequencies in the range 104 to 1011 or 1012 Hz, of the electromagnetic spectrum suitable for use in telecommunications.
Microwave Links:	means the transmission of information by electromagnetic waves with wavelengths in the microwave range (1 m - 1 mm) of the electromagnetic spectrum suitable for use in telecommunications.
Telecommunication Channels:	means Radio Frequency links & Microwave Transmission links (hereinafter referred to as "Telecommunication Channels")
The Applicant:	means Sandford Living Limited (hereinafter referred to as the "Applicant")
The Development:	means the proposed development situated at the former Milltown Park House, Milltown Park, Sandford Road, Dublin 6 (hereinafter referred to as the "Development")



EXECUTIVE SUMMARY

Independent Site Management (ISM) has been engaged to provide a specific assessment that the proposal being made by Sandford Living Limited (the "Applicant") within its submission to An Bord Pleanála (the 'Planning Authority'), allows for the retention of important Telecommunication Channels ("Telecommunication Channels") such as microwave links, to satisfy the criteria of Section 3.2 of the Building Height Guidelines (2018).

To provide this assessment, ISM reviewed the Applicant's proposed development (the "Development"), together with their proposed allowances to retain relevant Telecommunication Channels in the context of the immediate surrounding registered and documented telecommunication sites.

Pursuant to our review, ISM can conclude based on the findings outlined herein that the proposal being made by the Applicant within its submission to the Planning Authority allows for the retention of important Telecommunication Channels, such as Microwave links, and therefore satisfies the criteria of Section 3.2 of the Building Height Guidelines (2018).



ABOUT THE AUTHOR

ISM is a consultancy firm and asset management company that provides telecommunication consultancy and services to developers and property owners.

ISM works closely with all providers of wireless and fixed line telecommunication services to bridge their infrastructure requirements with that of private and public development. ISM has successfully been providing this service in Ireland for 20 years.

ISM is a multidiscipline firm proficient in the 3 main areas in the delivery of telecommunication services:

- (1) Radio Frequency technology;
- (2) Microwave Transmission technology; &
- (3) Fixed Line fiber optic & copper technologies.

ISM has had an integral part in procuring, designing, building and subsequently managing over 300 mobile base station and/or fixed wireless sites, the vast majority of which originated in densely populated, urban environments.

ISM has designed built and operates 6 in-building distributed antenna systems, and 2 large area managed fibre optic networks.



DEVELOPMENT DESCRIPTION

Sandford Living Limited intend to apply to An Bord Pleanála for permission for a strategic housing development at this c. 4.26 hectare site at Milltown Park, Sandford Road, Dublin 6, D06 V9K7. Works are also proposed on Milltown Road and Sandford Road to facilitate access to the development including improvements to pedestrian facilities on an area of c. 0.16 hectares. The development's surface water drainage network shall discharge from the site via a proposed 300mm diameter pipe along Milltown Road through the junction of Milltown Road / Sandford Road prior to outfalling to the existing drainage network on Eglinton Road (approximately 200 metres from the Sandford Road / Eglinton Road junction), with these works incorporating an area of c. 0.32 hectares. The development site area, road works and drainage works areas will provide a total application site area of c. 4.74 hectares.

The development will principally consist of: the demolition of c. 4,883.9 sq m of existing structures on site including Milltown Park House (880 sq m); Milltown Park House Rear Extension (2,031 sq m); the Finlay Wing (622 sq m); the Archive (1,240 sq m); the link building between Tabor House and Milltown Park House rear extension to the front of the Chapel (74.5 sq m); and 36.4 sq m of the 'red brick link building' (single storey over basement) towards the south-western boundary; the refurbishment and reuse of Tabor House (1,575 sq m) and the Chapel (768 sq m), and the provision of a single storey glass entrance lobby to the front and side of the Chapel; and the provision of a 671 No. unit residential development comprising 604 No. Build-to-Rent apartment and duplex units (88 No. studios, 262 No. one bed units, 242 No. two bed units and 12 No. three bed units) and 67 No. Build-to-Sell apartment and duplex units (11 No. studios, 9 No. one bed units, 32 No. two bed units and 15 No. three bed units).

Block A1 will range in height from part 5 No. storeys to part 10 No. storeys and will comprise 94 No. Build-to-Rent apartments; Block A2 will range in height from part 6 No. storeys to part 8 No. storeys (including part double height at ground floor level) and will comprise 140 No Build to-Rent apartments and duplex units; Block B will range in height from part 3 No. to part 7 No. storeys and will comprise 91 No. Build-to-Rent apartments; Block C will range in height from part 2 No. storeys to part 8 No. storeys (including part double height at ground floor level) and will comprise 163 No. Build-to-Rent



apartments; Block D will range in height from 3 No. storeys to 5 No. storeys and will comprise 39 No. Build-to-Sell apartments; Block E will be 3 No. storeys in height and will comprise 28 No. Build-to-Sell duplex units and apartments; Block F will range in height from 5 No. storeys to part 7 No. storeys and will comprise 92 No. Build-to-Rent apartments; and the refurbished Tabor House (4 No. storeys including lower ground floor level) will comprise 24 No. Build-to-Rent apartments.

The development also includes a creche within Block F (400 sq m) with outdoor play area; and the provision of communal internal amenities (c. 1,248.8 sq m) and facilities (c. 158.3 sq m) throughout the residential blocks, Tabor House and the converted Chapel building including co-working space, gym, lounges, reading rooms, games room, multi-purpose space, concierge, mail rooms and staff facilities.

The proposed works also include a new 2.4 metre high boundary wall across the site from east to west (towards the southern boundary) requiring the demolition of a portion of the red brick link building that lies within the subject site towards the south-western boundary (36.4 sq m) and the making good of the façade at the boundary. The existing Link Building is the subject of a separate application for permission (DCC Reg Ref. No. 3866/20) that includes a request for permission to demolish that Link Building, including the part of the building on the lands the subject of this application for SHD permission. If that application is granted and first implemented, no demolition works to the Link Building will be required under this application for SHD permission. If that application is refused permission or not first implemented, permission is here sought to demolish only that part of the Link Building now existing on the lands the subject of this application for permission and to make good the balance at the red line with a blank wall.

The development also provides a new access from Milltown Road (which will be the principal vehicular entrance to the site) in addition to utilising and upgrading the existing access from Sandford Road as a secondary access principally for deliveries, emergencies and taxis; new pedestrian access points; pedestrian/bicycle connections through the site; 344 No. car parking spaces (295 No. at basement level and 49 No. at surface level) which includes 18 No. mobility impaired spaces, 10 No. car share spaces, 4 No. collection/drop-off spaces and 2 No. taxi spaces; bicycle parking; 14 No. motorcycle spaces; bin storage; boundary treatments; private balconies



and terraces facing all directions; external gantry access in sections of Blocks A1, A2 and C; hard and soft landscaping including public open space and communal open space (including upper level communal terraces in Block A1, Block B and Block C which will face all directions); sedum roofs; PV panels; substations; lighting; plant; lift cores; and all other associated site works above and below ground. The proposed development has a gross floor space of c. 54,871 sq m above ground level over a partial basement (under part of Block A1 and under Blocks A2, B and C) measuring c. 10,607 sq m, which includes parking spaces, bin storage, bike storage and plant.

SITE LOCATION/LAYOUT MAP

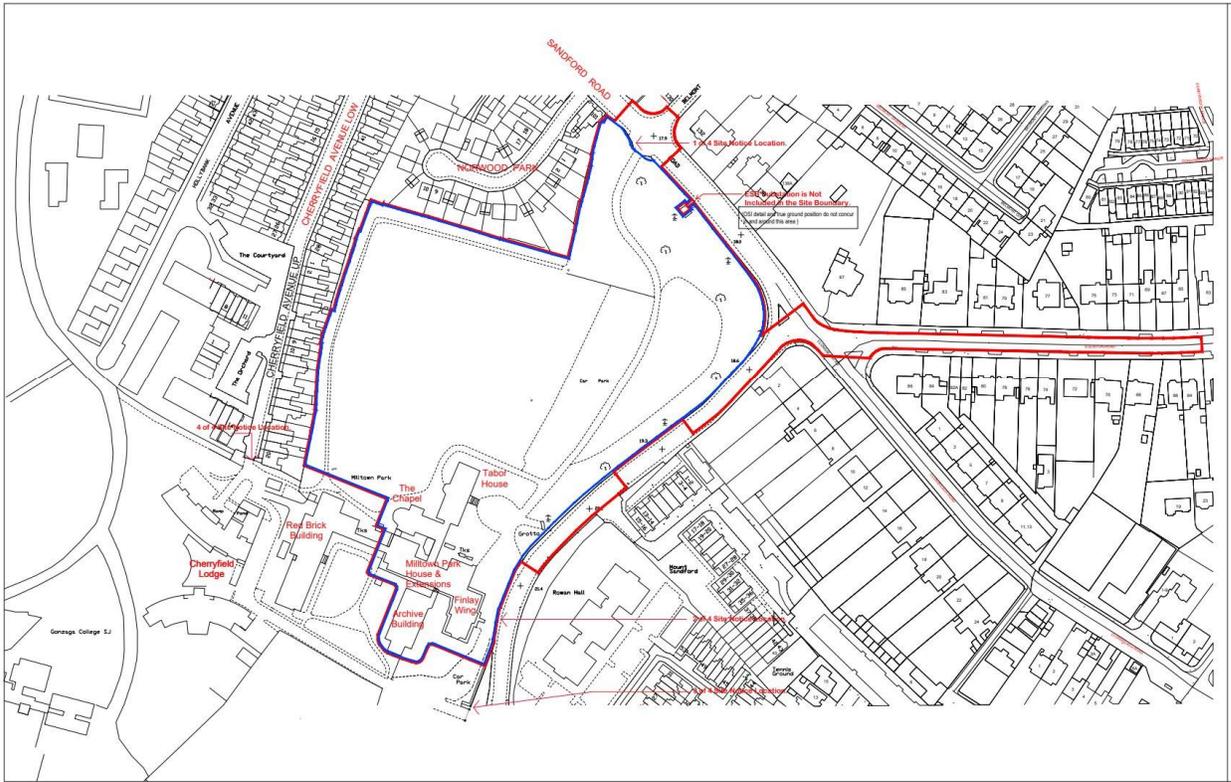


Figure 1

TELECOMMUNICATION CHANNELS

This report assessed the two wireless Telecommunication Channels or networks of Telecommunication Channels that may be affected by the height and scale of a new development, Radio Frequency links & Microwave Transmission links

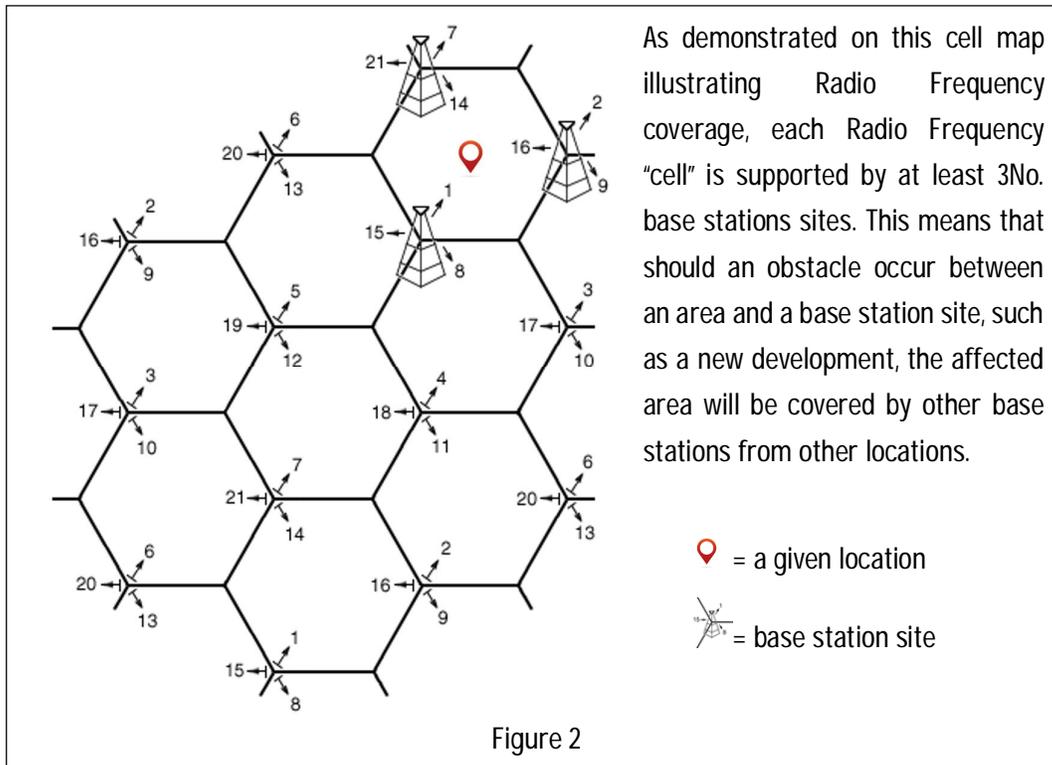
Radio Frequency links & Microwave Transmission Links are used in Ireland's mobile phone and fixed wireless networks and disseminate at an average above ground level height of 20m, making them the most relevant Telecommunication Channels to be assessed in relation to the height and scale of a new development and to that end what allowance the Applicant needs to make for their retention.

Mobile phones send and receive signals via links from nearby antenna sites or cellular towers, technically known as base stations, using Radio Frequency waves. Microwave Transmission links use microwave dishes to "transmit" from these base stations to other base stations forming a network. Radio Frequency waves operate at a lower power within lower frequencies of the radio spectrum, whereas Microwave Transmission operates at higher power within higher frequencies of the radio spectrum.

Radio Frequency waves are distributed over land areas in "cells", each served by at least one fixed-location transceiver (base station), but more normally by three cell sites or base stations. These base stations provide the cell with the network coverage, which can then be used for voice, data, and other types of content. A cell typically uses a different set of frequencies from neighbouring cells to avoid interference and provide guaranteed service quality within each cell.

When joined together, these cells provide Radio Frequency coverage over a wide geographic area (Cellular network). This enables numerous portable transceivers (e.g., mobile phones, tablets and laptops equipped with mobile broadband modems, pagers, etc.) to communicate with each other and with fixed transceivers and telephones anywhere in the network, via base stations, even if some of the transceivers are moving through more than one cell during transmission.





Cellular networks offer a number of desirable features, but most notably, additional cell towers can be added indefinitely and are not limited by the horizon, therefore it can be considered indeterminable as to whether a new development affects the Radio Frequency coverage of a geographical area which is being served by multiple base stations, not necessarily the closest.

Conversely, Microwave Transmission links are point-to-point links, which are easily determined to be affected, or not, by the height and scale of a new development. In point-to-point wireless communications, it is important for the line of sight between two base stations to be free from any obstruction (terrain, vegetation, buildings, wind farms and a host of other obstructions). As any interference or obstruction in the line of sight can result in a loss of signal.

While installing Microwave links, it is important to keep an elliptical region between the transmitting Microwave link and the receiving Microwave link free from any obstruction for the proper functioning of the system. This 3D elliptical region between the transmit antenna and the receive antenna is called the Fresnel Zone. The size of the ellipse is determined by the frequency of operation and the distance between the two sites.

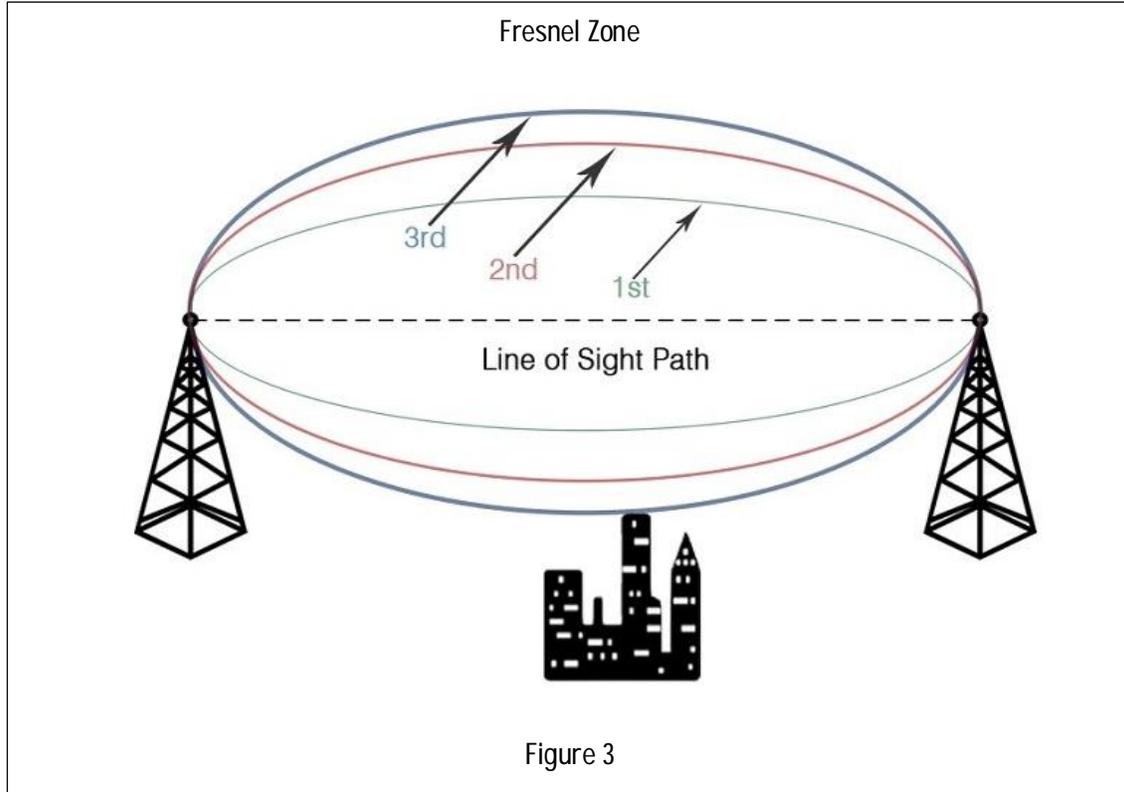


Figure 3

Essentially, if there is an obstacle in the Fresnel zone, part of the radio signal will be diffracted or bent away from the straight-line path. The practical effect is that on a point-to-point Microwave link, referred to herein, the refraction will reduce the amount of energy reaching the receiving microwave dish. The thickness or radius of the Fresnel zone depends on the frequency of the signal – the higher the frequency, the smaller the Fresnel zone. Microwave links are high frequency radio links used for point-to-point transmission.

FINDINGS

ISM's assessment did not identify any Microwave links that will require the Applicant to make specific allowances for their retention ("Mitigation Measures").

Our assessment has not identified any Radio Frequency links that will require the Applicant to make specific allowances for their retention.

ISM carried out a full assessment of neighbouring registered and documented telecommunication sites to assess what Microwave links would be impacted by the height and scale of the Development. Refer to Figure 4 & 5 of the appendices for full analysis.

ISM carried out a full assessment of neighbouring registered and document telecommunication sites to assess what Radio Frequency links might be impacted by the height and scale of the Development. To asses this, we carried out a walk test throughout the surrounding areas to ascertain what cells were serving the street areas to the north, south, east & west of the Development site. Refer to Figure 6 of the appendices for full analysis

Our assessment identified Radio Frequency coverage for the local geographic area is served by several cells at strategic distances away from the development site on a 360° basis which is typical cell pattern for urban Radio Frequency coverage. The walk test data determined that the business, residential and public road areas to the north, south, east & west of the Development are adequately covered by the cell sites identified in figure 6 and are not reliant on Radio Frequency coverage from any one cell that would be obstructed by the Development.

Please note that telecommunication networks are always evolving, and as such, these findings remain subject to change.



MITIGATION MEASURES

ISM did not identify any Telecommunication Channels that would as a consequence of the height and scale of the Development, require specific mitigation measures in order to retain them.

ISM has recommended and the Applicant has accepted, to provide a dedicated allocation of space at and on the Lift Shaft overrun together with access to a power supply, where steel support structures can be fixed at a future date if required, to provide necessary mitigation measures should retention of any Microwave links be required (subject to planning permission if applicable). Refer to Figure 7 of the appendices for full analysis.

ISM can therefore conclude that the proposal being made by the Applicant within its submission to the Planning Authority allows for the retention of important Telecommunication Channels, such as Microwave links, to satisfy the criteria of Section 3.2 of the Building Height Guidelines (2018).

APPENDICIES

Figure 4: Identification of neighbouring registered and document telecommunication sites
(Area Telecommunication Analysis)

Figure 5: Identification of Microwave links disseminating from neighbouring registered and
document telecommunication sites (Microwave Link Analysis)

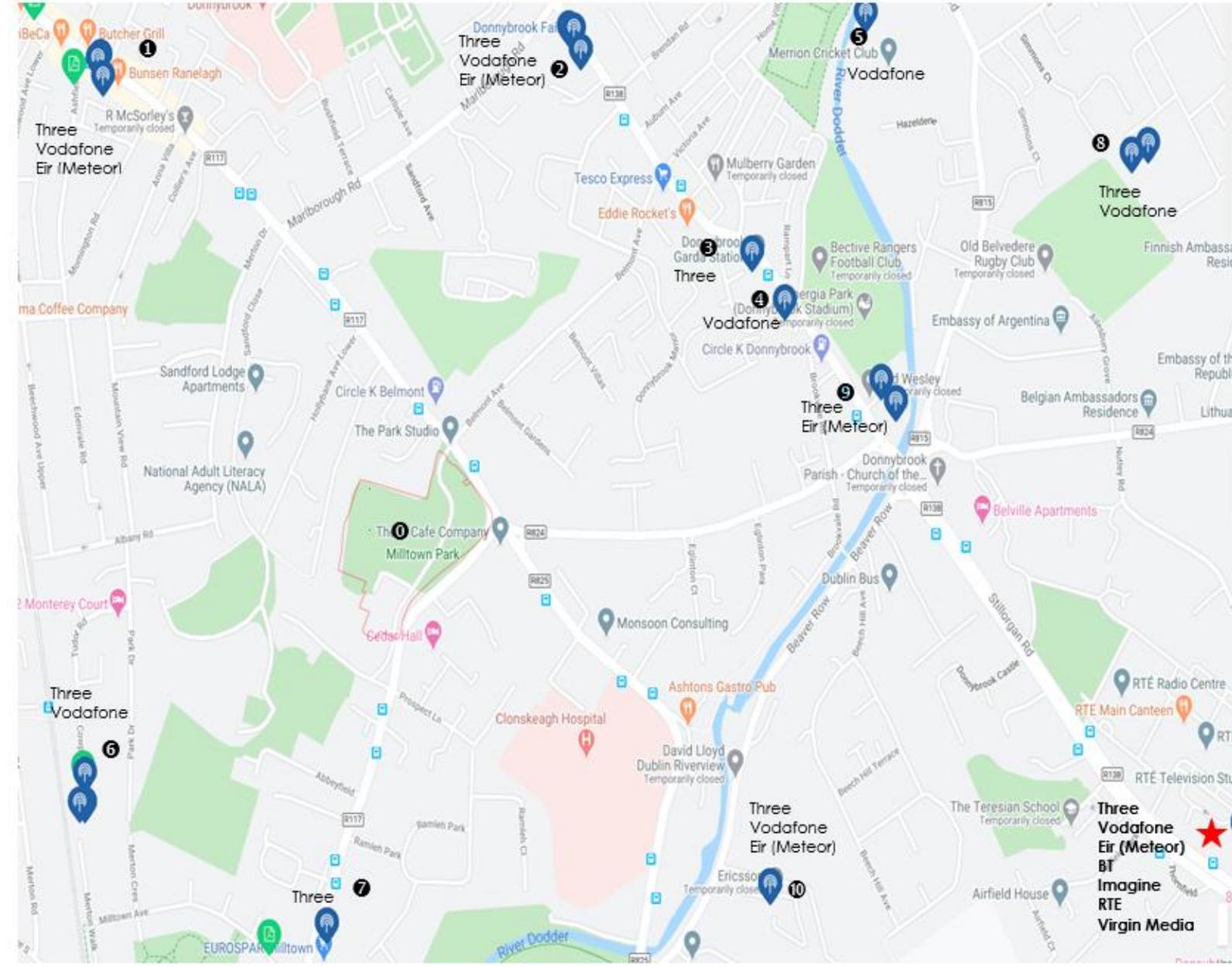
Figure 6: Identification of local area Cells by Cell ID (Cell Identification Analysis)

Figure 7: Mitigation Measures (if required in future)

Figure 4

Area Telecommunication Analysis

Source: Comreg



Note
 All Dimensions to be checked on site
 No Dimensions to be scaled from this Drawing
 This drawing to be read with relevant
 Consultant Drawings

- ① Proposed Development
- ① Cinnamon Ranelagh (ISM)
- ② Donnybrook Fair
- ③ Donnybrook Garda Mast
- ④ Donnybrook exchange
- ⑤ Cricket Club (flood Light)
- ⑥ Milltown ESB
- ⑦ Milltown EuroSpar
- ⑧ RDS
- ⑨ Birdcage (Stadium)
- ⑩ Ericsson
- ★ RTE

* ISM Site

FINAL

ism INDEPENDENT
 SITE MANAGEMENT

83 Harcourt Street
 Dublin 2, Ireland D02 C977
 +353 1 905 8800
 info@ismireland.com

Client
 Sandford Living Limited

Project
 Sandford Road

Option	1
Date	02/09/2021
File Name	Sandford Road

Drawing:
 Area Site Analysis

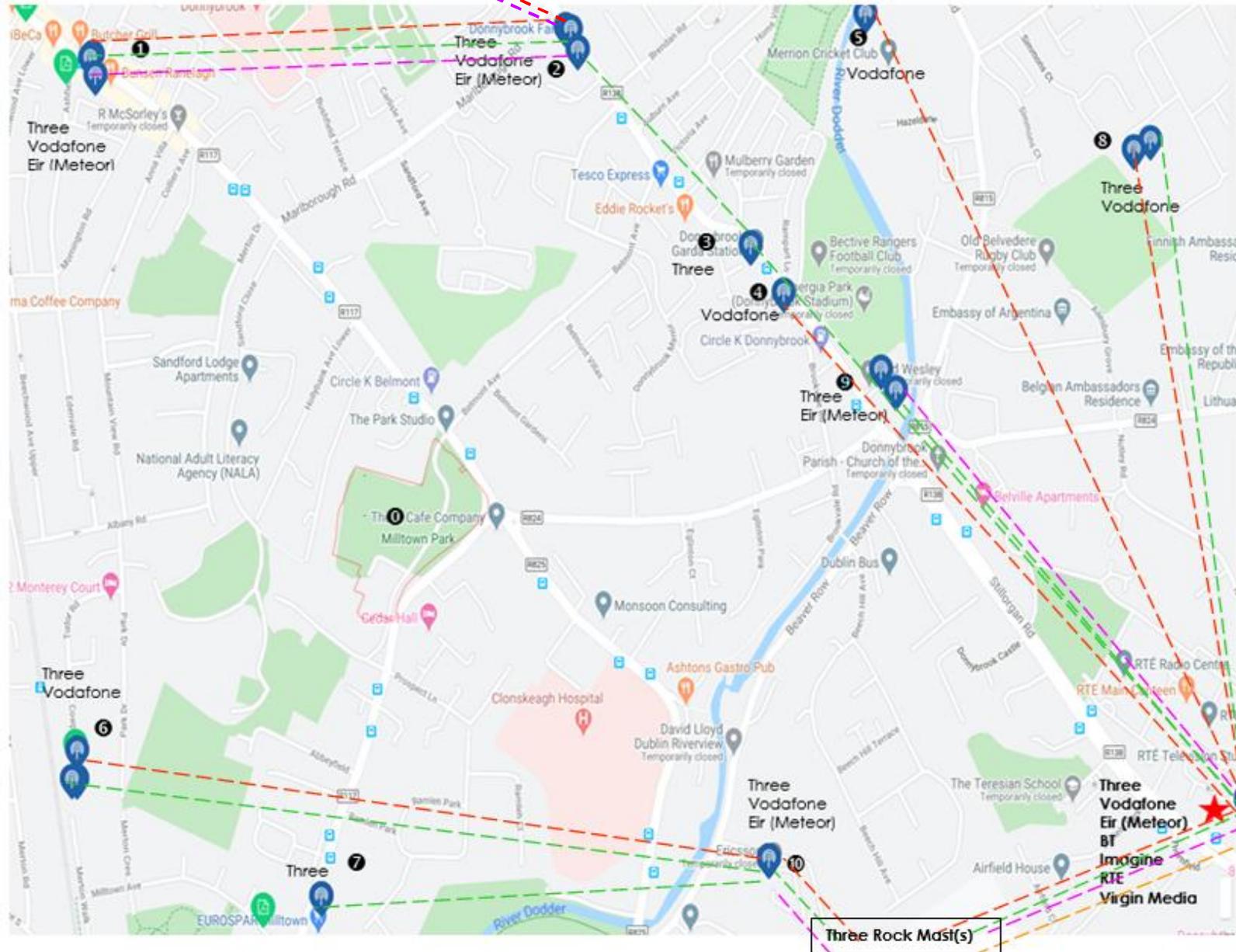
Building	Drawing No.	Zone	Rev
SPN	G 2621		1

© Independent Site Management Limited

Figure 5

Burlington Hotel Microwave Link Analysis

Source: Comreg ISM Vodafone Three & Eir Mobile



Note
 All Dimensions to be checked on site
 No Dimensions to be scaled from this Drawing
 This drawing to be read with relevant
 Consultant Drawings

- Three Transmission Link
- Vodafone Transmission Link
- Eir Transmission Link
- BT Transmission Link

FINAL

ism INDEPENDENT
 SITE MANAGEMENT

83 Harcourt Street
 Dublin 2, Ireland D02 C977
 +353 1 905 8800
 info@ismireland.com

Client
 Sandford Living Limited

Project
 Sandford Road

Option	1
Date	02/09/2021
File Name	Sandford Road

Drawing:
 Link Analysis

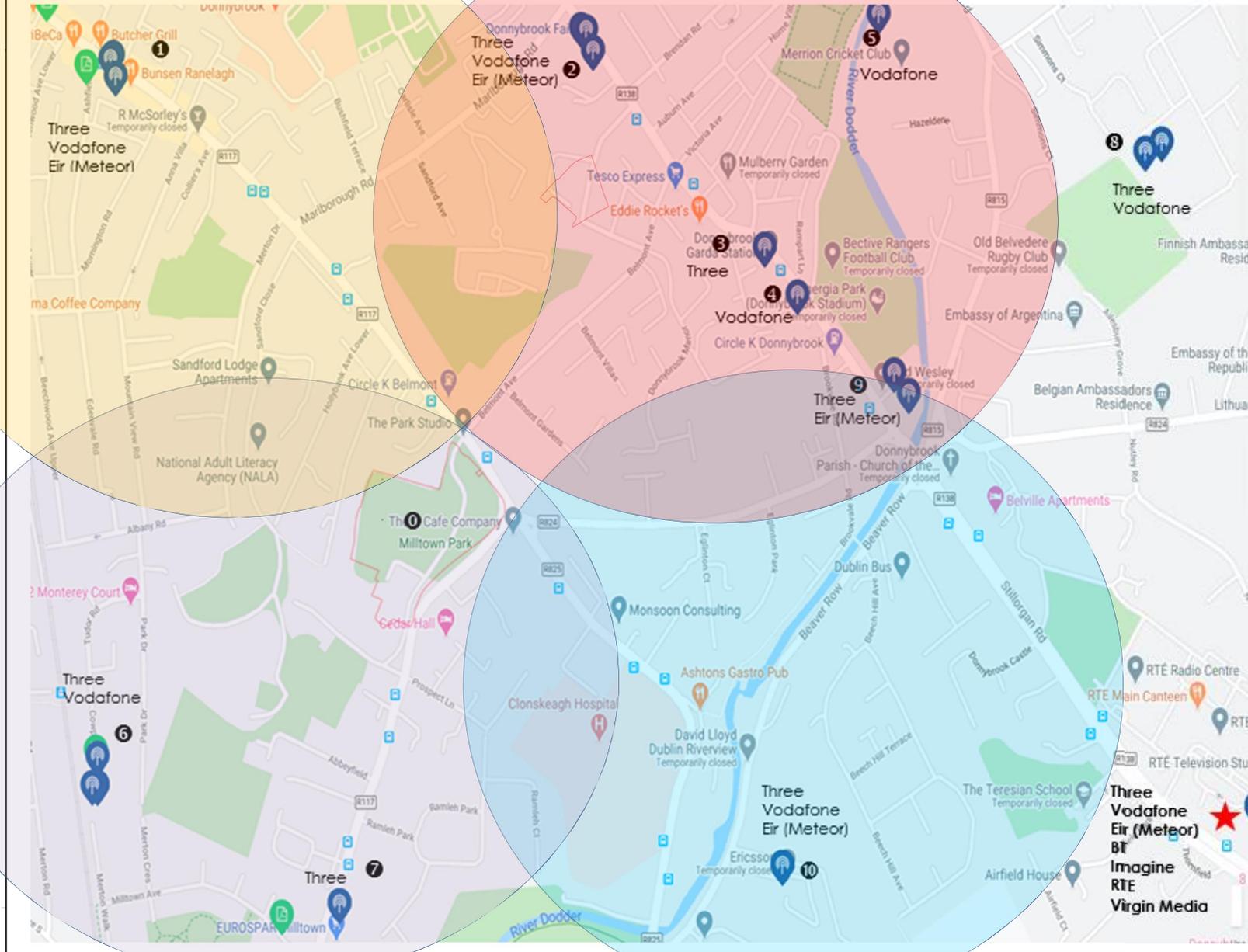
Building	Drawing No.	Zone	Rev
SPN	G 2621		1

© Independent Site Management Limited

Figure 6

Walk Test Data

Source: Comreg, ISM



Note
 All Dimensions to be checked on site
 No Dimensions to be scaled from this Drawing
 This drawing to be read with relevant
 Consultant Drawings

- Ericsson Cell ID
- Cinnamon Cell ID
- Multiple Cell IDs
 1. Donnybrook Fair
 2. Donnybrook Guard
 3. Stadium
- Milltown ESB Cell ID

NOTE
 The Anite Walker Air test kit was used to test and record the radio environment. This kit controls and logs the radio environment and the Cell ID the signal is coming from. Measurements were then mapped against the public roadway to provide the results

FINAL



83 Harcourt Street
 Dublin 2, Ireland D02 C977
 +353 1 905 8800
 info@ismteland.com

Client
 Sandford Living Limited

Project
 Sandford Road

Option	1
Date	02/09/2021
File Name	Sandford Road

Drawing:
 Cell Identification Analysis

Building	Drawing No.	Zone	Rev
SPN	G 2621		1

© Independent Site Management Limited

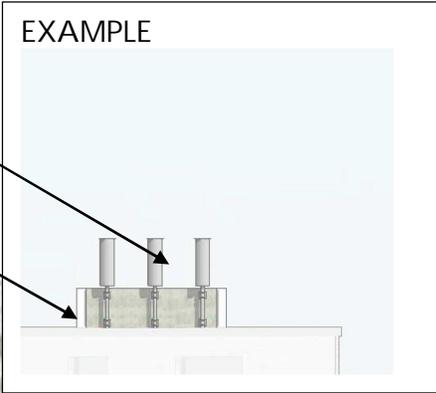
Figure 7

Mitigation Measure Design

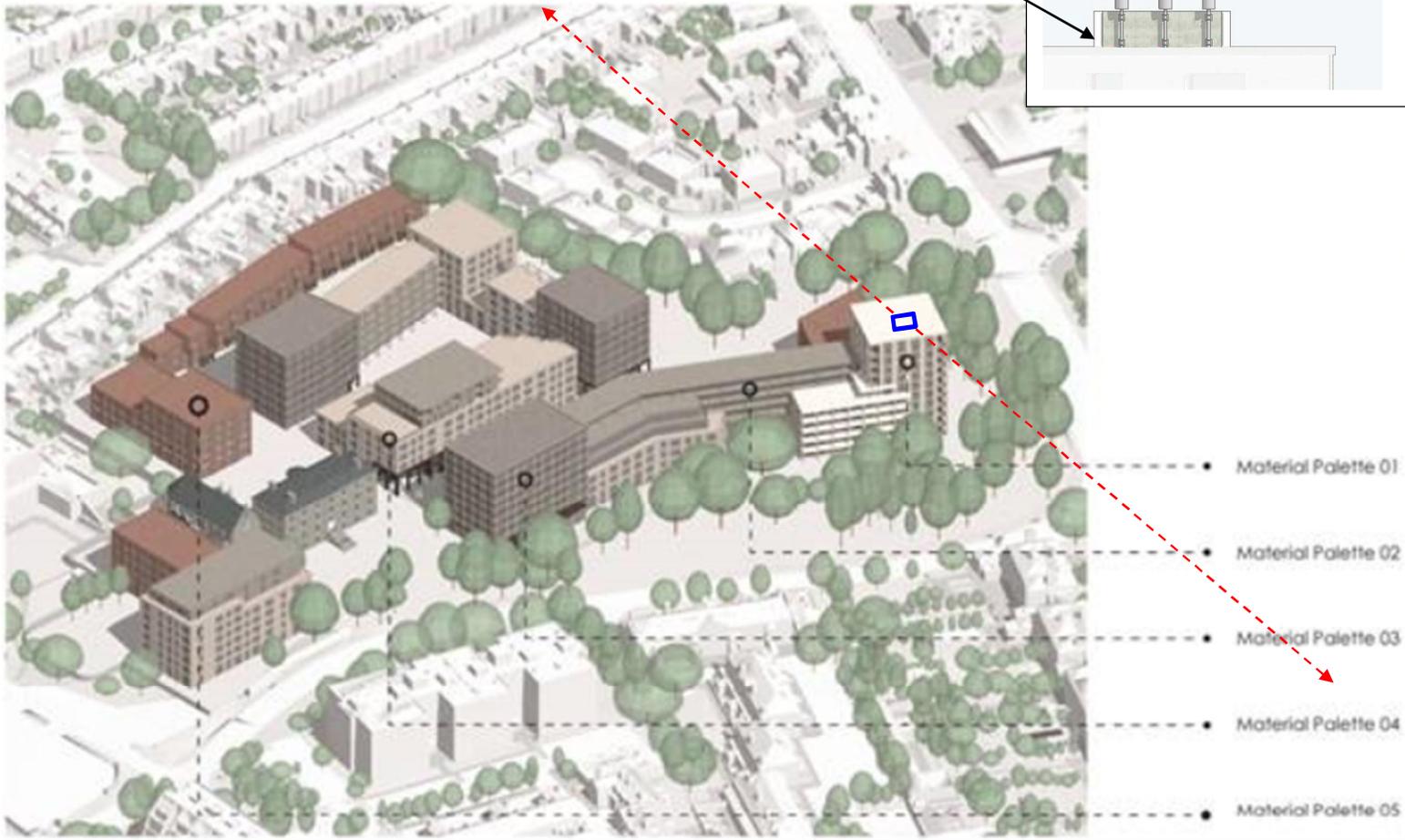
Source: Comreg ISM

Applicant has nominated a location on the roof plan to mount steel support poles capable of holding 2 No. Ø0.3m dishes ea. □ Location

2 No. Ø 0.3m Microwave link dishes mounted on steel support poles affixed to Lift shaft overrun with in radio friendly GRP shrouds



Lift Shaft Overrun



Note
All Dimensions to be checked on site
No Dimensions to be scaled from this Drawing
This drawing to be read with relevant Consultant Drawings

Typical Installation



- - - Transmission Link
- - - Transmission Link
- Location of Steel support poles

--	--	--	--

FINAL



83 Harcourt Street
Dublin 2, Ireland D02 C977
+353 1 905 8800
info@smireland.com

Client
Sandford Living Limited

Project
Sandford Road

Option	1
Date	02/09/2021
File Name	Sandford Road

Drawing:
Mitigation Measure

Building	Drawing No.	Zone	Rev
SPN	G 2621		1