



# ***Enabling Ireland's Digital Economy***

**Telecommunications and Internet Federation  
Submission to Mobile and Broadband Taskforce**

**30 September 2016**

*Telecommunications and Internet Federation - Enabling Ireland's Digital Economy*

## Introduction

### ***Telecommunications and Internet Federation***

The Telecommunications and Internet Federation (TIF) is the Ibec representative body for the electronic communications industry in Ireland. TIF members include all companies making significant capital investment in Ireland's telecommunications infrastructure.

### ***Investment***

The telecommunications sector employs c. 20,000 people in Ireland and enables the digital economy. Over the last 5 years TIF member companies have made a network capital investment of the order of €2.5bn throughout Ireland and this investment is continuing. When coupled with the €854m the industry paid the Exchequer for spectrum licences in 2012, this rises to approximately €3.3bn. This unprecedented investment took place as telecoms prices to the consumer fell by 10%. (Please refer to Appendix 1.) Meanwhile over the period 2001-15 total industry revenues fell by 23%.

The objective of this network investment is to ensure that Ireland has a state of the art telecommunications infrastructure that supports a competitive, innovative economy and a socially inclusive society.

### ***Competition***

The market is highly competitive with 10 mobile service providers including 2 recent entrants and numerous entities selling broadband to the public over fixed networks (fibre, copper and cable) and wireless networks. For example in mobile telephony, there has been a 47% decrease in monthly mobile average revenue per user since 2005.

### ***Innovation***

Customer numbers and usage patterns have changed substantially in recent years and this has had very significant implications for the customer experience. Smartphones and tablets, social media and video streaming are now common place. The total number of broadband subscriptions has increased by approximate 800% over the past 10 years. While 3G services were only launched in 2004, there are now approximately 4 million 3G/4G subscribers. Smartphones are now driving rapid growth in mobile data usage with a 500% increase in the period 2011–2015 (ComReg), putting enormous pressure on networks. Faster mobile broadband speeds are available via 4G and there has been a significant improvement in fixed broadband speeds, particularly since 2012, mainly due to the ongoing programme of fibre upgrades in the national fixed network.

However, the ambitious Government commitment to deliver to every premises in the State a minimum broadband speed of 30Mbps and to address mobile coverage issues requires focussed and innovative solutions to overcome Ireland's unique demographic challenges.

### ***Social inclusion/population dispersal***

A very significant challenge associated with the Irish market is the fact that we have among the most dispersed populations and highest proportions of rural dwellers in Europe. In turn natural features impact on service provision to a greater extent because the Irish population is so dispersed. According to the OECD some 27% of our population live in townlands or villages with fewer than 50 homes compared to an OECD average of 11%. Population dispersal also means it is more expensive to provide telecoms services here than in most of western Europe because more telecoms network infrastructure in terms of masts, fibre, cabinets etc. is required per customer. Notwithstanding these challenges Ireland has met and exceeded its targets under the EU's Digital Agenda.

### ***Mobile coverage***

Addressing mobile coverage is complex. Mobile coverage concerns are common in numerous jurisdictions and not unique to Ireland. Factors affecting mobile coverage include the following:

- Changes in topography can absorb and block radio waves which can result in areas with poor “outdoor” coverage or “coverage blackspots”.
- Buildings with particularly thick walls weaken radio waves and insulation can also be a factor.
- Glass and metal reflect radio waves and can cause poor coverage indoors and in cars.
- The optimal location for a mobile phone when connected to a Bluetooth car kit is on a dashboard or windscreen mount. Placing the phone in the car foot well or glove box seriously impacts on the received coverage levels and negatively affects user experience.

Operators conduct road tests to test the quality of the coverage and to identify improvements required.

### ***Mandate regarding telecommunications***

Joined up thinking is needed at all levels to assess and address coverage needs. The objective is for all stakeholders involved to work together to deliver the common goal of a state of the art telecommunications infrastructure for Ireland.

As an overarching proposal TIF recommends that each county council, relevant State agency and relevant semi-State company should have a clear mandate to promote the roll out of telecoms infrastructure and improved telecommunications services generally. Each of these entities should designate a senior official with responsibility for promoting telecommunications infrastructure development who should liaise with operators on coverage and roll out issues.

### ***Taskforce***

TIF members are very supportive of and share Government's commitment to accelerate the rollout of improved telecoms services to Irish consumers, both by the private sector and the National Broadband Plan (NBP).

TIF requests an early meeting with the Taskforce to discuss how industry can best provide assistance. It looks forward to helping the Taskforce to succeed in its objective of providing immediate solutions to alleviate telecommunications service deficits, particularly in rural Ireland, prior to the full build and rollout of the network which is planned under the National Broadband Plan.

TIF notes that industry has not been asked to participate on the Taskforce. As the main network providers and investing companies will be central to the implementation of most of the Taskforce's recommendations TIF requests a consultative process on these recommendations as they evolve.

### ***Summary of TIF Recommendations***

*Key practical actions that the Taskforce can recommend are:*

- (i) Consistent and timely decisions regarding road opening applications
- (ii) Avoid 'gold plating' of specifications for road reinstatement
- (iii) Streamlined approach to planning and planning regulations/exemptions which are regularly updated
- (iv) Improved access to road infrastructure and surrounding publicly owned lands for mobile infrastructure; and
- (v) State intervention in areas where it is uneconomic to roll out further mobile infrastructure.

## Barriers to Network Rollout

TIF suggests that the Taskforce ensure that decisions are made efficiently and consistently regarding telecommunications infrastructure (e.g. road opening and planning) by all local authorities and Transport Infrastructure Ireland (TII) and within an agreed national deadline. In this regard TIF suggests a period of no more than 8 weeks from application to approval.

### Planning Process

A practical illustration of the issue of consistency on planning procedures across all local authorities is the different approaches to licensing the erection of road-side cabinets for broadband in the rollout programme for Fibre to the Cabinet (FTTC) services to date. While the major FTTC operator programmes are reducing in scope, a substantial number of cabinets will still be needed to ensure that all remaining FTTC target areas are covered.

### *Permits and exemptions*

The rollout of improved mobile telecommunications infrastructure has been slowed by the fact that the relevant planning regulations and exemptions have not been updated since 2001. To put this in context 2001 was several years before Irish consumers started to use smartphones. In view of the rapid change in mobile telecommunications technology this 15 year hiatus is indefensible. TIF has provided both the Department of Communications and the Department of the Environment with proposed amendments to the current regulations which need to be implemented immediately.

The following example will illustrate what is involved. Under the current regulations an operator does not require planning permission to put an antenna on an existing mast provided it is not more than 1.5m long. However, the now standard quad band antenna which is essential for 4G is 2.7m in length and so requires planning permission. This is the type of antenna which is deployed in rural areas (for all technologies including 2G/3G/4G).

Amending the current exemptions to include this new larger antenna will allow for the prompter deployment of this antenna across the network and save valuable time in local authority planning departments. This is particularly important for rural areas.

Constant developments in mobile technology require a process which allows for planning regulations and exemptions to be reviewed on a regular basis. The process for making amendments to the planning regulations and provision for exemptions should be simplified to allow for appropriate changes to keep pace with consumer demand for new technology. The restrictive height limits and narrow class of building/structure allowed are prohibiting the development of mobile sites. More details in respect of these matters are set out in Appendix 2.

### ***Planning Applications***

Industry notes that there has been significant opposition to planning permission for masts at local level and that in many cases it was the same people who opposed planning that subsequently raised the issue of mobile coverage. This needs to change if mobile coverage is to improve.

The majority of planning permissions refused by Councils are then approved by An Bord Pleanála on appeal. This process is time consuming and results in delays in rolling out telecommunications infrastructure. Rejections also lead sub-optimal location of mobile masts. Please refer to Appendix 3 for further information.

The operators welcomed the 2012 circular by the Department of the Environment on Telecommunications (PL07/12). This removed the ability of local planning authorities to grant temporary permissions for telecommunications infrastructure and removed the requirement for the operators to lodge a reinstatement bond. Both changes have meant significant cost and time reduction in renewing planning applications every 3 to 5 years.

### ***Contributions/Fees***

Development contributions should be waived if a telecommunications mast is to address rural mobile coverage. There is a precedent for this as in January 2013 the Department of Environment, Community and Local Government Development Contribution Planning Guidelines 2013 recommended development contributions waivers for broadband infrastructure (masts and antennae). However, there is no consistent application of planning fees and contributions across all local authorities.

As there is no defined class or fee for a telecommunications application, planning authorities will apply either Class 8 (€600) or Class 13 (€240).

Fingal County Council charges separately for the dishes, antennae and ground equipment so a retention application will cost €720 (Class 13 – €240 x 3).

In general the local authorities comply with the 2012 Circular Letter (PL 07/12) exempting broadband infrastructure. However some local authorities are continuing to impose development contributions on retention applications e.g. Kerry (€15,000) and Mayo (€5,000).

Site retentions are also a challenge of growing relevance that impact on mobile coverage because operators have to seek planning retention for masts once the original approval expires.

For further information on the above please refer to Appendix 2.

## Access to Infrastructure (road and other infrastructure)

### *Process for road openings*

#### *Specifications*

Longstanding and extensive bilateral discussions have been in train between TIF and the Department of Transport, Tourism and Sport regarding the latest revised Guidelines for the Opening, Backfilling and Reinstatement of Public Roads (commonly known as the 'Purple Book'). While the Taskforce's support for this process would be welcome, nothing should be done that would compromise or disrupt it. Recent engagement between TIF and Department of Transport has resulted in progress and all steps should be taken to ensure the successful completion of this process in a timely fashion.

TIF requests the Taskforce's support for the inclusion of industry's recommendations regarding specifications and timelines in the latest version of the Purple Book because an independent report by McMahon Design and Management concluded that the initial draft imposes costs c.50% higher than in the UK. In particular proposed rigorous conditions on wide trenches/full bay reinstatement will add significant costs especially in urban and suburban areas. These suggested amendments will maximise the amount spent in any given year on the rollout of high speed broadband by ensuring that funds are not absorbed by unnecessary 'gold plating'.

TIF urges the removal of alternative specifications for telecommunications infrastructure on roads managed by Transport Infrastructure Ireland (TII) and the streamlining of the road opening licence process for TII managed roads.

TIF recommends a review of the current arrangements around hedge and tree trimming. While TIF fully supports conservation and ecology, the current window for this work is arguably too short and the NBP as a multi-year project may be disproportionately affected.

#### *Approval Process*

A major reason for escalating costs for utilities is the difficulty in completing work in one visit. A streamlining of the planning approach which would allow work to be completed in one set of joined-up tasks would be a very significant improvement and reduce disruption to the public.

A disadvantage in the current approval process is the focus on approval of specific tasks rather than categorising the infrastructure roll-out as a programme. This will be particularly important for the NBP which is in practical terms an upgrade or replacement of a substantial part of the national telecommunications infrastructure.

An approvals process should be considered that is more comprehensive in its scope. For example, at a minimum, approvals should be considered on an exchange area basis. Then, as issues are encountered (e.g. 'dig downs' etc. that run contrary to the original design), a notification process and retrospective approval within the original overall approval would be

a more efficient method to allow progress to continue. 'Dig down' is a key issue. As the new EU Directive on accelerating the rollout of high speed broadband mandates access by all telecommunications operators to all utility infrastructure, thus mirroring the access obligations on certain fixed network operators, all operators accessing existing infrastructure should be able to quickly 'dig down' on this infrastructure without going through a complicated and time-consuming approval process designed as if the infrastructure is being newly deployed.

### ***Access to duct***

An important factor in the efficient rollout of the NBP is likely to be the incidence of blocked ducts preventing access for all operators (infrastructure sharing is an obligation on all bidders). The absence of an efficient approach to resolving this could be a significant delay factor.

### ***Access to motorway infrastructure***

The initiatives to identify sites beside roads and motorways suitable for telecoms equipment as set out in the *Guidance on the Potential Location of Overground Telecommunications Infrastructure on Public Roads* (commonly known as the 'Green Book') should be continued and progressed in a timely fashion. Further engagement is required to address the need for clarity on the processes in obtaining licenses and the use of the land required.

### ***Access to other property***

All county councils and relevant state agencies and semi-state companies should promote the roll out of telecoms infrastructure by making facilities, buildings etc. available at a reasonable cost in locations where the siting of masts will improve mobile coverage.



## Consumer Issues

### *Consumer Information*

#### *Handsets*

All stakeholders have a role to play in managing consumer expectations regarding broadband and mobile coverage. In the case of mobile telephony this includes handsets. As operators are constrained in their individual dealings with handset manufacturers, there may be a role for an independent third party. An independent third party could collate information on handset performance which could be communicated to end-users consistently and fairly. It should be noted that handset manufacturers do not include receiver performance in the technical specifications they make available.

#### *Networks*

The provision of transparent and consolidated mobile coverage information should help to inform consumers. Operators have informed ComReg that they are willing to cooperate with an initiative similar to that run by Ofcom to provide consolidated coverage maps.

#### *Complaints*

All telecommunications companies endeavour to deal with consumer complaints as effectively and efficiently as possible through their customer care programmes. The level of competition in the market provides a major incentive for companies to respond effectively to complaints thereby helping to both retain and attract customers. ComReg also publishes information regarding complaints and queries received by it on a quarterly basis which creates an incentive for operators to improve their services.

### *Community engagement by industry*

Industry through TIF engages with local authorities, T.D.s and other stakeholders through its outreach programme. Individual companies also engage with stakeholders as appropriate. TIF suggests that ComReg should provide further and more detailed information on topical aspects of telecommunications of interest to the public on its website including coverage and other frequently asked questions.

### *Identifying black spots/defining issues*

Understanding best practice models from other jurisdictions should form part of the process of addressing black spots. Relevant examples from France and the UK should be investigated and reviewed.

Mobile operators have not experienced a diminution of mobile coverage nor is there a significant issue with voice call quality and cell handover. Furthermore they have not experienced significant issues in relation to the quality of their coverage maps.

There are black spots in Ireland as it is either uneconomic to service these areas or there are obstacles outside the operators' control which prevent the provision of service e.g. planning and unduly restrictive TII rules.

Ultimately, almost complete nationwide mobile coverage will require a significant number of additional masts and an extensive network build which is not commercially viable for operators.

TIF suggests that an independent quantification of the number of sites required for almost complete nationwide coverage should be carried out. This will allow operators and government to assess the size and cost of addressing the issue.

Appendix 4 is a high level summary of actions being taken in France to improve mobile coverage which may be of interest in the context of Irish rural coverage.

## **Regulation, Policy and Networks**

TIF is unclear what areas the Taskforce intend to cover under this very wide-ranging category. The telecommunications sector - especially under the ex-ante regulatory model - is highly complex and governed by a multiple of administrative and regulatory policies and processes that are very difficult to unpack. The practices in place today are largely the result of dialogue and consultation between a range of public and private stakeholders that have taken a long time to agree, are presented within a legislative and legal framework and therefore cannot be changed easily.

For that reason we would urge the Working Groups to take a realistic view as to what is achievable and to identify improvement measures that are reasonable, easy to implement quickly and have a practical positive operational impact.

### ***Network configuration***

Networks are configured to provide the best possible service and coverage to customers. Planning decision can sometimes result in masts being located in sites that are not in the optimal location from an engineering perspective for providing coverage. Today's network coverage reflects the consequences of planning decisions over two decades.

### ***Network upgrade programmes***

The telecommunications sector has engaged in a major investment programme with a network capital investment of €2.5bn over the last five years to improve service to customers and this investment continues. All network providers recognise the short-term disturbance caused by network upgrades and engage in communications with key external stakeholders to mitigate any inconvenience caused. Each operator has its own policies and procedures in this regard and details can be shared bilaterally with the Taskforce if required.

### ***Engagement with industry on network development***

Operators are willing to engage in dialogue with the Department of Communications and ComReg on their network development plans.

## Conclusion

Industry network investment continues at the same enormous scale as over the last decade with the objective of improving service to customers. To give some context, this investment by industry over this period is 20% larger than Ireland's entire Public Capital Programme.

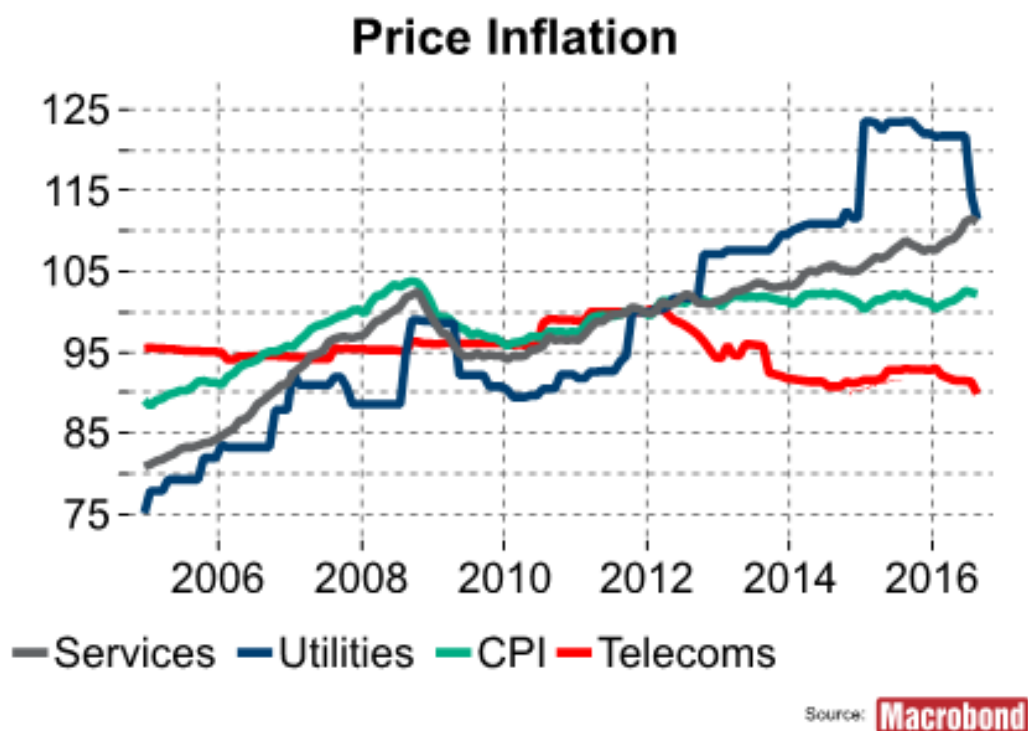
Through TIF industry is willing to assist the Taskforce to secure its objectives and will engage constructively to this end. To ensure industry and the public service are aligned on the Taskforce's recommendations TIF requests a consultative process on these recommendations as they evolve.

More telecommunications infrastructure is essential to improved service. To ensure a strategic approach to telecommunications each county council, relevant State agency and relevant semi-State company should have a clear mandate to promote the roll out of telecoms infrastructure and improved telecommunications services generally. This should be made the responsibility of a designated senior official in each of these entities who should liaise with operators on coverage and roll out issues.

TIF recommends early implementation of its key recommendations including the following:

- (i) Consistent and timely decisions regarding road opening applications
- (ii) Avoid 'gold plating' of specifications for road reinstatement
- (iii) Streamlined approach to planning and planning regulations/exemptions which are regularly updated
- (iv) Improved access to road infrastructure and surrounding publicly owned lands for mobile infrastructure; and
- (v) State intervention in areas where it is uneconomic to roll out further mobile infrastructure.

## Appendix 1: Price trends 2006-16



## Appendix 2: The planning process

### Review of exemptions and consistent application across all local authorities

One of the major planning impediments to network development is the outdated 2001 exempted development regulations. The technology and equipment has changed considerable since 2001 but the regulations have not been changed. The restrictive height limits and narrow class of building/structure allowed are prohibiting development of mobile sites.

Some of the changes required include:

- **Increasing the fixture height above roof level/parapet to 3m under Class 31 (k)**  
The extra metre allows for new standard quad band antennae to be installed without planning permission. The standard quad band antenna deployed in an urban area is 1.9m in length. When the feeder cables and RETs are factored in the total size of the antenna is approximately 2.3m which is above the permitted height allowed under the current Class 31 (K).

The extra metre would allow sufficient height for the deployment of this now standard antenna that provides all the technologies (2G/3G/4G). It would allow the mobile operators to quickly deploy these antennae without the need to go through the planning process which could take up to 6 months for the relevant approval to be issued.

- **Extending the class of building/structure allowed under Class 31 (k)**  
Extending the class of building/structure allowed will dramatically increase the potential site options available to mobile operators in both rural and urban areas. The class of buildings/structures included in the amended list are already used by operators in preference to building new free standing masts in the same area. However if an operator identifies a suitable option like an existing water tower, planning permission is required for any proposed works which can add delays to the installation of the site.

In general the vast majority of applications submitted to the local planning authorities involving these buildings/structures are granted planning permission. Allowing water towers, lighting structures, recreational buildings/structures and facilities, commercial/agricultural storage and utility structures to be included within Class 31 (k), would dramatically increase the site delivery process and the options available in an area. It would also help to define what is allowed under exempted development as some local authorities have different interpretations of the current regulation.

Listed below are examples of planning applications for the type of structure/building proposed to be included under Class 31 (K).

Type of structure	LPA	Ref. no.	Decision
<b>Ferbane water tower</b>	Offaly County Council	11/263	Granted
<b>Pembroke Cricket Club - floodlight</b>	Dublin City Council	2512/11	Granted
<b>St Vincent's University Hospital</b>	Dublin City Council	2807/08	Granted
<b>Connolly Hospital</b>	Fingal County Council	FW14A/0153	Granted
<b>Edenderry water tower</b>	Offaly County Council	09122	Granted
<b>Callan water tower</b>	Kilkenny County Council	11646	Granted
<b>Corinthians RFC - floodlight</b>	Galway County Council	09256	Granted
<b>Agricultural shed</b>	Louth County Council	041653	Granted
<b>Neptune Stadium – recreational building</b>	Cork City Council	0934067	Granted
<b>Thomond Park - floodlights</b>	Limerick City & County Council	08770119	Granted
<b>Broadmeadow Equestrian Centre - recreational building</b>	Meath County Council	DA900527	Granted
<b>Agricultural shed</b>	Meath County Council	TA50424	Granted
<b>Dr. Hyde Park viewing stand - recreational structure</b>	Roscommon County Council	139 & ABP ref 241812	Granted
<b>N2 Storage and Retail Park – commercial storage building</b>	Meath County Council	DA900741 &	Granted
<b>Castletroy water tower</b>	Limerick County Council	12/840	Granted
<b>Kiltrough water Tower</b>	Meath County Council	LB150485	Granted
<b>Howth Golf Course, Sutton, Co. Dublin – recreational building</b>	Fingal County Council	F07A/0815	Granted

- Allowing equipment on mixed use buildings/residential under new Class 31(i):**  
 Demand for fast and reliable broadband is particularly high in urban areas. Suitable options in urban areas, particularly residential areas, can be extremely limited. Allowing mixed use buildings/residential buildings would increase potential site options within these difficult areas. In general most local planning authorities prefer operators not to install telecommunications equipment on residential buildings.

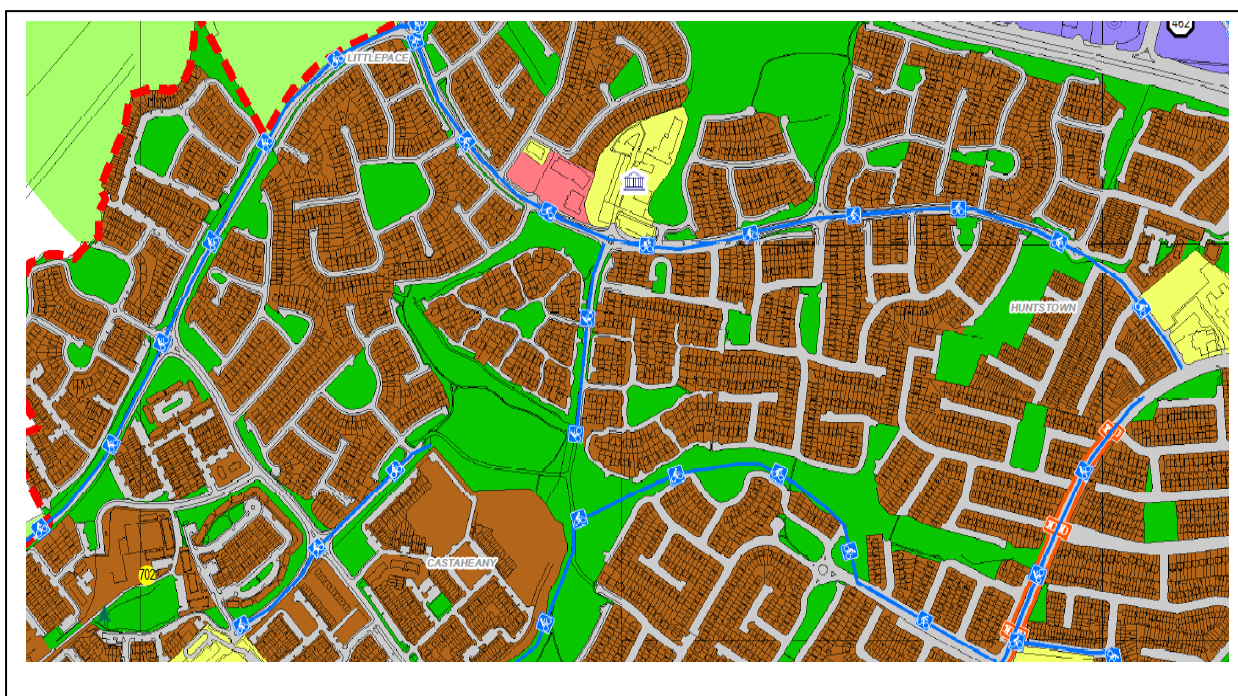
For example the proposed development at the Montrose Hotel was refused by Dun Laoghaire Rathdown County Council partly on the grounds that the student accommodation was residential. An Bord Plenála later overturned the decision.

The current planning guidelines encourage mixed use development within urban centres so single use developments are getting harder to identify.

Allowing telecommunications equipment under Class 31 on mixed use properties would hugely benefit mobile coverage in suburban areas. Areas like Adamstown, Stepside and Ongar are currently suffering from poor coverage as suitable options in these areas cannot be found due to their residential character. Most tall buildings in these areas are either completely residential or have a retail shop on the ground floor with apartments on the upper levels. Current planning policy dictates that the chances of obtaining planning permission on these types of building are slim.

The map below is taken from the Fingal County Development Plan 2011- 2017 and shows the area around Ongar Village/Huntstown in west Dublin. This is an example of a suburban location where the predominant land use is residential (brown) and open space/recreational amenities (green). These zonings do not permit telecommunications installations. The mobile operators are currently searching this area for a location for a new installation to improve coverage but are unable to find a suitable option.

The yellow zoned area includes a church, school and GAA club. The pink zoned area is mixed use with residential at first floor level. These zonings also prohibit telecommunication installations.





**Listed below are examples of planning applications on mixed use type buildings as proposed to be included under Class 31 (I)**

Type of structure	LPA	Ref no	Decision
<b>8-10, Rathmines Road Upper, Rathmines, Dublin 6 - Mixed use</b>	Dublin City Council	3247/11	Granted
<b>149, North Strand Road, Dublin 3 – Mixed use</b>	Dublin City Council	4356/07	Granted
<b>Montrose Hotel – Residential</b>	Dun Laoghaire – Rathdown Co Co	D14A/0415 & ABP 244141	Granted
<b>Macken House, Macken Street Upper, Dublin 1 – Mixed use</b>	Dublin City Council	DSDZ4025/15	Granted
<b>Dalkey News – Mixed use</b>	Dun Laoghaire – Rathdown Co Co	ABP 238918	Granted
<b>Ellis Quay Apartments, 10-13, Ellis Quay, Dublin 7 – Residential</b>	Dublin City Council	1825/06	Granted

- **Allowing a transportable radio installation for a 16 week period under Class 31 (g) (2 a & c)**

Increasing the timeframe allowed for the deployment of a transportable radio installation would be beneficial particularly when covering public/social events like for example music concerts in Marley Park or the Irish Golf Open. The mobile operators have to comply with the timeframes set by the organisers of these events. In some cases organisers want the deployment of the temporary mast two/three weeks before the event. The extra allowance would provide the mobile operators with sufficient time to deploy and dismantle the installation.

In cases where an existing base station has become incapacitated and needs to be replaced, the extra timeframe allows the mobile operators to source a suitable replacement and if required apply for planning permission for the replacement site.

- **Increasing the amount of equipment allowed onto an existing support structure under Class 31 (h)**

This would allow multiple operators to co-locate onto the same structure thus reducing the need for separate structures in the same area. As larger structures can accommodate more equipment it is proposed that existing antenna support structures **over 15m high** should be allowed the additional attachment of 18 antennae of which not more than 12 shall be dish type. Existing antenna support structures **under 15m high** would remain the same as per current Class 31 (h).

### **Small cell planning/streetworks**

Exemptions are required for small cell deployment. Use of streetwork solutions (lighting poles, camera support structures, specially designed structures etc) are fairly common in

other countries. If designed and sited properly they are a very good option within an urban area where “traditional” options are limited.

### **Access to state owned infrastructure & buildings**

Currently the operators have access to Office of Public Works (OPW) property (Garda masts, OPW buildings). This greatly helps network operators to provide coverage in towns throughout the country. However, other state agencies should be encouraged to open up their infrastructure in a similar fashion e.g. TII, local councils etc. This could help to greatly improve mobile coverage along local and national roads.

### **Planning retention for existing sites**

Local authority rezoning is a specific challenge in retaining mobile infrastructure. Rezoning is an issue in retaining sites but these cases are small in number, mostly in urban areas. Cases like the rezoning of the Montrose Hotel and the Metro Hotel Santry to residential have caused issues. The rezoning of buildings and land will become a major issue in the future due to the housing crisis as more land is rezoned residential. It needs to be acknowledged that *telecommunications development is vital in residential areas*, and should be permissible, once sensitively located, in residential areas and in particular on mixed use buildings.

### **Ongoing challenges with planning applications**

There are a number of practical issues with the planning system that adds cost and time to the submitting of applications e.g. some local authorities will harshly invalidate applications over minor issues e.g. Kerry and Offaly County Councils are quick to invalidate applications.

### Appendix 3: % Applications refused per local authority

County	Total number of applications	Total number refused	Overall % applications refused
Kerry	111.00	89	80%
Cork City	37.00	15.00	41%
Laois	59.00	18.00	31%
South Dublin	161.00	46.00	29%
Fingal	161.00	44.00	27%
Sligo	65.00	17.00	26%
Dun Laoghaire Rathdown	85.00	20.00	24%
Donegal	73.00	17.00	23%
Dublin City	199.00	46.00	23%
Leitrim	49.00	11.00	22%
Longford	43.00	9.00	21%
Waterford	86.00	18.00	21%
Galway City	25.00	5.00	20%
Kildare	117.00	21.00	18%
Wicklow	106.00	19.00	18%
Limerick	229.00	40.00	17%
Mayo	129.00	22.00	17%
Westmeath	74.00	12.00	16%
Clare	139.00	17.00	12%
Offaly	77.00	9.00	12%
Wexford	107.00	12.00	11%
Carlow	27.00	3.00	11%
Roscommon	92.00	10.00	11%
Monaghan	66.00	7.00	11%
Louth	48.00	5.00	10%
Meath	159.00	16.00	10%
Galway	246.00	24.00	10%
Cavan	141.00	11.00	8%
Kilkenny	98.00	7.00	7%
Tipperary	145.00	10.00	7%
Cork	299.00	20.00	7%

## **Appendix 4: Article on French government scheme**

### **French state to fund passive infrastructure in areas with no mobile coverage**

“The French government announced that it will provide €30m for the building of masts in the main villages of areas still without any mobile phone signal (“white area”). This area represents around 300 municipalities with small villages of fewer than 400 inhabitants.

Local authorities will provide sites to build a mast and a connection to the electricity grid. The four mobile network operators will install active equipment and either share the infrastructure or use a national roaming service. The Law of August 6, 2015 states that the financing of passive infrastructure in the white area is a cost to be borne by local authorities but the French government decided to intervene in the funding to speed up the deployment.

Mobile Operators agreed in May 2015 to complete mobile (2G) coverage in the white area by the end of 2016 or at the latest six months after the provision of a mast on a specific site. They also agreed to make 3G available by mid-2017 (meaning in around 2,200 municipalities).

The operators also agreed with the government to cover 800 strategic sites with mobile telephony and mobile internet covering, for example, economic development sites, cultural or touristic sites, and ski resorts.

The government will launch in March a call for proposals for local authorities to submit sites. The initial deployments should take place in 2016. The government will provide €42.5m to fund these strategic sites, covering half of the costs to build and connect each site.”

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