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The Planning Officer,  
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County Hall  
Marine Rd  
Dunlaoghaire  
Co. Dublin

**Date:** 2<sup>nd</sup> June 2021  
**Re:** Section 254 Application- Proposed Telecommunications Streetworks Solution  
**Applicant:** Cignal Infrastructure Ltd., Suite 309, Q House, 76 Furze Road, Sandyford  
Industrial Estate, Dublin 18.  
**Site Name:** Shankill, Shanganagh Rd.  
**Location:** Shankill, Shanganagh Rd., Dublin 18.

Dear Sir/Madam,

On behalf of our client, Cignal Infrastructure Ltd. ("Cignal") please find attached application under Section 254 (1) (g) subsection 5 (A) of the Planning and Development Act 2000, which provides for the installation of communications infrastructure under licence from the Authority. We have included plans and other information concerning the requirement, position, design and capacity of the structure as outlined in Section 254 (3). We are happy to provide additional information on request.

#### **Background**

The applicant, Cignal is a company of Cellnex, which is a European Telecommunications infrastructure provider. Cignal are a registered Infrastructure Provider for the Communications Industry with over 1800 sites around Ireland supporting mobile and broadband communications. Cignal provide Tower, Mast, Roof Top and Streetworks Solutions for the expanding requirements of the Licenced Operators including EIR, Vodafone and Three.

Cignal is authorised by ComReg to provide Electronic Communications Networks and Services, which allows them to apply for a licence under section 254(1) of the Planning and Development Act, 2000 for the establishment of over ground electronic communications infrastructure and any associated physical infrastructure. Please see attached a Certificate of Authorisation for your information.

### **The Requirement**

Working closely with mobile network Licenced Operator Eir, Signal have identified the subject site as a known blackspot for mobile and wireless broadband. A specific solution to address the deficit in coverage has been identified and approved by the mobile network Licenced Operators.

### **The Proposal**

With reference to the attached plans you will note that it is proposed to provide a 18m high Smart Streetpole Solution in the specified location. See below a photograph of a similar Smart Streetpole and cabinet installed in Drummartin Road in July 2021. This was installed under a Section 254 Licence granted by DLR Co Co.



*Fig 1. Existing Smart Streetpole Solution as erected in Drummartin Road, Kilmacud, D14*

The street pole has an approx. diameter of 324mm and will be galvanised and painted in finish up to 14.3m in height. Above the 14.3m height an antenna will be mounted to a finishing height of up to 18m. The antenna will be shrouded by a 406mm sheath to match the pole.

The pole would be accompanied by an Operator Cabinet specifically located in a position agreeable to the local authority engineers. (Refer to detailed drawings attached). The

antenna and structure are designed to blend in with the streetscape, are Irish made and will provide instant 4G coverage.



Fig 2. Aerial View Site Location

Please find attached the following documents in respect of the Section 254 Application.

- Planning Report by David Mulcahy Planning Consultant
- Sepa Transfer Confirmation of payment
- Licence Application Drawings
- Com Reg Map
- Visual Impact Assessment Photomontages
- Services Drawings
- Signal Com Reg Authorization
- Eir Mobile ICNIRP Compliance Statement

We trust you find the attached in order. Please don't hesitate to contact the undersigned should you require any further information. We would be obliged if you would acknowledge receipt of the application and we look forward to hearing from you in due course.

Yours Sincerely,

/ Chartered Engineer



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## **PLANNING STATEMENT**

to support s.254 licence application for

### **TELECOMMUNICATIONS INFRASTRUCTURE**

at

**SHANGANAGH ROAD, SHANKILL, DUBLIN 18**

Client: Signal Infrastructure Ltd.

31<sup>ST</sup> May 2021





## 1.0 INTRODUCTION

David Mulcahy Planning Consultants Ltd have been instructed by **Signal Infrastructure Ltd**<sup>1</sup> to prepare a planning statement to support a Section 254 licence application for a telecommunication structure at Shanganagh Rd, Shankill, Dublin 18.

The purpose of this report is to describe the planning context including receiving environment, planning history, planning policies and objectives, outline the development to be retained and demonstrate how the proposal accords with the proper planning and sustainable development of the area.

This report should be read in conjunction with the drawings prepared by **Jason Redmond Associates, Consulting Engineers** who are the agents for this application. All correspondence should be sent to Jason Redmond Associates<sup>2</sup>.

Note: all underlined italic text is author's emphasis. All maps are orientated due north.

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<sup>1</sup> Suite 311, Q House, Sandyford Industrial Estate, Dublin 18, D18 YV50.

<sup>2</sup> Signal Infrastructure Ltd., C/O Jason Redmond Associates, 5 Lismard, Portlaoise, Co. Laois.

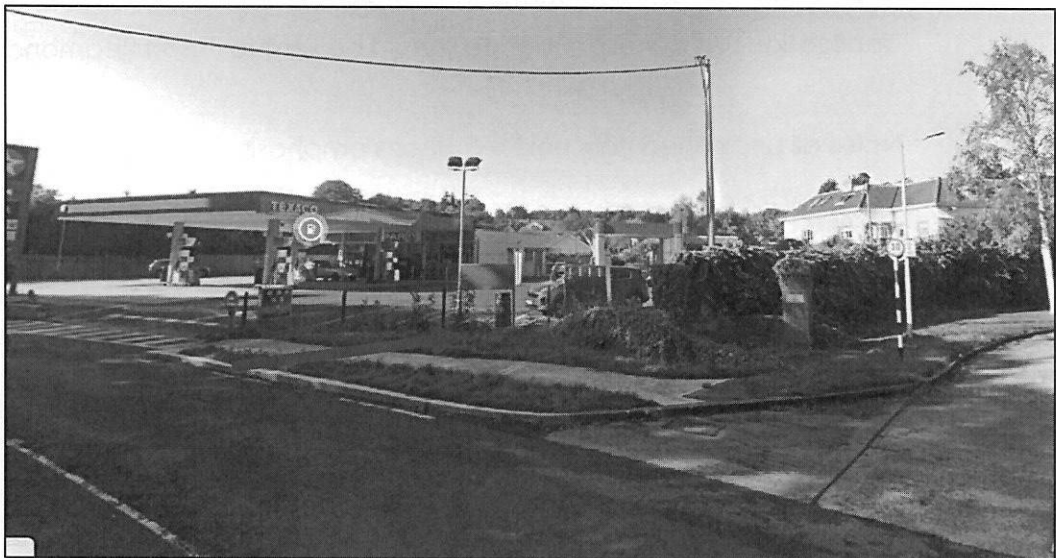
## **2.0 LOCATION AND DESCRIPTION**

### **2.1 Location**

The site is located on a grassed area adjacent to a public footpath in front of a Texaco petrol station at the junction of Broomfield Court and Shanganagh Road, Dublin 18. Please refer to the site location map submitted with the application.

### **2.2 Description**

The site location is situated on a grassed area adjacent to a public footpath. The use of the footpath by pedestrians will not be materially compromised by the proposed development.



**Fig No.1** Photograph of subject site (approx.) taken from Shanganagh Road.



**Fig No.2** Aerial photograph with approximate location of site indicated.

### **2.3 Ownership**

The site is located on land owned by Dun Laoghaire-Rathdown County Council.

### **2.4 Adjoining Land Uses**

Texaco service station is adjoining the site. The remaining area is comprised mainly of mature suburban residential dwellings to the west south and east with private detached dwellings to the north of the site.

## **3.0 PROPOSED DEVELOPMENT**

### **3.1 Description**

The proposal consists of a proposed 18m alpha 2.0 streetpole solution, with 1 no. 3.7 alpha 2.0 antenna at azimuths 0°, 120°, 240° (model AW3707) & 1 no. ø300mm dish (to be included only if no fiber infrastructure in area), including integrated cabinet (1.649m high x 1.168m wide x 0.793m deep).

Refer to drawings and CGI images prepared by Jason Redmond Associates, Consulting Engineers for further details.

The proposed development is located on a grassed area adjacent to a public footpath adjoining a Texaco Spar service station. The footpath will not be interrupted by the proposed development or interfere with authorised usage.

### **3.2 Technical Justification**

#### **3.2.1 Objective of Search Ring Area**

The search ring, or area within which a telecommunications installation is required in order to meet the search ring objectives, is an area of c. 250 metres in diameter. The site is required in order to improve network coverage in the area. It has been identified by radio engineers that an installation within the search ring will bring required coverage to the coverage black spot, subject to a site-specific assessment and radio clearance - see diagram of search ring below.

"As part of Eir Ltd licensing requirements and the continuing rollout of their 3G and 4G network, Eir requires a site on the Shanganagh road in Shankill. The current sites in the area for Eir do not provide adequate indoor service for high speed mobile broadband in and around this area.



The Location on Shanganagh Road was chosen because of the following:

- It's within the Search Ring coverage footprint.
- There is adequate space to locate a street works solution and cabinet.
- There is fibre located nearby to ensure connectivity into the network.
- No overhead cables located at the proposed location.
- The location will not interfere with existing services.

**Alternative Locations Reviewed and discounted:**

**Texaco Spar Shankill:** Roof top or Alpha solution, SP not engaging.

**DN207877F:** SP not engaging.

**DN211301F:** SP not engaging.

The search ring is quite specific given the coverage void. A number of streetworks locations were reviewed and ruled out because of proximity to residential and amenity space. The chosen location is adjacent to an existing commercial building on a public arterial roadway. With the surrounding mature trees the location chosen suits the solution deployment.

A number of locations along the Shanganagh road were reviewed and ruled out due to insufficient footpath room or surrounding tree growth.

Eir are upgrading the network in Dublin to provide customers with good quality voice and high-speed data services. To meet customer demands, a new site at this location is required to provide indoor service to the residents of this area and surrounding environs. Eir's existing coverage here suffers from a lack of dominance and the new site will improve coverage for the many residential and commercial users within the area as well as commuters traveling to and from work.

### 3.2.3 Coverage Map

The coverage maps below are self-explanatory. The *do-nothing* approach would result in a continued deficit in indoor/in car coverage in addition to outdoor mobile and wireless broadband cover over a significant section of the subject urban environment. The *do something* approach will bring full indoor/outdoor coverage to a significant splay of residential and business premises in this area and surrounding environs.

Figure 4 below demonstrates a large area in white/transparent surrounding the site. This area clearly demonstrates where the market requires the infrastructure.

Figure 5 demonstrates the difference in coverage levels, which will result if the proposed LA is granted (blue area). This represents a substantial increase in coverage service levels over and beyond the current coverage situation in this area.

Figure 6 demonstrates existing and proposed coverage.

It is respectfully submitted that the coverage maps below clearly demonstrate the significance of the proposed installation with respect of the telecommunications network.

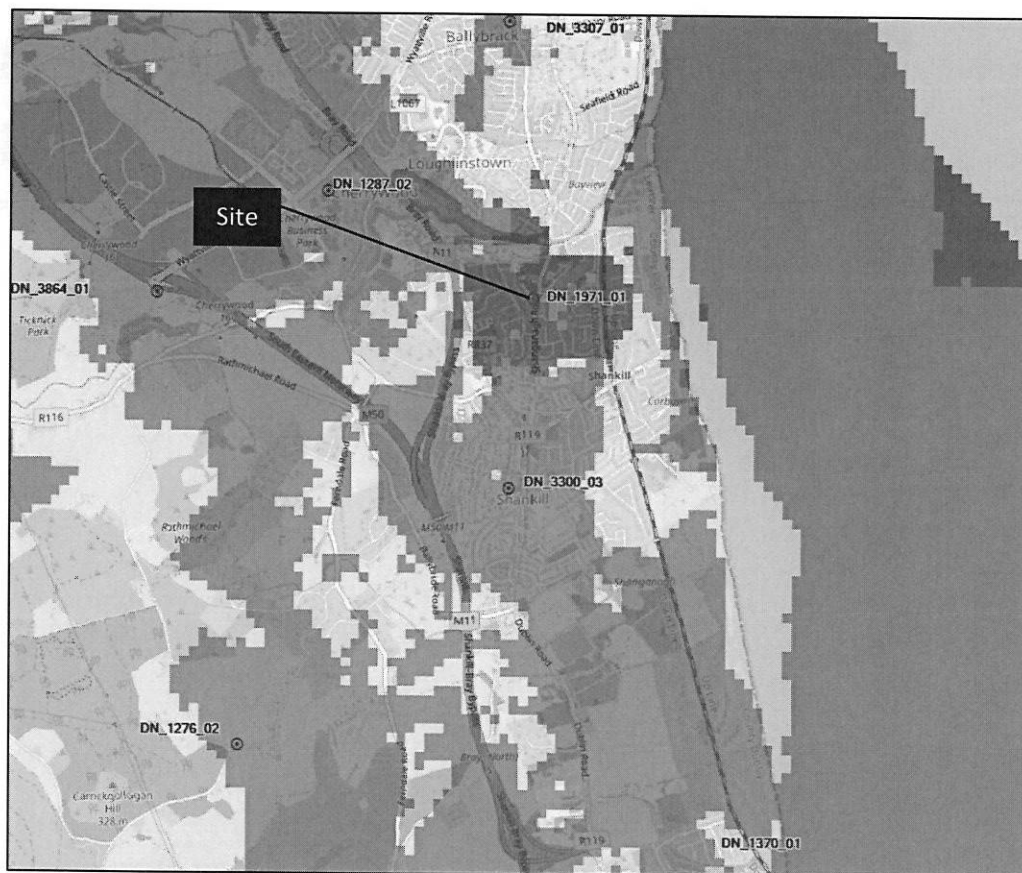




**Figure 4:** Existing Eir Indoor coverage footprint in the area without Signal site.



**Figure 5:** Indoor Coverage comparison of new Cignal Site (blue)



**Figure 6:** Comparison of existing and proposed coverage.

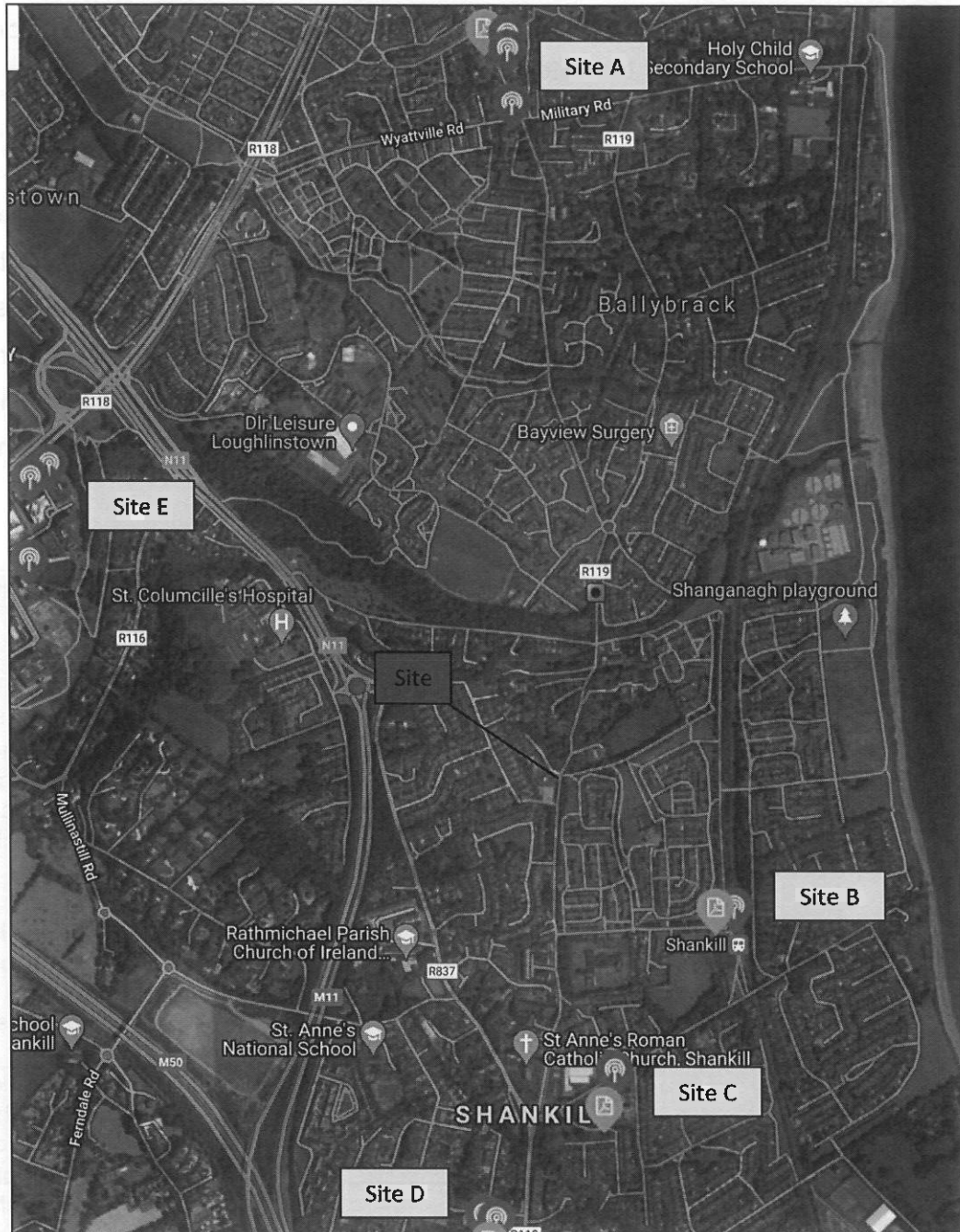
### 3.2.4 Comreg Map/Policy

The following map sets out the existing Comreg Sites in this area. Please refer to <https://siteviewer.comreg.ie/#explore>.

The maps below show there is a notable absence of telecommunication infrastructure in the vicinity of the subject site.

It should be noted that telecommunications traffic through urban/commercial areas require more capacity and therefore more infrastructure, given the smaller spatial footprint of search areas and higher development densities in association

with higher volumes of radio traffic (owing to modern technologies and devices not limited to mobile phone devices) through any individual radio cell.



**Fig. No.7** Comreg Map of closest Existing Sites in General Area.

### 3.2.5 Alternative sites

Please refer to the above Comreg Map under figure 7 above, which sets out the other relevant Infrastructure in the subject general area of Shanganagh Road, Shankill. It must be noted that all of the sites identified are situated outside the required search ring, which has a diameter of 250 metres.

As all of the remaining nearest sites in a radial pattern surrounding the proposed development are outside of the required search ring, sharing of facilities on other installations, outside of the required search ring will not address the coverage objectives of the subject search ring. However, in the interest of demonstrating other sites in the broader area for assessment purposes by the planning authority, the following table indicates the closest established sites within a 2 km radius and presents the associated 'Discounted Reasons':

Site:	Name of Site (Comreg):	Approx. Distance from Site:	Details/Discounted Reason(s):
<b>A</b>	VODAFONE_DX237; THREE_DU0104; METEOR 3307.	1.4km	Site is significantly outside of the required search ring, therefore there is no benefit in adding equipment at this location towards the end of achieving current required search ring objectives. Eir (Meteor) is already positioned at this site therefore equipment at this location would not address the service needs of the subject search ring.
<b>B</b>	VODAFONE DX238	508m	Site is significantly outside of the required search ring, therefore there is no benefit in adding equipment at this location towards the end of achieving current required search ring objectives.

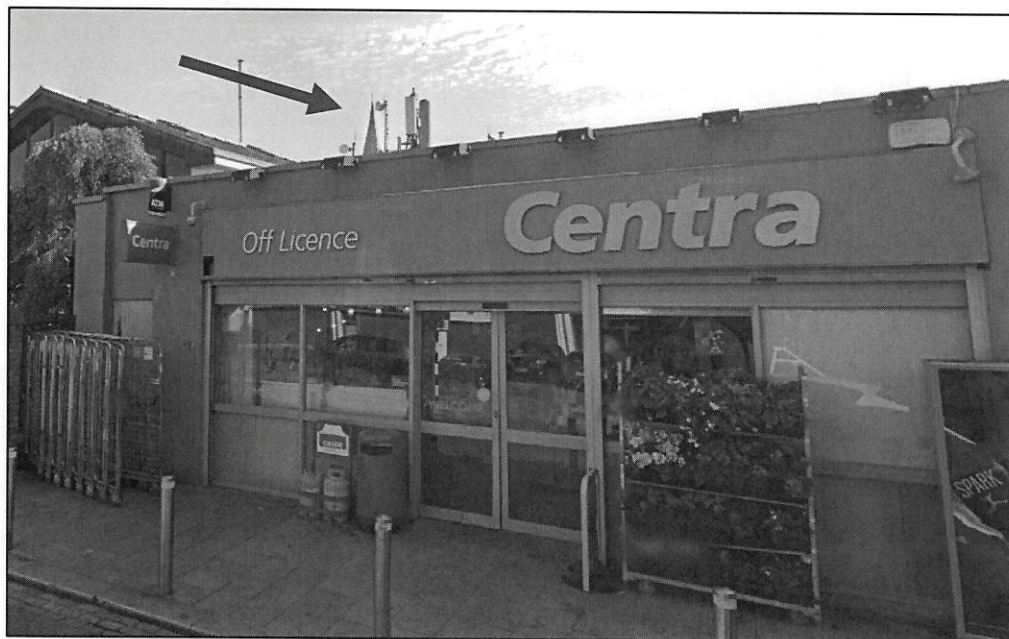
<b>C</b>	THREE_ DU0901	718m	Site is significantly outside of the required search ring therefore there is no benefit to be gained by adding equipment at this location towards the end of achieving the required objectives.
<b>D</b>	VODAFONE_DNSKL; METEOR 3300	990m	Site is significantly outside of the required search ring, therefore there is no benefit in adding equipment at this location towards the end of achieving current required search ring objectives. Eir (Meteor) is already positioned at this site therefore equipment at this location would not address the service needs of the subject search ring.
<b>E</b>	METEOR DN_1287; VODAFONE DN323; THREE_DU0208	1.23km	Site is significantly outside of the required search ring, therefore there is no benefit in adding equipment at this location towards the end of achieving current required search ring objectives. Eir (Meteor) is already positioned at this site therefore equipment at this location would not address the service needs of the subject search ring.



**Site A** - VODAFONE\_DX237; THREE\_DU0104; METEOR 3307.



**Fig No.8** Located on building on Shanganagh Rd near junction with Wyattville Road – not visible



**Fig No.8a** Located behind Centra Ballybrack.



**Site B –VODAFONE DX238**



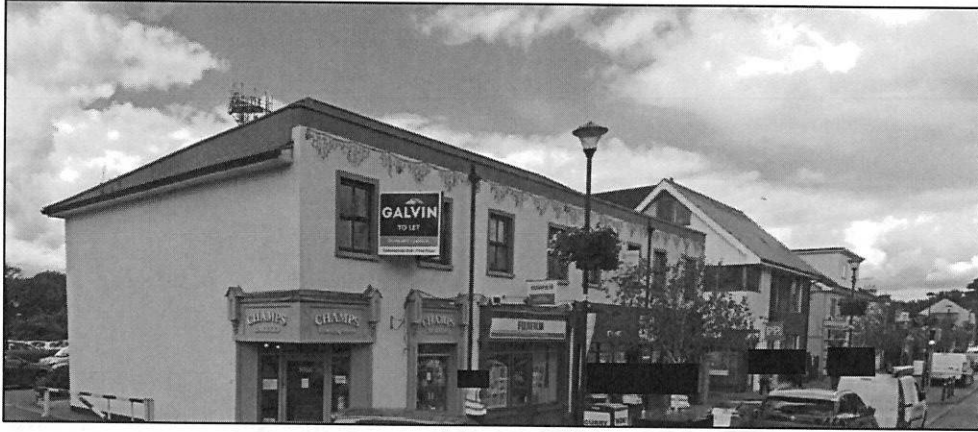
**Fig No.9** Located at Shankill Dart Station

**Site C - THREE\_ DU0901**



**Fig No.10** Located at Shankill Garda Station

**Site D** - VODAFONE\_DNSKL; METEOR 3300



**Fig No.11** Located behind commercial buildings on Dublin Rd

**Site E** - METEOR DN\_1287; VODAFONE DN323; THREE\_DU0208



**Fig No.12** Located in a few locations in Cherrywood Business Park

## 4.0 APPLICANT: BACKGROUND

### 4.1 Introduction

The applicant, Cignal Infrastructure Ltd is a company of Cellnex, which is a European Telecommunications infrastructure provider, which specifically facilitates co-location to the communications sector in Ireland and Europe. Cignal was purchased by Cellnex in September 2019. Cignal Infrastructure Ltd remains the legal entity or trading name for the organisation in Ireland. The organisation has significant commercial relationships with each mobile network operator in the State namely Three, Vodafone and Meteor/eir in addition to radio, broadband and emergency communication service providers. Whilst managing their existing portfolio of 300 former Coillte sites, in addition to over 250 new sites., Cellnex has recently completed the purchase of an additional 1150 sites from CK Hutchinson in Ireland. This brings the total portfolio in Ireland to **c.1800 sites nationwide**. The applicant plans to add new developments to support the ongoing infrastructural requirements of the telecommunications industry and to facilitate the provision of broadband in current **"black spot" areas** and to also facilitate higher data transmission speeds in urban areas through various initiatives. It is submitted that the intervention of private sector firms such as Cignal Infrastructure Ltd. (and its parent company Cellnex), in the roll-out of telecommunications infrastructure, is a significant and fundamental pillar in the Governments telecommunications policy and its future plans.

## **5.0 PLANNING CONTEXT**

### **5.1 Taskforce: Backdrop to Process**

The Section 254 Telecommunications Licence Process has evolved as a direct outcome of the Governments Programme for Government, which gave a commitment to establish a Mobile Phone and Broadband Task Force to identify immediate solutions to broadband/mobile phone coverage deficits and to investigate how better services could be provided to consumers. The Taskforce made a number of key recommendations and set out clear actions, which have evolved with reference to the Implementation Report, inter alia.

Chapter 2, Planning and Licencing, of the Taskforce Report recommended that: *'Provisions relating to planning exemptions for telecommunications infrastructure should be amended to facilitate its smoother deployment and the removal of barriers to investment'. [author's emphasis]*

The Task Force also recommended the following:

*'That a review of the relevant statutory Planning Guidelines should be undertaken, in conjunction with telecoms industry representatives and other relevant stakeholders, with the aim of evaluating and updating key aspects of the Guidelines to provide clarity and consistency in their interpretation and implementation'.*

### **5.2 Distinction between Section 254 and Class 31**

As a direct result of this Government Task Force Report and addendum Implementation Report, two crucial yet mutually exclusive instruments of Irish Planning Law were enacted by resolution of the Oireachtas in order to facilitate the Government's aim; *'To identify immediate solutions to broadband/mobile phone coverage deficits and to investigate how better services could be*

*provided to consumers'*. These two legislative instruments were also supported under European Law by the European Union (Reduction of Cost of Deploying High-Speed Public Communications Networks) Regulations 2016.

Putting it simply, the key differentiating element of the Section 254 legislation is that it refers to **Public Roads** whilst the Class 31 exemptions refer to Private Lands and associated 'Exemptions'.

Section 254 requires the applicant to acquire a Licence for the construction of such Telecommunications Infrastructure adjunct to Public Roads. This licence application must demonstrate how the proposal conforms to the proper planning and sustainable development of the area. Under Section 254, an Appeal of a decision to An Bord Pleanála is provided for. There are no height stipulations provided for therein, however Cignal is committed to the highest standards of proper planning and sustainable development and aims to achieve highest possible environmental assimilation standards. One such example of this aim is portrayed in the pursuit of slim line design prototypes, which have evolved since the enactment of the legislation, such as the Alpha 2 model (inter alia), which has combined highly technical specifications with a slim line aesthetically attractive construct with credit afforded to the Cignal Design Team in conjunction with JRA (Jason Redmond Associates).

### **5.3 Spirit of the Legislation**

Planning Authorities, An Bord Pleanála and the Judiciary invariably refer to the 'Spirit of the Legislation', under their respective reports/summations, in drawing conclusions and in issuing Judgements. It is therefore respectfully submitted that the spirit of the Section 254 Licence process is to 'remove barriers' to the roll out and deployment of Telecommunications Infrastructure nationally in order 'to provide immediate solutions to mobile voice and broadband deficits in Ireland'. However, it is noted that regard must be had to the proper planning and

sustainable development of an area and be in accordance with respective Development Plans.

#### **5.4 Provisions of Section 254, Planning and Development Act 2000 (as amended)**

The salient provisions of Section 254 legislation under the Planning and Development Act 2000 (as amended) are as follows:

*254. — (1) Subject to subsection (2) , a person shall not erect, construct, place or maintain —*

*F924 [(ee) overground electronic communications infrastructure and any associated physical infrastructure, ]*

*on, under, over or along a public road save in accordance with a licence granted by a planning authority under this section.*

*(5) In considering an application for a licence under this section a planning authority, or the Board on appeal, shall have regard to —*

- (a) the proper planning and sustainable development of the area,*
- (b) any relevant provisions of the development plan, or a local area plan,*
- (c) the number and location of existing appliances, apparatuses, or structures on, under, over or along the public road, and*
- (d) the convenience and safety of road users including pedestrians.*

#### **5.5 Licence History & Precedent**

##### **5.5.1 Previous Licence Application on Subject Site**

There have been no previous Section 254 Licence Applications by the applicant in the subject local area.

##### **5.5.2 Previous Licence Applications in the Jurisdiction**

The reception of Licence Applications has been very positive for the most part. Numerous Licence Applications have already been approved by various planning authorities throughout the Jurisdiction. Such a positive reception of this

new Statutory Instrument reflects innovative, proactive and positive engagement between Local Authorities and Telecommunications Infrastructure providers, which is a significant and dynamic step forward for the Telecommunications Sector, which was clearly espoused under the Taskforce Report and accords with 'the spirit of the legislation'.

The following Section 254 Licence Applications have been granted by An Bord Pleanála in recent times: ABP: PL.305114-19 (Lahinch Rd, Ennis), ABP: PL 306440-20 (Ballybane, Galway) and, ABP: PL 306033 – 05E (Letterkenny, Co. Donegal), PL06S.307196 (Lucan, Co. Dublin).

With regard to the principle of development and the associated acceptance of the proposed modernised type of telecommunications pole, under ABP PL 305114-19 the inspector referred, with regard to the principle of development, "*It is agreed that modern technology has provided for design standards that are more amenable to coming within the scope for a License application under Section 254*".

The above Section 254 Licence Applications have similar characteristics to the subject area in terms of receiving environment.

## **5.6 Street Works in Northern Ireland and the UK, US.**

It is very important to convey that this type of Telecommunications solution is extremely commonplace in Northern Ireland, the UK, Europe and in the US.

Furthermore, 'The Greenbook', 'Guidance on the Potential Location of Overground Telecommunications Infrastructure on Public Roads' (April 2015), published by the Dept of DCCAE (see [www.dccae.ie](http://www.dccae.ie)) demonstrates various examples of such structures similar to the structure proposed herewith.



The Green Book acknowledges that the type of infrastructure required will vary, depending on a number of factors, such as location, existing road type and network coverage targets.

In Section 5.4 Consideration of Suitability of Locations, the Green Book refers to the use of standalone poles as the preferred option in urban settings where there is a wide verge or similar.

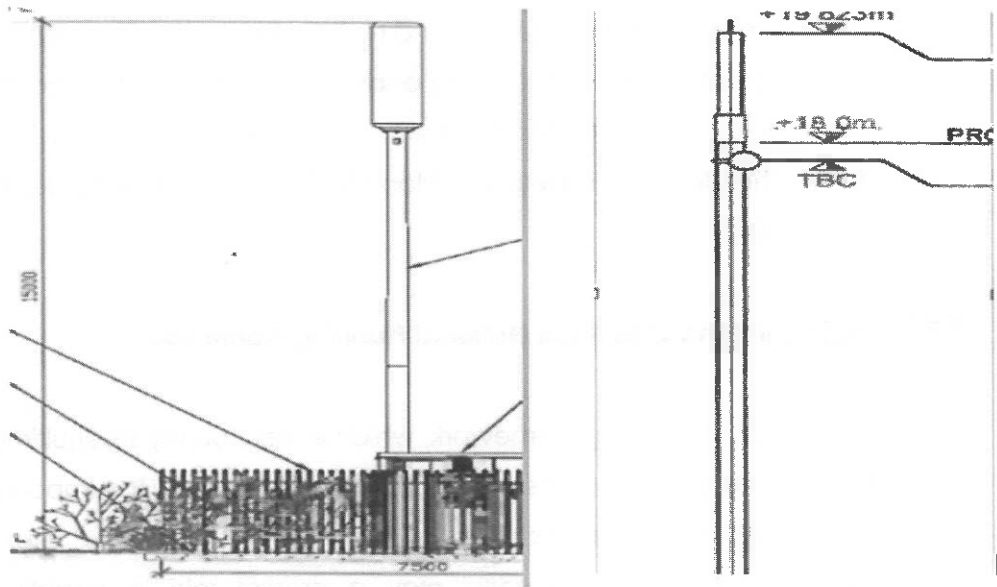
Consideration of Opportunities to Facilitate Telecommunications Infrastructure on the Roads Network			
Urban Roads			
	General	Opportunities	Comment
	<p>In the case of urban roads, there are generally few opportunities to cater for large, stand-alone masts. There may be opportunities in the vicinity of some roundabouts.</p> <p>There are, however, likely to be more opportunities to accommodate small telecoms antennae / cabinets within the streetscape. Also, it may be feasible to erect new poles to accommodate telecommunications infrastructure.</p>	<p>Opportunities are generally limited to locations where a wide verge or footpath allows the accommodation of small cabinets/antennae and/or the erection of stand-alone poles to accommodate telecommunications infrastructure.</p>	<p>Stand-alone poles are the preferred option in urban areas, as there are ongoing operational and maintenance issues relating to accommodating electronic equipment on lighting columns.</p>

**Fig.No.13** Guidance on potential location of overground telecommunications infrastructure on public roads.

In general, the height of telecommunications infrastructure is determined by the network requirements. According to EIR, an overall height of 18m is required on at Shanganagh Road in order to provide the required coverage and to clear local obstacles that would cause network interference.

Pan surveys were taken at three locations in the vicinity and the antenna central height of 16.5m is required to clear the surrounding mature trees

We note Appendix A of the Green Book, which offers examples of acceptable roadside infrastructure, particularly examples three and four, both of which are structures of 15m and over.



**Fig No.14** Image 5 Examples of small and medium size Single Operator Sites Extracted from the Green Book Appendix A.

For these reasons we suggest that the proposed development is in line with the National and EU digital agenda and the City Development Plan and as such should be permitted as a critical addition to the local service provision

## 5.7 Proper Planning and Sustainable Development Considerations

This section sets out the Planning Considerations relevant to the subject licence application. Signal Infrastructure Ltd. has given due regard to the following policy documents in selecting the subject site.

### National Telecommunications Policy

- Planning Guidelines for Telecommunications Antennae and Support Structures' (1996).
- Circular Letter PL 07/12 issued by the Department of the Environment and Local Government.
- The 'Green Book': Guidance on the Potential Location of Overground Telecommunications Infrastructure on Public Roads (April 2015), Published by The Dept of DCCAE (Product of Collaboration with Department of

Communications Energy and Natural Resources, Department of Transport Tourism and Sport, County and City Management Association, Office for Local Authority Management, National Roads Authority (TII)).

- The National Broadband Plan 2012 (and updated under Project Ireland 2040).

#### **5.7.1 Project Ireland 2040 – The National Planning Framework**

The National Planning Framework, which is the Country's penultimate, high level planning steering document at national level, stresses the importance of island wide telecoms connectivity. It refers that in the information age, telecommunications networks play a crucial role in enabling social and economic activity.

#### **5.7.2 Circular Letter PL 11/2020, Telecommunications Services – Planning Exemptions and Section 254 Licences**

This Circular was issued on 17<sup>th</sup> December 2020. It clarifies that a s.254 licence is required for overground electronic communications infrastructure and any associated physical infrastructure but such works are exempt from planning permission.

While a section 254 licence is required for such works, section 254(7) further provides that development carried out in accordance with a licence issued under section 254 shall be exempted development for the purposes of the Act.

#### **5.7.3 East and Midlands RSES (Regional Spatial Economic Strategy)**

This strategic policy document refers under Chapter 11 that; *'In the information age, telecommunications networks play a crucial role in enabling social and economic activity. This RSES supports actions to strengthen communications links*

*to develop a stable, innovative and secure digital communications and services infrastructure on an all-island basis'.*

Section 6.4: The Region's Economic Engines and their Sectoral Opportunities:

In alignment with the Growth Strategy for the Region in Chapter 3, and in conjunction with the Settlement Strategy expressed in Chapter 4, it is an aim of the RSES that there is a convergence between where people live and work and that settlements improve the quality of life of their people.

*'The pervasiveness of digitisation across all sectors compounds the complexity of sector development, and it provides for constant and rapid evolution of emerging technologies including artificial intelligence, machine learning, robotics and virtual reality'.*

Section 8.6 Communications Network and Digital Infrastructure

*Access to broadband in the Region is improving but remains incomplete. Many rural and peripheral areas of the Region are poorly served by broadband and there is a need to increase the rate of investment in broadband, in particular in rural areas.*

*The increasing use of digital technologies is impacting on every aspect of our lives: from transport, to education, leisure and entertainment and health services. Infrastructure to deliver better connected services is vital to our continued growth, supporting businesses and enhancing our communities. As the digital economy grows, we must ensure that the business opportunities and benefits are felt throughout the Region from our capital city to every town, village and outlying rural area - author's emphasis.*

*The provision of next generation broadband services to rural areas is a key enabling support to ensure smaller urban areas and rural areas are not at a disadvantage in attracting and retaining enterprise and employment compared to larger urban centres. The National Broadband Plan will play an integral role in*

*delivering this infrastructure and revitalising businesses and communities across rural Ireland. This is a fast moving and evolving infrastructure and the region will need to be able to respond and adapt to future communications networks and technology along with changing work practices and emerging economic models.*

**Regional Policy Objective - RPO 8.25**

Local authorities shall:

- *Support and facilitate delivery of the National Broadband Plan.*
- *Facilitate enhanced international fibre communications links, including full interconnection between the fibre networks in Northern Ireland and the Republic of Ireland.*
- *Promote and facilitate the sustainable development of a high-quality ICT network throughout the Region in order to achieve balanced social and economic development, whilst protecting the amenities of urban and rural areas.*
- *Support the national objective to promote Ireland as a sustainable international destination for ICT infrastructures such as data centres and associated economic activities at appropriate locations.*
- *Promote Dublin as a demonstrator of 5G information and communication technology.*

**Regional Policy Objective - RPO 8.26**

- *The EMRA supports the preparation of planning guidelines to facilitate the efficient roll out and delivery of national broadband.*

#### **5.7.4 Dunlaoghaire Rathdown County Development Plan 2016 - 2022**

##### **Policy EI28: Telecommunications Infrastructure**

*It is Council policy to promote and facilitate the provision of an appropriate telecommunications infrastructure, including broadband connectivity and other technologies, within the County.*

*The widespread availability of a high quality telecommunications network throughout Dún Laoghaire-Rathdown will be critical to the development of a knowledge economy, will help attract inward investment in hi-tech knowledge based industries and will engender the image of the County as the premier entrepreneurial County in the State.*

*The advantages of a high quality telecommunications network must, however be, balanced against the need to safeguard the rural and urban environment, particularly in sensitive areas where the impacts on residential amenity and visual amenity of areas needs to be adequately assessed.*

##### **Zoning Objective**

The site is located on a larger landholding owned by the Council. The front portion of this landholding is not zoned, whereas the rear portion is zoned Objective A, the objective of which is "To protect and-or improve residential amenity". The site is located on this rear portion.

'Public Services' are a permissible use under this zoning objective and it is submitted that this is the most relevant land use in respect of telecommunication infrastructure.



**Fig.No.15** Extract from the Dun Laoghaire-Rathdown zoning map 2016-22.

#### **Site Designations (Zoning, Scenic Routes, Landscape Sensitivity etc.)**

The site has no specific amenity designation. There is no protected scenic route proximate to the site. It is not within an ACA or within a SAC/SPA. The site falls within the area defined as public road and therefore this proposal should be considered under the Section 254 legislation as outlined under Section 3.1 above.



## 6.0 VISUAL IMPACT ASSESSMENT

Please refer to the CGI images prepared by Jason Redmond Associates, Consulting Engineers submitted with the application showing before and after images of the proposed development.

For the purpose of this study the criteria as set out in the current EPA Guidelines on Information to be contained in Environmental Impact Assessment Reports (2017, Draft) are used in the assessment of the likely impacts. The criteria for rating the significance of impacts are outlined below:

Criteria for significance of effects under EPA Guidelines

EPA Rating	
<i>Imperceptible</i>	<i>An impact capable of measurement but without significant consequences</i>
<i>Not Significant</i>	<i>An effect which causes noticeable changes in the character of the environment without significant consequences</i>
<i>Slight</i>	<i>An impact which causes noticeable changes in the character of the environment without affecting its sensitivities</i>
<i>Moderate</i>	<i>An impact that alters the character of the environment in a manner that is consistent with the existing and emerging baseline trends</i>
<i>Significant</i>	<i>An impact which, by its character, magnitude, duration or intensity alters a sensitive aspect of the environment</i>
<i>Very Significant</i>	<i>An effect which, by its character, magnitude, duration or intensity significantly alters most of a sensitive aspect of the environment</i>
<i>Profound</i>	<i>An impact which obliterates sensitive characteristics</i>

A total of **10 no. Visual Reference Points** have been identified within a 300m radius of the site (1 from Broomfield Court, 5 from Shanganagh Road, 2 from Rathsallagh park and 2 from Hazelwood).

VRPs 2, 7 & 10 are taken from Shanganagh Rd<sup>3</sup> at distances of 43m, 196m and 111m respectively from the site. The pole and cabinet are visible at these viewpoints. Given the established context provided by the receiving environment which comprises electricity poles and mature trees, along with the slender nature of the structure, and the neutral sky grey colour, the visual impact is considered to be slight to moderate. It will read as part of the typical street furniture and will not be an incongruous insertion into the streetscape.

VRPs 1, 5 & 6 are taken from Broomfield Court and Rathsallagh Park (1,2) at distances of 33m, 62m and 120m respectively from the site. The pole is visible from VRP 1 and only partially visible due to the presence of mature trees are VRPs 5 & 6. It appears as a normal functional utility infrastructure and its visual impact is considered to be slight.

From VRP 3 at a distance of 70m, the top of the pole is barely visible due to the presence of mature trees and its visual impact is considered to be slight.

There is no view of the structure from VRPs 4, 8 & 9.

### **VIA Conclusion**

It is concluded that while the proposed 18 metre pole will be visible from close-up locations, which is to be expected, it is not considered that such visual sighting of same would be detrimental to the visual amenities of the area, the community amenities or of the public realm at this location.

---

<sup>3</sup> Refer to table at the front of the VIA prepared by Jason Redmond Associates which provides numerical listings for VPRs on the same road.

Established street lighting and mature trees have the effect of absorbing the proposed structure from many of the viewpoints.

The proposed pole structure and cabinet, which are proposed for this spatial context is a more stream-lined and sleek version of the structures, which were initially rolled out under the Section 254 Licence process. The proposed structure/equipment is testament to the objective of the Cellnex Company, Signal, which has been to strive to carefully select appropriate sites, which meet coverage objectives, but which also sensitively address the streetscape wherein such structures are located. It is respectfully submitted that the proposed structure, is presented as a utility structure in this streetscape.

## **7.0 APPROPRIATE ASSESSMENT SCREENING**

### **7.1 Natura 2000 Provisions**

Having regard to the nature and limited scale of the proposed development and nature of the receiving environment together with the distance from the nearest European site, no Appropriate Assessment issues arise and it is not considered that the proposed development would be likely to have a significant effect individually or in combination with other plans or projects on a European site.

## **8.0 ICNIRP COMPLIANCE**

### **8.1 Health and Safety legislation and Guidelines**

The subject site will be built in accordance with current Health and Safety legislation and Guidelines, which is ultra vires to the planning process. Comreg is the appropriate authority with responsibility for same. The proposed equipment and installation are designed to be in full compliance with the limits set by the Guidelines of the International Commission on Non-Ionising Radiation Protection.

## **9.0 CONCLUSION**

It is respectfully submitted that the proposed street work solution accords with pattern and character of the public realm in this area of the Shanganagh Road, Shankill, Dublin 18.

The principle of the proposed Alpha 2.0 pole structure has been accepted by numerous planning authorities and An Bord Pleanála, since the enactment of the legislation. All other locations i.e. existing telecommunication sites have been evaluated and discounted for various reasons set out above. The majority of the established sites assessed were too far from the search ring, to satisfy its technical requirements. The Cellnex Team also considered 'Alternatives' and various locations were ruled out for genuine reasons.

Furthermore, the Dun Laoghaire-Rathdown County Council Development Plan 2016-2022 clearly recognises the importance of the development of a high-quality telecommunications network.

The proposed 18 metre pole solution will provide for optimum coverage as required in an area where there is a noted dearth in coverage. Additionally, given the current Covid 19 crisis, the newly acquired practices of wholesale 'Working from Home' have placed increasing demands on the network as noted by Government in recent Circulars and associated actions. It is also widely accepted that 'Working from Home' practices will become the new norm for a significant time period into the future. Therefore, the immediate urgency of this type of telecommunications infrastructure to address coverage gaps in the network, in addition to increased demand, has never been so crucial to the ongoing economic and sustainable development of the Country.

It is submitted that the proposed pole will be of neutral sky grey, which will reflect the skyline and therefore the proposed pole will be well assimilated with regards to its colour/texture and therefore complies with the best principles of siting and design.

On a site-specific basis, the proposed location, will not interfere with the use of the footpath and will provide an appropriate setting for the proposed pole and cabinet where it will appear as normal utility infrastructure.

The VIA submitted herewith demonstrates that there will be no negative impact on the visual amenities of this area with slight to moderate visual impacts being perceived as one observes the structure in middle to near distance. It is submitted that whilst the structure will naturally be visible, it cannot be argued that visibility of such a structure alone amounts to detrimental impacts rather normal perception of development. This type of structure is crucial functional infrastructure, which significantly contributes to successful place making, in a modern day, functional public realm.

The proposed development is also consistent with the main thrust of Regional Policy (EMRA RSES).

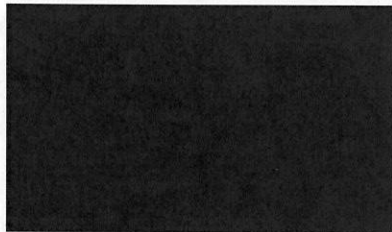
The planning authority is respectfully requested to consider the necessity for this infrastructure, which the market would not require if there was not a demand for same. The planning authority is also requested to consider the meticulous site selection process undertaken, which has to satisfy the criteria of the planning authority in addition to the technical/radio requirements of the identified search ring.

With regard to the S.254 legislation, as cited under Section 4 above, it is submitted that the proposed development.

- Accords with the proper planning and sustainable development of the area.
- Accords with the relevant provisions of the development plan.
- Does not detract from the convenience and safety of road users including pedestrians,
- Assimilates within the existing pattern of appliances, apparatuses, or other structures along the public road.

In conclusion, it is respectfully submitted that the proposal fully complies with the proper planning and sustainable development of the area and it is requested that Dun Laoghaire-Rathdown County Council grant this Licence Application with regard to the case set out above.

A stage II Appropriate Assessment is not considered necessary. We invite the Council as the competent body to agree with this conclusion.



**David Mulcahy Planning Consultants Ltd**  
**CHARTERED PLANNING CONSULTANTS**



Marsh Ireland Brokers Ltd  
Marsh House  
25-28 Adelaide Road  
Dublin 2  
D02 RY98  
Tel: 01 604 8100  
www.marsh.ie

To Whom It May Concern

7th January 2022

Dear Sir/Madam,

**Confirmation of Insurance – Cellnex Ireland Ltd, Signal Infrastructure Limited and/or  
Cellcom Ireland Ltd and/or On Tower Ireland Ltd.**

As requested by you, we are writing to confirm that we act as your Insurance Broker and that we have arranged insurance(s) on your behalf as detailed below with insurers who are authorised to conduct insurance business in Ireland by their respective regulatory authority(ies). A copy of this letter may be provided by you to third parties who have a legitimate need to receive confirmation of your insurance cover.

**Business Description**

Provides telecommunications infrastructure solutions

**EMPLOYERS' LIABILITY**

INSURER: XL Insurance Company SE  
POLICY NUMBER: [REDACTED]  
PERIOD OF INSURANCE: 1st January 2022 to 28<sup>th</sup> February 2022 (both days inclusive)  
LIMIT OF INDEMNITY: €13,500,000 (for each and every occurrence)

**PUBLIC LIABILITY**

INSURER: XL Insurance Company SE  
POLICY NUMBER: [REDACTED]  
PERIOD OF INSURANCE: 1st January 2022 to 28<sup>th</sup> February 2022 (both days inclusive)  
LIMIT OF INDEMNITY: €6,500,000 (any one event and in the aggregate during the period of insurance)

Marsh Ireland Brokers Limited, trading as Marsh Ireland, Bowring Marsh, Charity Insurance, Echelon Claims Consultants, Guy Carpenter & Company, ILCS, Insolutions, Lloyd & Partners, Marsh Aviation Consulting, Marsh Claims Management Services, Marsh Claims Solutions, Marsh Specialty, Marsh Reclaim, and Marsh Risk Consulting, is regulated by the Central Bank of Ireland.

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A business of Marsh McLennan

We have placed the insurance which is the subject of this letter after consultation with you and based upon your instructions only. Terms of coverage are based upon information furnished to us by you, which information we have not independently verified.

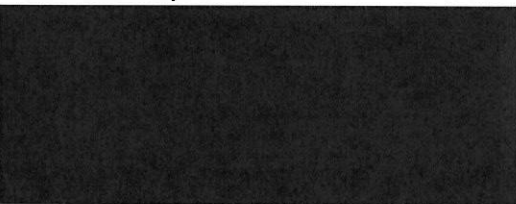
This letter is issued as a matter of information only and confers no right upon you or any third party to whom it is disclosed, other than those provided by the policy. This letter does not amend, extend or alter the coverage afforded by the policies described herein. Notwithstanding any requirement, term or condition of any contract or other document with respect to which this letter may be issued or pertain, the insurance afforded by the policy (policies) described herein is subject to all terms, conditions, limitations, exclusions and cancellation provisions and may also be subject to warranties. Limits shown may have been reduced by paid claims.

We express no view and assume no liability with respect to the solvency or future ability to pay off any of the insurance companies which have issued the insurance(s).

Where a copy of this letter has been provided to a third party, we assume no obligation to advise that third party of any developments regarding your insurance(s) subsequent to the date hereof. Additionally this letter is given on the condition that we are not assuming any liability to any third party who receives a copy of this letter, based upon the placement of your insurance(s) and/or the statements made herein.

This letter shall be governed by and shall be construed in accordance with Irish law.

Yours sincerely,



Client Advisor  
Marsh Ireland Brokers Ltd  
Direct Dial: [REDACTED]  
E-mail: [REDACTED]

Marsh Ireland Brokers Limited, trading as Marsh Ireland, Bowring Marsh, Charity Insurance, Echelon Claims Consultants, Guy Carpenter & Company, ILCS, Insolutions, Lloyd & Partners, Marsh Aviation Consulting, Marsh Claims Management Services, Marsh Claims Solutions, Marsh Specialty, Marsh Reclaim, and Marsh Risk Consulting, is regulated by the Central Bank of Ireland.

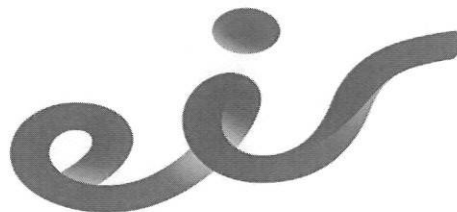
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Marsh



A business of Marsh McLennan





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Citywest Business Campus  
Dublin 24 D24 HX03  
T +353 1 671 4444  
eir.ie

## Radio Emissions Statement

As an operator of a Mobile Telecommunications Network *Eir Ltd* is aware of its requirements in relation to management of electromagnetic field radiation and are committed to management of risk to our employees, members of the public and any other groups who may be affected by our networks. All of the radio equipment on our network and our radio base stations are "Safe by Design" and are designed to meet international health and safety standards and best practice, including the relevant guidance from International Commission on Non-Ionizing Radiation Protection (ICNIRP) and from the Communications Regulator in Ireland.

*Eir Ltd* own and operate mobile telecommunications sites across Ireland. These sites are built and managed to operate within the limits for exposure to Electromagnetic Fields which are set by the Communications Regulator and are based on guidance from the International Council for Non-Ionising Radiation Protection (ICNIRP) and meet the requirements of directives from the European Commission. The issue of radiation from Mobile Phones has been a concern for many people since the introduction of this technology significant numbers of studies have been performed and have been reviewed by international experts. The World Health Organisation in their fact sheet on Electromagnetic fields and public health: mobile phones have stated that "A large number of studies have been undertaken on both acute and long-term effects from HF (High Frequency EMF Radiation) exposure typical of base stations. Research at these levels of exposure has provided no conclusive evidence of any related adverse health effects". (Ref; <http://www.who.int/mediacentre/factsheets/fs193/en/>). In their on line Q&A on Mobile Phones and Cancer the WHO also states "Studies to date provide no indication that environmental exposure to RF fields, such as from base stations, increases the risk of cancer or any other disease." (<http://www.who.int/features/qa/30/en/>)

The International Council on Non Ionising Radiation Protection, who are the lead independent agency on non-ionising radiation safety have stated "A large number of studies have been undertaken on both acute and long-term effects from HF (High Frequency Non Ionising Radiation) exposure typical of base stations. Research at these levels of exposure has provided no conclusive evidence of any related adverse health effects." (<http://www.icnirp.org/en/applications/base-stations/index.html>) in late 2015 The European Commission's Scientific Committee on Emerging and Newly Identified Health Risks published a "Final Opinion on the Potential health effects of exposure to electromagnetic fields (EMF)" The expert opinion is based on the latest scientific studies and expert review. In its summary the Scientific Committee state that "The results of current scientific research show

Directors:

eir is a trading name of eircom Limited,  
Registered as a Branch  
in Ireland Number 907674  
Incorporated in Jersey Number 116389

Branch Address: 1 Heuston South Quarter,  
St. John's Road, Dublin 8  
VAT registration: IE 3286434NH

that there are no evident adverse health effects if exposure remains below the levels recommended by the EU legislation.

Our antennae are well below this level) Overall, the epidemiological studies on radiofrequency EMF exposure do not show an increased risk of brain tumours. Furthermore, they do not indicate an increased risk for other cancers of the head and neck region.”

The maximum exposure levels that are set by ICNIRP for Public exposure to radiation in the mobile phone frequency range is 28 V/m. All of our sites are designed and maintained to operate well within these guideline limits. Independent compliance inspections that are carried out for our company and are published by the Communications Regulator on their website ([www.siteviewer.ie](http://www.siteviewer.ie)) show that the levels of EMF radiation from mobile telecoms masts in Ireland ranges between 0.5-3V/m, well within the safe exposure limits advised by international experts.

We continue to monitor the advice and guidance given by Government, international experts and equipment manufacturers to ensure that the sites that we operate continue to operate well within the limits set for exposure of members of the public and for our employees and contractors who will work at your location.

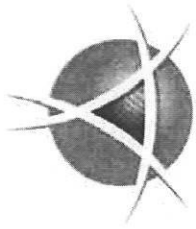
**Internal Documentation References:**

Meteor Mobile Communications Design and Build Specification and Guidelines  
Standard Safe Operating practices - Mobile Network

**Statement Prepared By:**

[Redacted]

**Date:** 12/07/17



Commission for  
**Communications Regulation**  
Coimisiún Um  
**Rialáil Cumarsáide**

**Declaration under Regulation 5 of the European Communities  
(Electronic Communications)(Authorisation) Regulations 2011 (S.I.  
335 of 2011)**

**To whom it may concern**

In accordance with the terms of Regulation 5 of the European Communities (Electronic Communications)(Authorisation) Regulations 2011, the Commission for Communications Regulation hereby confirms that the undertaking named below has submitted a notification pursuant to Regulation 4(1)

**Authorised Person: Signal Infrastructure Ltd**

and in accordance with that Regulation is deemed to be authorised to provide an electronic communications network or electronic communications service subject to the terms and conditions of a general authorisation issued by the Commission for Communications Regulation.

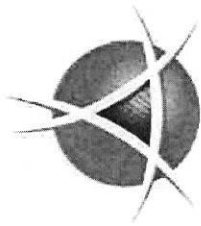
An Authorised Person may:

- (a) provide the electronic communications networks or services as described in the notification and which is recorded in the public register maintained for that purpose by the Commission for Communications Regulation,
- (b) apply for a consent under section 53 of the Act of 2002 to commence or carry out road works. Applications for such consent shall be made to the road authority in whose functional area the Authorised Person proposes to carry out the road works.
- (c) apply for a licence under section 254(1) of the Planning and Development Act 2000 for the establishment of overground electronic communications infrastructure and any associated physical infrastructure on, under, over or along a public road. Applications for such a licence shall be made to the planning authority in whose functional area the Authorised Person proposes to establish the infrastructure.

Where an Authorised Person is providing an electronic communications service or network to the public, such Authorised Person has the right to negotiate interconnection with another Authorised Person or another undertaking deemed to be authorised in another Member State. The right to negotiate interconnection is subject to the provisions of the European Communities (Electronic Communications Networks and Services)(Access) Regulations 2011 and any decisions,

**Commission for Communications Regulation**  
**An Coimisiún um Rialáil Cumarsáide**

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Telephone +353 1 804 9600 Fax +353 1 804 9665 Email [info@comreg.ie](mailto:info@comreg.ie) Web [www.comreg.ie](http://www.comreg.ie)

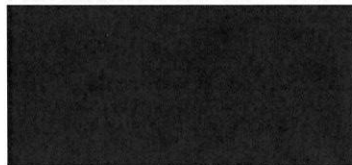


Commission for  
**Communications Regulation**  
Coimisiún Um  
**Rialáil Cumarsáide**

determinations, requirements, specifications, notifications and directions issued by the Commission for Communications Regulation from time to time. Such interconnection shall be for the purpose of providing publicly available Electronic Communications Services in order to ensure the provision and interoperability of services.

**Issued on behalf of the Commission for Communications Regulation by**

**Name:**



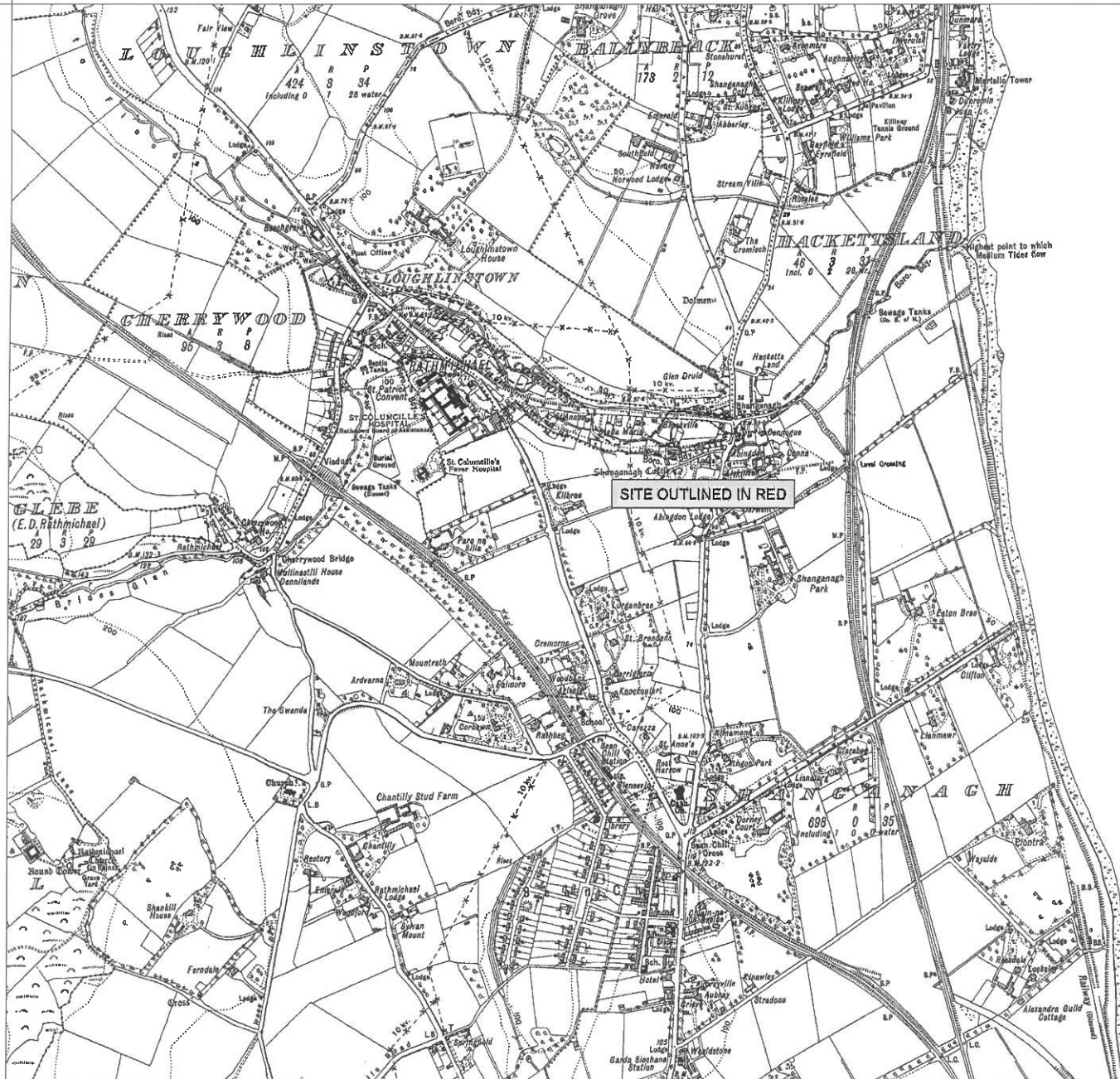
**Title/Position:**      **Analyst – Market Framework Division**

**Date:**                      **3 March 2016**

**Commission for Communications Regulation**  
**An Coimisiún um Rialáil Cumarsáide**

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E = 723571.245, N = 721343.915

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Survey Date =  
Levelled Date = 31-Dec-1912  
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Revision Date =  
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B	REVISED LOCATION	25/02/21		
A	ISSUED FOR PLANNING	14/02/21		
No.	Revision	Date	By	Ckd

## DELMEC

10 Barrowfield Business Park, Sixty Road,  
Grangecullen, Carlow, R63 E3W7,  
Rep. of Ireland.

**cellnex**  
driving telecom connectivity

Signal Infrastructure Ltd.  
Suite 311, G House, 76 Fuzze Road,  
Sandyford Industrial Estate, Dublin 18,  
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Jason Redmond & Associates Consulting Engineers

Civil Structural  
Project Management  
5 Limerick Court, Portlaoise,  
Co. Laois.  
PH 05166 91155  
Email: [info@jra.ie](mailto:info@jra.ie)

## PLANNING

Signal site ID CIG-02048  
Operator site ID DN\_1971

Site Name  
SHANGANAGH ROAD, DUN LAOGHAIRE  
CO. DUBLIN

Title  
CELLNEX SMART STREETPOLE  
SITE LOCATION MAP

Designed Date 12/05/2021  
Drawn Scale 1:1500 Rev. B  
Dwg No. DN\_1971-100  
DWG LOCATION: [www.osi.ie/about/terms-conditions](http://www.osi.ie/about/terms-conditions)





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A	ISSUED FOR PLANNING	14/05/21		
No.	Revision	Date	By	Chd

**DELMEC**

10 Barnackville Business Park, Slieve Road,  
Grangecullen, Carrig, R93 E9W7,  
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**cellnex**  
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Jason Redmond & Associates Consulting Engineers

Chief Structural  
Project Management  
6 Lismore Court, Portlaoise,  
Co. Laois,  
PH: 05786 81155  
Email: info@jase.ie

**PLANNING**

Cignal site ID CIG-02048

Operator site ID DN 1971

Site Name  
SHANGANAGH ROAD, DUN LACGHARE  
CO. DUBLIN

Title  
CELLNEX SMART STREETPOLE  
SITE LOCATION MAP AERIAL PHOTO

Designed 12.05.2021

Drawn Scale 1:250 Rev. B

Dwg No. DN 1971-101

DWG LOCATION: c:\projects\cellnex\1971-101.dwg



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Data Source / Reference:  
PRIME2  
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Autodesk AutoCAD (DWG, R2013)  
File Name:  
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Reference Index:  
Map Series / Map Sheet:  
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1:1,000 / 2016-03

Date Extraction Date:  
Date= 12-May-2021

Source Data Release:  
OGLAS Release V1.14.0.112

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No.	Revision	Date	By	Clad

## DELMEC

10 Barrowside Business Park, Sleaty Road,  
Greysteel, Carlow, R63 E9W7,  
Rep. of Ireland.

**cellnex**  
driving telecom connectivity  
Signal Infrastructure Ltd.  
Suite 311, G House, 78 Fureze Road,  
Sandyford Industrial Estate, Dublin 18,  
D18 YV55, IRELAND.

Jason Redmond & Associates Consulting Engineers

Civil Structural  
Project Management  
5 Lisnand Court, Portlaoise,  
Co. Laois.  
PH: 05766 81155  
Email: [info@jraco.ie](mailto:info@jraco.ie)

## PLANNING

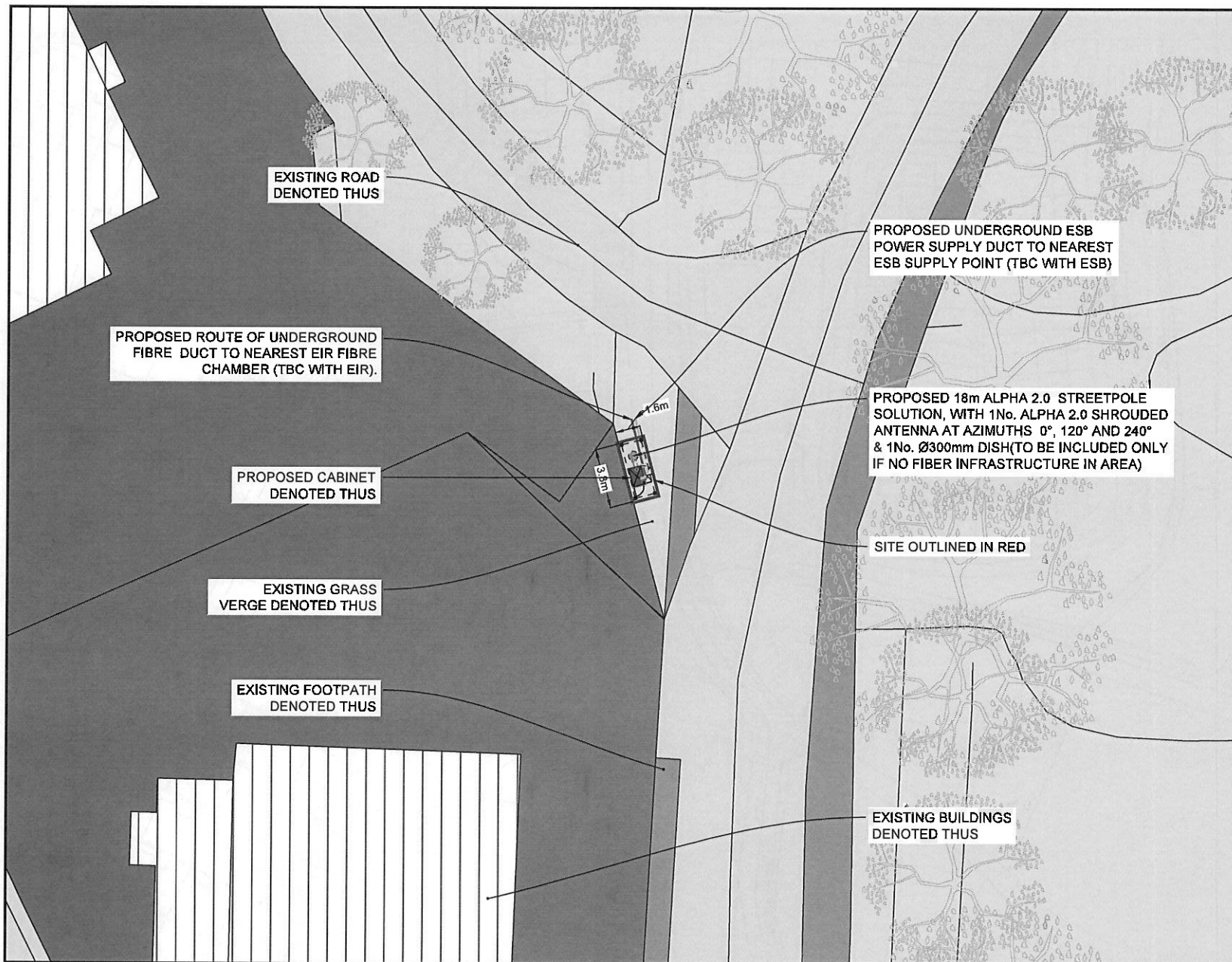
Signal site ID	CIG-02048
Operator site ID	DN_1971

Site Name  
SHANGANAGH ROAD, DUN LAOGHAIRE  
CO. DUBLIN

Title  
CELLNEX SMART STREETPOLE  
SITE LOCATION PLAN

Designed		Date	12.05.2021
Drawn		Scale	1:1,000
Dwg No.	DN_1971-102	Rev.	B

DWG LOCATION: [www.osi.ie/about/terms-conditions](http://www.osi.ie/about/terms-conditions)



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### LEGEND

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SITE OUTLINED THUS	
EXISTING BUILDING	
EXISTING GRASS VERGE	
EXISTING FOOTPATH	
EXISTING HARDSTANDING	



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No.	Revision	Date	By	Ckd

## DELMEC

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Grangecastle, Carrow, R63 EW97,  
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driving telecom connectivity  
Cignal Infrastructure Ltd.  
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### Jason Redmond & Associates Consulting Engineers

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Co. Laois.  
PH: 05786 81155  
Email: info@jra.ie

## PLANNING

Cignal site ID CIG-02048

Operator site ID DN\_1971

Site Name  
SHANGANAGH ROAD, DUN LAOGHAIRE  
CO. DUBLIN

Title  
CELLNEX SMART STREETPOLE  
SITE LAYOUT PLAN

Designed 12/05/2021  
Drawn Scale 1:250 Rev. B

Dwg No. DN\_1971-103

DWG LOCATION: c:\projects\shanganagh\shanganagh\103-103.dwg







# 18m Alpha 2.0 STREETPOLE

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B	REVISED LOCATION	20/05/21		
A	ISSUED FOR PLANNING	14/05/21		
No.	Revision	Date	By	Chd

**DELMEC**

10 Barrowdale Business Park, Steady Road,  
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**PLANNING**

Signal site ID CIG-02048  
Operator site ID DN\_1971

Site Name  
SHANGANAGH ROAD, DUN LAOGHAIRE  
CO. DUBLIN

Title  
CELLNEX SMART STREETPOLE  
SCHEMATIC ELEVATION

Designed Date 12.05.2021  
Drawn Scale NTS Rev. B  
Dwg No. DN\_1971-104  
DWG LOCATION: c:\projects\cellnex\1971-104.dwg

# 18m Alpha 2.0 STREETPOLE

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B	REVISED LOCATION	25/02/21		
A	ISSUED FOR PLANNING	14/02/21		
No.	Revision	Date	By	Ckd

**DELMEC**

10 Barrowade Business Park, Sleafy Road,  
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Jason Redmond & Associates Consulting Engineers

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5 Lismacourt Court, Portlaoise,  
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**PLANNING**

Cignal site ID CIG-02048

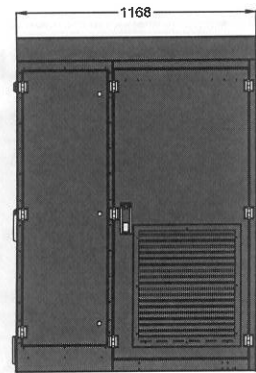
Operator site ID DN\_1971

Site Name  
SHANGANAGH ROAD, DUN LAOGHAIRE  
CO. DUBLIN

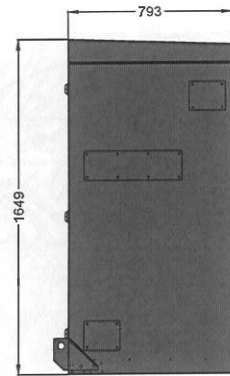
Title  
CELLNEX SMART STREETPOLE  
STANDARD ELEVATION AND DETAILS

Designed  Date 12.05.2021  
Drawn  Scale A5 Rev. B  
Dwg No. DN\_1971-105

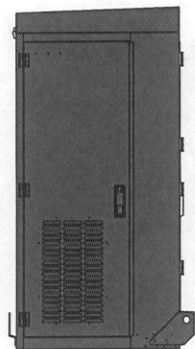
DWG LOCATION: C:\Users\jra\Documents\Projects\1971-105



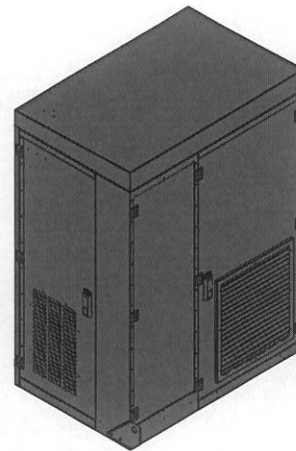
FRONT VIEW



R/H SIDE VIEW



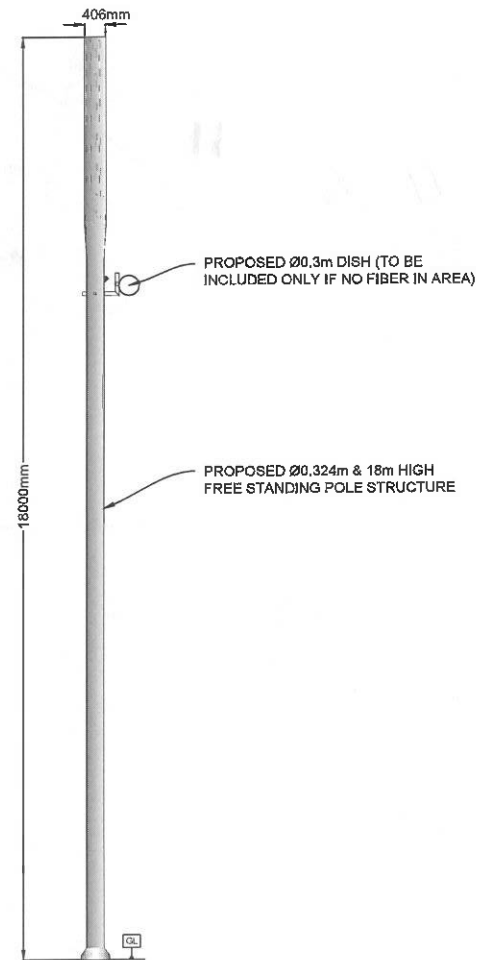
L/H SIDE VIEW



ISO. VIEW







## CABINET DETAILS

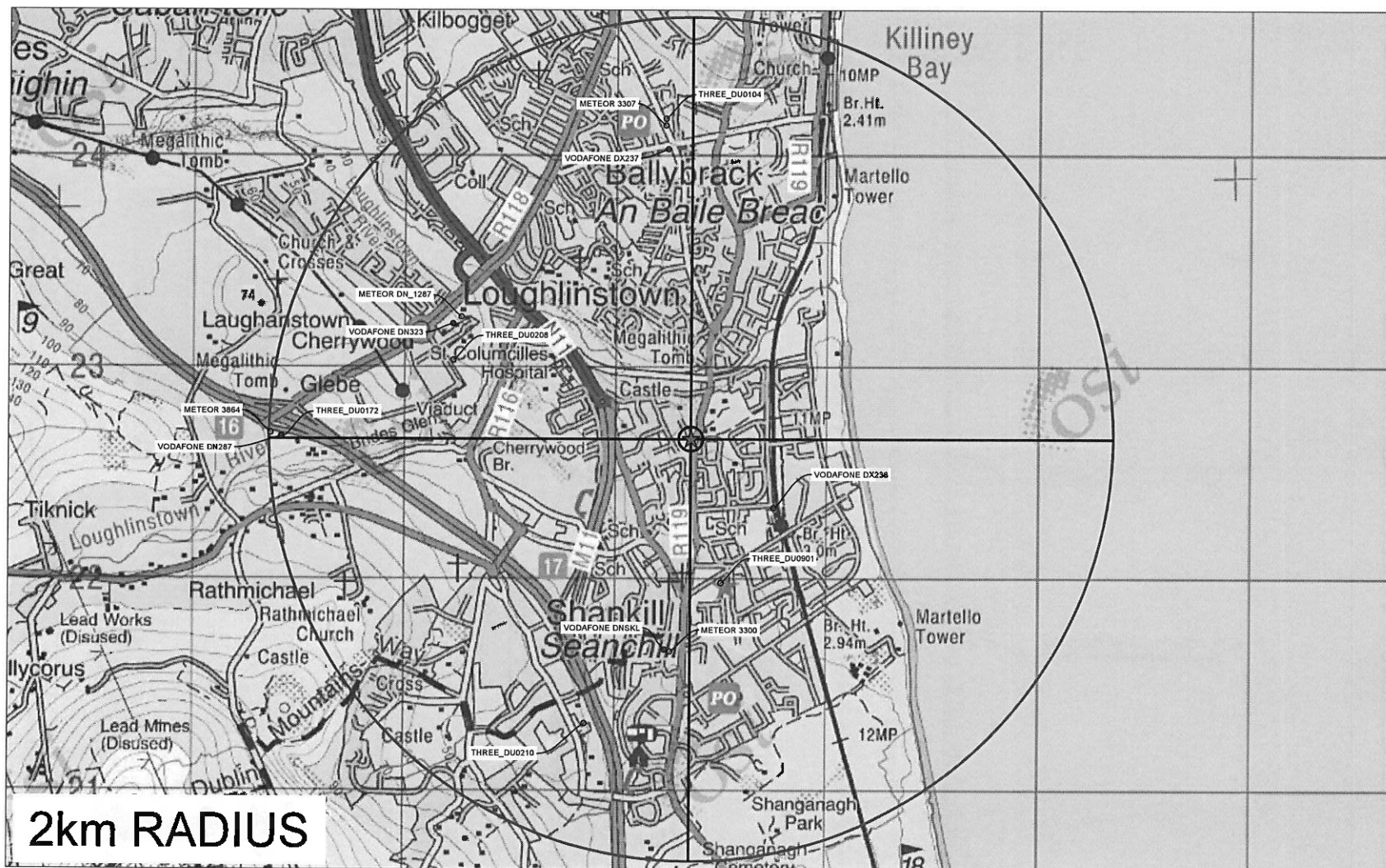
SCALE 1:25



## TYPICAL POLE

SCALE 1:100

<b>LEGEND:</b>	
Search Ring Radius	
Radius Area (2km)	
Proposed Site SR- 0446	
Existing Vodafone site shown thus	
Existing EIR site shown thus	
Existing H3Gi site shown thus	



**LOCATION MAP**  
SCALE 1:20,000

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18m Alpha 2.0 STREETPOLE



A	PLANNING ISSUE	20/05/21		
No.	Revision	Date	By	Chk

**DELMEC**

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**Civil Structural  
Project Management**  
6 Lisnard Court, Portlaoise,  
Co. Laois,  
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Email: info@nspc.ie

## PLANNING

Signal site ID	CIG-02048
----------------	-----------

Operator site ID	DN 1971
------------------	---------

Site Name  
SHANGANAGH ROAD, DUN LAOGHAIRE  
CO. DUBLIN

Title	CELLNEX SMART STREETPOLE COMREG MAP
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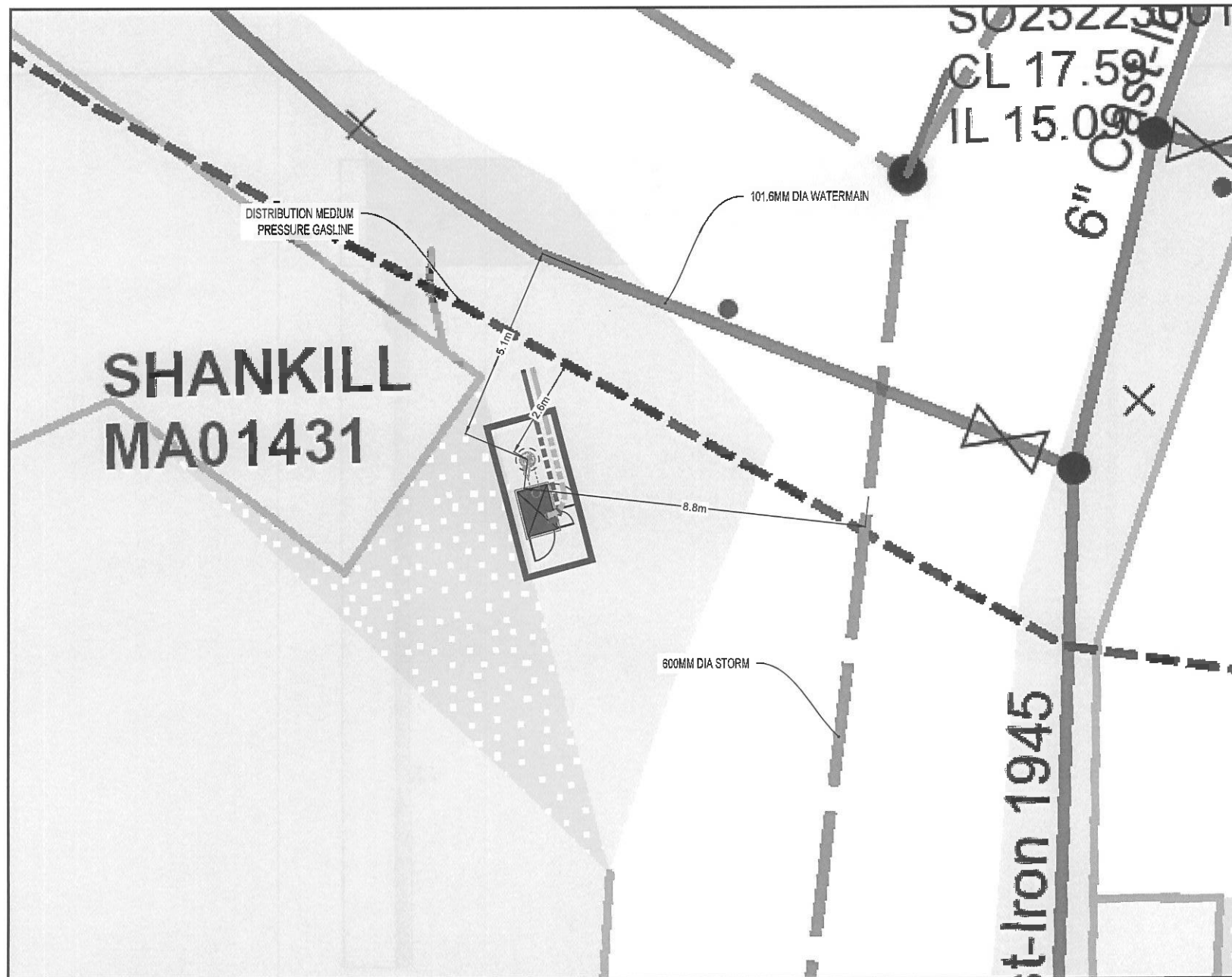
Designed		Date	13.05.2021
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Drawn	Scale 1:20,000	Rev. A
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Dwg No. DN 1971-107

DWG LOCATION: [C:\Users\james\AppData\Local\Temp\AutoCAD LT 2017\DWG](#)





**UNDERGROUND SERVICES**  
SCALE 1:100

18m ALPHA 2.0 STREETPOLE

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B	REVISED LOCATION	25/05/21	By	Cld
A	ISSUED FOR PLANNING	20/05/21	By	Cld
No.	Revision	Date	By	Cld

**DELMEC**

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Cignal site ID CIG\_02048

Operator site ID DN\_1971

Site Name  
SHANGANAGH ROAD, DUN LAOGHAIRE  
CO. DUBLIN

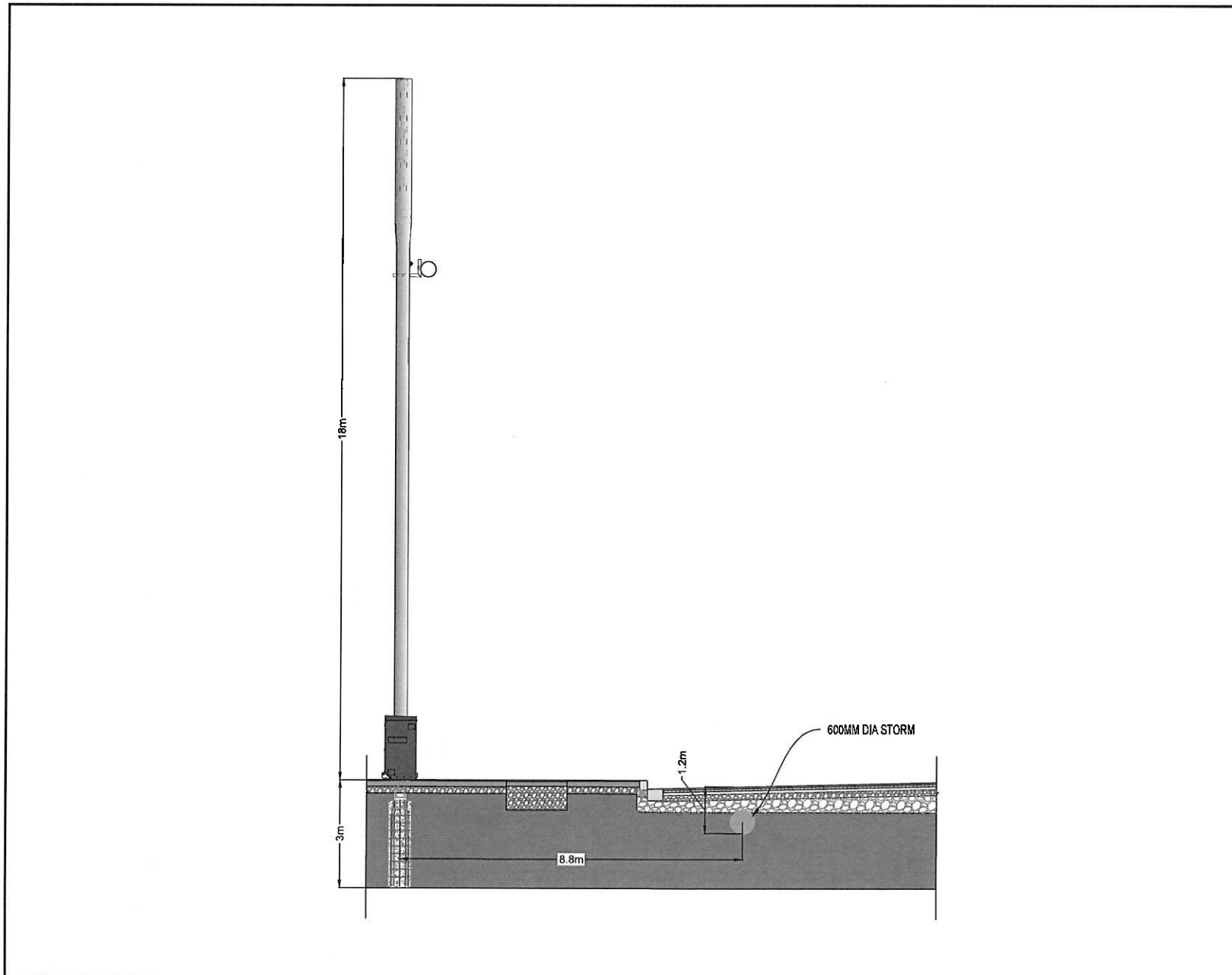
Title  
SIGNAL SMART STREETPOLE  
SITE LAYOUT PLAN

Designed Date 14/05/2021

Drawn Scale 1:50 Rev. B

Dwg No. DN\_1971-500

Dwg location:



## UNDERGROUND SERVICES

SCALE 1:100

## 18m ALPHA 2.0 STREETPOLE

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NOT FOR CONSTRUCTION



B	REVISED LOCATION	25/05/21		
A	ISSUED FOR PLANNING	20/05/21		
No.	Revision	Date	By	Chd

**DELMEC**

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Signal site ID CIG\_02048

Operator site ID DN\_1971

Site Name  
SHANGANAGH ROAD, DUN LAOGHAIRE  
CO. DUBLIN

Title  
SIGNAL SMART STREETPOLE  
ELEVATIONS

Designed Date 14.05.2021

Drawn Scale 1:100 Rev. B

Dwg No. DN\_1971-501

Dwg location:

# 18m ALPHA 2.0 STREETPOLE

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NOT FOR CONSTRUCTION



REVISED LOCATION	25/05/21			
ISSUED FOR PLANNING	25/05/21			
No.	Revision	Date	By	Ckd

**DELMEC**

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Email: jra@jra.ie

Signal site ID CIG\_02048

Operator site ID DN\_1971

Site Name  
SHANGANAGH ROAD, DUN LAOGHAIRE  
CO. DUBLIN

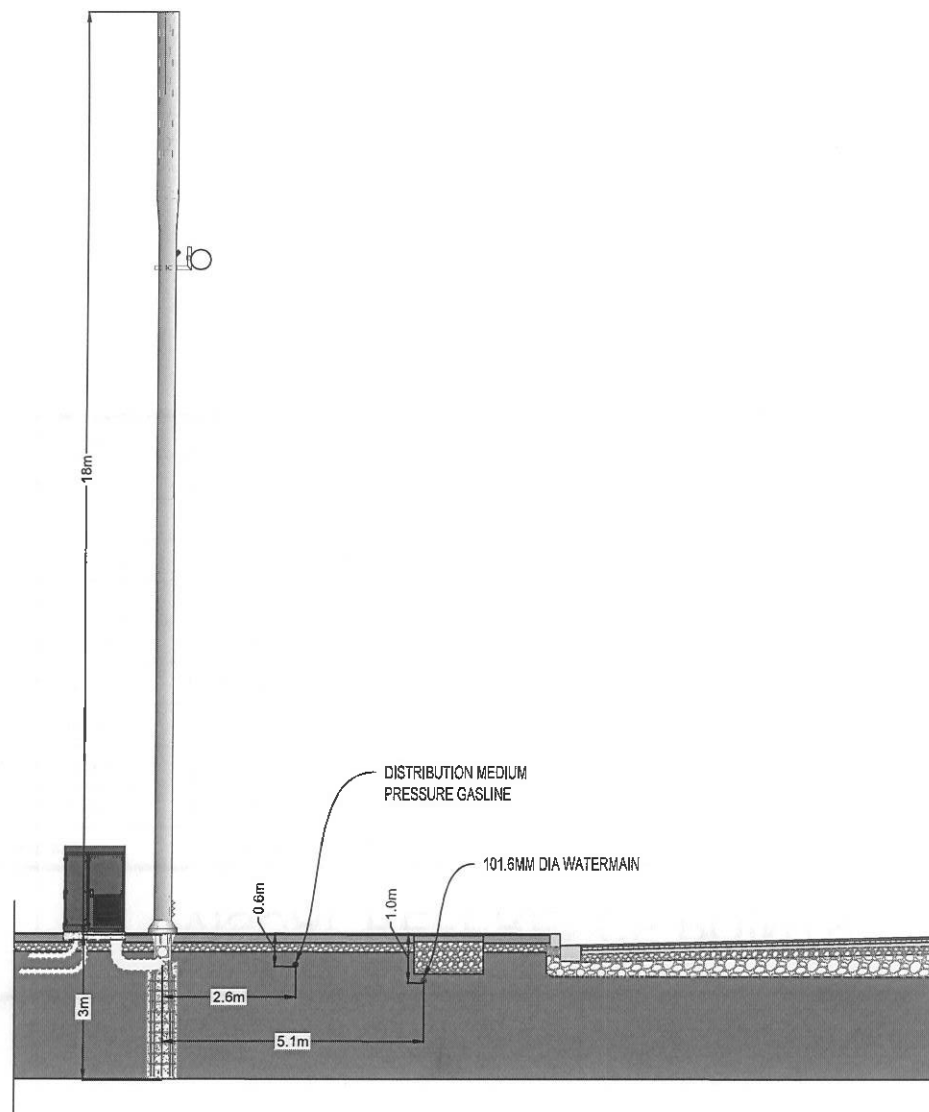
Title  
SIGNAL SMART STREETPOLE  
ELEVATIONS

Designed [Redacted] Date 14.05.2021

Drawn [Redacted] Scale 1:100 Rev. B

Dwg No. DN\_1971-502

Dwg location:



## UNDERGROUND SERVICES

SCALE 1:100

VISUAL REFERENCE POINTS					
DWG NO.	LOCATION	COORDINATES (ITM)	DISTANCE	BEARING	VISIBILITY
1	BROOMFIELD COURT	725269.0605, 722705.4317	33M	321°	Pole visible.
2	SHANGANAGH ROAD 1	725318.7451, 722713.8490	43M	40°	Pole and cabinet visible.
3	SHANGANAGH ROAD 2	725326.5996, 722739.7232	70M	32°	Top of pole visible.
4	SHANGANAGH ROAD 3	725322.9853, 722757.2556	83M	24°	Pole not visible.
5	RATHSALLAGH PARK 1	725352.3163, 722678.8576	62M	91°	Pole visible.
6	RATHSALLAGH PARK 2	725410.8122, 722683.7963	120M	89°	Pole visible.
7	SHANGANAGH ROAD 4	725298.4802, 722482.3060	196M	179°	Pole and cabinet visible.
8	HAZELWOOD 1	725273.1018, 722494.9376	185M	186°	Pole not visible.
9	HAZELWOOD 2	725241.0259, 722501.2085	185M	196°	Pole not visible.
10	SHANGANAGH ROAD 5	725297.8769, 722568.8806	111M	117°	Pole and cabinet visible.

DWG NO.	LOCATION	COORDINATES (ITM)	DISTANCE	BEARING	VISIBILITY
1	BROOMFIELD COURT	725269.0605, 722705.4317	33M	321°	Pole visible.
2	SHANGANAGH ROAD 1	725318.7451, 722713.8490	43M	40°	Pole and cabinet visible.
3	SHANGANAGH ROAD 2	725326.5996, 722739.7232	70M	32°	Top of pole visible.
4	SHANGANAGH ROAD 3	725322.9853, 722757.2556	83M	24°	Pole not visible.
5	RATHSALLAGH PARK 1	725352.3163, 722678.8576	62M	91°	Pole visible.
6	RATHSALLAGH PARK 2	725410.8122, 722683.7963	120M	89°	Pole visible.
7	SHANGANAGH ROAD 4	725298.4802, 722482.3060	196M	179°	Pole and cabinet visible.
8	HAZELWOOD 1	725273.1018, 722494.9376	185M	186°	Pole not visible.
9	HAZELWOOD 2	725241.0259, 722501.2085	185M	196°	Pole not visible.
10	SHANGANAGH ROAD 5	725297.8769, 722568.8806	111M	117°	Pole and cabinet visible.

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NOT FOR CONSTRUCTION

A	INITIAL ISSUE	20/05/21		
No.	Revision	Date	By	Ckd

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Signal site ID	CIG_02048
----------------	-----------

Operator site ID	DN 1971
------------------	---------

Site Name  
SHANGANAGH ROAD, DUN LAOGHAIRE  
CO.DUBLIN

**Title**  
SIGNAL SMART STREETPOLE  
VRP INFORMATION

Designed		Date	13.05.2021
Drawn		Scale	NA
		Rev.	A

Dwg No. DN 1971-VRP INFORMATION

Dwg location: \_\_\_\_\_





# 18m Alpha 2.0 STREETPOLE

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A	INITIAL ISSUE	20/05/21		
No.	Revision	Date	By	Ckd

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Signal site ID CIG\_02048

Operator site ID DN\_1971

Site Name  
SHANGANAGH ROAD, DUN LAOGHAIRE  
CO.DUBLIN

Title  
SIGNAL SMART STREETPOLE  
VRP INFORMATION

Designed	Date	13.05.2021
Drawn	Scale	1:1
Dwg No.	DN_1971-VRP INFORMATION	
Dwg Location	[Redacted]	



VRP1 - WITHOUT SOLUTION IN PLACE



VRP1 - WITH SOLUTION IN PLACE

## 18m Alpha 2.0 STREETPOLE

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A	INITIAL ISSUE	20/02/21	By	Ckd
No.	Revision	Date	By	Ckd

**DELMEC**

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Signal site ID CIG\_02048

Operator site ID DN\_1971

Site Name  
SHANGANAGH ROAD, DUN LAOGHAIRE  
CO.DUBLIN

Title  
SIGNAL SMART STREETPOLE  
VRP 1

Designed 13.05.2021

Drawn Scale M Rev. A

Dwg No. DN\_1971-121

Dwg location: [REDACTED]



VRP2 - WITHOUT SOLUTION IN PLACE



VRP2 - WITH SOLUTION IN PLACE

18m Alpha 2.0 STREETPOLE

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A	INITIAL ISSUE	20/05/21		
No.	Revision	Date	By	Chd

DELMEC

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Signal site ID	CIG_02048
Operator site ID	DN_1971

Site Name  
SHANGANAGH ROAD, DUN LAOGHAIRE  
CO.DUBLIN

Title  
SIGNAL SMART STREETPOLE  
VRP 2

Designed		Date	13.05.2021
Drawn		Scale	KA Rev. A
Dwg No.	DN_1971-122		
Dwg location:	[unclear]		







VRP4 - SOLUTION NOT VISIBLE

18m Alpha 2.0 STREETPOLE

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A	INITIAL ISSUE	28/05/21		
No.	Revision	Date	By	Ckd

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Signal site ID CIG\_02048

Operator site ID DN\_1971

Site Name  
SHANGANAGH ROAD, DUN LAOGHAIRE  
CO.DUBLIN

Title  
SIGNAL SMART STREETPOLE  
VRP 4

Designed Date 13/05/2021

Drawn Scale 1:1 Rev. A

Dwg No. DN\_1971-124

Dwg location: jra\projects\2021\1971-124\1971-124.dwg



VRP5 - WITHOUT SOLUTION IN PLACE



VRP5 - WITH SOLUTION IN PLACE

# 18m Alpha 2.0 STREETPOLE

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A	INITIAL ISSUE	20/05/21		
No.	Revision	Date	By	Clid

**DELMEC**

10 Barrowside Business Park, Sleaty Road,  
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Email: info@jrasc.ie

Cignal site ID CIG\_02048

Operator site ID DN\_1971

Site Name  
SHANGANAGH ROAD, DUN LAOGHAIRE  
CO.DUBLIN

Title  
CIGNAL SMART STREETPOLE  
VRP 5

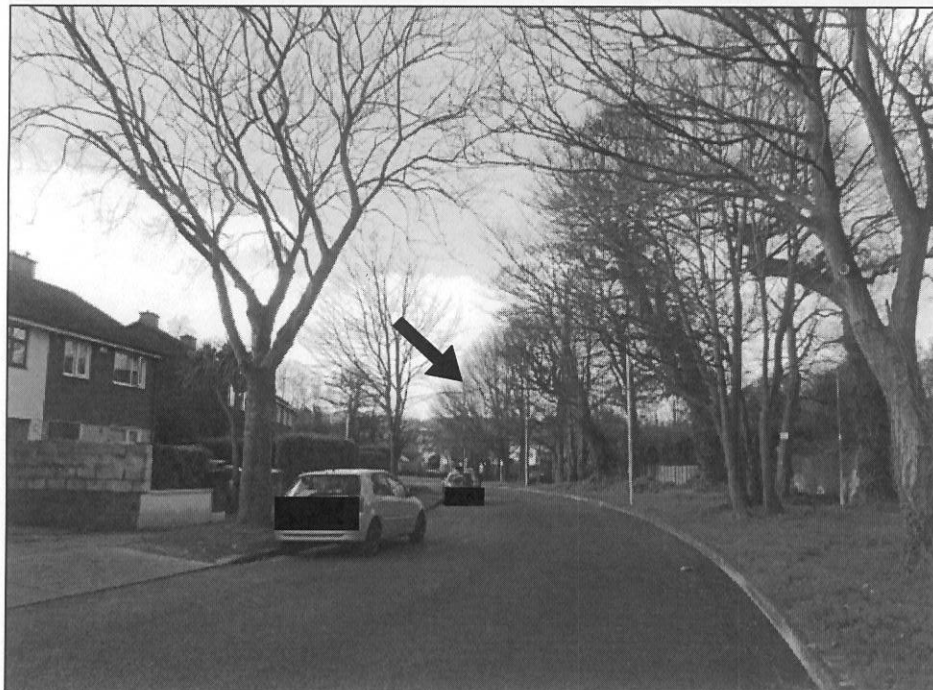
Designed Date 13.05.2021  
Drawn Scale RA Rev. A

Dwg No. DN\_1971-125

Dwg Location: 18m Alpha 2.0 STREETPOLE



VRP6 - WITHOUT SOLUTION IN PLACE



VRP6 - WITH SOLUTION IN PLACE

## 18m Alpha 2.0 STREETPOLE

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A	INITIAL ISSUE	30/05/21	By	Ckd
No.	Revision	Date	By	Ckd

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Signal site ID CIG\_02048

Operator site ID DN\_1971

Site Name  
SHANGANAGH ROAD, DUN LAOGHAIRE  
CO.DUBLIN

Title  
SIGNAL SMART STREETPOLE  
VRP 6

Designed Date 13.05.2021  
Drawn Scale NA Rev. A

Dwg No. DN\_1971-126  
Dwg location: [redacted]





VRP7 - WITHOUT SOLUTION IN PLACE



VRP7 - WITH SOLUTION IN PLACE

## 18m Alpha 2.0 STREETPOLE

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NOT FOR CONSTRUCTION

A	INITIAL ISSUE	28/05/21	By	Ckd
No.	Revision	Date	By	Ckd

**DELMEC**

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Suite 311, G House, 78 Fuzo Road,  
Bansbury Industrial Estate, Dublin 15,  
D18 YV50, IRELAND.

Jason Redmond & Associates Consulting Engineers

**Jason Redmond & Associates**  
Civil Structural  
Project Management  
5 Lismore Court, Portlaoise,  
Co. Laois,  
PH: 05785 81155  
Email: info@jrassoc.ie

Signal site ID CIG\_02048

Operator site ID DN\_1971

Site Name  
SHANGANAGH ROAD, DUN LAOGHAIRE  
CO.DUBLIN

Title  
SIGNAL SMART STREETPOLE  
VRP 7

Designed Date 13/05/2021  
Drawn Scale N/A Rev. A

Dwg No. DN\_1971-127

Dwg Location: Signal Smart Streetpole VRP 7, Shanganagh Road, Dun Laoghaire, Co. Dublin





VRP8 - SOLUTION NOT VISIBLE

## 18m Alpha 2.0 STREETPOLE

THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL ENGINEERING & ARCHITECTURAL INFORMATION & MUST BE USED ONLY IN ACCORDANCE WITH THE TERMS OF THE CONTRACT OF INFORMATION & SERVICE OR IF IN ANY CASE, THE CONTRACT OF INFORMATION & SERVICE IS NOT IN FORCE.

CONTRACTORS TO BE INFORMED IMMEDIATELY OF ANY CHANGES NOTED ON SITE.

NOT FOR CONSTRUCTION

A	INITIAL ISSUE	20/05/21	By	Ctd
No.	Revision	Date	By	Ctd

### DELMEC

10 Barrowside Business Park, Sleshy Road,  
Graiguenallen, Carlow, R93 1BW7,  
Rep. of Ireland.

### cellnex

driving telecom connectivity

Signal Infrastructure Ltd.  
Suite 311, Q House, 78 Forze Road,  
Sandyford Industrial Estate, Dublin 18,  
D18 YV50, IRELAND.

Jason Redmond & Associates Consulting Engineers

▲  
Civil Structural  
Project Management  
5 Lismore Court, Portlaoise,  
Co. Laois.  
PH: 05768 81158  
Email: info@jra.ie

Signal site ID CIG\_02048

Operator site ID DN\_1971

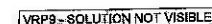
Site Name  
SHANGANAGH ROAD, DUN LAOGHAIRE  
CO.DUBLIN

Title  
CIGNAL SMART STREETPOLE  
VRP 8

Designed Date 13.05.2021  
Drawn Scale N/A Rev. A

Dwg No. DN\_1971-128

Dwg location: /Users/jra/Desktop/Projects/Signal/Signal Smart Streetpole/Signal Smart Streetpole.dwg





18m Alpha 2.0 STREETPOLE

THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL ENGINEERS & ARCHITECT'S DRAWINGS. FIGURED DIMENSIONS ONLY (NOT SCALING) TO BE USED. WHERE A CONFLICT OF INFORMATION EXISTS OR IF IN ANY DOUBT - ASK.

CONSULTANTS TO BE INFORMED IMMEDIATELY OF ANY DISCREPANCIES BEFORE WORK PROCEEDS

NOT FOR CONSTRUCTION

A	INITIAL ISSUE	20/05/21		
No.	Revision	Date	By	C

**DELMEC**

10 Barrowside Business Park, Sleaty Road,  
Graigucullen, Carlow, R93 E3W7,  
Rep. of Ireland.

**cellnex**  
driving telecom connectivity

Signal Infrastructure Ltd.  
Suite 311, Q House, 76 Furze Road,  
Sandyford Industrial Estate, Dublin 18,  
D18 YV50, IRELAND.

Jason Redmond & Associates Consulting Engineers

  
Civil Structural  
Project Management  
5 Lisnard Court, Portlaoise,  
Co. Lao.  
PH: 05788 81165  
Email: info@jasco.ie

Signal site ID	CIG_02048
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Operator site ID	DN_1971
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Site Name  
SHANGANAGH ROAD, DUN LAOGHAIRE  
CO.DUBLIN

Title  
 SIGNAL SMART STREETPOLE  
 VRP 9

Designed [REDACTED] Date 13.05.2021

Designed		
Drawn	Scale 1/4" = 1'	Rev. A

Dwg. No. DN 1971-129

Dwg location: *None*



<b>18m Alpha 2.0 STREETPOLE</b>					
THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL SPECIFICATIONS & AGREEMENTS STANDARDISED DRAWINGS SHOULD ONLY NOT BE USED, WHERE A CONFLICT OF INTEREST CAN BE IDENTIFIED BY THE USER.					
COMPLAINTS TO BE INFORMED IMMEDIATELY OF ANY DISCREPANCIES BEFORE WORK PROCEEDS.					
<b>NOT FOR CONSTRUCTION</b>					
A	INITIAL ISSUE			20/05/01	
No.	Revision			Date	By Ck
<p>10 Barrowside Business Park, Steady Road, Graiguescullen, Carlow, R93 E3W7, Rep. of Ireland.</p> <i>driving telecom connectivity</i> Cellnax Infrastructure Ltd. Suite 311, Q House, 78 Fuzes Road, Sandford Industrial Estate, Coblen 10, D18 YV60, IRELAND.					
Jason Redmond & Associates Consulting Engineers					
 Civil Structural Project Management 5 Lismard Court, Portlaoise, Co. Laois. Ph: 05766 81155 Email: info@jrasc.ie					
Signal site ID				CIG_02048	
Operator site ID				DN_1971	
Site Name					
SHANGANAGH ROAD, DUN LAOGHAIRE CO.DUBLIN					
Title					
SIGNAL SMART STREETPOLE VRP 10					
Designed				Date 13.05.2021	
Drawn				Scale N/A Rev. A	
Dwg No. DN_1971-130					

**Date Received:** 02/06/2021

**Applicant:** Cignal Infrastructure Ltd.,  
Suite 309, Q House,  
76 Furze Road,  
Sandyford Industrial Estate,  
Dublin 18.

**Location:** Shanganagh Road, Shankill, Dublin 18

**Application Reference:** CTT.21.014 - Shankill

**Date of Report:** 08/12/2021

Dear Sir/Madam,

I am writing to you in response to the application made on behalf of Cignal Infrastructure Ltd under the provisions of Section 254 of the Planning and Development Act, 2000 (as amended) for the installation of communications infrastructure under licence from Dun Laoghaire Rathdown County Council on Shanganagh Road adjacent to the junction with Broomfield Court.

Dun Laoghaire Rathdown County Council have reviewed the application and wish to advise that the license request has been refused.

In reviewing the application in conjunction with relevant service departments within Dun Laoghaire Rathdown County Council, the Council has identified that the proposed installation location forms an obstruction to an upcoming roads infrastructure project on Shanganagh Road. For your reference, I attach a drawing illustrating the location of the proposed installation plotted and overlaid on the layout of the proposed Shanganagh Road Improvement Scheme. Please refer to the pink cross hairs at CH700 on the drawing. The Proposed installation is located in the centre of the 2m wide footpath (indication in grey colour) and this would not be acceptable.

Yours faithfully,

**J Finnerty**  
\_\_\_\_\_  
**Jennifer Finnerty,**  
**Assistant Staff Officer**  
**Roads Maintenance**