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The Planning Officer,
Planning Department,
Dunlaoghaire - Rathdown County Council
County Hall
Marine Rd
Dunlaoghaire
Co. Dublin

Date: 13th September 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: Gledswood Drive
Location: Gledswood Drive, Dublin 14.

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 Three, Cignal 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, Dublin 14.

The street pole has an approx. diameter of 360mm and will be galvanised and painted in finish up to 15.25m in height. Above the 15.25m height, an antenna will be mounted to a finishing height of up to 18m. The antenna will be shrouded by a 360mm 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

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,

[Redacted Signature]

Chartered Engineer

[Redacted Name]



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PLANNING STATEMENT

to support s.254 licence application for

TELECOMMUNICATIONS INFRASTRUCTURE

at

GLEDWOOD DRIVE, DUBLIN 14

Client: Signal Infrastructure Ltd.

08th September 2021

1.0 INTRODUCTION

David Mulcahy Planning Consultants Ltd have been instructed by **Signal Infrastructure Ltd**¹ to prepare a planning statement to support a Section 254 licence application for a telecommunication structure at Gledswood Drive, Dublin 14.

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 Associates².

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

¹ Suite 311, Q House, Sandyford Industrial Estate, Dublin 18, D18 YV50.

² 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 north of Gledswood Drive in Dublin 14 close to junction with Roebuck Road. Please refer to the site location map submitted with the application.

2.2 Description

The site forms part of an area of public open space surrounded by public roads and containing a number of mature trees, a CCTV camera mounted on a tall pole, a seat, a bin and cycle parking.



Fig No.1 Photograph of subject site taken from Roebuck Avenue.



Fig No.2 Aerial photograph with approximate location of site indicated (source: Google Maps)

2.3 Ownership

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

2.4 Land Uses in the Vicinity

There is a footpath to the east with Roebuck Avenue beyond. The adjoining lands to the north, south and west form part of the wider grass verge where the site is located. There is a CCTV mounted camera on a tall pole to the immediate north of the site. Gledeswood Road is located to the south.

There are commercial uses to the south of Gledeswood Road (neighbourhood centre).

There are multiple tall street lights, telegraph poles in the vicinity of the site along with some lower height traffic lights.

There are no dwellings in the immediate vicinity. There are dwellings to the east and west at a substantial distance of over 50m (Rosemount Crescent and Bird Avenue) and views of the site are obscured by mature trees.

3.0 PROPOSED DEVELOPMENT

3.1 Description

The proposal consists of a 18m Alpha 3.0 streetpole, with 1no. 3.2m AW3836 Alpha Antenna at azimuths TBC°, along with ancillary cabinetry (1.898m wide x 1.652m high x 0.798m deep). The proposed streetpole will replace the existing streetpole with the CCTV camera. All equipment from the existing streetpole will be installed on the proposed streetpole. Exact technical detail is to be agreed with Dun Laoghaire Rathdown County Council.

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

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. 200 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.

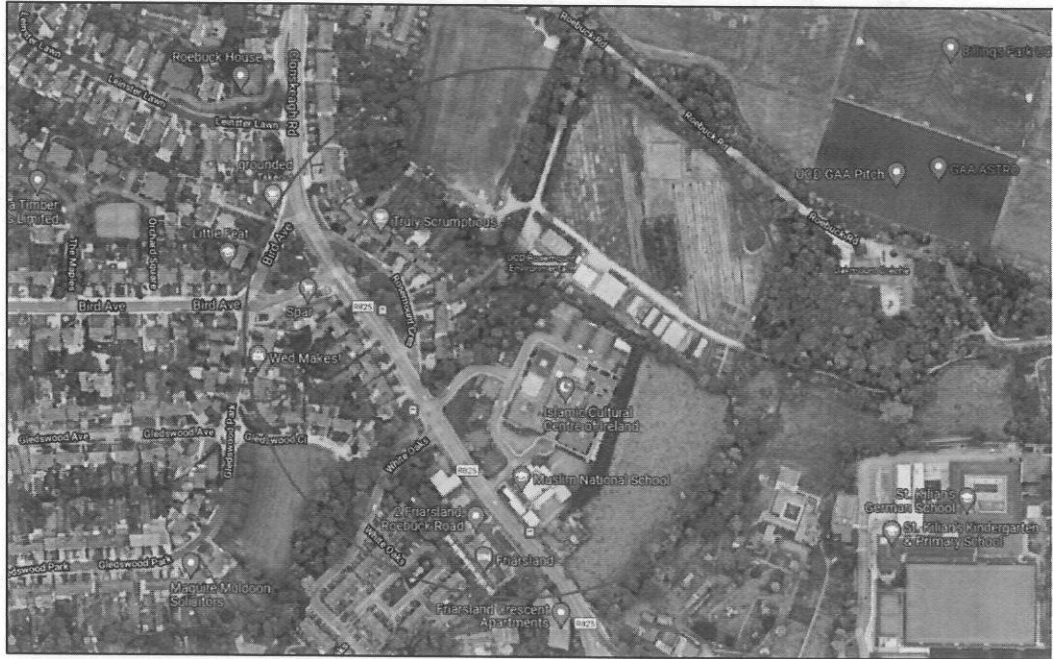


Fig No.3 200m Search Ring for subject site.

3.2.2 Reasons why candidate location was chosen:

This location in Gledswood Drive was chosen because of the following:

1. It is within the search ring.
2. There is adequate space to locate a street works solution and cabinet.
3. The proposed street works will replace the existing on-street CCTV pole.
4. There is fibre located close to this location to ensure connectivity into the network.
5. The location will not interfere with existing services or footpath.

Alternative Locations Examined by Three:

Three Ireland has a policy to co-locate into existing telecommunications structure where possible, that are located with the target area. Following comprehensive search of the target search area, no existing base station options were identified that could be shared or upgraded to provide the necessary coverage required.

1. Current technologies fail to provide adequate coverage or capacity demand in local area. Candidate structure is limited from an upgrade perspective thus cannot be upgraded to support future technologies. This has degraded customer experience in the area.
2. St Killians School – School engaged to propose lighting Pole solution – Site provider not interested in housing Telecom's equipment
3. UCD sports grounds – College engaged to propose site solution – No feedback from site provider.
4. Gledswood Drive Streetwork – Site option adequate for providing coverage in the area for all desired future technologies ensuring adequate customer experience in the future.

Three is 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 local residents and business users around Gledswood Drive and its environs. The new site will improve coverage for the many residential and business users within the area as well as commuters traveling to and from work.

The proposed installation will form part of an established telecommunications network system that Three operates in the area and has been carefully chosen

to ensure performance levels are maintained. The site is considered the best possible solution to meet both the existing and future demands of its customers in this area. Failure to progress this installation in its proposed location will impact service in the area as demonstrated in the plots provided and will have a negative impact on Three's network by leaving customers around Gledswood Drive and environs without sufficient coverage.

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.

The main function for the site in Gledswood Drive and wider area is to provide mobile voice and data coverage to Gledswood Drive and to improve voice and broadband access to local residents & business users around this area.

Figure 4 below demonstrates a large areas in red surrounding the site. This area clearly demonstrates a poor signal level where the market requires the infrastructure.

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

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

Legend:

█	-71	Excellent
█	-75	Very Good
█	-83	Good
█	-92	Fair
█	-103	Poor



Figure 4: EXISTING INDOOR COVERAGE – poor signal level

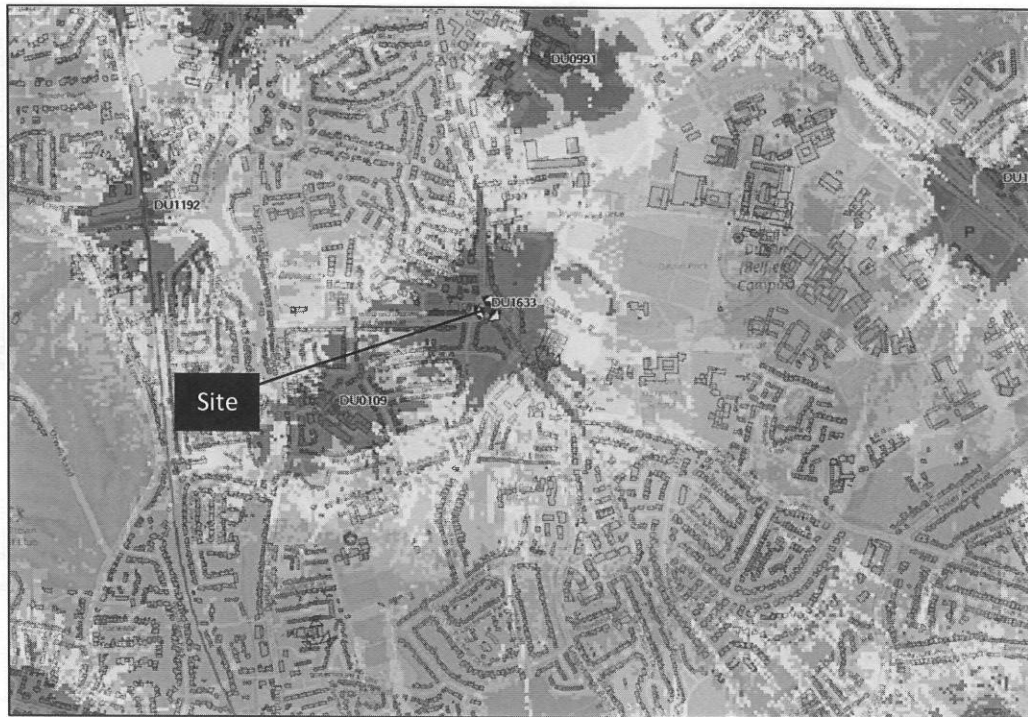


Figure 5: PROPOSED INDOOR COVERAGE – excellent coverage

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>.

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.

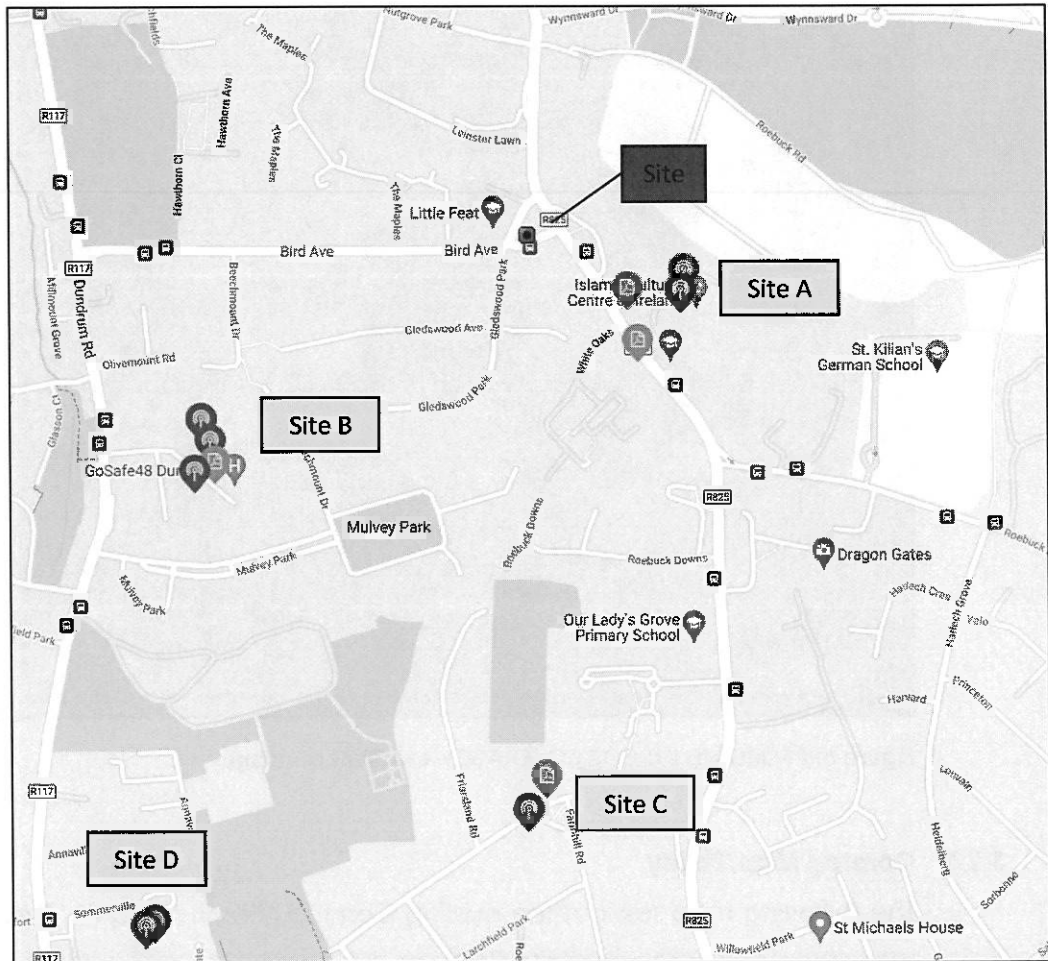


Fig. No.6 Comreg Map of closest Existing Sites in General Area.

3.2.5 Alternative Sites

Please refer to the above Comreg Map (Fig No.6) in association with the following Table, which set out the other relevant Infrastructure in the subject general area of Gledswood Drive. It must be noted that all of the sites identified are situated outside of the required search ring, which has a diameter of c.200 metres.

Three have exhausted all other options in the area for alternative sites. Any existing telecoms structures are not located close enough to the demand area. As can be seen below, after reviewing the nearest telecoms structures to the

proposed site it can be seen that Three Ireland are already live and transmitting on some of these sites. Only a site at this location in Gledswood Drive will be capable of providing the required service levels expected by customers in this area.

However, in the interest of demonstrating other sites in the broader area for assessment purposes by the planning authority, we provide an analysis of other sites in the vicinity of the site below.

Firstly, the Council are referred to the diagram submitted with the application showing all telecommunications sites within 2km of the subject site - Cellnex Smart Streetpole Comreg map (separate enclosure).

The following table indicates the established sites near the subject site (and presents associated 'Discounted Reasons' why they are deemed unsuitable:

Site:	Name of Site (Comreg):	Approx. Distance from Site:	Details/Discounted Reason(s):
A	THREE_DU1117; METEOR DN_1443; VODAFONE_DN319	214m	THREE is already positioned at this site and cannot be upgraded to support future technologies, therefore equipment at this location would not address the service needs of the subject search ring.
B	THREE_DU0109; METEOR DN_1230; VODAFONE_DN319	540m	Site is 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. THREE is already positioned at this site therefore equipment at this location would not address the service needs of the subject search ring.

C	VODAFONE_DN274	775m	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.
D	VODAFONE_DNDND;	1.05km	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.

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

Previous Licence Application on Subject Site

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

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*". This appeal was granted by the Board subject to conditions and it pertained to a similar description; 15 metre Alpha 2.0 pole and cabinet, in height and general dimensions.

We also refer the Council to a recent decision by An Bord Pleanála (ref. LC93.309598) dated 28th July 2021 concerning a proposed for a 15m high

streetpole solution to address identified mobile and mobile broadband coverage blackspots at the Junction of St. John's Hill and The Folly, Waterford (Reg. Ref. 19/523).

Waterford City & County Council refused permission on account of the fact that the subject site was considered to be located on an elevated and exposed suburban site, in close proximity to a scout den, a hospital/care home, a number of protected structures and numerous residential properties, in circumstances where the proposal has not been subject of formal public notification and there has not been an opportunity for formal public engagement or submissions.

The Board however granted permission for a conditional 10 year licence.

The An Bord Pleanála Inspector noted that:

- *"The structure may briefly be of visual interest but would then become an accepted and normal part of the urban streetscape. These structures are becoming more common".*
- *"The procedure for such an application is set out in the legislation and there are four specific elements that the planning authority shall have regard to. There is no provision for public participation and therefore, the fact that it has 'not been subject of formal public notification and there has not been an opportunity for formal public engagement or submissions' is not relevant. I consider the planning authority was not entitled to refuse permission for the licence on this basis".*
- *"The structure will be very visible on the streetscape. However, a visual impact is unavoidable with telecommunications infrastructure such as this ... it would not have any undue adverse impact on the surrounding land uses or the protected structures".*

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) 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.7 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 Three, an overall height of 18m is required in Gledswood Drive in order to provide the required coverage and to clear local obstacles that would cause network interference.

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.

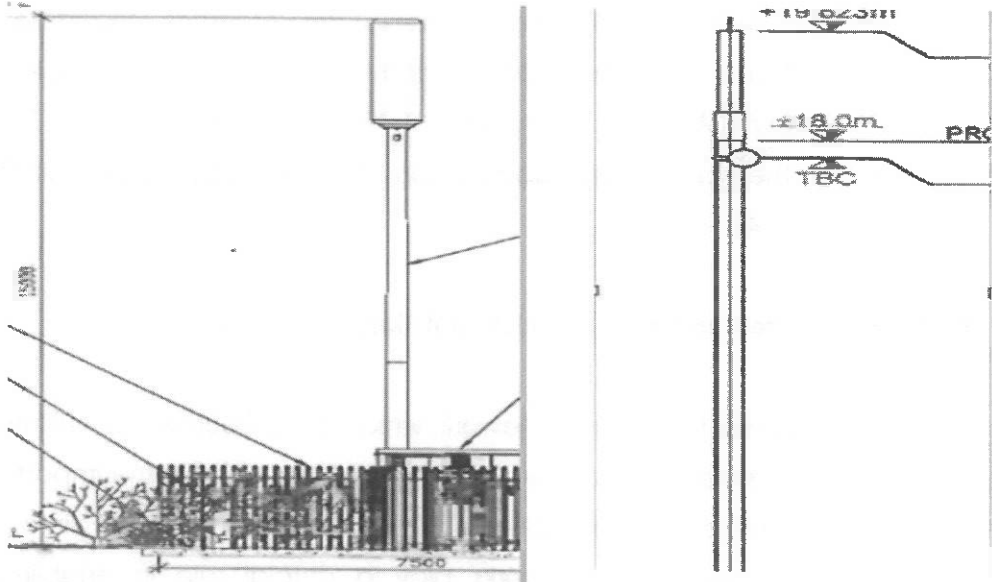


Fig No.8 Image 5 Examples of small and medium size Single Operator Sites Extracted from the Green Book Appendix A.

For these reasons we suggest that the proposed development is in line with the National and EU digital agenda and the County 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 17th 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

The subject site is zoned **Objective F**, the objective of which is "To preserve and provide for open space with ancillary active recreational amenities". 'Public services' are open for consideration and we submit that the proposed development would fall under this land use.

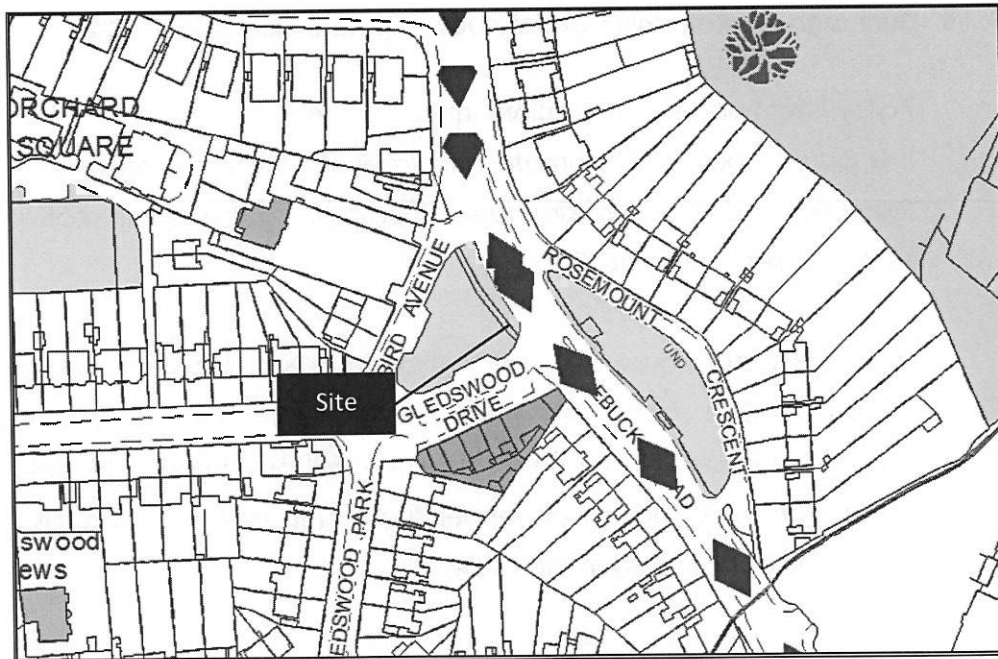


Fig No.9 Extract from DLR Development Plan 2016-22 zoning map (Map No.1).

Site Designations (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 13 no. Visual Reference Points have been identified within a 150m radius of the site, 3 on Roebuck Road, 3 on Clonskeagh Road, 2 on Leinster Lawn, 3 on Bird Avenue and 2 on Gledswood Park.

VRPs 2, 3, 4, 5, 6, 8, 9, 10 & 12 are taken from Roebuck Road (2,3³), Clonskeagh Road (1,2,3), Leinster Lawn (2), Bird Avenue (1,2) and Gledswood Park (1) at distances of 85m, 39m, 56m, 112m, 150m, 113m, 47m, 63m and 72m respectively of the site. The pole and cabinet are clearly visible from these locations. Given the established context provided by the receiving environment, 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 & 13 are taken from Roebuck Road (1) and Gledswood Park (2) at distances of 149m and 137m respectively from the site. Only the top of the pole is visible from these locations. Given the established context provided by the receiving environment along with the slender nature of the structure and the neutral sky grey colour, the visual impact is considered to be not significant to slight. It will read as part of the typical street furniture and will not be an incongruous insertion into the streetscape.

There is no view of the structure from VRPs 7 & 11.

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. It is critical to assess the proposed development against the baseline of the existing CCTV camera pole

³ Please refer to the table provided at the front of the VIA prepared by Jason Redmond Associates; roads with more than one VPR are labelled by numbers.

which it will replace. The difference from a visual impact between the two structures is considered to be minimal.

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, Cignal Infrastructure Ltd, 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.

Please note the inspector's comment under ABP reference PL.61.306440, which was an appeal against a decision of Galway City Council to refuse a similar Alpha 2.0 pole structure. The Board overturned the decision of the planning authority in this instance and the ABP inspector, whilst recommending a grant be issued, referred the following in relation to design and visual impacts:

'I would consider that the structure itself is nondescript in character and design and is not dissimilar in scale or design of a lamp standard or traffic light pole. I would consider that the structure is of a design and scale that would not be out of character or be a visually obtrusive or an incongruous element in a suburban area such as this'.

It is respectfully submitted that the proposal, in a similar suburban context, will be assimilated into the established streetscape and skyline at this location and within the backdrop of the receiving environment and is entirely in accordance with the proper planning and sustainable development of the area.

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 Gledswood Drive, Dublin 14.

The principle of the proposed Alpha 3.0 pole structure has been accepted by numerous planning authorities and An Bord Pleanála, since the enactment of the legislation.

It is respectfully submitted that policy cited under the Dunlaoghaire Rathdown County Development Plan 2016-22, particularly with regard to colocation, was clearly applied to the site selection process. 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 Dunlaoghaire Rathdown County 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 is replacing an existing pole at this location and therefore the visual impact will be minimal. The proposed new pole will be of neutral sky grey, which will reflect the skyline and therefore it will be well assimilated with regards to its colour/texture and complies with the best principles of siting and design.

On a site-specific basis, the proposed location 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 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, in the same manner as the existing CCTV camera pole, 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 recently adopted Regional Policy (EMRA RSES).

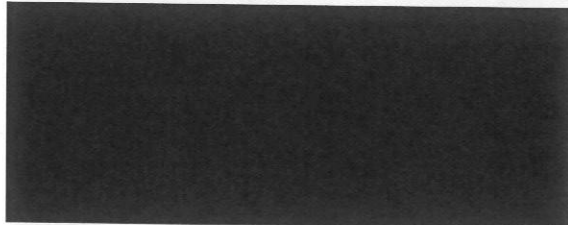
The planning authority is respectfully requested to consider the necessity for this infrastructure, which the market would not require if there was not a demand for same. The planning authority is also requested to consider the meticulous site selection process undertaken, which has to satisfy the criteria 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 Dunlaoghaire 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 28th 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 28th 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.

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 are trading names of Marsh Ireland Brokers Limited. Marsh Ireland Brokers Limited is a private company limited by shares registered in Ireland under company number 169458. VAT Number IE 6569458D. Registered Office: 4th Floor, 25-28 Adelaide Road, Dublin 2, Ireland, D02 RY98. Directors: [REDACTED]



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.

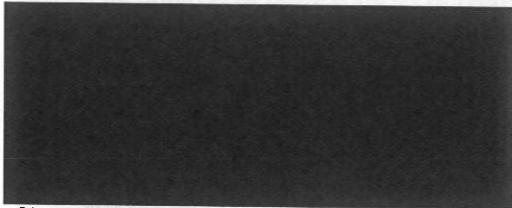
This letter is issued as a matter of information only and confers no right upon you or any third party to whom it is disclosed, other than those provided by the policy. This letter does not amend, extend or alter the coverage afforded by the policies described herein. Notwithstanding any requirement, 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,



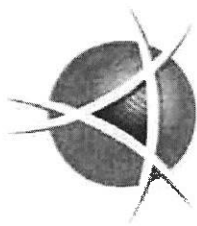
Client Advisor
Marsh Ireland Brokers Ltd
Direct Dial: [REDACTED]
E-mail: [REDACTED]

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.

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 are trading names of Marsh Ireland Brokers Limited. Marsh Ireland Brokers Limited is a private company limited by shares registered in Ireland under company number 169458. VAT Number IE 6569458D. Registered Office: 4th Floor, 25-28 Adelaide Road, Dublin 2, Ireland, D02 RY98. Directors: [REDACTED]



A business of Marsh McLennan



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.

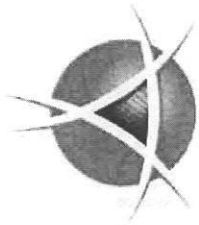
An Authorised Person may:

- (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
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Bloc DEF, Cúirt na Mainistreach, Ionad Irish Life, Sraid Na Mainistreach locht, Baile Atha Cliath 1
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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:

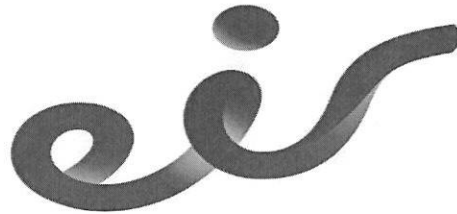


Title/Position: **Analyst – Market Framework Division**

Date: **3 March 2016**

Commission for Communications Regulation
An Coimisiún um Rialáil Cumarsáide

Block DEF, Abbey Court, Irish Life Centre, Lower Abbey St, Dublin 1
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2022 Bianconi Avenue
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) 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

18m Alpha 3.0 STREETPOLE

SITE COORDINATES

LATITUDE:	53°18'18.50"N	10 EASTING:	117,281.1	17M EASTING:	717,871.6
LONGITUDE:	01°12'22.70"W	50 NORTHING:	228,722.7	17M NORTHING:	728,766.9



B	UPDATED EBB DUCT ROUTE	09/2021		
A	INITIAL ISSUE	2/09/21		
No.	Revision	Date	By	Ckd.

DELMEC

10 Barronside Business Park, Stealy Road,
Grangecullen, Carlow, R53 E3W7,
Rep. of Ireland.

cellnex
driving telecom connectivity

Signal Infrastructure Ltd
Suite 311, Q House, 70 Furze Road,
Sandyford Industrial Estate, Dublin 18,
D18 VY50, IRELAND.

Jason Redmond & Associates Consulting Engineers

Ché Stravard
Project Management
& Liaison Court, Portlaoise,
Co. Laois
PH: 057 708 8155
Email: info@jra.ie

Signal site ID	CIG-03293
Operator site ID	DU1633

Site Name
**GLEDSDWOOD DRIVE
DUBLIN 14**

Title
**CELLNEX SMART STREETPOLE
LOCATION MAP & PHOTOGRAPHS**

Designed	Date	21/09/21
Drawn	Scale	1:50,000 Rev. B
Dwg No.	DU1633-300	

DWG LOCKDOWN FROM CONSULTING TO BEING REPRODUCED WITHOUT THE PERMISSION OF THE CLIENT



LOCATION MAP
SCALE 1:50,000

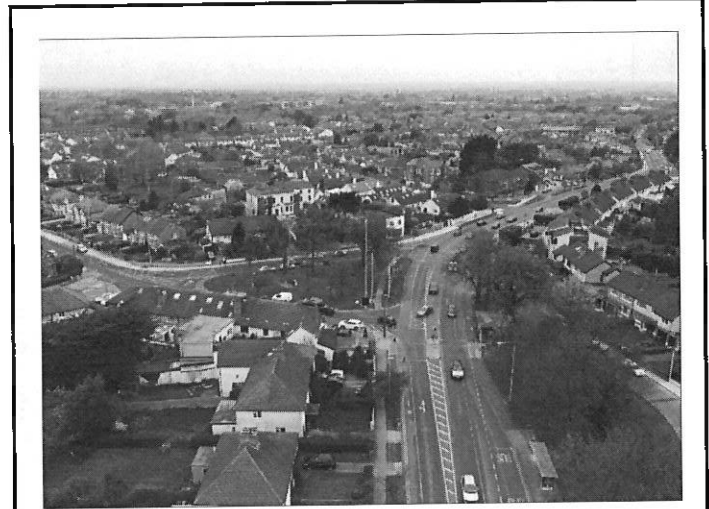


Fig 1. ELEVATION OF STRUCTURE

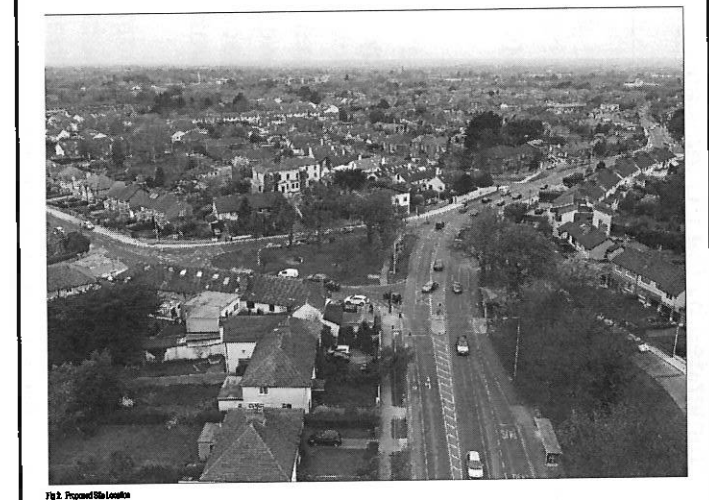


Fig 2. Proposed Site Location

SITE PHOTOGRAPHS

18m Alpha 3.0 STREETPOLE

SITE COORDINATES

LATITUDE:	53°19'46.47N	10 EASTING:	317,862.1	10M EASTING:	717,817.4
LONGITUDE:	0°14'12.25W	10 NORTHING:	226,727.7	10M NORTHING:	728,788.0
	4.28261				



B	UPDATED ESB DUCT ROUTE	08/2021		
A	INITIAL ISSUE	21/08/21		
No.	Revision	Date	By	Clk

DELMEC

30 Boreenaside Business Park, Steady Road,
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cellnex

driving telecom connectivity

Signal Infrastructure Ltd.
Suite 211, O'Hanlon, 70 Parnock Road,
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D16 YV60, IRELAND.

Jason Redmond & Associates Consulting Engineers

Civil Structural
Project Management
8 Leonard Court, Parkdale,
Co. Leix.
Pct: 08780 81168
Email: info@jra.ie

Signal site ID: CIG-03293

Operator site ID: DU1633

Site Name:
GLEDWOOD DRIVE
DUBLIN 14

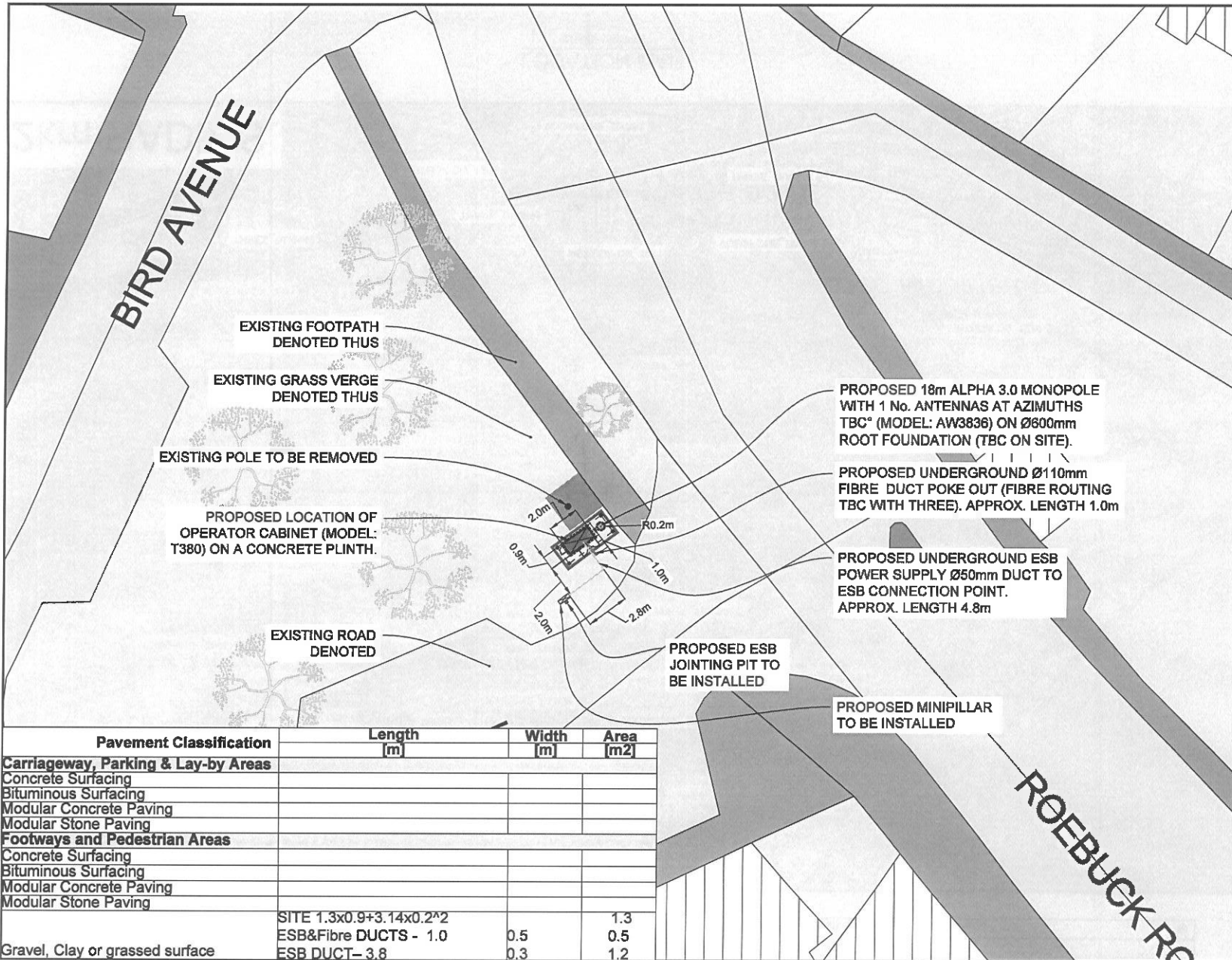
Title:
CELLNEX SMART STREETPOLE
SITE LAYOUT

Designed: [] Date: 21/08/2021

Drawn: [] Scale: 1:200 Rev: B

Dwg No. DU1633-301

GRID LOCATION: FROM GLEDWOOD DRIVE (GLEDWOOD DRIVE) TO THE PROPOSED STREETPOLE LOCATION ON GLEDWOOD DRIVE

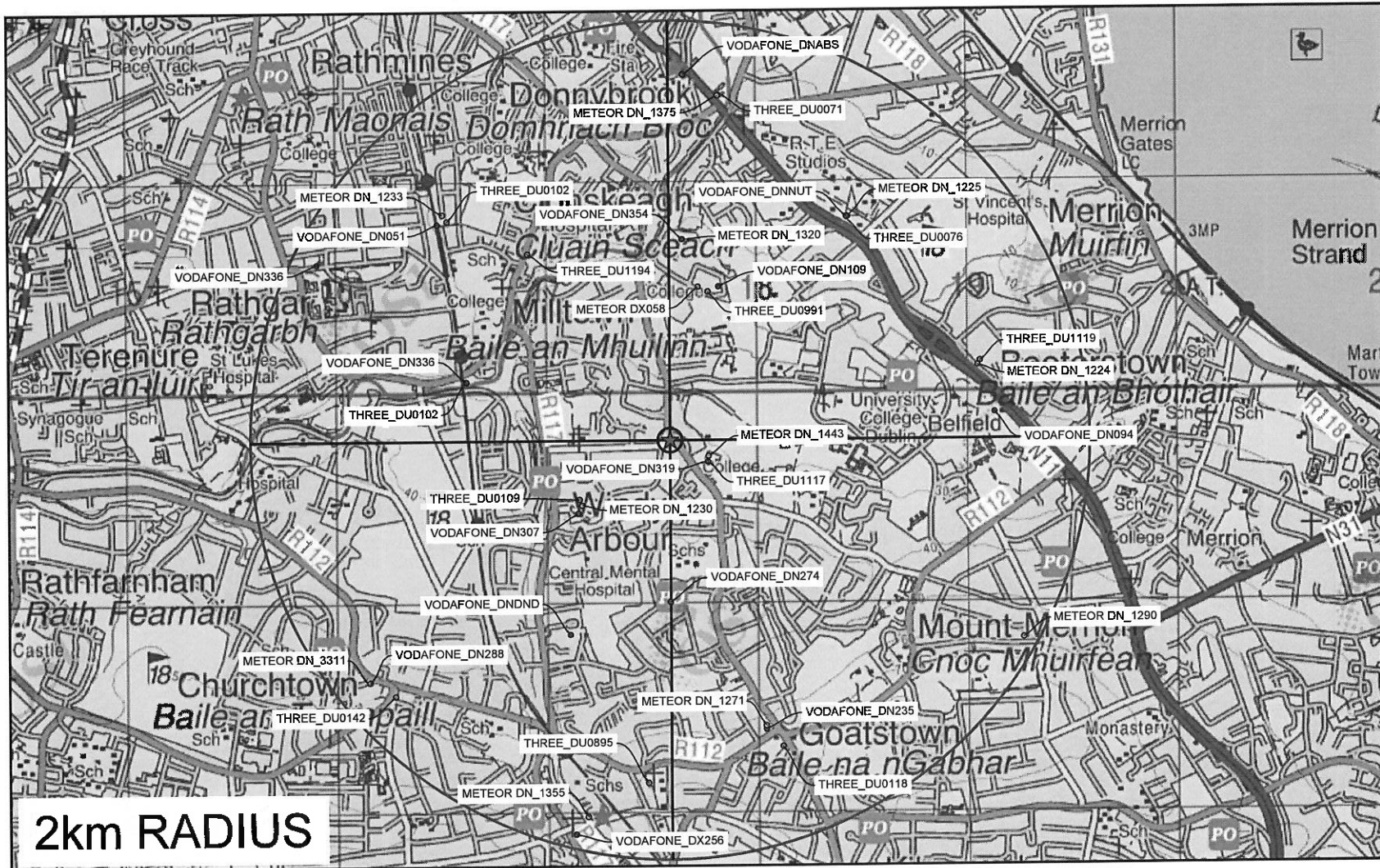


Pavement Classification	Length [m]	Width [m]	Area [m2]
Carriageway, Parking & Lay-by Areas			
Concrete Surfacing			
Bituminous Surfacing			
Modular Concrete Paving			
Modular Stone Paving			
Footways and Pedestrian Areas			
Concrete Surfacing			
Bituminous Surfacing			
Modular Concrete Paving			
Modular Stone Paving			
	SITE 1.3x0.9+3.14x0.2^2		1.3
	ESB&Fibre DUCTS - 1.0	0.5	0.5
Gravel, Clay or grassed surface	ESB DUCT- 3.8	0.3	1.2

SITE LAYOUT

SCALE 1:250

LEGEND:	
Search Ring Radius	○
Radius Area (2km)	○
Proposed Site SR- 1186	★
Existing Vodafone site shown thus	●
Existing EIR site shown thus	●
Existing H3Gi site shown thus	●



2km RADIUS

LOCATION MAP
SCALE 1:20,000



No.	Revision	Date	By	Ckd

DELMEC

10 Barnowide Business Park, Sleaty Road,
Graiguelan, Carlow, R93 E3W7,
Rep. of Ireland.

cellnex
driving telecom connectivity

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

Jason Redmond & Associates Consulting Engineers

Civil Structural
Project Management
5 Limerick Court, Portlaoise,
Co. Laois,
PH: 05788 81155
Email: info@jrasc.ie

PLANNING

Signal site ID	CIG-XXXX
Operator site ID	SR-1186

Site Name
**GLEDSDOOD DRIVE
DUBLIN 14**

Title
**CELLNEX SMART STREETPOLE
COMREG MAP**

Designed	Date	02.09.2021
Drawn	Scale	1:20,000 Rev. A

Dwg No. SR-1186-107
DWG LOCATION: [http://www.cellnex.com](#)

18m Alpha 3.0 STREETPOLE

SITE COORDINATES

LATITUDE:	53°18'18.57N	NG EASTING:	347,582.1	ITM EASTING:	717,517.6
LONGITUDE:	6°14'12.27W	NG NORTHING:	228,772.7	ITM NORTHING:	728,760.9
	-4.236721				



A	INITIAL ISSUE	21/09/21		
No.	Revision	Date	By	Ckd

DELMEC

10 Barrrowville Business Park, Seary Road,
Grainnecollen, Carlow, R93 E3W7,
Rep. of Ireland.

cellnex
driving telecom connectivity

Signal Infrastructure Ltd.
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Jason Redmond & Associates Consulting Engineers

Civil Structural
Project Management
5 Llanard Court, Portlaoise,
Co. Laois.
PH: 05785 81155
Email: info@jrasco.ie

Signal site ID CIG-03293

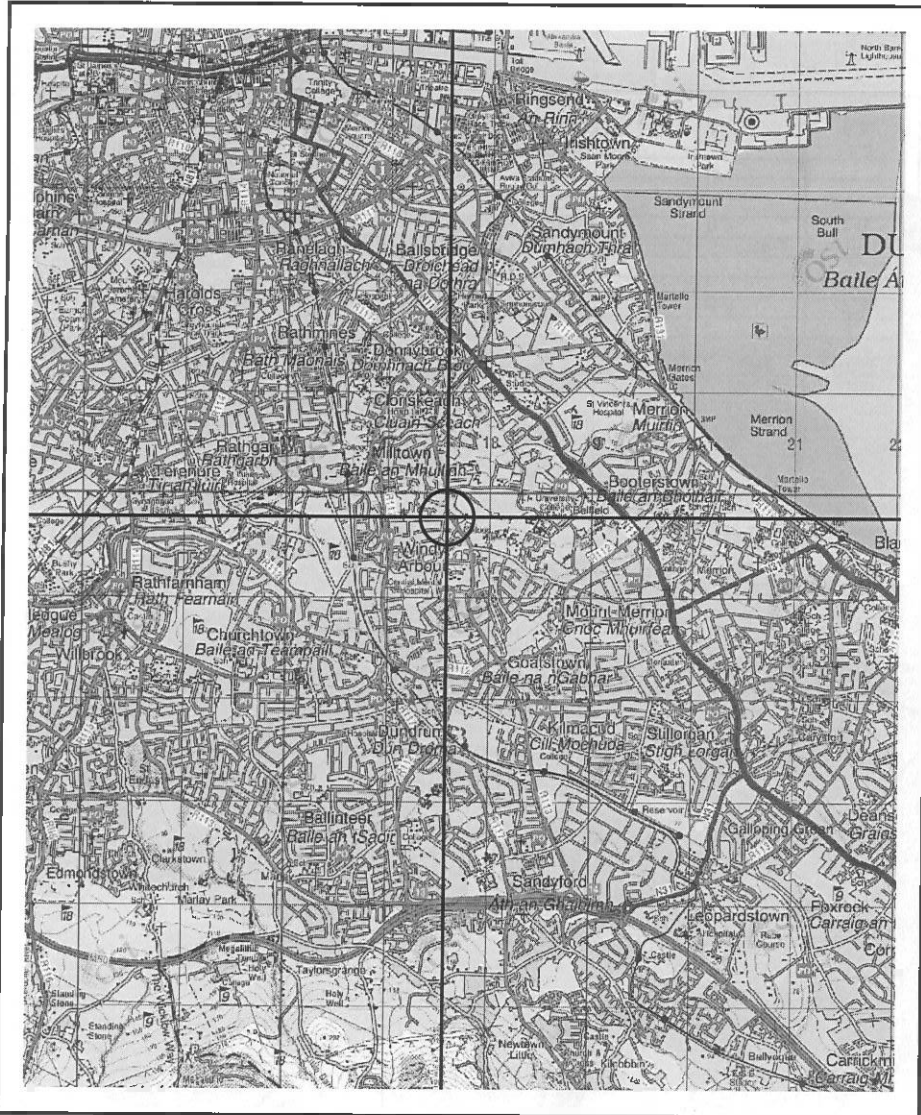
Operator site ID DU1633

Site Name
GLEDSDOOD DRIVE
DUBLIN 14

Title
CELLNEX SMART STREETPOLE
LOCATION MAP & PHOTOGRAPHS

Designed	Date	21.09.2021
Drawn	Scale	1:50,000 Rev. A
Dwg No.	DU1633-300	

2020 LOCATION: Cellnex Smart Streetpole in Gledswood Dr, DU1633



LOCATION MAP
SCALE 1:50,000

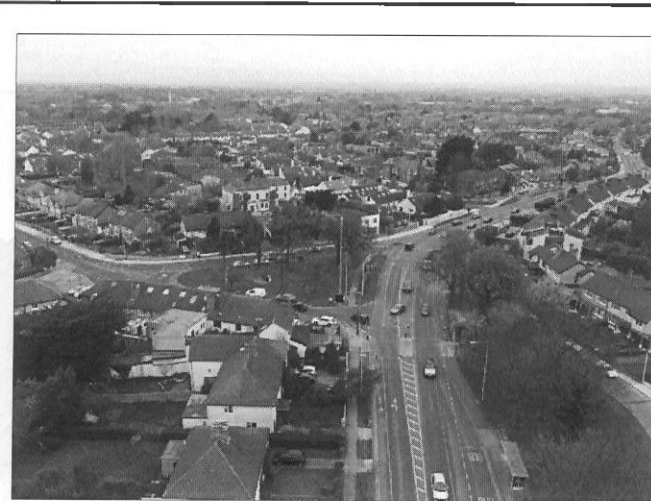


Fig 1. ELEVATION OF STRUCTURE

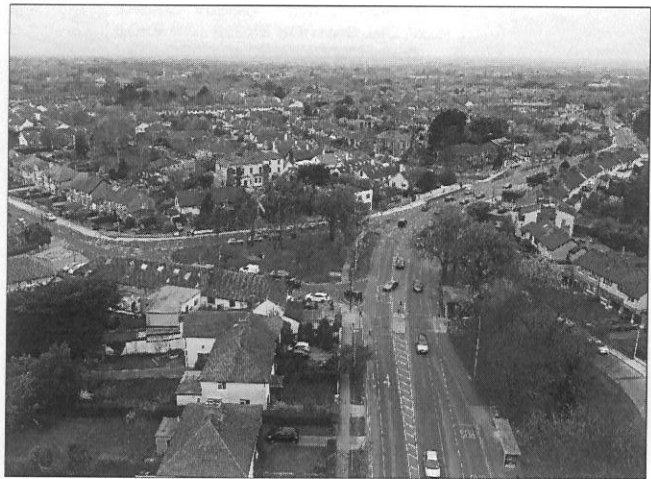
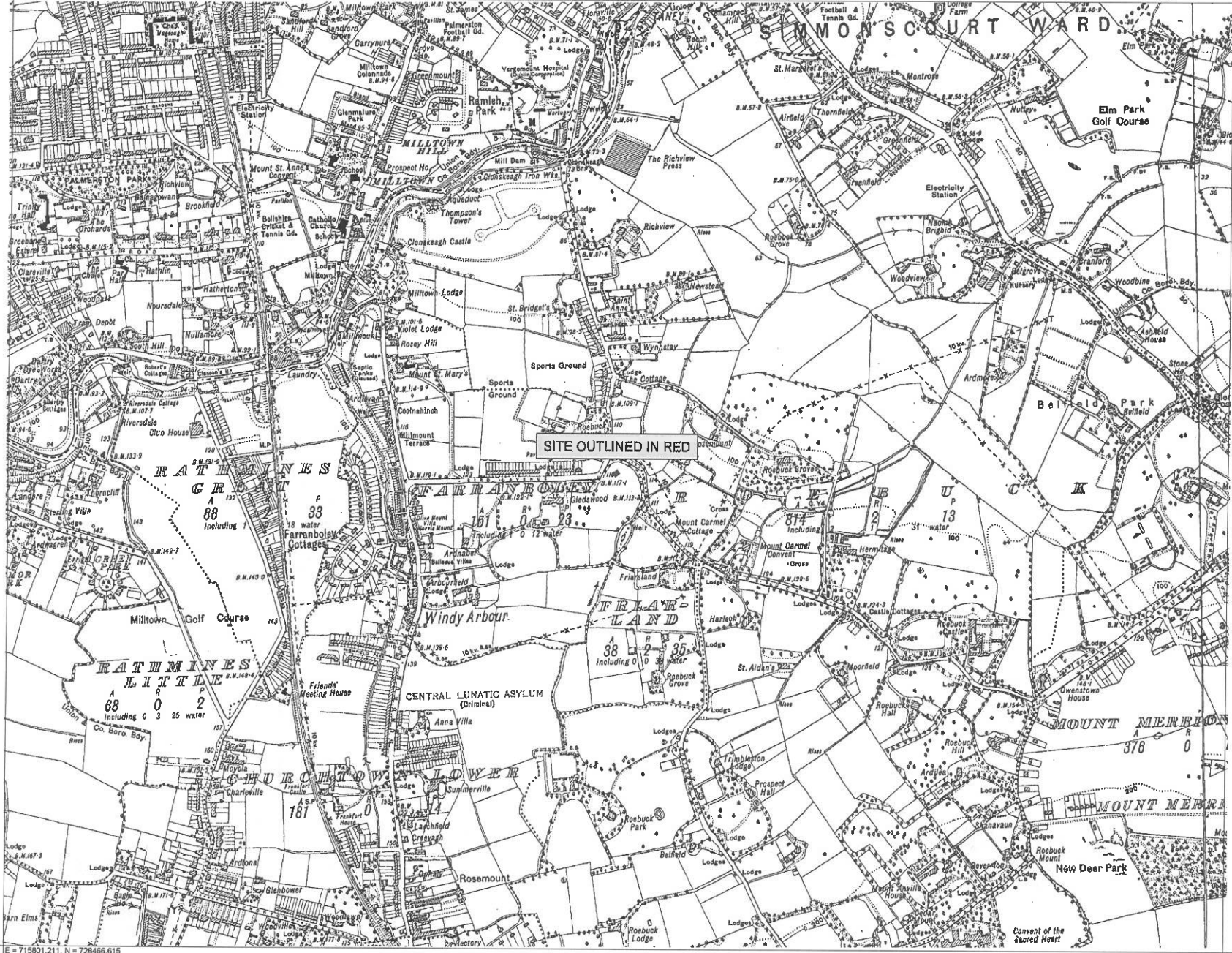


Fig 2. Proposed Site Location

SITE PHOTOGRAPHS

E = 719236.224, N = 731139.185



E = 715801.211, N = 728466.615

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Ordnance Survey Ireland/Government of Ireland
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18m Alpha 3.0 STREETPOLE

THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL RELEVANT SPECIFICATIONS AND CONDITIONS OF CONTRACT. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMISSIONS AND APPROVALS FROM THE RELEVANT AUTHORITIES PRIOR TO COMMENCING WORK. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMISSIONS AND APPROVALS FROM THE RELEVANT AUTHORITIES PRIOR TO COMMENCING WORK.

CONSULTANTS TO BE INFORMED IMMEDIATELY OF ANY DISCREPANCIES BEFORE WORK PROCEEDS.

NOT FOR CONSTRUCTION

Description:
Metric 3" Latest Edition
Publisher / Source:
Ordnance Survey Ireland (OSI)
Data Source / Reference:
OSI 1:1
Revision Date = 21-Dec-1988
Survey Date = 21-Dec-1988
Levelled Date = 21-Dec-1988
OSI 1:1
Revision Date = 21-Dec-1987
Survey Date = 21-Dec-1987
Levelled Date = 21-Dec-1987
OSI 1:1
Revision Date = 21-Dec-1984
Survey Date = 21-Dec-1984
Levelled Date = 21-Dec-1984
OSI 1:1
Revision Date = 21-Dec-1987
Survey Date = 21-Dec-1987
Levelled Date = 21-Dec-1987

File Format:
Tagged Image File Format (TIFF)

File Name:
18m Alpha 3.0.tif

City Centre / Area of Interest (AOI):
UIC: 1177623.3007, 734823.0022
UIC: 1177623.3007, 734823.0022
UIC: 1177623.3007, 734823.0022
UIC: 1177623.3007, 734823.0022

Projection / Spatial Reference:
PROJCRS: Irish Transverse Mercator

Centre Point Coordinates:
ACT = 720160.3867, 730909.0022

Date Generation Date:
01-Jun-2021

Product Version:
1.3

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Scale:
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DELMEC

10 Barrowlands Business Park, Steady Road,
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PLANNING

Signal site ID: CIG-XXXX

Operator site ID: SR-1186

Site Name:
GLEDSDRIVE
DUBLIN 14

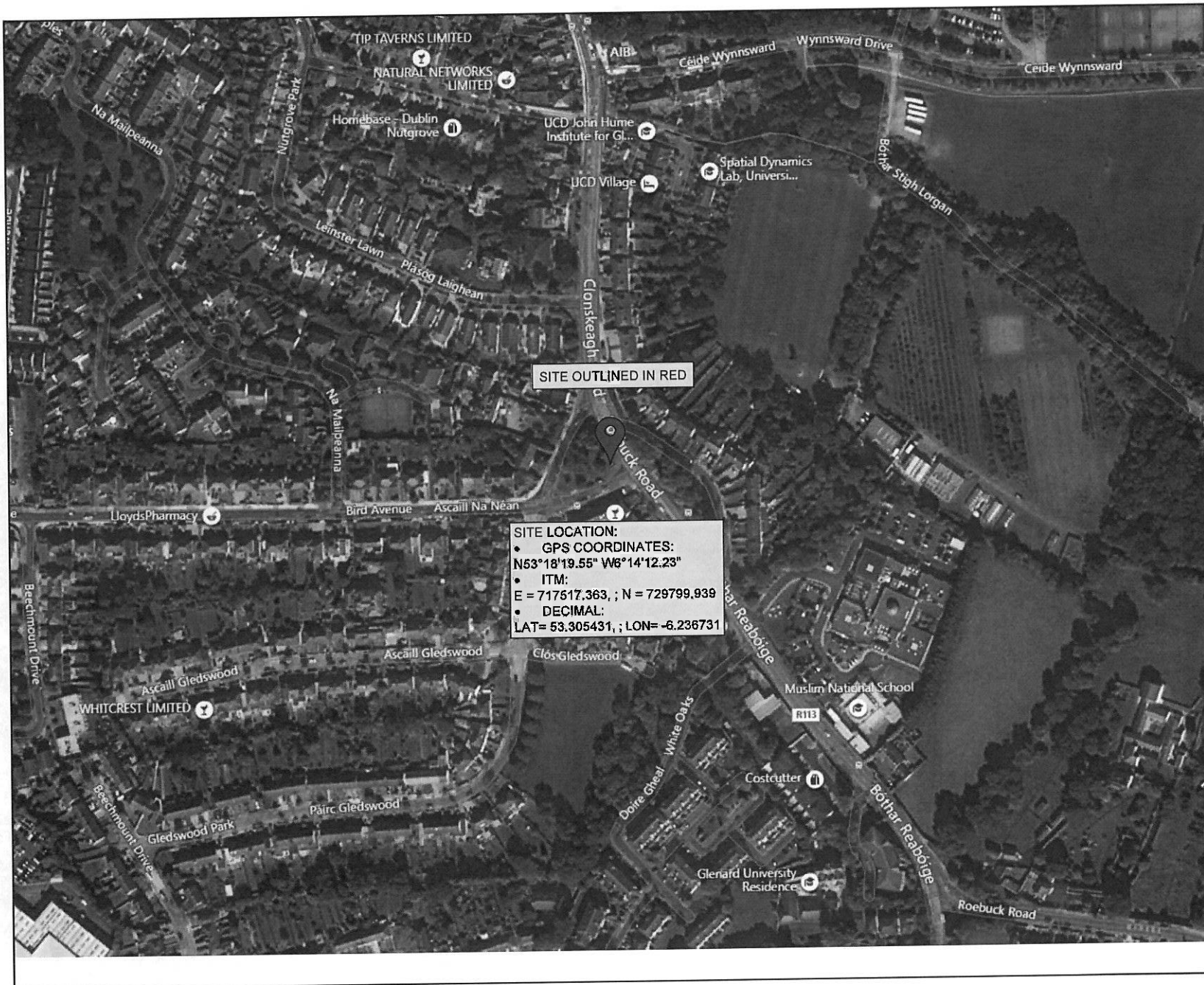
Title:
CELLNEX SMART STREETPOLE
SITE LOCATION MAP

Designed: [] Date: 01.06.2021

Drawn: [] Scale: 1:10,000 Rev: B

Dwg No. SR-1186-100

DWG LOCATION: www.jrassoc.ie



SITE LOCATION:

- GPS COORDINATES:
N53°18'19.55" W8°14'12.23"
- ITM:
- E = 717517.363 ; N = 729799.939
- DECIMAL:
LAT= 53.305431 ; LON= -6.236731

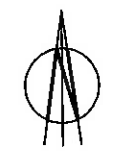
SITE OUTLINED IN RED

18m Alpha 3.0 STREETPOLE

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B	UPDATED TO IEM SOLUTION	03/09/21			
A	PLANNING ISSUE	03/09/21			
No.	Revision	Date	By	Ckd	

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PLANNING

Signal site ID CIG-XXXX
Operator site ID SR-1186

Site Name
**GLEDWOOD DRIVE
DUBLIN 14**

Title
**CELLNEX SMART STREETPOLE
SITE LOCATION MAP AERIAL PHOTO**

Designed [] Date 01.09.2021
Drawn [] Scale 1:2500 Rev. B

Dwg No. SR-1186-101

DWG LOCATION: []

E = 717678.585, N = 729927.046



E = 717358.815, N = 729678.754

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Description:
 Digital Cartographic Model (DCM)
Publisher / Source:
 Ordnance Survey Ireland (OSI)
Data Source / Reference:
 PRIME2
File Format:
 Autodesk AutoCAD (DWG_R2013)
File Name:
 v_20191228_1.dwg
City Extent / Area of Interest (AOI):
 LULXID= 718028.8987,736194.0022
 LURXIDY= 720391.8087,736194.0022
 LULXIDL= 718028.8987,736194.0022
 LURXIDY= 720391.8087,736194.0022

Projection / Spatial Reference:
 Projection= IRENETRS_Air_M_Transversa_Mercator
Centre Point Coordinates:
 X,Y= 720100.3887,736409.0022

Reference Index:
 Map Series / Map Sheets
 1:1,000 | 3188-20
 1:1,000 | 3188-11
 1:1,000 | 3188-15
 1:1,000 | 3188-16

Date Extraction Date:
 Date= 01-Aug-2021

Source Data Release:
 DCMA Release V1.140.112
 Product Version
 Version= 1.3

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A	PLANNING ISSUE	03/04/21		
No.	Revision	Date	By	Chk

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PLANNING

Signal site ID CIG-XXXX

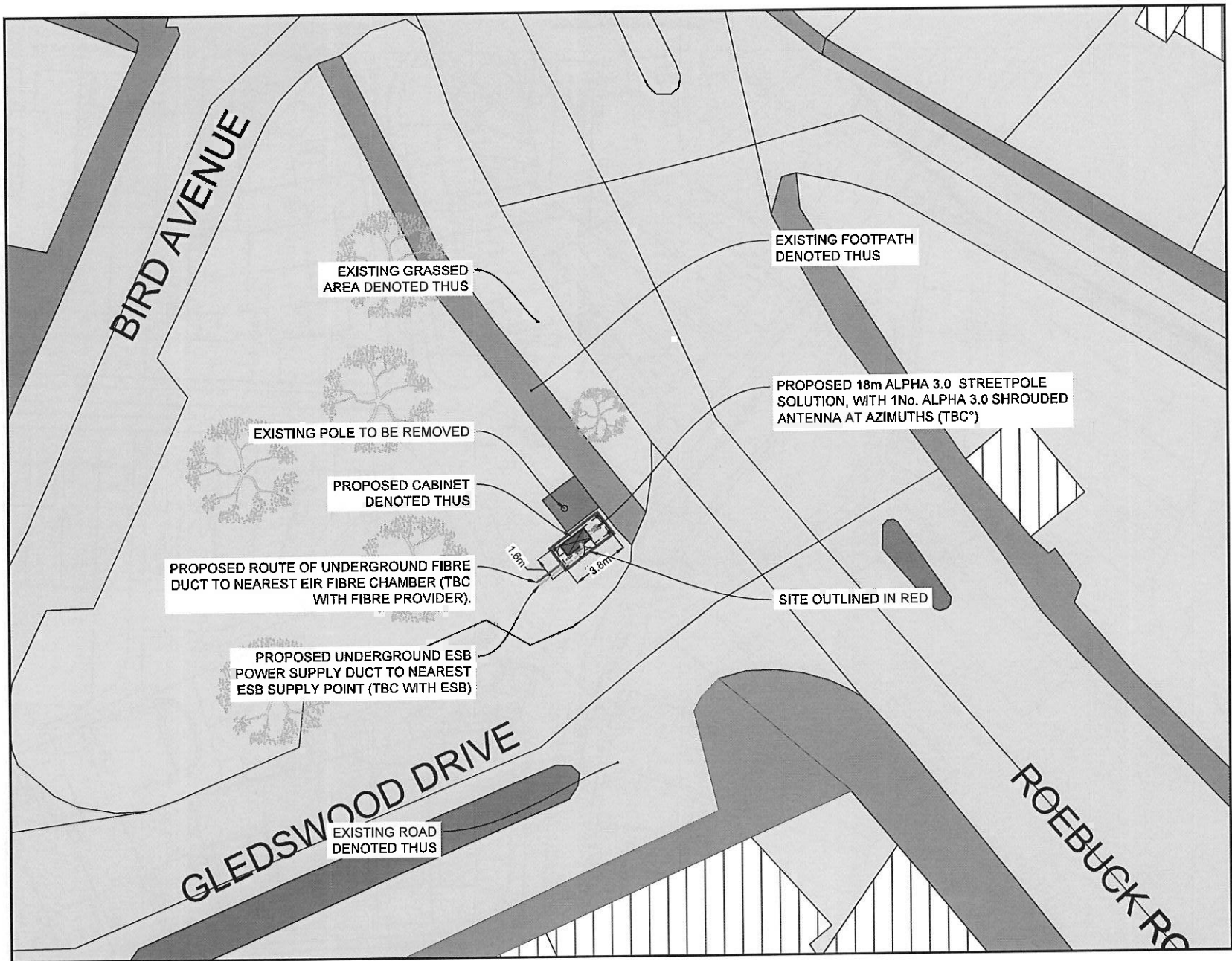
Operator site ID SR-1186

Site Name
 GLEDSDRIVE
 DUBLIN 14

Title
 CELLNEX SMART STREETPOLE
 SITE LOCATION PLAN

Designed		Date	01.06.2021
Drawn		Scale	1:1000
Dwg No.	SR-1186-102	Rev.	B

DWG LOCATION: [C:\Users\jra\Documents\Projects\SR-1186-102](#)



SITE LAYOUT
SCALE 1:250

18m Alpha 3.0 STREETPOLE

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LEGEND

- EXISTING ROADS
- SITE OUTLINED THUS
- EXISTING BUILDINGS
- EXISTING GRASS VERGE
- EXISTING FOOTPATHS
- EXISTING HARDSTANDING



B	UPDATED TO 18M SOLUTION	03/06/21		
A	PLANNING ISSUE	03/06/21		
No.	Revision	Date	By	Ckd

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PLANNING

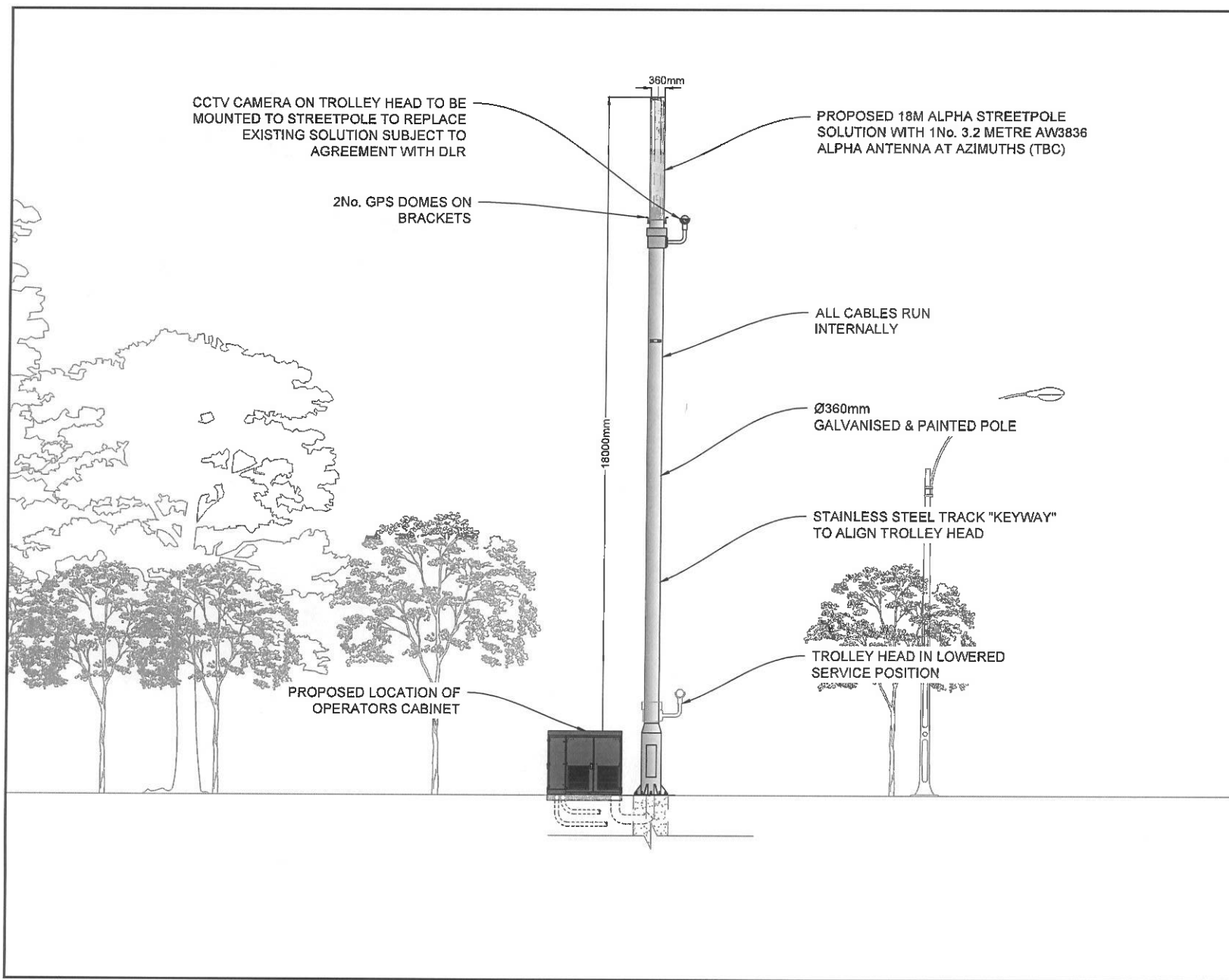
Signal site ID	CIG-XXXXX
Operator site ID	SR-1186

Site Name
**GLEDWOOD DRIVE
DUBLIN 14**

Title
**CELLNEX SMART STREETPOLE
SITE LAYOUT PLAN**

Designed	Date	01.06.2021
Drawn	Scale	1:250
Drawn No.	Rev.	B

Dwg No. **SR-1186-103**
DWG LOCATION: cellnex.com



ELEVATION
SCALE 1:100

18m Alpha 3.0 STREETPOLE

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B	UPDATED TO 18M SOLUTION	03/06/21		
A	PLANNING ISSUE	03/06/21		
No.	Revision	Date	By	Clk

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PLANNING

Signal site ID: CIG-XXXX

Operator site ID: SR-1186

Site Name
GLEDSWOOD DRIVE
DUBLIN 14

Title
CELLNEX SMART STREETPOLE
ELEVATION

Designed: [] Date: 01/06/2021

Drawn: [] Scale: 1:100 Rev: B

Dwg No. SR-1186-103A

DWG LOCATION: []



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A	PLANNING ISSUE	03/09/21		
No.	Revision	Date	By	Ckd

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PLANNING

Signal site ID	CIG-XXXX
Operator site ID	SR-1186

Site Name
GLEDSDWOOD DRIVE
DUBLIN 14

Title
CELLNEX SMART STREETPOLE
SCHEMATIC ELEVATION

Designed	Date	31.08.2021
Drawn	Scale	NIS Rev. B

Dwg No. SR-1186-104

DWG LOCATION: [https://www.jra.ie/](#)

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B	UPDATED TO TRM SOLUTION	03/09/21		
A	PLANNING ISSUE	03/06/21		
No.	Revision	Date	By	Ckd

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PLANNING

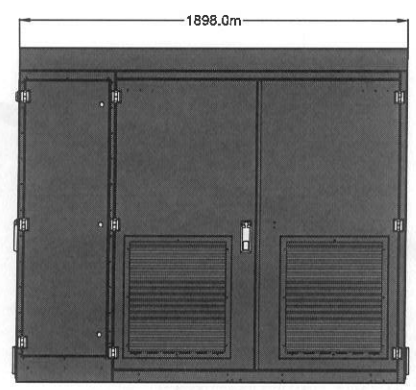
Signal site ID	CIG-XXXX
Operator site ID	SR-1186

Site Name
GLEDSWOOD DRIVE
DUBLIN 14

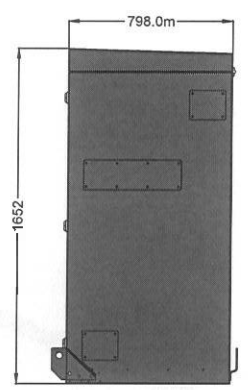
Title
CELLNEX SMART STREETPOLE
STANDARD ELEVATION AND DETAILS

Designed	Date	01/06/2021
Drawn	Scale	A4 Rev. B
Dwg No.	SR-1186-105	

DWG LOCATION: C:\projects\cellnex\SR-1186-105.dwg



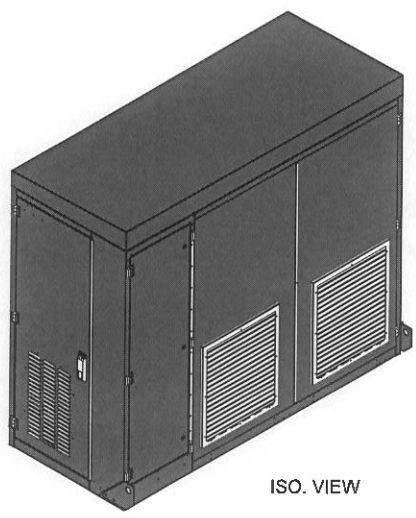
FRONT VIEW



R/H SIDE VIEW



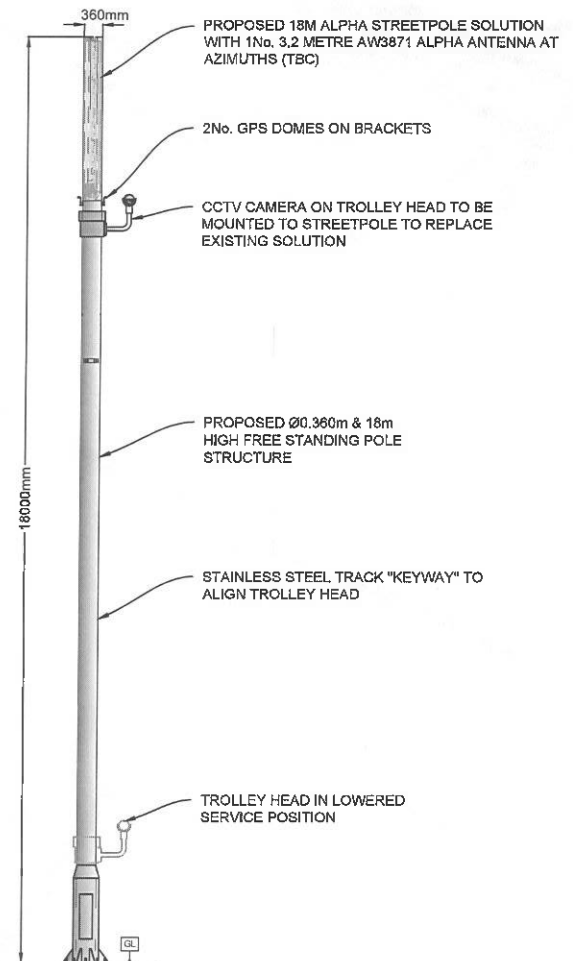
L/H SIDE VIEW



ISO. VIEW

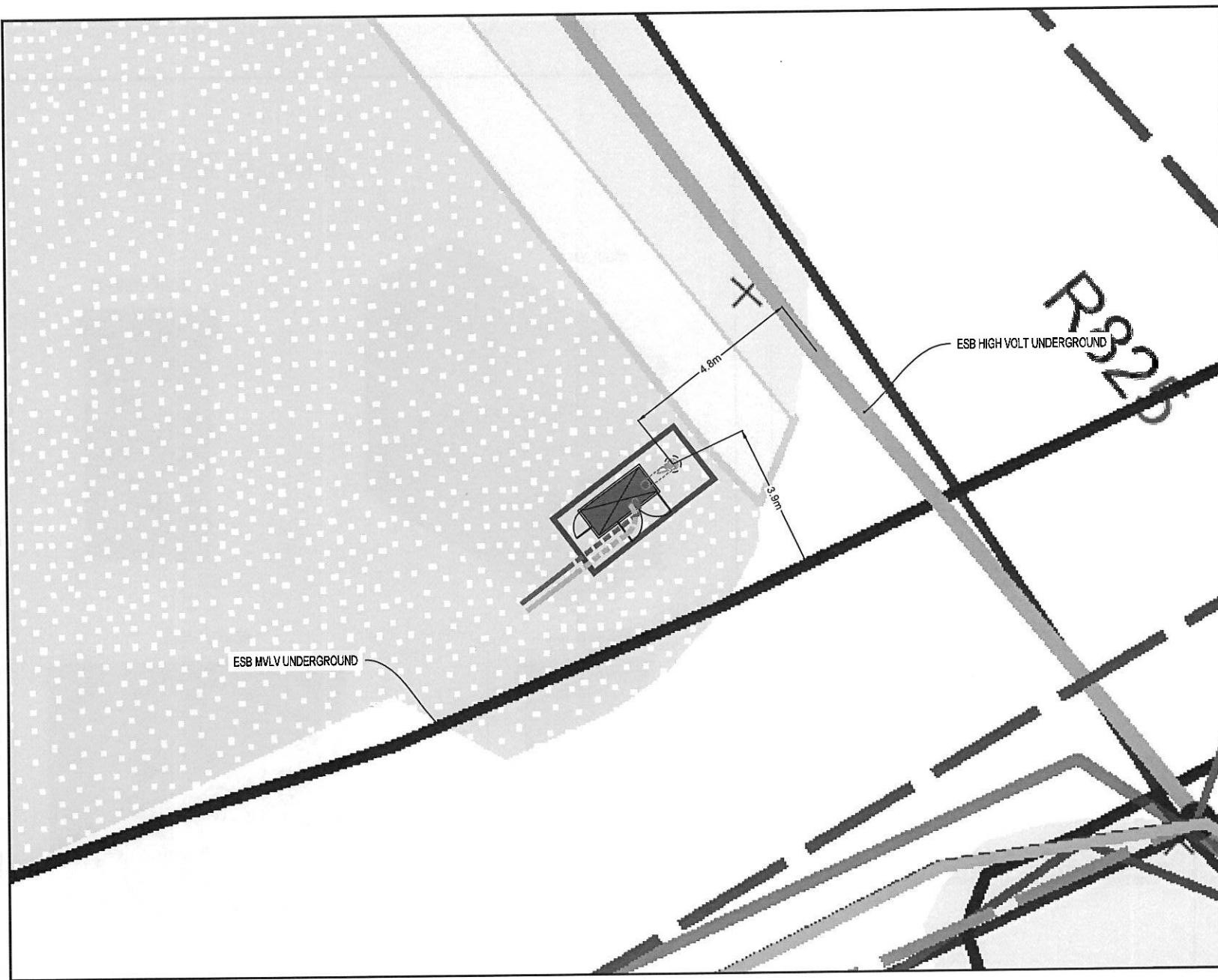
CABINET DETAILS

SCALE 1:25



TYPICAL POLE

SCALE 1:100



UNDERGROUND SERVICES
SCALE 1:100

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A	ISSUED FOR PLANNING	05/09/11		
No.	Revision	Date	By	Clk

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Email: info@jrasoc.ie

Signal site ID	CIG_XXXX
Operator site ID	SR-1186

Site Name
GLEDWOOD DRIVE
DUBLIN 14

Title
SIGNAL SMART STREETPOLE
SITE LAYOUT PLAN

Designed		Date	05.05.11
Drawn		Scale	1:100
		Rev.	A

Dwg No. SR-1186-500

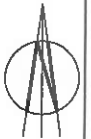
Dwg location:

18m Alpha 3.0 STREETPOLE

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A	ISSUED FOR PLANNING	03/09/21		
No.	Revision	Date	By	Clk

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Signal site ID	CIG_XXXX
Operator site ID	SR-1186

Site Name
GLEDWOOD DRIVE
DUBLIN 14

Title
SIGNAL SMART STREETPOLE
ELEVATIONS

Designed		Date	03.09.2021
Drawn		Scale	1:100
		Rev.	A

Dwg No. SR-1186-501

Dwg location:



UNDERGROUND SERVICES

SCALE 1:100

18m Alpha 3.0 STREETPOLE

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No.	Revision	Date	By	Clid
A	ISSUED FOR PLANNING	03/02/21		

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Email: info@jra.ie

Signal site ID CIG_XXXX

Operator site ID SR-1186

Site Name
GLEDSDOWN DRIVE
DUBLIN 14

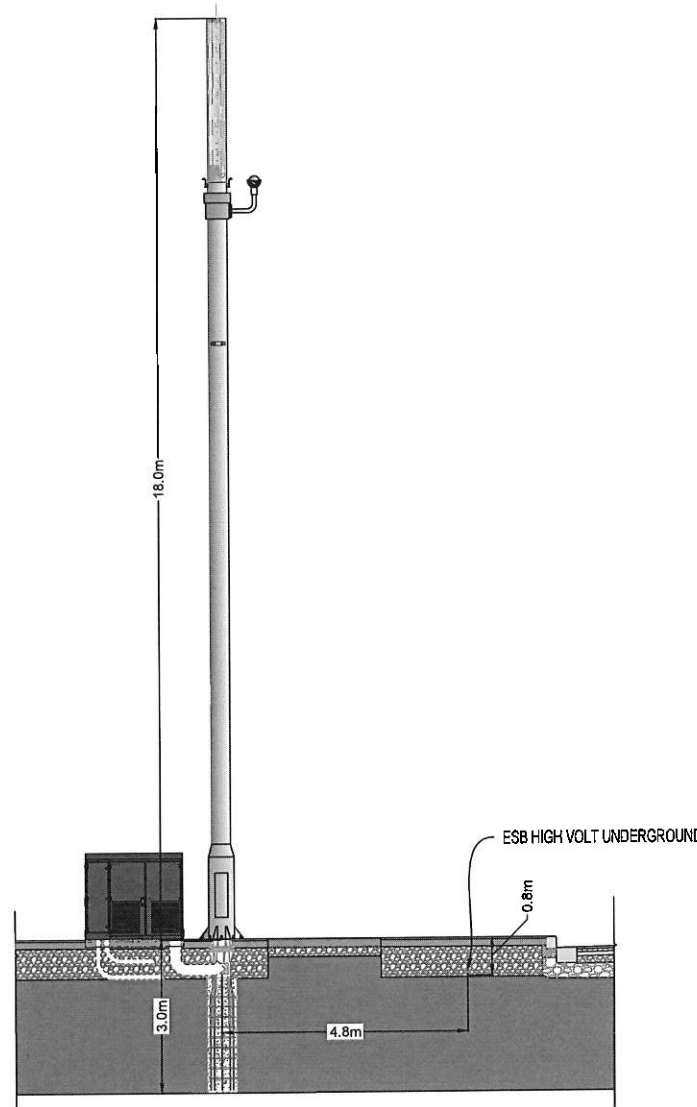
Title
SIGNAL SMART STREETPOLE
ELEVATIONS

Designed [Redacted] Date 03/02/21

Drawn [Redacted] Scale 1:100 Rev. A

Dwg No. SR-1186-502

Dwg location:



UNDERGROUND SERVICES

SCALE 1:100

18m Alpha 3.0 STREETPOLE

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VISUAL REFERENCE POINTS

DWG NO.	LOCATION	COORDINATES (ITM)	DISTANCE	BEARING	VISIBILITY
1	ROEBUCK ROAD 1	717619.8473, 729689.3185	149M	138°	Top of pole visible.
2	ROEBUCK ROAD 2	717585.6461, 729746.6100	85M	129°	Pole and cabinet visible.
3	ROEBUCK ROAD 3	717555.5831, 729786.3774	39M	110°	Pole and cabinet visible.
4	CLONSKEAGH ROAD 1	717519.4274, 729855.3720	56M	2°	Pole and cabinet visible.
5	CLONSKEAGH ROAD 2	717510.4418, 729911.7403	112M	357°	Pole and cabinet visible.
6	CLONSKEAGH ROAD 3	717509.1333, 729949.7439	150M	357°	Pole and cabinet visible.
7	LEINSTER LAWN 1	717432.5428, 729916.0028	144M	325°	Pole not visible.
8	LEINSTER LAWN 2	717493.4421, 729910.0838	113M	348°	Pole and cabinet visible.
9	BIRD AVENUE 1	717493.1373, 729839.8798	47M	329°	Pole and cabinet visible.
10	BIRD AVENUE 2	717459.6910, 729776.5890	63M	250°	Pole and cabinet visible.
11	BIRD AVENUE 3	717421.9425, 729775.0393	99M	257°	Pole not visible.
12	GLEDWOOD PARK 1	717464.7819, 729750.4296	72M	229°	Pole and cabinet visible.
13	GLEDWOOD PARK 2	717454.3558, 729677.5021	137M	208°	Top of pole visible.

No.	Revision	Date	By	Clk
A	INITIAL ISSUE	06/09/21		

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Cignal site ID CIG_XXXX

Operator site ID SR-1186

Site Name
GLEDWOOD DRIVE
DUBLIN 14

Title
CIGNAL SMART STREETPOLE
VRP INFORMATION

Designed Date 01/02/2021

Drawn Scale NA Rev. A

Dwg No. SR-1186-VRP INFORMATION

Dwg location: g:\proj\18m_alpha_3.0_streetpole\18m_alpha_3.0_streetpole_vrp.dwg



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A	INITIAL ISSUE	06/08/21		
No.	Revision	Date	By	Clid

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 PH: 05788 91155
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Signal site ID	CIG_XXXXX
Operator site ID	SR-1186

Site Name
**GLEDSDOWN DRIVE
 DUBLIN 14**

Title
**SIGNAL SMART STREETPOLE
 VRP INFORMATION**

Designed	Date	03.09.2021
Drawn	Scale	1:1
	Rev.	A

Dwg No. **SR-1186-VRP INFORMATION**
 Dwg location: *[illegible]*



VRP1 - WITHOUT SOLUTION IN PLACE



VRP1 - WITH SOLUTION IN PLACE

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No.	Revision	Date	By	Clkd

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cellnex
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Co. Lark.
Ph: 02768 81155
Email: info@jrasc.ie

Signal site ID	CIG_XXXXX
Operator site ID	SR-1186

Site Name	GLEDSDOWN DRIVE DUBLIN 14
-----------	------------------------------

Title	CIGNAL SMART STREETPOLE VRP 1
-------	----------------------------------

Designed		Date	03.09.2021
Drawn		Scale	MA
		Rev.	A

Dwg No.	SR-1186-121
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Dwg location: [unclear]



VRP2 - WITHOUT SOLUTION IN PLACE



VRP2 - WITH SOLUTION IN PLACE

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Signal site ID	CIG_XXXXX
Operator site ID	SR-1186

Site Name	GLEDWOOD DRIVE DUBLIN 14
-----------	-----------------------------

Title	CIGNAL SMART STREETPOLE VRP 2
-------	----------------------------------

Designed	Date	05/04/21
Drawn	Scale	NA
	Rev.	A

Dwg No. SR-1186-122
 Dwg location: [unclear]



VRP3 - WITHOUT SOLUTION IN PLACE



VRP3 - WITH SOLUTION IN PLACE

18m Alpha 3.0 STREETPOLE

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Signal site ID	CIG_XXXX
Operator site ID	SR-1186

Site Name
GLEDSDWOOD DRIVE
DUBLIN 14

Title
SIGNAL SMART STREETPOLE
VRP 3

Designed	Date	03.05.2021
Drawn	Scale	N/A
Rev.	A	

Dwg No. SR-1186-123
Dwg location: [unclear]



VRP4 - WITHOUT SOLUTION IN PLACE



VRP4 - WITH SOLUTION IN PLACE

18m Alpha 3.0 STREETPOLE

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No.	Revision	Date	By	Chk
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Email: info@jrassoc.ie

Signal site ID	CIG_XXXXX
Operator site ID	SR-1186

Site Name	GLEDWOOD DRIVE DUBLIN 14
-----------	-----------------------------

Title	CIGNAL SMART STREETPOLE VRP 4
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Designed	Date	03.08.2021
Drawn	Scale	Rev. A

Dwg No.	SR-1186-124
Dwg location:	



VRP5 - WITHOUT SOLUTION IN PLACE



VRP5 - WITH SOLUTION IN PLACE

18m Alpha 3.0 STREETPOLE

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Signal site ID CIG_XXXX

Operator site ID SR-1186

Site Name
GLEDSDWOOD DRIVE
DUBLIN 14

Title
CIGNAL SMART STREETPOLE
VRP 5

Designed Date 01.09.2021

Drawn Scale NA Rev. A

Dwg No. SR-1186-125

Dwg location: [unclear]



VRP6 - WITHOUT SOLUTION IN PLACE



VRP6 - WITH SOLUTION IN PLACE

18m Alpha 3.0 STREETPOLE

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Signal site ID	CIG_XXXX
Operator site ID	SR-1186

Site Name
 GLEDWOOD DRIVE
 DUBLIN 14

Title
 SIGNAL SMART STREETPOLE
 VRP 6

Designed	Date	06/05/21
Drawn	Scale	1:1
	Rev.	A

Dwg No. SR-1186-126
 Dwg Location: [unclear]

18m Alpha 3.0 STREETPOLE

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VRP7 - SOLUTION NOT VISIBLE

A	INITIAL ISSUE	06/01/21		
No.	Revision	Date	By	Clk

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 Pk: 05785 81155
 Email: info@jrasso.ie

Signal site ID CIG_XXXX

Operator site ID SR-1186

Site Name
 GLEDSWOOD DRIVE
 DUBLIN 14

Title
 SIGNAL SMART STREETPOLE
 VRP 7

Designed Date 01.02.2021

Drawn Scale NA Rev. A

Dwg No. SR-1186-127

Dwg location: [unclear]



VRP8 - WITHOUT SOLUTION IN PLACE



VRP8 - WITH SOLUTION IN PLACE

18m Alpha 3.0 STREETPOLE

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No.	Revision	Date	By	Ckd
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Signal site ID	CIG_XXXXX
Operator site ID	SR-1186

Site Name
 GLEDSDWOOD DRIVE
 DUBLIN 14

Title
 SIGNAL SMART STREETPOLE
 VRP 8

Designed	Date	03.02.2001
Drawn	Scale	NA Rev. A

Dwg No. SR-1186-128

Dwg location: [unreadable]



VRP9 - WITHOUT SOLUTION IN PLACE



VRP9 - WITH SOLUTION IN PLACE

18m Alpha 3.0 STREETPOLE

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 Email: info@jrassoc.ie

Cignal site ID	CIG_XXXX
Operator site ID	SR-1186

Site Name	GLEDSDWOOD DRIVE DUBLIN 14
-----------	-------------------------------

Title	CIGNAL SMART STREETPOLE VRP 9
-------	----------------------------------

Designed	Date	01/09/2021
Drawn	Scale	NA
	Rev.	A

Dwg No. SR-1186-129
 Dwg Location: [unclear]



VRP10 - WITHOUT SOLUTION IN PLACE



VRP10 - WITH SOLUTION IN PLACE

18m Alpha 3.0 STREETPOLE

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Signal site ID	CIG_XXXX
Operator site ID	SR-1186

Site Name	GLEDWOOD DRIVE DUBLIN 14
-----------	-----------------------------

Title	SIGNAL SMART STREETPOLE VRP 10
-------	-----------------------------------

Designed	Date 01/02/2021
Drawn	Scale NA Rev. A

Dwg No. SR-1186-130
 Dwg Location: gledwood drive smart streetpole vrp10



VRP11 - SOLUTION NOT VISIBLE

18m Alpha 3.0 STREETPOLE

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Ph: 05786 61155
Email: info@jrassoc.ie

Signal site ID: CIG_XXXX

Operator site ID: SR-1186

Site Name
GLEDSDWOOD DRIVE
DUBLIN 14

Title
SIGNAL SMART STREETPOLE
VRP 11

Designed: [Redacted] Date: 01.06.2021

Drawn: [Redacted] Scale: NA Rev. A

Dwg No. SR-1186-131

Dwg location: [Redacted]



VRP1 - WITHOUT SOLUTION IN PLACE



VRP1 - WITH SOLUTION IN PLACE

18m Alpha 3.0 STREETPOLE

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No.	Revision	Date	By	Chd
A	INITIAL ISSUE	06/01/21		

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PH: 05788 81166
Email: info@jrasoc.ie

Signal site ID	CIG_XXXXX
Operator site ID	SR-1186

Site Name	GLEDSDOOD DRIVE DUBLIN 14
-----------	------------------------------

Title	CIGNAL SMART STREETPOLE VRP 12
-------	-----------------------------------

Designed	Date	03.08.2021
Drawn	Scale	1:1
	Rev.	A

Dwg No.	SR-1186-132
Dwg location:	



VRP13 - WITHOUT SOLUTION IN PLACE



VRP13 - WITH SOLUTION IN PLACE

18m Alpha 3.0 STREETPOLE

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Ph: 05785 81155
Email: info@jrassoc.ie

Signal site ID: CIG_XXXXX

Operator site ID: SR-1186

Site Name
GLEDWOOD DRIVE
DUBLIN 14

Title
SIGNAL SMART STREETPOLE
VRP 13

Designed: [] Date: 01.08.2021
Drawn: [] Scale: NA Rev: A

Dwg No. SR-1186-133

Dwg location: []

Date: 05/01/2022

Jason Redmond & Associates Consulting Engineers
5 Lismard Court,
Portlaoise,
Co. Laois
R32 NH2H

Re: Section 254 Application- Proposed Telecommunications Streetworks Solution

Date Received: 13/09/2021

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

Site Name: Gledswood Drive

Location: Gledswood Drive, Dublin 14.

dlr Application Reference: CTT.21.029 - Gledswood Drive, Dublin 14.

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 Gledswood Drive, Dublin 14.

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 Traffic section have reviewed the application and advised of upcoming plans to upgrade the area in question with a pedestrian improvement

scheme. dlr Traffic has concerns that the designs for new footpaths at Roebuck Road/Gledswood Drive will be impacted by the placement of the cabinet and mast.

Yours faithfully,

J Finnerty
Jennifer Finnerty,
Assistant Staff Officer
Roads Maintenance