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

Date: 19th January 2022
Re: Section 254 Application- Proposed Telecommunications Streetworks Solution
Applicant: On Tower Ireland Ltd., Suite 309, Q House, 76 Furze Road, Sandyford
Industrial Estate, Dublin 18
Site Name: Brady's Kilmacud Replacement OTI
Location: Kilmacud Road Upper, Stillorgan, Co. Dublin

Dear Sir/Madam,

On behalf of our client, On Tower Ireland Ltd. ("OTI") 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, OTI is a company of Cellnex, which is a European Telecommunications infrastructure provider. OTI are a registered Infrastructure Provider for the Communications Industry with over 1800 sites around Ireland supporting mobile and broadband communications. OTI provide Tower, Mast, Roof Top and Streetworks Solutions for the expanding requirements of the Licenced Operators including EIR, Vodafone and Three.

The Requirement

Working closely with mobile network Licenced Operator Three, OTI 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 15m 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 12.25m in height. Above the 12.25m height, an antenna will be mounted to a finishing height of up to 15m. 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 boost in coverage.

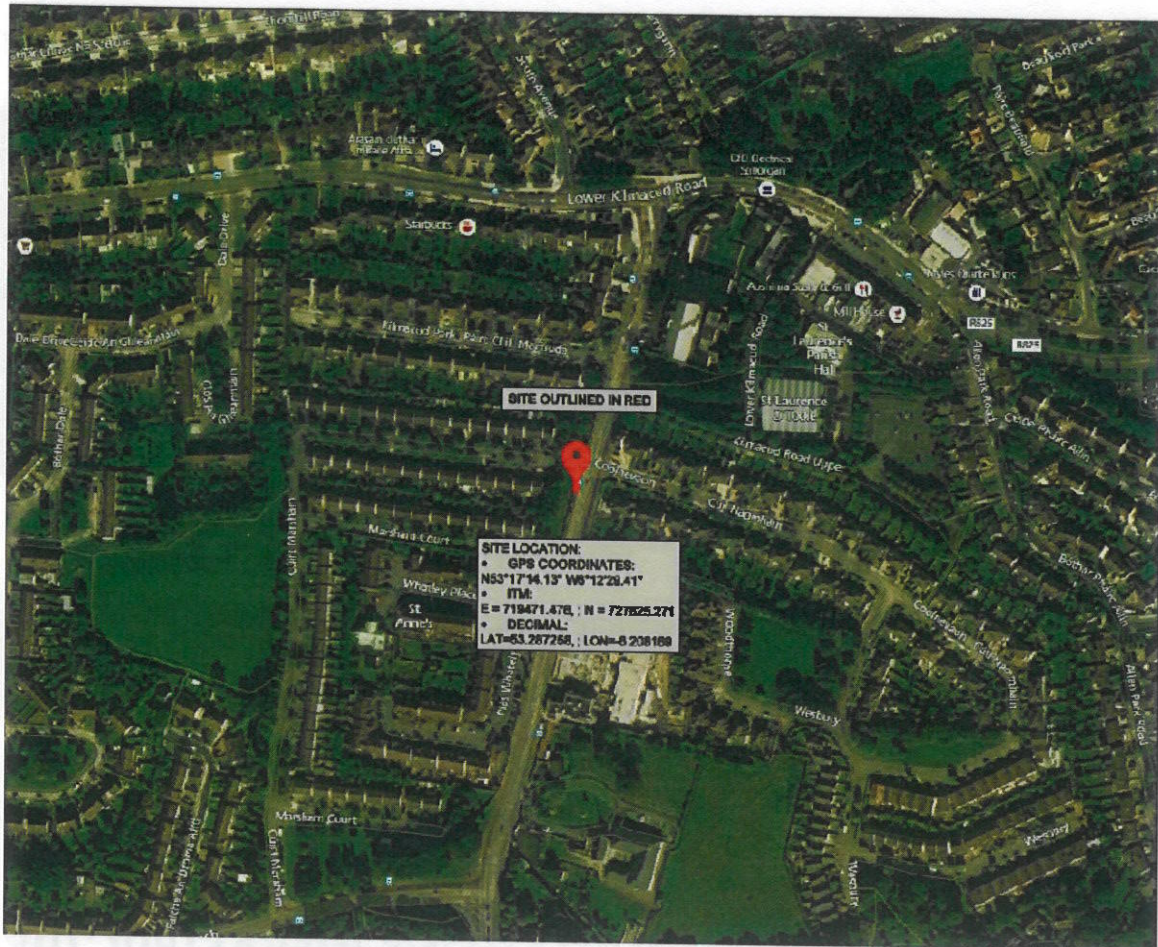


Fig 2. Aerial View Site Location

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

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

DM

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PLANNING STATEMENT

to support s.254 licence application for

TELECOMMUNICATIONS INFRASTRUCTURE

at

KILMACUD ROAD UPPER, STILLORGAN, CO. DUBLIN

Client: On Tower Ireland Ltd.

28th April 2022

1.0 INTRODUCTION

David Mulcahy Planning Consultants Ltd have been instructed by **On Tower Ireland Ltd**¹ to prepare a planning statement to support a Section 254 licence application for a telecommunication structure at Kilmacud Road Upper, Stillorgan, Co. Dublin. The proposed streetpole will replace coverage provided by the existing site at Bradys, Dunmartin Road, Stillorgan, along with getting 4G/LTE² and 5G.

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 Associates³.

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 LTE (Long Term Evolution) is a mobile communication standard. In the cellular network, mobile data can be transferred over the air in larger amounts and at higher speeds than was possible under earlier wireless communication standards. As the name "Long Term Evolution" implies, this standard will continue to be valid for a long time to come. The launch of 5G will not change this. The LTE network will continue to serve as the foundation upon which the 5G mobile network is built.

³ On Tower Ireland Ltd., C/O Jason Redmond Associates, 5 Lismard, Portlaoise, Co. Laois.

2.0 LOCATION AND DESCRIPTION

2.1 Location

The site is located on the west side of Kilmacud Road Upper in close proximity to the pedestrian entrance to Marsham Court. Please refer to the site location map submitted with the application.

2.2 Description

The site currently consists of a wide public footpath.



Fig No.1 Photograph of subject site taken from Kilmacud Road Upper.



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

There is a bus stop to the north, an area of public open space to the west (bounded by a tall wall facing toward the subject site), Kilmacud Road Upper to the east and a public footpath to the south.

There is a row of tall public streetlights along the west and east side of Kilmacud Road Upper.

There is also a row of mature street trees along the west side of Kilmacud Road Upper.



Fig No.2a Street lights and street trees along Kilmacud Road.

3.0 PROPOSED DEVELOPMENT

3.1 Description

The proposal consists of a 15m Alpha 3.0 streetpole, with 1no. Alpha 3.0 Antenna at azimuths TBD°, along with ancillary cabinetry (1.898m wide x 1.652m high x 0.798m deep).

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. 400 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. The majority of the land uses within the search ring is residential land use.



Fig No.3 400m Search Ring for subject site.

3.2.2 Reasons why candidate location was chosen:

This location in Kilmacud Road Upper was chosen because of the following:

1. It is within the search ring.
2. It is at the edge of residential development rather than located centrally within the residential development.
3. There is adequate space to locate a street works solution and cabinet.
4. The proposed street works will blend in with the existing on-street lighting poles.
5. There is fibre located close to this location to ensure connectivity into the network.
6. The location will not interfere with existing services or footpath.
7. It is not in the direct eye-line of any residential dwelling.

Existing Locations Examined by Three:

The proposed streetpole will replace coverage provided by the existing site at Bradys, along with getting 4G/LTE and 5G.

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. H3G site DU0081 Stillorgan Park Hotel– This is 0.9 km away from coverage objective– unable to cover required search ring area.
2. H3G site DU1283 Brady's Kilmacud– Three is currently at this location. Due to the limited available space to upgrade the existing equipment on-site, DU1283 will be decommissioned. **Note:** a second streetworks solution to the west of the decommissioned site will be required to address the coverage blackspot generated. The second solution's application will be lodged shortly after this application.

3. H3G site DU0827 St. Olafs GAA– This is 1.1 km away from coverage objective – unable to cover specific search ring area.
4. H3G site DU1557 Leopardstown Inn – This is 1.1 km away from coverage objective – unable to cover specific search ring area.
5. H3G site DU0868 Stillorgan – This is 1 km away from coverage objective – unable to cover specific search ring area.
6. H3G site DU0080 Stillorgan Maple House– This is 0.5 km away from coverage objective – unable to cover specific area.

Three 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 local residents and business users around Kilmacud Road Upper 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 Kilmacud Road Upper 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 Kilmacud Road Upper is to provide mobile voice and data coverage to the area and improve voice and broadband access to local residents & business users around this area.

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

Figure 5 demonstrates the significant difference in coverage levels – v good/excellent, which will result if the proposed licence is granted (green/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.

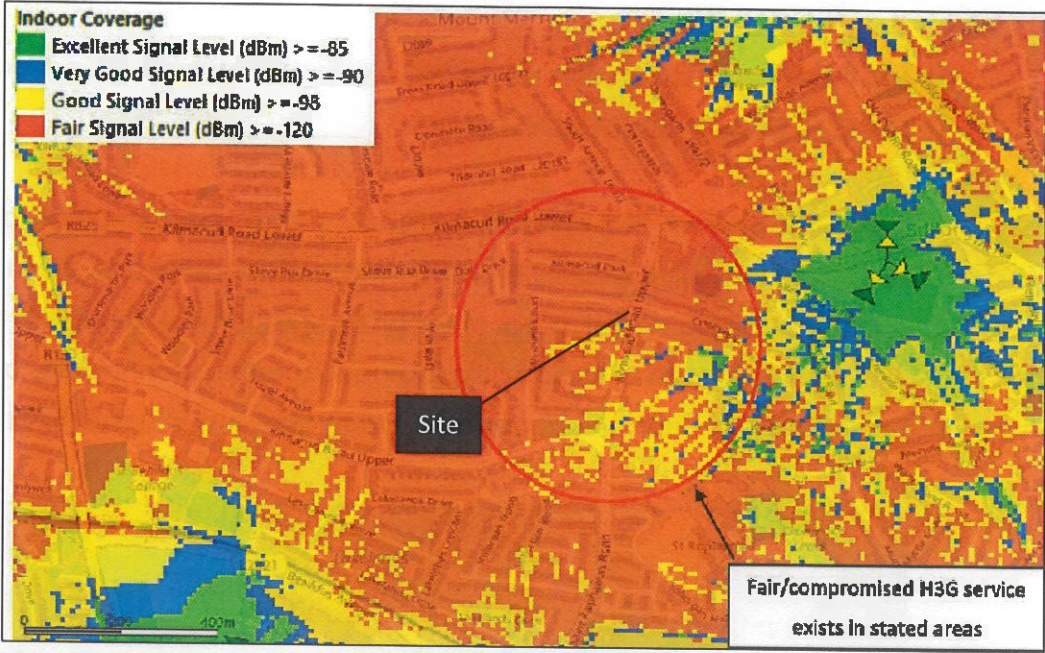


Figure 4: EXISTING INDOOR COVERAGE-- mainly fair signal level

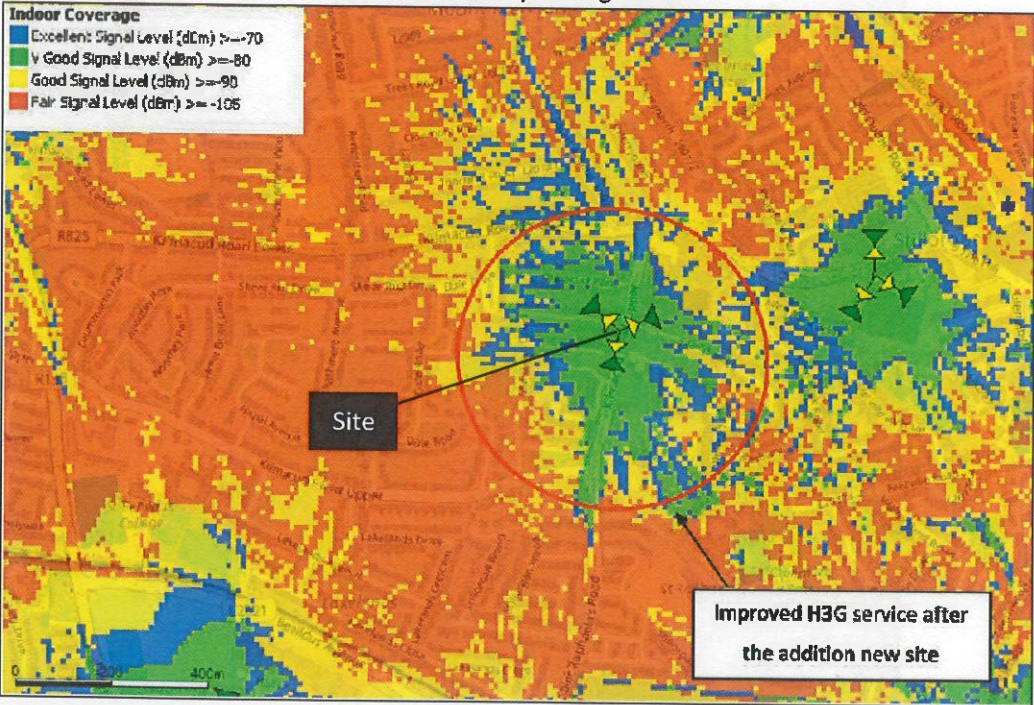


Figure 5: PREDICTED INDOOR COVERAGE-- v good/excellent coverage

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.

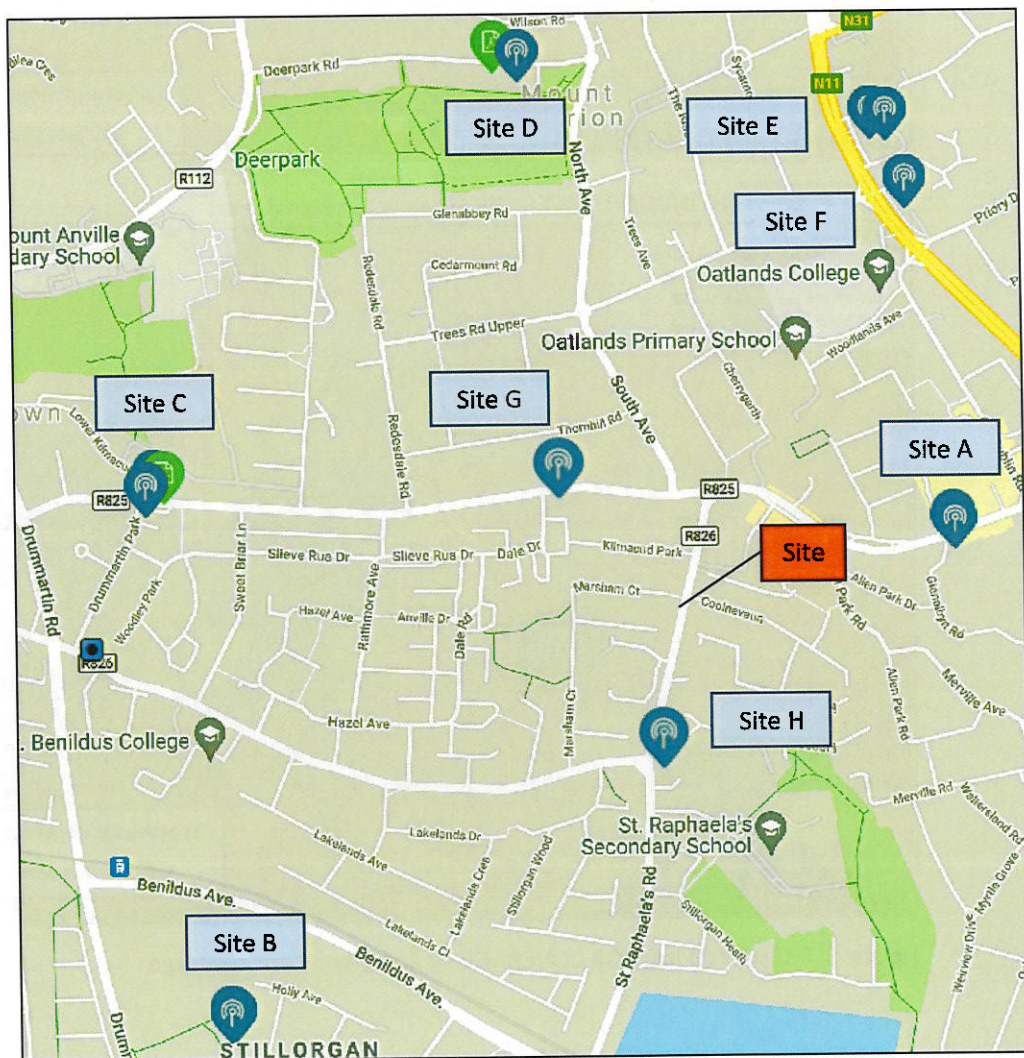


Fig. No.6 Comreg Map of closest Existing Sites in General Area.

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 Kilmacud Road Upper. It must be noted that all of the sites identified, except **Site G**, are situated outside of the required search ring, which has a diameter of c.400 metres. **Site G** is a 15m Eir streetworks solution along Lower Kilmacud Road. There are multiple appeals filed with An Bord Pleanala against this streetworks solution and a decision is expected in July 2022.

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 Kilmacud Road Upper 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 closest 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_DU0080; METEOR DN_1312; VODAFONE_DN327	522m	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.
B	THREE_DU0827; METEOR DN_1228; VODAFONE_DN330	1.12km	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	THREE_DU1283; METEOR DN_1259; VODAFONE_DN242	977m	THREE's is already positioned at this site. Due to the limited available space to upgrade the existing equipment on-site, DU1283 will be decommissioned. 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_DN1290;	1km	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.

E	THREE_DU0081; METEOR DN_1229;	947m	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.
F	VODAFONE_DNPRP	866m	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.
G	METEOR DN_1695;	306m	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. At this time, the technology for a high capacity, multi-operator slimline antenna is not available; therefore, a colocation is not feasible at this time.
H	METEOR DN_3321;	288m	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. At this time, the technology for a slimline high capacity, multi-operator antenna is not available; therefore, a colocation is not feasible at this time.

There are two additional Eir streetwork solutions (Meteor DN_1259 and Meteor DN_1271) that are located 1.2km and 1.5km away from the proposed development. The sites are significantly outside of the required search ring; therefore, there is no benefit to be gained by adding equipment at either of these locations towards achieving the required objectives.

4.0 APPLICANT: BACKGROUND

4.1 Introduction

The applicant, On Tower Ireland Ltd ("OTI") 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. On Tower Limited Ltd remains a 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 OTI (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 Pleanala is provided for. There are no height stipulations provided for therein, however OTI 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 OTI Design Team in conjunction with JRA (Jason Redmond Associates).

5.3 Spirit of the Legislation

Planning Authorities, An Bord Pleanala 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. Another similar streetworks was granted a licence by DLR Co Co approximatley 306m North West adjacent to Dale Drive. This streetworks was granted to Cignal Infrastructure (A Cellnex Company) with the Operator Eir. Additionally another licence was granted to Cignal Infrastructure for Eir for a site approximately 288m south of the subject site on the junction of St Raphaela's Rd and the R826.

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).

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 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 15m is required in Kilmacud Road Upper 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.

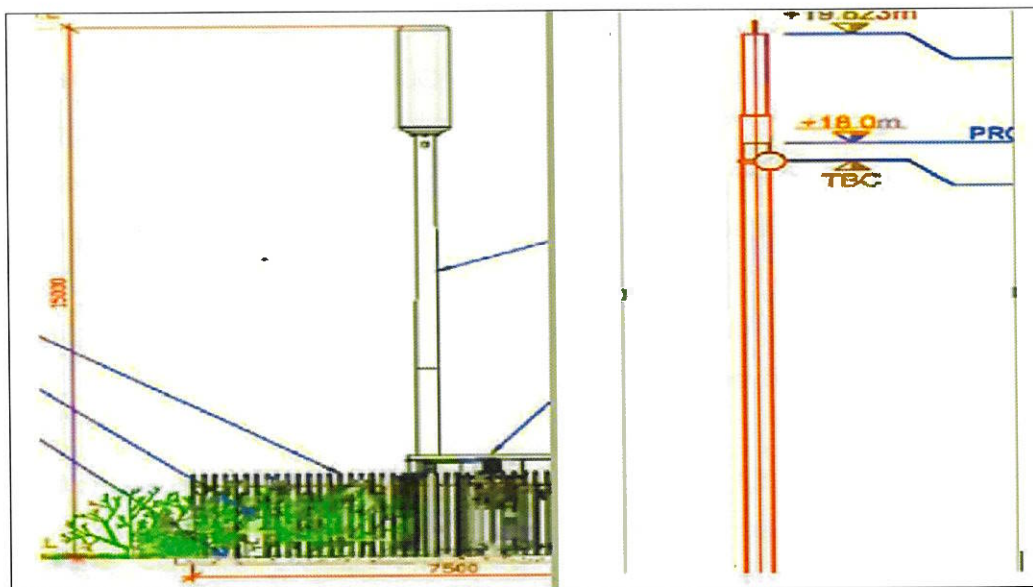


Fig No.8 Image 5 Examples of small and medium size Single Operator Sites Extracted from the Green Book Appendix A.

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. OTI 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 **not zoned** (public roads in the zoning maps are not zoned). The adjoining lands to the west are zoned Objective F. Two maps are shown below as the site is located at the edge of Map No.2 so part of Map No.6 is also relevant.

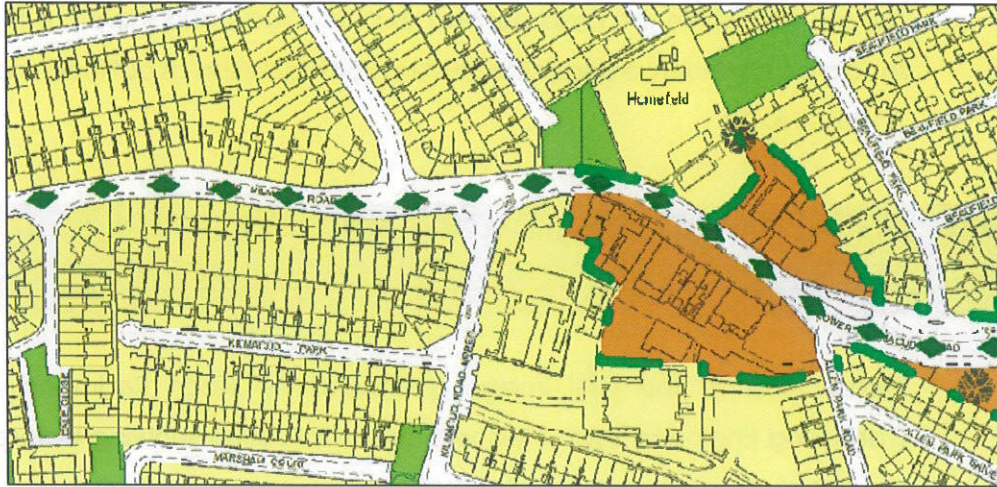


Fig No.9 Extract from DLR Development Plan 2016-22 zoning map (Map No.2).



Fig No.10 Extract from DLR Development Plan 2016-22 zoning map (Map No.6).

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.

There is a Protected Structure to the south-east of the site but its at a distance of over 150m from the site with only a very oblique angled view available of same, and therefore is not considered to be relevant.

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 6 no. Visual Reference Points have been identified within a 154m radius of the site

VRPs 1, 2 & 3 are taken at distances of 154m, 87m and 68m respectively of the site. The pole and cabinet are clearly visible from these locations. VRP 4 is taken at a distance of 37m from the site. Only the top of the pole is visible from this location. 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.

VRP 6 is taken at a distance of 90m from the site. The pole is not visible through the trees (even in winter time with no leaves present).

There is no view of the structure from VRP 5.

VIA Conclusion

It is concluded that while the proposed 15 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. 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 imperceptible. It will read as part of the typical street furniture and will not be an incongruous insertion into the streetscape.

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, OTI, 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 Kilmacud Road Upper, Stillorgan, Co. Dublin.

The principle of the proposed 15m 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 15 metre pole solution will provide for optimum coverage as required in an area where there is a noted dearth in coverage. It has been located at the edge of the residential area within the search ring rather than within same to minimise any potential impact on residential amenity. 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 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, 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).

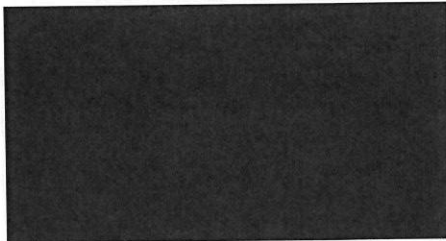
The planning authority is respectfully requested to consider the necessity for this infrastructure, which the market would not require if there was not a demand for same. The planning authority is also requested to consider the meticulous site selection process undertaken, which has to satisfy the criteria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



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Dublin 2
D02 RY98
Tel: 01 604 8100
www.marsh.ie

To Whom It May Concern

9th of March 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

PUBLIC LIABILITY

INSURER: XL Insurance Company SE
POLICY NUMBER: [REDACTED]
PERIOD OF INSURANCE: 1st March 2022 to 28th February 2023 (both days inclusive)
LIMIT OF INDEMNITY: €7,000,000 (any one event and in the aggregate during the period of insurance)

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

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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,

[Redacted signature block]

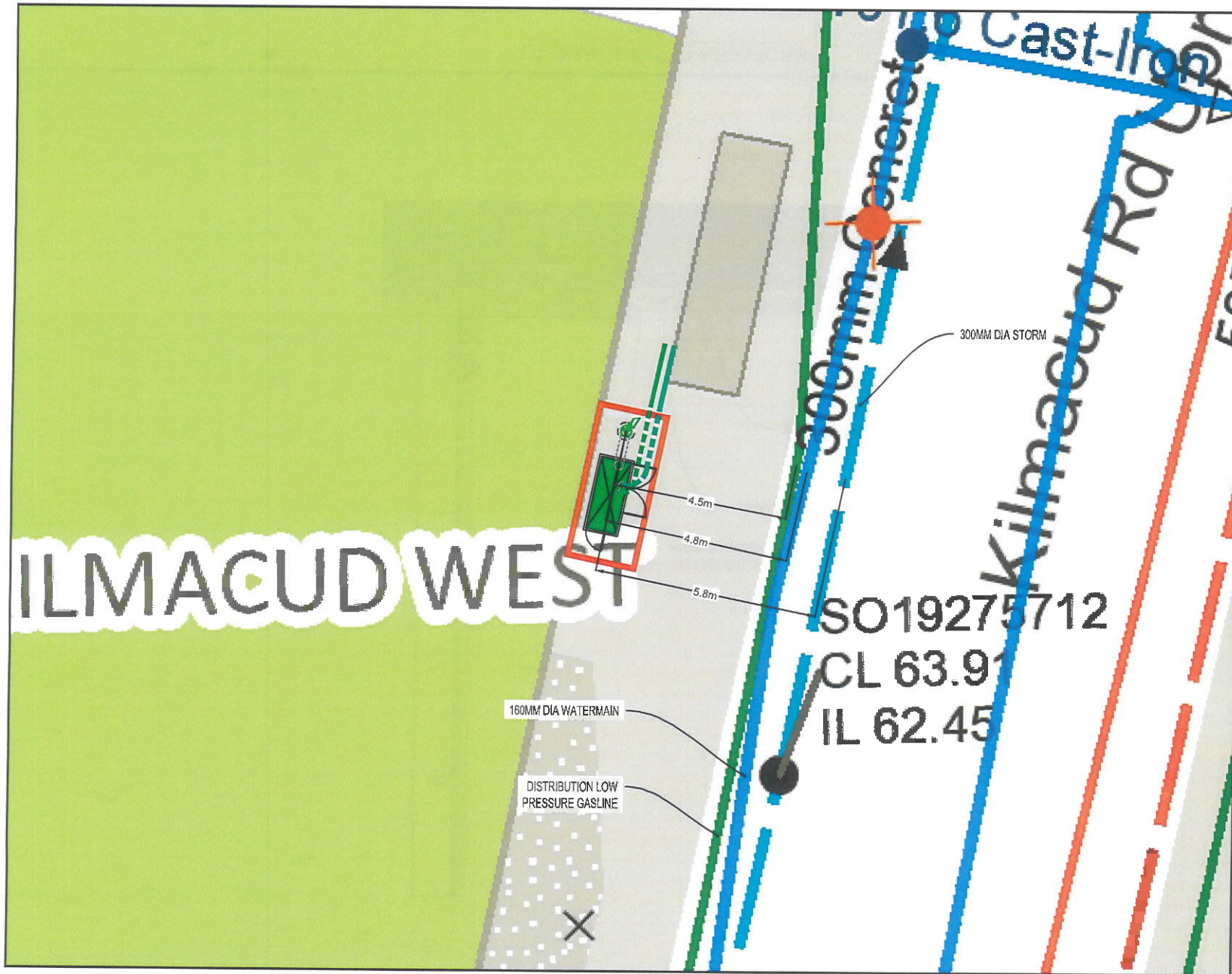
Client Advisor
Marsh Ireland Brokers Ltd
Direct Dial: [Redacted]
E-mail: [Redacted]

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UNDERGROUND SERVICES

SCALE 1:100

15m Alpha 3.0 STREETPOLE

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Jason Redmond & Associates Consulting Engineers

Civil Structural
Project Management
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Co. Laois,
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Email: jra@jra.ie

PLANNING

Signal site ID: CIG_03587

Operator site ID: SR_3153

Site Name: BRADYS KILMACUD REPLACEMENT OTI

Site Address: PUBLIC FOOTPATH ALONG KILMACUD ROAD UPPER
STILLORGAN
CO. DUBLIN

Title: SIGNAL SMART STREETPOLE
SITE LAYOUT PLAN

Designed	Date	06/12/2021
Drawn	Scale	1:100
	Rev.	A

Dwg No. SR_3153-500

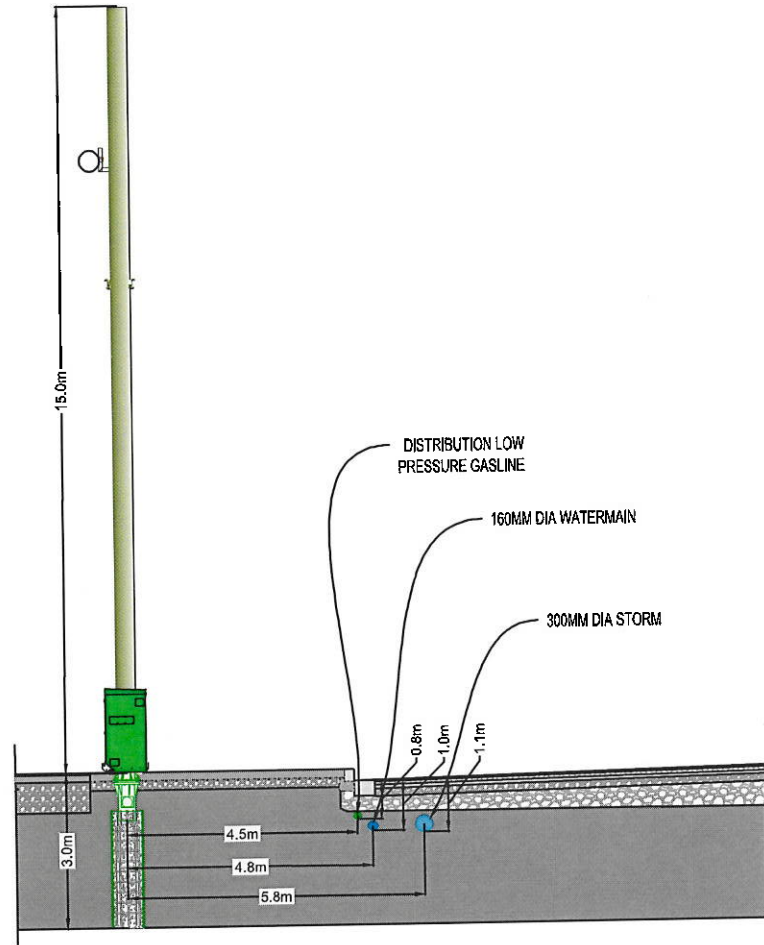
LOCATION:

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PLANNING

Signal site ID: **CIG_03587**

Operator site ID: **SR_3153**

Site Name: **BRADYS KILMACUD REPLACEMENT OTI**

Site Address: **PUBLIC FOOTPATH ALONG KILMACUD ROAD UPPER
STILLORGAN
CO. DUBLIN**

TITLE: **SIGNAL SMART STREETPOLE
ELEVATIONS**

Designed: [] Date: 08.12.2021
Drawn: [] Scale: 1:100 Rev: A

Dwg No. **SR_3153-501**

DATE: 08.12.2021

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E = 719742.245, N = 752479.615

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Survey Date = 31-Dec-1940

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File Name:
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Projection / Spatial Reference:
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PLANNING

Signal site ID **CIG-03587**

Operator site ID **SR_3153**

Site Name **BRADYS KILMACUD REPLACEMENT OTI**

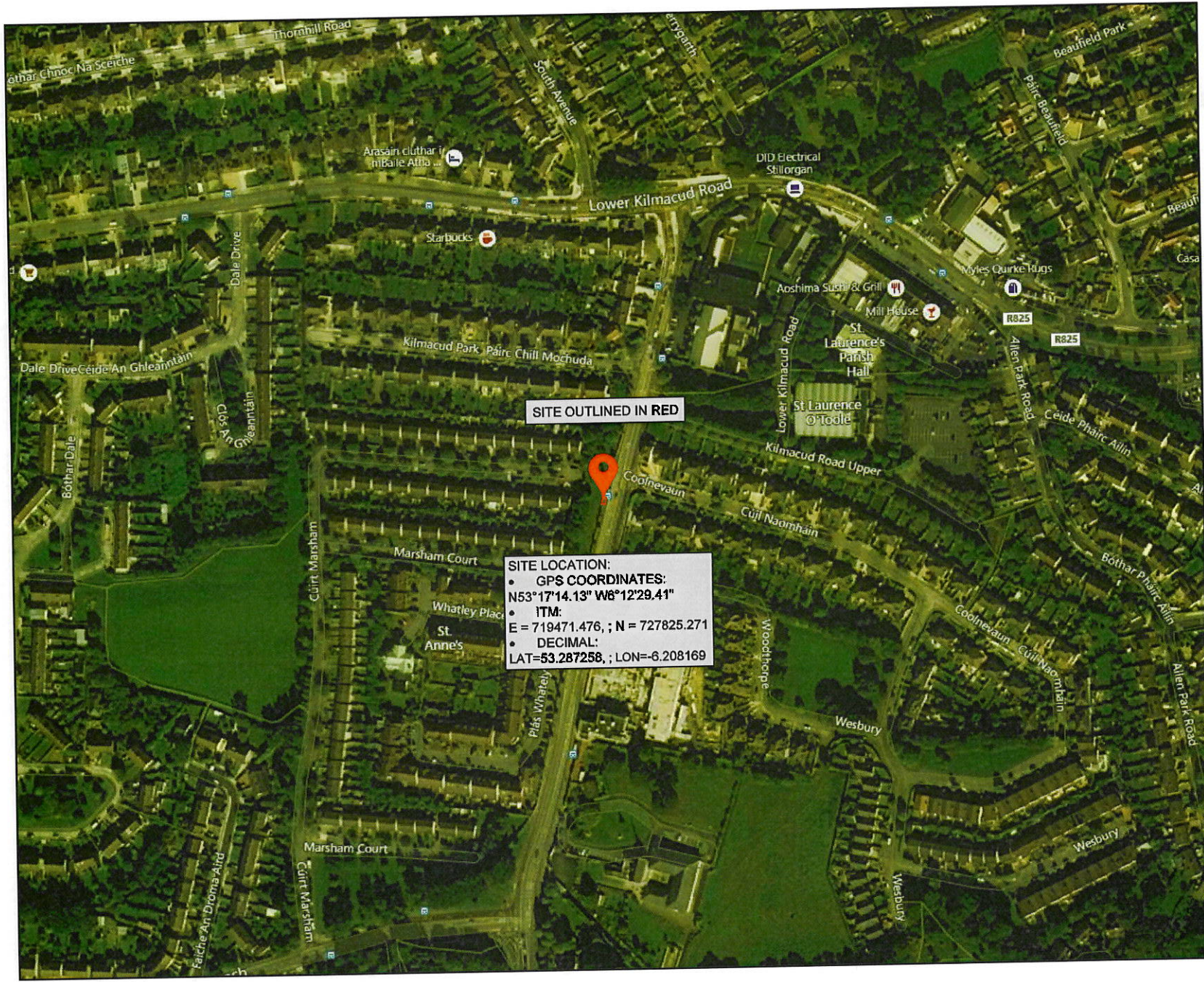
Site Address
**PUBLIC FOOTPATH ALONG KILMACUD ROAD UPPER
STILLORGAN
CO. DUBLIN**

Title
**CELLNEX SMART STREETPOLE
SITE LOCATION MAP**

Designed **02.12.2021**
Drawn **Scale 1:15000 Rev. A**

Dwg No. SR_3153-100

DWG LOCATION: [unclear] [unclear] [unclear] [unclear] [unclear] [unclear]



SITE OUTLINED IN RED

SITE LOCATION:
 • GPS COORDINATES:
 N53°17'14.13" W8°12'29.41"
 • ITM:
 E = 719471.476 ; N = 727825.271
 • DECIMAL:
 LAT=53.287258 ; LON=-8.208169

15m Alpha 3.0 STREETPOLE

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Jason Redmond & Associates Consulting Engineers

JRA
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 5 Linnard Court, Portlaoise,
 Co. Laois.
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PLANNING

Signal site ID **CIG-03587**

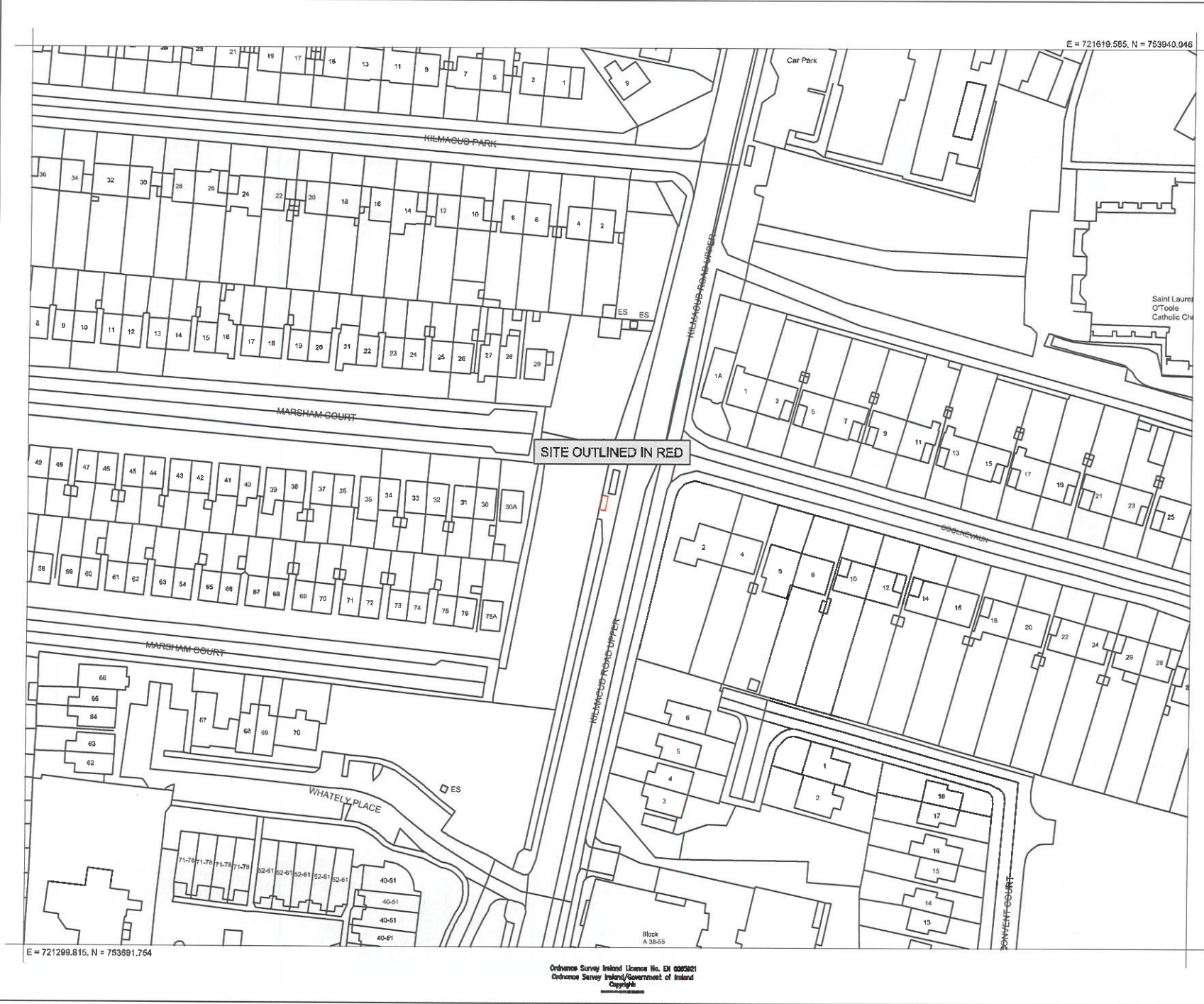
Operator site ID **SR_3153**

Site Name
BRADYS KILMACUD REPLACEMENT OTI

Site Address
**PUBLIC FOOTPATH ALONG KILMACUD ROAD UPPER
 STILLORGAN
 CO. DUBLIN**

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

Designed		Date	02/12/2021
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Dwg No.	SR_3153-101	Rev.	A



E = 721619.555, N = 753940.046

E = 721299.815, N = 753691.764

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Data Source / Reference:
 PRO22
File Format:
 Autodesk AutoCAD (DWG, R2013)
File Name:
 V_59237254_1.dwg
Clip Extent / Area of Interest (AOI):
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Projection / Spatial Reference:
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Reference Index:
 Map Series / Map Sheet
 1:1,000 / 3362-15
 1:1,000 / 3362-10
Data Extraction Date:
 Date= 02-Dec-2021
Source Data Release:
 DCLMS Release V1.145.112
Product Version:
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Jason Redmond & Associates Consulting Engineers

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PLANNING

Signal site ID: CIG-03587

Operator site ID: SR_3153

Site Name: BRADYS KILMACUD REPLACEMENT OTI

Site Address: PUBLIC FOOTPATH ALONG KILMACUD ROAD UPPER STILLORGAN CO. DUBLIN

Title: CELLNEX SMART STREETPOLE SITE LOCATION PLAN

Designed: [Redacted] Date: 02.12.2021
 Drawn: [Redacted] Scale: 1:100 Rev: A

Dwg No. SR_3153-102

DWG LOCATION: [Redacted]



SITE LAYOUT
SCALE 1:250

15m Alpha 3.0 STREETPOLE

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LEGEND

EXISTING ROADS	
SITE OUTLINED THUS	
EXISTING BUILDING	
EXISTING GRASS VERGE	
EXISTING FOOTPATHS	
EXISTING HARDSTANDING	



A	PLANNING ISSUE	02/12/21		
No.	Revision	Date	By	Clk

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cellnex
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PLANNING

Signal site ID **CIG-03587**

Operator site ID **SR_3153**

Site Name
BRADYS KILMACUD REPLACEMENT OTI

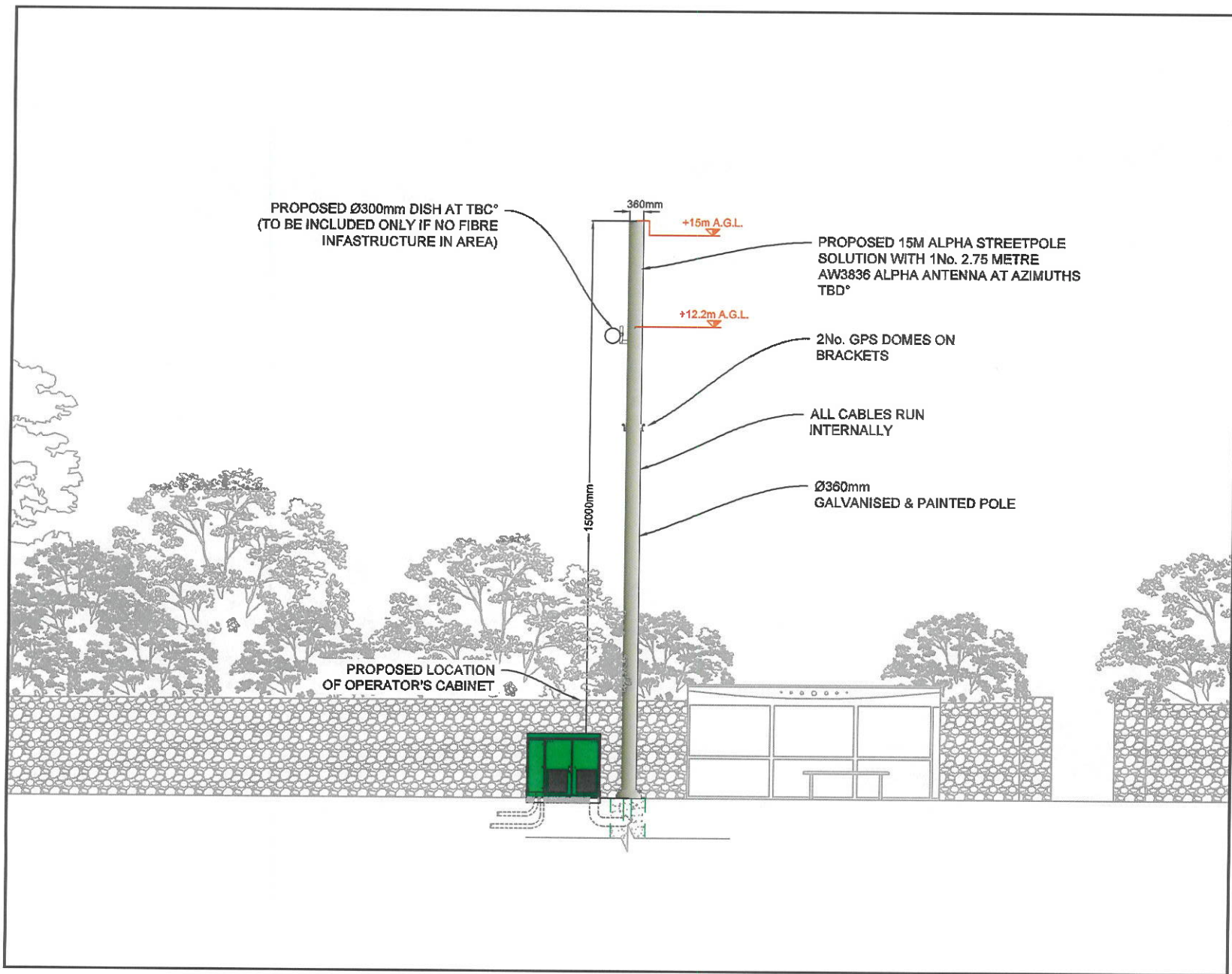
Site Address
**PUBLIC FOOTPATH ALONG KILMACUD ROAD UPPER
STILLORGAN
CO. DUBLIN**

Title
**CELLNEX SMART STREETPOLE
SITE LAYOUT PLAN**

Designed Date **02.12.2021**
Drawn Scale **1:250** Rev. **A**

Dwg No. **SR_3153-103**

DWG LOCATION:



PROPOSED Ø300mm DISH AT TBC°
(TO BE INCLUDED ONLY IF NO FIBRE
INFRASTRUCTURE IN AREA)

360mm

+15m A.G.L.

PROPOSED 15M ALPHA STREETPOLE
SOLUTION WITH 1No. 2.75 METRE
AW3836 ALPHA ANTENNA AT AZIMUTHS
TBD°

+12.2m A.G.L.

2No. GPS DOMES ON
BRACKETS

ALL CABLES RUN
INTERNALLY

Ø360mm
GALVANISED & PAINTED POLE

15000mm

PROPOSED LOCATION
OF OPERATOR'S CABINET

ELEVATION
SCALE 1:100

15m Alpha 3.0 STREETPOLE

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Rep. of Ireland.



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Jason Redmond & Associates Consulting Engineers

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PLANNING

Signal site ID **CIG-03587**

Operator site ID **SR_3153**

Site Name
BRADYS KILMACUD REPLACEMENT OTI

Site Address
**PUBLIC FOOTPATH ALONG KILMACUD ROAD UPPER
STILLORGAN
CO. DUBLIN**

Title
**CELLNEX SMART STREETPOLE
ELEVATION**

Designed **[Redacted]** Date **02.12.2021**

Drawn **[Redacted]** Scale **1:100** Rev. **A**

Dwg No. **SR_3153-103A**

DRG LOCATION: [Redacted]



15m Alpha 3.0 STREETPOLE

THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL ENGINEERS & ARCHITECTS DRAWINGS FOR THE PROJECT AND ANY OTHER DOCUMENTS TO BE LIAISED WITH A COPY LIST OF REVISIONS AND DATE OF ANY REVISIONS. ABC

CONSULTANTS TO BE ADVISED OF ANY CHANGES TO BE MADE TO THIS DRAWING.

NOT FOR CONSTRUCTION

A	PLANNING ISSUE	05/12/21
No.	Revision	Date

DELMEC

10 Barrowside Business Park, Steady Road,
Graiguescullen, Carlow, R93 E3V7,
Rep. of Ireland.

cellnex

driving telecom connectivity

On Tower Ireland Ltd. (OTI)
Suite 311, Q House, 70 Furze Road,
Saneyfords Industrial Estate, Dublin 18,
D18 YV90, IRELAND.

Jason Redmond & Associates Consulting Engineers

Chief Structural
Project Management
5 Leonard Court, Portlaoise,
Co. Laois,
Ph: 05325 81155
Email: info@jrasc.ie

PLANNING

Signal site ID: CIG-03587

Operator site ID: SR_3153

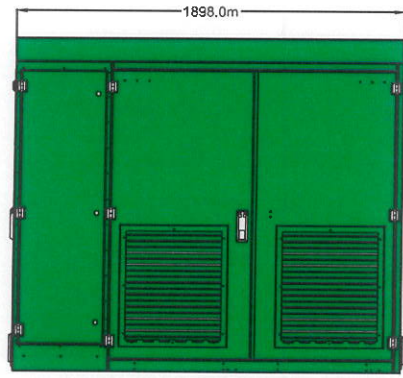
Site Name
BRADYS KILMACUD REPLACEMENT OTI

Site Address
PUBLIC FOOTPATH ALONG KILMACUD ROAD UPPER
STILLORGAN
CO. DUBLIN

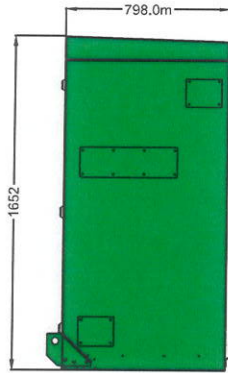
Title
CELLNEX SMART STREETPOLE
SCHEMATIC ELEVATION

Designed: [Redacted] Date: 02-12-2021
Drawn: VTS Scale: VTS Rev: A

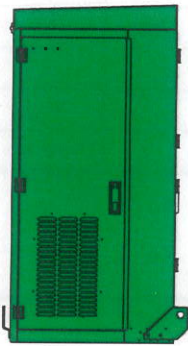
Dwg No. SR_3153-104
DWG LOCATION: [Redacted]



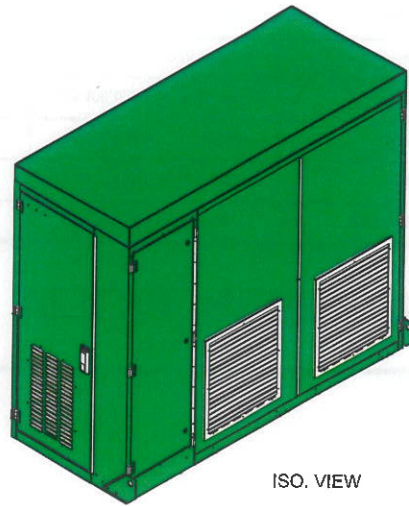
FRONT VIEW



R/H SIDE VIEW



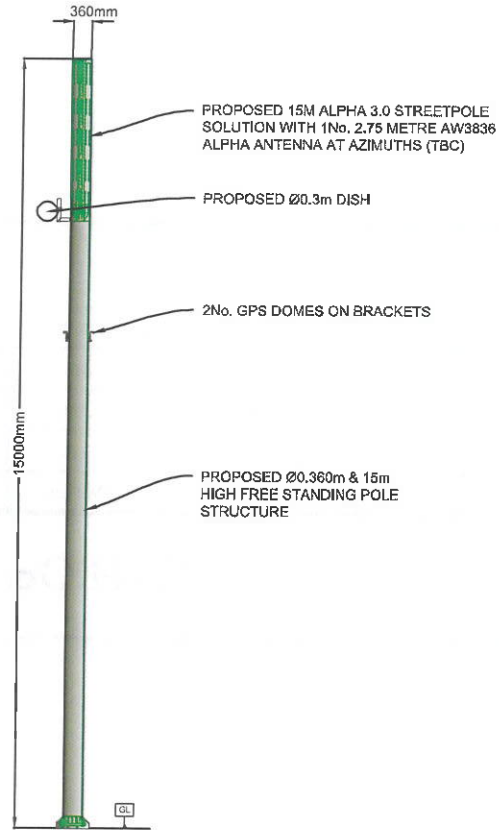
L/H SIDE VIEW



ISO. VIEW

CABINET DETAILS

SCALE 1:25



TYPICAL POLE

SCALE 1:100

15m Alpha 3.0 STREETPOLE

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CONTRACT DRAWING TO BE PROVIDED IMMEDIATELY UPON ANY DISCREPANCY AS PER THE PROJECT PROGRAMME.

NOT FOR CONSTRUCTION

No.	Revision	Date	By	Cltd
A	PLANNING ISSUE	05/12/21		

DELMEC

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Jason Redmond & Associates Consulting Engineers

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5 Lennox Court, Portlaoise,
Co. Leix,
Ph: 05786 81155
Email: info@jrasc.ie

PLANNING

Signal site ID **CIG-03587**

Operator site ID **SR_3153**

Site Name **BRADYS KILMACUD REPLACEMENT OTI**

Site Address **PUBLIC FOOTPATH ALONG KILMACUD ROAD UPPER**

STILLORGAN

CO. DUBLIN

Title **CELLNEX SMART STREETPOLE**

STANDARD ELEVATION AND DETAILS

Designed **[Redacted]** Date **02.12.2021**

Drawn **[Redacted]** Scale **A5** Rev. **A**

Dwg No. **SR_3153-105**

DWG LOCATION: **[Redacted]**

15m Alpha 3.0 STREETPOLE

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 DESIGN & DRAW TO BE IN ACCORDANCE WITH ALL APPLICABLE STANDARDS & REGULATIONS.

NOT FOR CONSTRUCTION

VISUAL REFERENCE POINTS

DWG NO.	LOCATION	COORDINATES (ITM)	DISTANCE	BEARING	VISIBILITY
1	VRP 1	719511.4051, 727897.6847	154M	177°	Pole and cabinet visible.
2	VRP 2	719468.9918, 727726.8486	87M	187°	Pole and cabinet visible.
3	VRP 3	719495.0230, 727834.1890	68M	191°	View of proposed site.
4	VRP 4	719576.4021, 727818.2950	37M	217°	Top of pole visible.
5	VRP 5	719326.6191, 727854.7069	148M	283°	Solution not visible.
6	VRP 6	7194386.0276, 727850.3198	90M	287°	Pole partially visible.

A	INITIAL ISSUE	DATE	BY	CHKD
No.	Revision	Date	By	Chk



10 Euroside Business Park, Sleaty Road,
 Graiguecullen, Carlow, R93 E3W7,
 Rep. of Ireland.



On Tower Ireland Ltd. (OTI)
 Suite 311, Q House, 76 Furze Road,
 Sandford Industrial Estate, Dublin 18,
 D18 YV56, IRELAND.

Jason Redmond & Associates Consulting Engineers

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 5 Lisnard Court, Parkdoon,
 Co. Limerick,
 PH: 08769 81155
 Email: info@jra.ie

PLANNING

Signal site ID: CIG_03587

Operator site ID: SR_3153

Site Name: BRADYS KILMACUD REPLACEMENT OTI

Site Address: PUBLIC FOOTPATH ALONG KILMACUD ROAD UPPER
 STILLORGAN
 CO. DUBLIN

Title: SIGNAL SMART STREETPOLE
 VRP INFORMATION

Designed: [Redacted] Date: 06.12.2011

Drawn: [Redacted] Scale: 1:1 Rev. A

Dwg No. SR_3153-VRP INFORMATION



15m Alpha 3.0 STREETPOLE

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NOT FOR CONSTRUCTION

A	INITIAL ISSUE	10/22		
No.	Revision	Date	By	Ctd

DELMEC

10 Barronside Business Park, Slesny Road,
Graiguelin, Carlow, R93 F3W7,
Rep. of Ireland.



On Tower Ireland Ltd. (OTI)
Suite 311, O House, 76 Parzoo Road,
Sawdyford Industrial Estate, Dublin 18,
D18 YV52, IRELAND.

Jason Redmond & Associates Consulting Engineers



PLANNING

Signal site ID CIG_03587

Operator site ID SR_3153

Site Name
BRADYS KILMACUD REPLACEMENT OTI

Site Address
PUBLIC FOOTPATH ALONG KILMACUD ROAD UPPER
STILLORGAN
CO. DUBLIN

Title
SIGNAL SMART STREETPOLE
VRP INFORMATION

Designed [REDACTED] Date 01.12.2021

Drawn [REDACTED] Scale 1:1 Rev. A

Dwg No. SR_3153-VRP INFORMATION

Location [REDACTED]



VRP1 - WITHOUT SOLUTION IN PLACE



VRP1 - WITH SOLUTION IN PLACE

15m Alpha 3.0 STREETPOLE

THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL ENGINEERS & ARCHITECTS DRAWINGS FOR MECHANICAL AND ELECTRICAL TO BE KEPT UNDER A COMPLETE OF INFORMATION AS TO BE IN ANY OTHER CASE.

THE DRAWING IS TO BE READ IN CONJUNCTION WITH ALL ENGINEERS & ARCHITECTS DRAWINGS FOR MECHANICAL AND ELECTRICAL TO BE KEPT UNDER A COMPLETE OF INFORMATION AS TO BE IN ANY OTHER CASE.

NOT FOR CONSTRUCTION

No.	Revision	Date	By	Clk
A	INITIAL ISSUE	10/22		

DELMEC

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Co. Laois,
Ph: 05785 81155
Email: info@jra.ie

PLANNING

Signal site ID: CIG_03587

Operator site ID: SR_3153

Site Name
BRADYS KILMACUD REPLACEMENT OTI

Site Address
PUBLIC FOOTPATH ALONG KILMACUD ROAD UPPER
STILLORGAN
CO. DUBLIN

Title
SIGNAL SMART STREETPOLE
VRP 1

Designed: [Redacted] Date: 06.12.2021

Drawn: [Redacted] Scale: 1:1 Rev: A

Dwg No. SR_3153-121

LOCATIONS: [Redacted]



VRP2 - WITHOUT SOLUTION IN PLACE



VRP2 - WITH SOLUTION IN PLACE

15m Alpha 3.0 STREETPOLE

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CONSULTANTS TO BE ADVISED OF ANY CHANGES TO THE WORK PROGRAMME.

NOT FOR CONSTRUCTION

A	INITIAL ISSUE	10/22		
No.	Revision	Date	By	Clkd

DELMEC

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 Craighurkilleen, Carlow, R93 E3W7,
 Rep. of Ireland.



On Tower Ireland Ltd, (OTI)
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 Sandymount Industrial Estate, Dublin 10,
 D16 YV50, IRELAND.

Jason Redmond & Associates Consulting Engineers

**Civil Structural
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 Co. Laois.
 PH: 05786 81105
 Email: info@jrasc.ie

PLANNING

Signal site ID **CIG_03587**

Operator site ID **SR_3153**

Site Name
BRADYS KILMACUD REPLACEMENT OTI

Site Address
**PUBLIC FOOTPATH ALONG KILMACUD ROAD UPPER
 STILLORGAN
 CO. DUBLIN**

Title
**CIGNAL SMART STREETPOLE
 VRP 2**

Designed **[Redacted]** Date 06.12.2021
 Drawn **[Redacted]** Scale **1:1** Rev. **A**

Dwg No. **SR_3153-122**
 DWG LOCATION: www.delmeccom.com



VRP3 - WITHOUT SOLUTION IN PLACE



VRP3 - WITH SOLUTION IN PLACE

15m Alpha 3.0 STREETPOLE

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NOT FOR CONSTRUCTION

A	INITIAL ISSUE	10/22		
No.	Revision	Date	By	Clk

DELMEC

10 Barrowside Business Park, Sleary Road,
 Graiguecullen, Carlow, R93 E3W7,
 Rep. of Ireland.

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On Tower Ireland Ltd. (OTT)
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 Sandycove Industrial Estate, Dublin 10,
 D18 YV50, IRELAND.

Jason Redmond & Associates Consulting Engineers

Civil Structural
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 5 Leonard Court, Portlaoise,
 Co. Laois,
 PH: 05780 81155
 Email: info@jra.ie

PLANNING

Signal site ID **CIG_03587**

Operator site ID **SR_3153**

Site Name
BRADYS KILMACUD REPLACEMENT OTI

Site Address
**PUBLIC FOOTPATH ALONG KILMACUD ROAD UPPER
 STILLORGAN
 CO. DUBLIN**

Title
**CIGNAL SMART STREETPOLE
 VRP 3**

Designed **[Redacted]** Date 08.12.2021

Drawn **[Redacted]** Scale **1:1** Rev. **A**

Dwg No. **SR_3153-123**



VRP4 - WITHOUT SOLUTION IN PLACE



VRP4 - WITH SOLUTION IN PLACE

15m Alpha 3.0 STREETPOLE

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ISSUE LEVEL TO BE SHOWN IN ALL DIMENSIONS UNLESS OTHERWISE SPECIFIED IN THE DRAWING.

NOT FOR CONSTRUCTION

A	INITIAL ISSUE	19/12		
No.	Revision	Date	By	Ckd

DELMEC

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cellnex

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Cell Tower Ireland Ltd. (OTB)
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Sandyford Industrial Estate, Dublin 18,
D18 YV59, IRELAND.

Jason Redmond & Associates Consulting Engineers

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5 Lisnard Court, Portlaoise,
Co. Laois,
PH: 05788 81155
Email: info@jrasc.ie

PLANNING

Signal site ID: CIG_03587

Operator site ID: SR_3153

Site Name:
BRADYS KILMACUD REPLACEMENT OTI

Site Address:
PUBLIC FOOTPATH ALONG KILMACUD ROAD UPPER
STILLORGAN
CO. DUBLIN

Title:
SIGNAL SMART STREETPOLE
VRP 4

Designed: [Redacted] Date: 08.12.2021

Drawn: [Redacted] Scale: 1:1 Rev: A

Dwg No. SR_3153-124

LOCATION: [Redacted]



VRPS - SOLUTION NOT VISIBLE

15m Alpha 3.0 STREETPOLE

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No.	Revision	Date	By	Chk
A	INITIAL ISSUE	10/12/21		

DELMEC

16 Barnowade Business Park, Steady Road,
 Castlegarrett, Carlow, R53 F3W7,
 Rep. of Ireland.

cellnex
driving telecom connectivity

On Tower Ireland Ltd. (OTI)
 Suite 311, O House, 76 Fuzze Road,
 Sandford Industrial Estate, Dublin 18,
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Jason Redmond & Associates Consulting Engineers

Civil Structural
 Project Management
 5 Lismard Court, Portlaoise,
 Co. Laois,
 Ph: 05786 81165
 Email: info@jrasc.ie

PLANNING

Signal site ID **CIG_03587**

Operator site ID **SR_3153**

Site Name
BRADYS KILMACUD REPLACEMENT OTI

Site Address
**PUBLIC FOOTPATH ALONG KILMACUD ROAD UPPER
 STILLORGAN
 CO. DUBLIN**

Title
**CIGNAL SMART STREETPOLE
 VRP 5**

Designed	Date 09.12.2021		
Drawn	Scale 1/4	Rev.	A

Dwg No. **SR_3153-125**
 DWG LOCATION: [www.delmeccompany.com](#)



VRP6 - WITHOUT SOLUTION IN PLACE



VRP6 - WITH SOLUTION IN PLACE

15m Alpha 3.0 STREETPOLE

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NOT FOR CONSTRUCTION

No.	Revision	Date	By	Clkd
A	INITIAL ISSUE	10/22		

DELMEC

10 Barrowside Business Park, Steady Road,
Grangecullen, Curlew, R93 E3W7,
Rep. of Ireland.



On Tower Ireland Ltd. (OTI)
Suite 311, G House, 78 Fitzee Road,
Sawoyford Industrial Estate, Dublin 18,
D18 YV50, IRELAND.

Jason Redmond & Associates Consulting Engineers

Civil Structural
Project Management
5 Linnard Court, Portlaoise,
Co. Laois,
PH: 05780 81155
Email: info@jra.ie

PLANNING

Signal site ID **CIG_03587**

Operator site ID **SR_3153**

Site Name
BRADYS KILMACUD REPLACEMENT OTI







Site Address
**PUBLIC FOOTPATH ALONG KILMACUD ROAD UPPER
STILLORGAN
CO. DUBLIN**

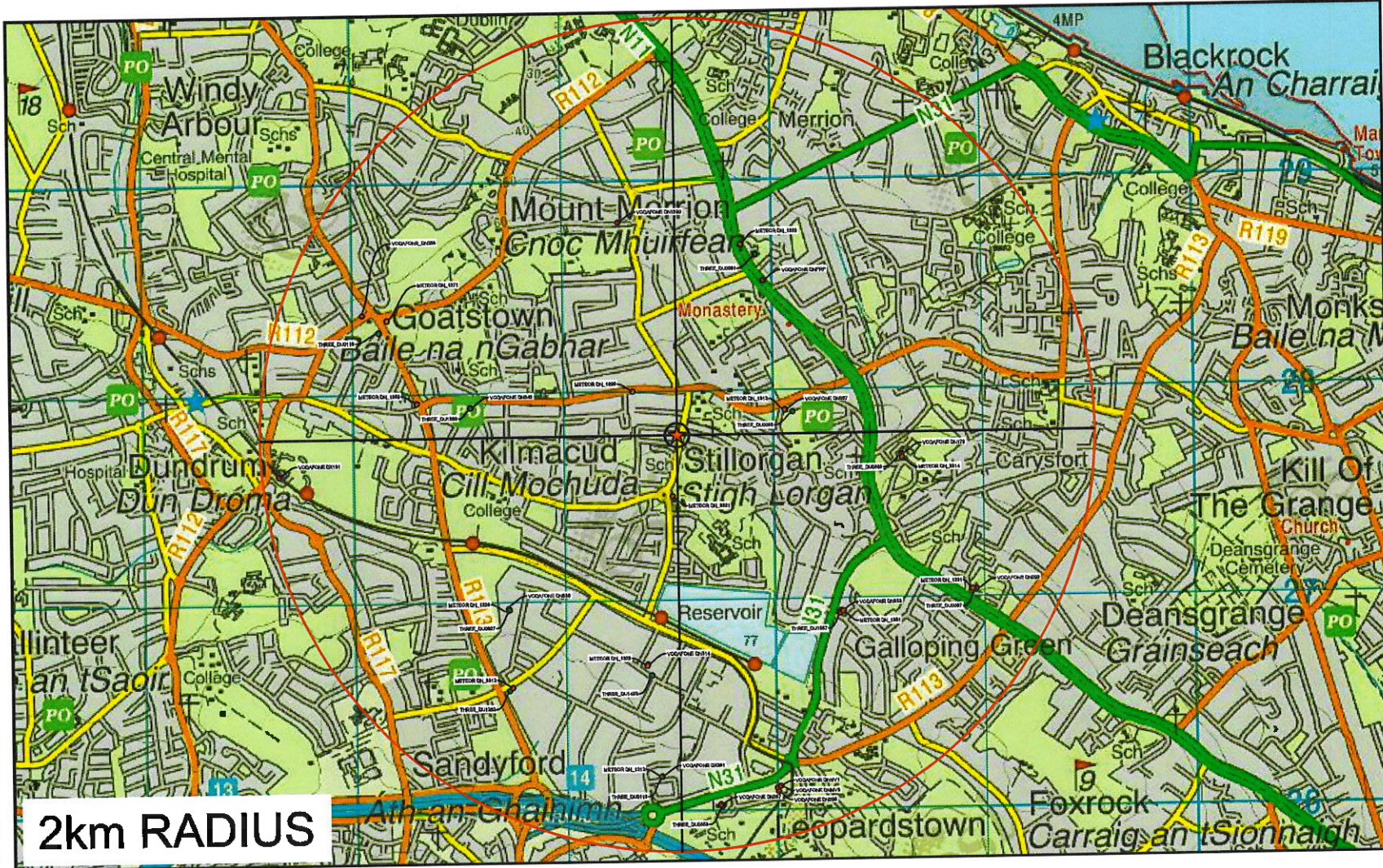
Title
**SIGNAL SMART STREETPOLE
VRP 6**

Designed **[Redacted]** Date 05.12.2021
Drawn **[Redacted]** Scale **1:1** Rev. **A**

Dwg No. **SR 3153-126**
Location **[Redacted]**

LEGEND:

Search Ring Radius	
Radius Area (2km)	
Proposed Site SR- 3153	
Existing Vodafone site shown thus	
Existing EIR site shown thus	
Existing H3Gi site shown thus	



LOCATION MAP
SCALE 1:20,000



B	UPDATED PER COMMENTS	26/02/22		
A	PLANNING ISSUE	01/12/21		
No.	Revision	Date	By	Cld

JELMEC

10 Barronville Business Park, Sleaty Road,
Graiguescullen, Carlow, R93 E9W7,
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cellnex
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Jason Redmond & Associates Consulting Engineers

CAE
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Project Management
5 Lismark Court, Portlaoise,
Co. Laois.
Ph: 05125 81158
Email: info@cae.ie

PLANNING

Signal site ID **CIG-03587**

Operator site ID **SR_3153**

Site Name
BRADYS KILMACUD REPLACEMENT OTI

Site Address
**PUBLIC FOOTPATH ALONG KILMACUD ROAD UPPER
STILLORGAN
CO. DUBLIN**

Title
**CELLNEX SMART STREETPOLE
COMREG MAP**

Designed	Date	04.12.2021
Drawn	Scale	1:20,000
	Rev.	B

Dwg No. **SR_3153-107**

Date: 17/05/2022

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

Re: Section 254 Application- Proposed Telecommunications Streetworks Solution

Date Received: 19.01.2022

Applicant: On Tower Ireland Ltd,
Suite 309, Q House,
76 Furze Road,
Sandyford Industrial Estate,
Dublin 18.

Site Name: Bradys, Kilmacud Road Upper

Location: Kilmacud Road Upper, Stillorgan, Co. Dublin

dlr Application Reference: CTT.22.033 – Brady's Kilmacud Road Upper

Dear Sir/Madam,

I am writing to you in response to the application made on behalf of On Tower Ireland 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 at Kilmacud Road Upper, Stillorgan, Co. Dublin.

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

The refusal is on the basis that it will result in an overconcentration of telecommunications infrastructure of this type on, under, over or along the public road in the local area, and as such, the application is considered to be contrary to the provisions of subsection 254(5)(c) of the of the Planning and Development Act 2000 (as amended).

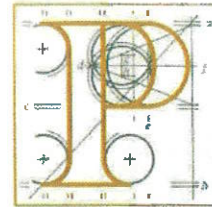
“Please find accompanying memo from the Planning Department which detail the reasons for refusal.”

Yours faithfully,

M. O' Carroll
Margaret O'Carroll,
Clerical Officer
Roads Maintenance

Our Case Number: ABP-313694-22

Planning Authority Reference Number: CTT.22.033



An
Bord
Pleanála

Dún Laoghaire-Rathdown County Council
County Hall
Marine Road
Dun Laoghaire
Co. Dublin

Laoghair
County

22 NOV

REC.
Road Main
& Public Li.

Date: 20 NOV 2023

Re: Telecommunications street works solution.
Kilmacud Road Upper, Stillorgan, Co. Dublin.

Dear Sir / Madam,

An order has been made by An Bord Pleanála determining the above-mentioned matter under the Planning and Development Acts 2000 to 2022. A copy of the order is enclosed.

In accordance with section 146(5) of the Planning and Development Act 2000, as amended, the Board will make available for inspection and purchase at its offices the documents relating to any matter falling to be determined by it, within 3 days following the making of its decision. The documents referred to shall be made available for a period of 5 years, beginning on the day that they are required to be made available. In addition, the Board will also make available the Inspector's Report, the Board Direction and Board Order in respect of the matter on the Board's website (www.pleanala.ie). This information is normally made available on the list of decided cases on the website on the Wednesday following the week in which the decision is made.

The Public Access Service for the purpose of inspection/purchase of file documentation is available on weekdays from 9.15am to 5.30pm (including lunchtime) except on public holidays and other days on which the office of the Board is closed.

Yours faithfully,

Executive Officer

BP100N



DUN LAOGHAIRE RATHDOWN CO. CO.
SECRETARIAT SECT.

21 NOV 2023

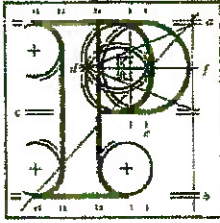
RECEIVED
PLANNING DEPT

Tel
Glaó Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

Tel (01) 858 8100
LoCall 1800 275 175
Fax (01) 872 2684
Website www.pleanala.ie
Email bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902



An
Bord
Pleanála

Board Order
ABP-313694-22

Planning and Development Acts 2000 to 2022

Planning Authority: Dún Laoghaire-Rathdown County Council

Planning Register Reference Number: CTT.22.033

Appeal by On Tower Ireland Limited care of David Mulcahy Planning Consultants Limited of 67 The Old Mill Race, Athgarvan, County Kildare against the decision made on the 17th day of May, 2022 by Dún Laoghaire-Rathdown County Council to refuse a licence for the proposed development.

Licence Application: Telecommunications Streetworks Solution at Brady's, Kilmacud Road Upper, Stillorgan, County Dublin.

Decision

In exercise of the powers conferred on it under section 254 of the Planning and Development Act, 2000, as amended, An Bord Pleanála, directs the planning authority to **GRANT** a licence, based on the reasons and considerations under and subject to the conditions set out below.

REASONS AND CONSIDERATIONS

Having regard to the provisions of section 254 of the Planning and Development Act, 2000, as amended, to the national, regional and local policy objectives, as set out in the Dún Laoghaire-Rathdown County Development Plan 2022 - 2028 and to the "Telecommunications Antennae and Support Structures Guidelines for Planning Authorities", issued by the Department of the Environment, Heritage and Local Government in 1996, as updated by Circular Letter PL 07/12 in 2012, it is considered that, subject to compliance with the conditions set out below, the proposed development would not be visually intrusive or seriously obtrusive to the amenities of the area or the residential amenities of properties in the vicinity and would, therefore, be in accordance with the proper planning and sustainable development of the area.

Conditions

1. The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, as amended by the further plans and particulars submitted, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the development shall be carried out and completed in accordance with the agreed particulars.

Reason: In the interest of clarity.

2. This licence shall be valid for five years from the date of this Order. The telecommunications structure and related ancillary structures shall then be removed and the lands reinstated on removal of the telecommunications structure and ancillary structures unless, prior to the end of the period, continuance shall have been granted for their retention for a further period.

Reason: To enable the impact of the development to be re-assessed, having regard to changes in technology and design during the specified period.

3. No advertisement or advertisement structure shall be erected or displayed on the proposed structure or within the curtilage of the site without a prior grant of planning permission.

Reason: In the interest of visual amenity.

4. No additional dishes, antennae or other equipment, other than indicated on the plans and particulars received by the planning authority with the application, shall be attached to the pole or otherwise erected on the site, without first obtaining the written consent of the planning authority.

Reason: In the interest of visual amenity.

5. Details of the proposed colour scheme for the pole, antennas and equipment containers shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

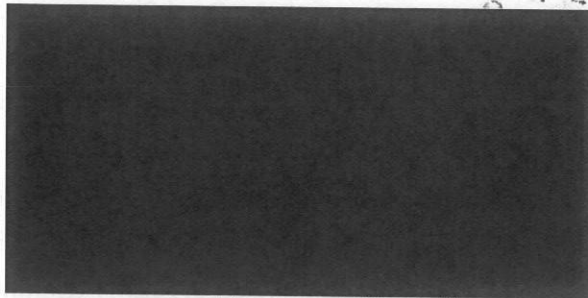
Reason: In the interest of visual amenity.

6. Surface water drainage arrangements for the proposed development shall comply with the requirements of the planning authority.

Reason: In the interest of public health.

7. In the event of the telecommunications structure and related ancillary structures becoming obsolete and being decommissioned, following discussions with the Area Engineer regarding the relocation of the public light contained upon the pole, the developer shall remove the pole and associated structures and return the site to its original condition, at their own expense.

Reason: To ensure satisfactory reinstatement of the site upon decommissioning of the structure.



**Member of An Bord Pleanála
duly authorised to authenticate
the seal of the Board.**

Dated this 17 day of November 2023.

Licence Number: CRM 245329

DÚN LAOGHAIRE-RATHDOWN COUNTY COUNCIL
Comhairle Contae Dhún Laoghaire-Ráth an Dúin

PLANNING AND DEVELOPMENT ACT, 2000
(SECTION 254)
PLANNING AND DEVELOPMENT REGULATIONS 2001

LICENCE TO PLACE A TELECOMMUNICATION
CABINET AND POLE ON THE PUBLIC FOOTPATH/ROADWAY

Dún Laoghaire-Rathdown County Council ("the Council")
in conjunction with An Bord Pleanála (ABP-313694-22)
grant to
On Tower Ireland Ltd. ("the Licensee")

a Licence to place and maintain 1 Telecommunications Cabinet
measuring externally 2.502m³ (0.798mL × 1.898mW × 1.652mH),
and a pole area 0.102m² (height 15m)
at the west side of Kilmacud Road Upper in proximity to the pedestrian entrance to Marsham Court
subject to the special Licence Conditions hereunder in the attached Schedule.

Underwriter: Zurich Insurance Company

Public Liability Insurance: Policy no. [REDACTED]

Date of grant of licence: 17/11/2023

Expiry date of licence: 16/11/2028

James Pielon

Senior Engineer

The granting of this licence does not exempt the licensee from the provisions of any other legislation.



SCHEDULE OF CONDITIONS

1. The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, as amended by the further plans and particulars submitted, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with Planning Authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the development shall be carried out and completed in accordance with the agreed particulars.
Reason: In the interest of Clarity
2. This licence shall be valid for five years from the date of the An Bord Pleanála decision (ABP-313694-22) on 17th November 2023. The telecommunications structure and related ancillary structures shall then be removed and the lands reinstated on removal of the telecommunications structure unless, prior to the end of the period, continuance shall have been granted for their retention for a further period.
Reason: To enable the impact of the development to be re-assessed, having regard to changes in technology and design during the specified period.
3. No advertisement or advertisement structure shall be erected or displayed on the proposed structure or within the curtilage of the site without a prior grant of planning permission.
Reason: In the interest of visual amenity.
4. No additional dishes, antennae or other equipment, other than indicated on the plans and particulars received by the planning authority with the application shall be attached to the pole or otherwise erected on the site without first obtaining the written consent of the planning authority.
Reason: In the interest of visual amenity.
5. Details of the proposed colour scheme for the pole, antennas and equipment containers shall be submitted to, and agreed in writing with, planning authority prior to commencement of development.
Reason: In the interest of the visual amenities of the area.
6. Surface water drainage arranged for the proposed development shall comply with the requirements of the planning authority.
Reason: In the interest of public health.
7. In the event of the telecommunications structure and related ancillary structures becoming obsolete and being decommissioned, following discussions with the Area Engineer regarding the relocation of the public light contained upon the pole, the developer shall remove the pole and associated structures and return the site to its original condition at their own expense.
Reason: To ensure satisfactory reinstatement of the site upon decommissioning of the structure.



