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

**Date:** 4<sup>th</sup> February 2022  
**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:** Milltown Chimney  
**Location:** St. Lukes Crescent, Milltown, 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 Eir, Signal have identified the subject site as a known blackspot for mobile and wireless broadband. A specific solution to address the deficit in coverage has been identified and approved by the mobile network Licenced Operators.

### **The Proposal**

With reference to the attached plans you will note that it is proposed to provide a 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, D14*

The street pole has an approx. diameter of 324mm and will be galvanised and painted in finish up to 11.3m in height. Above the 11.3m height an antenna will be mounted to a finishing height of up to 15m. The antenna will be shrouded by a 406mm sheath to match the pole.

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

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

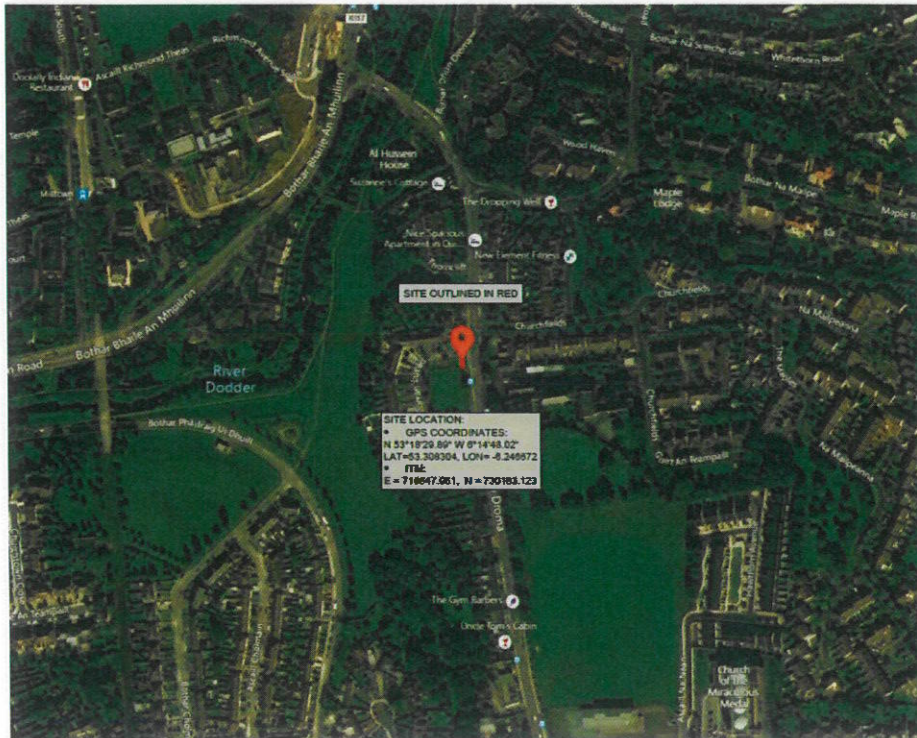


Fig 2. Aerial View Site Location

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

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

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

Ph: 05786 81155  
Email: [info@jrassc.ie](mailto:info@jrassc.ie)  
5 Lismard Court,  
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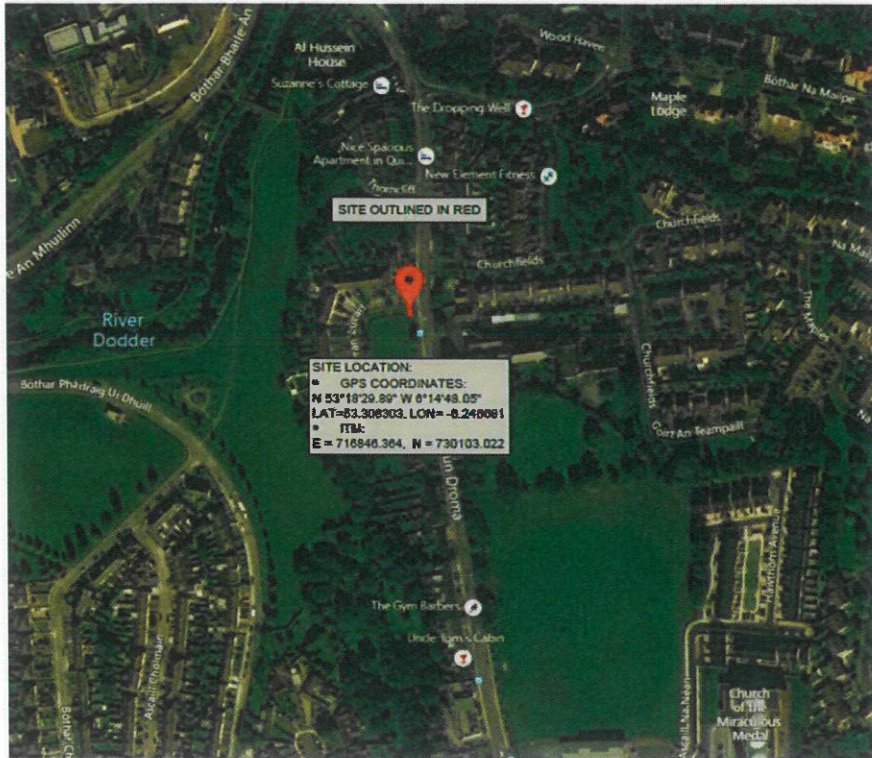


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Yours Sincerely,

Jason Redmond  
Chartered Engineer

**DM**

**DAVID MULCAHY  
PLANNING CONSULTANTS LTD**

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Company No: 493 133 Directors:

## **PLANNING STATEMENT**

to support s.254 licence application for

### **TELECOMMUNICATIONS INFRASTRUCTURE**

at

**ST LUKES CRESCENT, MILLTOWN, DUBLIN 14**

Client: Signal Infrastructure Ltd.

01<sup>st</sup> February 2022

## 1.0 INTRODUCTION

David Mulcahy Planning Consultants Ltd have been instructed by **Signal Infrastructure Ltd**<sup>1</sup> to prepare a planning statement to support a Section 254 licence application for a telecommunication structure at St. Lukes Crescent, Milltown, 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 Associates<sup>2</sup>.

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

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

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



## 2.0 LOCATION AND DESCRIPTION

### 2.1 Location

The site is located on the west side of Dundrum Road and the junction with St. Luke's Crescent. Please refer to the site location map submitted with the application.

### 2.2 Description

The site currently consists of public open space behind a low rise wall fronting onto a public footpath.



**Fig No.1** Photograph of subject site taken from Dundrum Road.



There is a dwelling located on the opposite side (east side) of Dundrum Road at a distance of [REDACTED]. It is well screened by dense planting and does not face toward the subject site.

[REDACTED] is located [REDACTED] to the west of the site and does face toward the site. However this distance is considered to be substantial and there are street trees which will obscure views of the proposed development.

### **3.0 PROPOSED DEVELOPMENT**

#### **3.1 Description**

The proposal consists of an 15m Alpha 2.0 streetpole with 1no. Alpha 2.0 shrouded antenna at azimuths TBC° & 1no. ø300mm dish (to be included only if no fibre infrastructure in area), along with ancillary cabinet (1.649m high x 1.168m wide x 0.793 deep).

Both the streetpole and the cabinet will be recessed into the area of public open space behind the boundary wall fronting onto the public footpath.

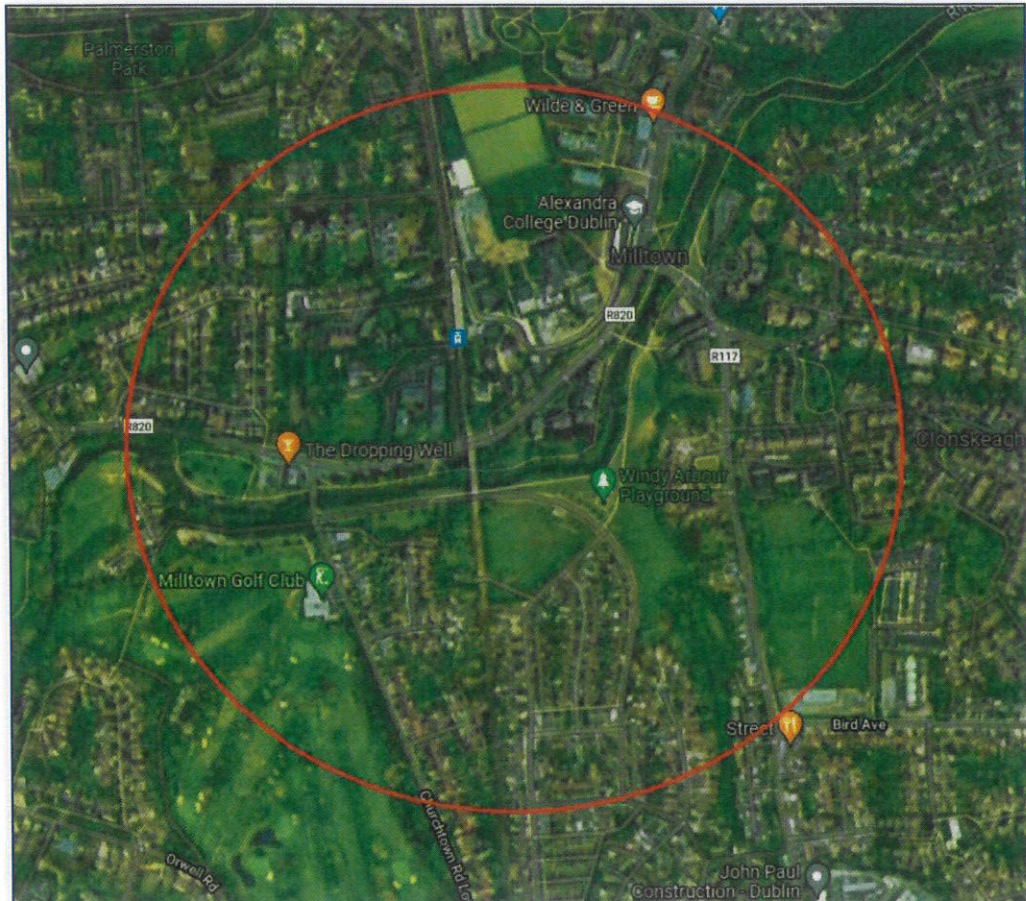
Refer to drawings and CGI images prepared by Jason Redmond Associates, Consulting Engineers for further details.

#### **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. 1km 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** Search Ring for subject site.

### **3.2.2 Reason why location was chosen:**

The location at St Lukes Crescent, Milltown was chosen because of the following:

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

**Other Locations Reviewed by Eir:**

1. The first option identified was The Shangarry Chimney, which is a disused chimney located overlooking the Luas bridge at Milltown. This structure currently has an operator installed (Site A in Fig 7 for the purposes of this report); however, the site provider had no interest in a proposal for an additional operator.
2. The Dropping Well Pub was also identified as an option, However after further review it was felt that this location would not be suitable as the pitched type roof would make an installation difficult from a build perspective and it was also felt that it would not be possible to get the required elevation from this location to provide the coverage required by the operator.
3. Milltown Golf Course was also approached however they were not interested in the proposal of installing a structure on their grounds.
4. A fourth candidate was looked at on the green area off Patrick Doyle Road, near the ESB substation. This location was discounted as it was felt it was too close to the Windy Arbour playground for a street work solution to be installed.
5. As described below in Section 5.5, a Streetworks Solution was applied for on Milltown Hill adjacent to St. Columbanus' Road, but was determined to be an unsuitable location.

Eir are upgrading the network in Dublin to provide customers with good quality voice and high-speed data services. As part of Eir Ltd licensing requirements and the continuing rollout of their 3G and 4G network, Eir requires a site in Milltown, Dublin 6.

The current coverage for Eir does not provide adequate indoor service for high speed mobile broadband and voice services in and around the area. Without a new site in this part of Milltown, parts of this area will continue to suffer a severe degradation in mobile voice and data services which leads to poor mobile coverage and as a result there would be a large number of dropped / blocked

calls and data sessions which will also possibly limits people's ability to work from home on the Eir network.

Areas which will be improved by this site will include but not limited to Milltown Road, Dundrum Rd, Whitethorn Road and Patrick Doyle Road.

### **3.2.3 Coverage Map**

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

Figure 4 below demonstrates the existing indoor around the site. Transparent/White area show where is there is a lack of coverage.

Figure 5 demonstrates the predicted indoor coverage levels, which will result if the proposed LA is granted (blue area). This represents a substantial increase in indoor coverage service levels in this area.

Figure 6 demonstrates the comparison in coverage levels between existing (red) and predicted (blue) if the new site is installed.

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 footprint in the area without Cignal site.



Figure 5: Predicted indoor coverage (blue) with new Cignal Site.

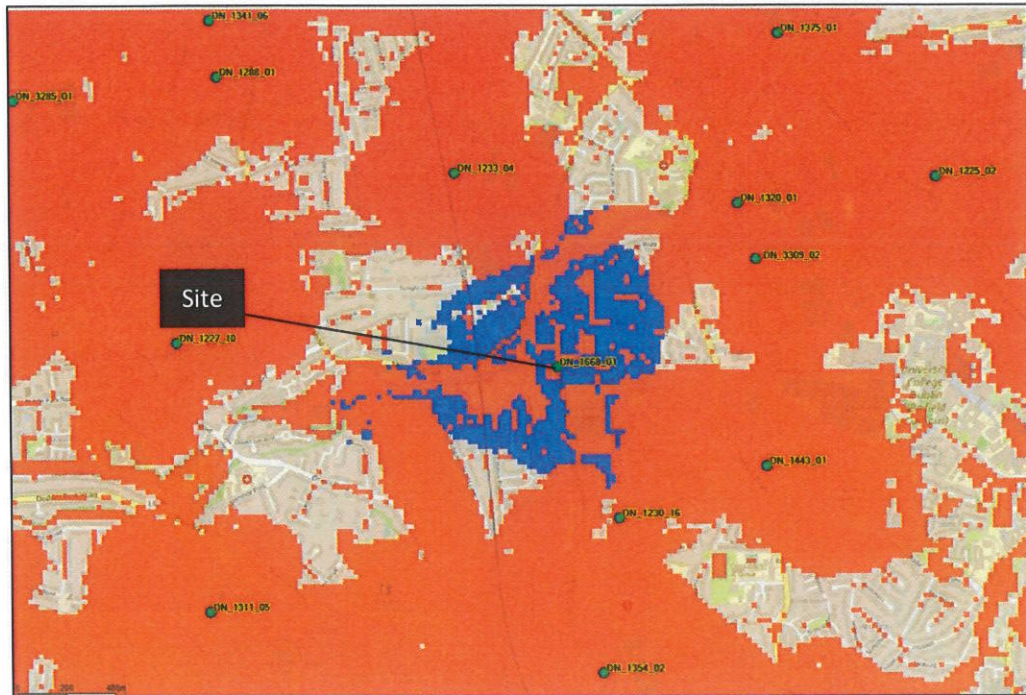


Figure 6: Comparison of coverage between existing (red) and predicted (blue)

### 3.2.4 Comreg Map/Policy

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

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

It should be noted that telecommunications traffic through urban/commercial areas require more capacity and therefore more infrastructure, given the smaller spatial footprint of search areas and higher development densities in association with higher volumes of radio traffic (owing to modern technologies and devices not limited to mobile phone devices) through any individual radio cell.



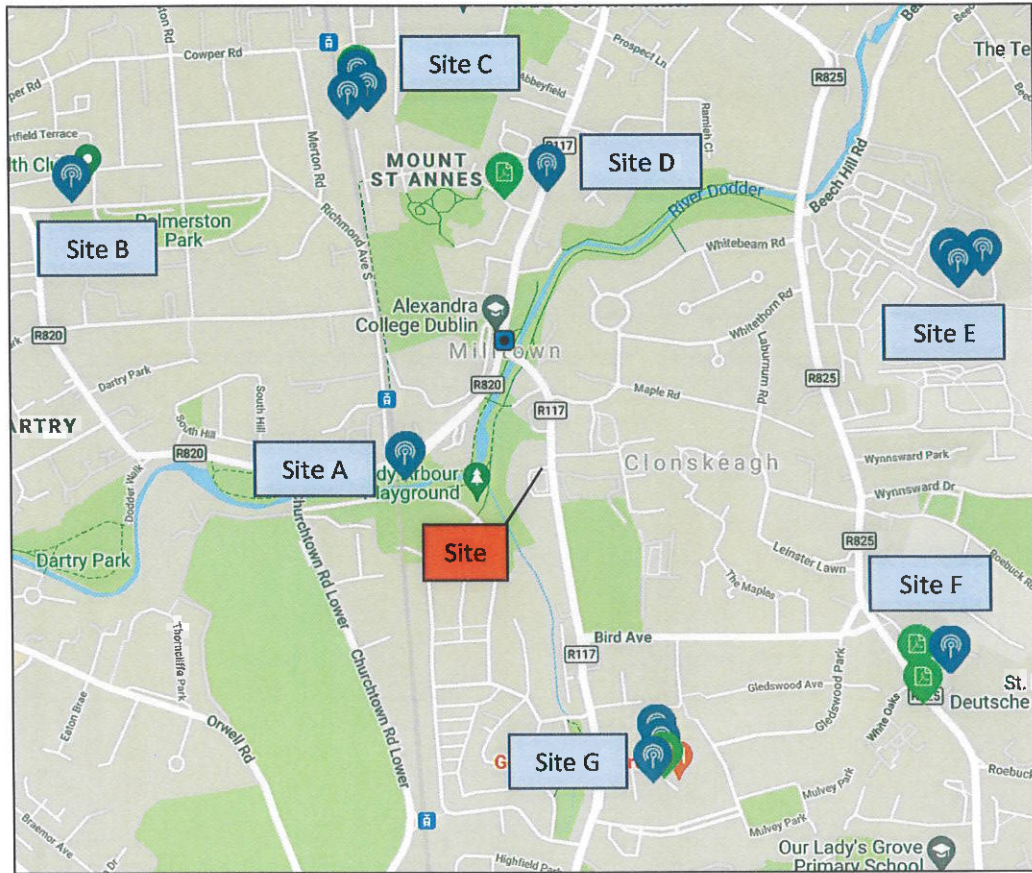


Fig. No.7 Comreg Maps of closest Existing Sites in General Area.

### 3.2.5 Alternative sites

Please refer to the above Comreg Map under figure 7 above, which sets out the other relevant Infrastructure in the subject general area of St Lukes Crescent, Milltown, Dublin 14. It must be noted that all of the sites identified are situated outside the required search ring, which has a diameter of c.1km

As all of the nearest sites in a radial pattern surrounding the proposed development are outside of the required search ring, sharing of facilities on other installations, outside of the required search ring will not address the coverage objectives of the subject search ring. However, in the interest of demonstrating other sites in the broader area for assessment purposes by the planning authority,

the following table indicates the closest established sites within a 2 km radius and also presents the associated 'Discounted Reasons':

Site:	Name of Site (Comreg):	Approx. Distance from Site:	Details/Discounted Reason(s):
A	THREE_DU1192; VODAFONE_DN055	298m	The Shangarry Chimney, which is a disused chimney located overlooking the Luas bridge at Milltownis located here. This structure currently has an operator installed however, the site provider had no interest in a proposal for an additional operator.
B	VODAFONE DN336	1.14km	Site is significantly outside of the required search ring, therefore there is no benefit in adding equipment at this location towards the end of achieving current required search ring objectives.
C	METEOR 1233; THREE_DU0102; VODAFONE DN051	830m	Site is significantly outside of the required search ring, therefore there is no benefit in adding equipment at this location towards the end of achieving current required search ring objectives. Eir is already positioned at this site therefore equipment at this location would not address the service needs of the subject search ring.
D	THREE_DU1194	570m	Site is significantly outside of the required search ring, therefore there is no benefit in adding equipment at this location towards the end of achieving current required search ring objectives.

<b>E</b>	METEOR 3309; VODAFONE DX058; VODAFONE DN109; THREE_DU0991	980m	Site is significantly outside of the required search ring, therefore there is no benefit in adding equipment at this location towards the end of achieving current required search ring objectives. Eir is already positioned at this site therefore equipment at this location would not address the service needs of the subject search ring.
<b>F</b>	METEOR 1443; THREE_DU1117; VODAFONE DN319	920m	Site is significantly outside of the required search ring, therefore there is no benefit in adding equipment at this location towards the end of achieving current required search ring objectives. Eir is already positioned at this site therefore equipment at this location would not address the service needs of the subject search ring.
<b>G</b>	METEOR 1230; THREE_DU0109; VODAFONE DN307	670m	Site is significantly outside of the required search ring, therefore there is no benefit in adding equipment at this location towards the end of achieving current required search ring objectives. Eir is already positioned at this site therefore equipment at this location would not address the service needs of the subject search ring.

## 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 Signal is committed to the highest

standards of proper planning and sustainable development and aims to achieve highest possible environmental assimilation standards. One such example of this aim is portrayed in the pursuit of slim line design prototypes, which have evolved since the enactment of the legislation, such as the Alpha 2 model (inter alia), which has combined highly technical specifications with a slim line aesthetically attractive construct with credit afforded to the Cignal Design Team in conjunction with JRA (Jason Redmond Associates).

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

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

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

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

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

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

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

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

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

## **5.5 Licence History & Precedent**

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

A previous licence application for a streetpole at Milltown Hill was refused under **Reg. Ref. TTA/019/022** as it would result in a visually incongruous addition at this location, in this area of open space and would significantly detract from the area in terms of visual amenity. On foot of this refusal discussions took place with the Council and the current location was identified as being suitable.

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

The reception of Licence Applications has been very positive for the most part. Numerous Licence Applications have already been approved by various planning authorities throughout the Jurisdiction. Such a positive reception of this new Statutory Instrument reflects innovative, proactive and positive engagement between Local Authorities and Telecommunications Infrastructure providers, which is a significant and dynamic step forward for the Telecommunications Sector, which was clearly espoused under the Taskforce Report and accords with 'the spirit of the legislation'.

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

With regard to the principle of development and the associated acceptance of the proposed modernised type of telecommunications pole, under ABP PL 305114-19 the inspector referred, with regard to the principle of development, *"It is agreed that modern technology has provided for design standards that are more amenable to coming within the scope for a License application under Section 254"*. This appeal was granted by the Board subject to conditions and it pertained to a similar development 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 Pleanala (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 sub-urban 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 Pleanala 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](http://www.dccae.ie)) demonstrates various examples of such structures similar to the structure proposed herewith.

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

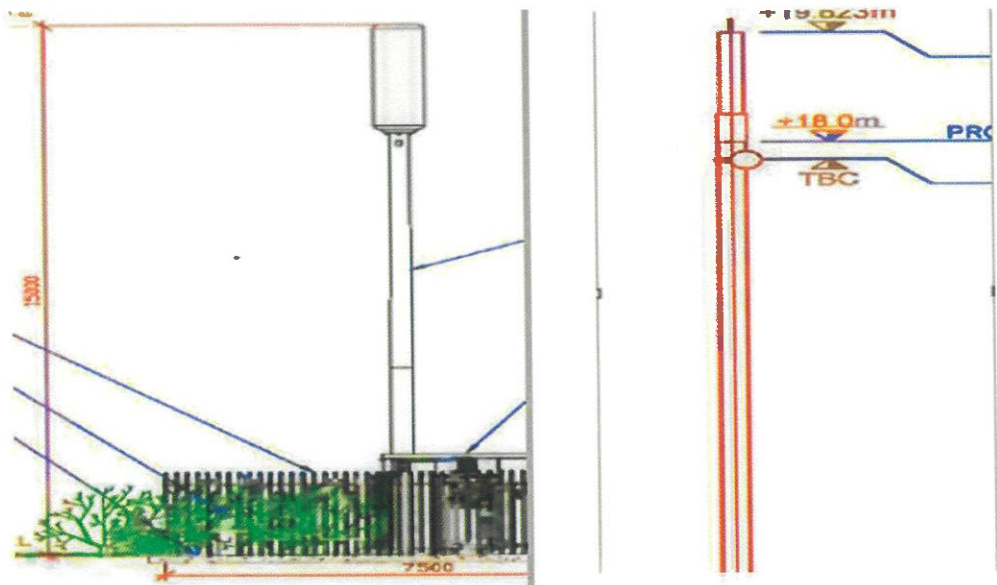
In Section 5.4 Consideration of Suitability of Locations, the Green Book refers to the use of standalone poles as the preferred option in urban settings where there is a wide verge or similar.

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

**Fig.No.8** Guidance on potential location of overground telecommunications infrastructure on public roads.

In general, the height of telecommunications infrastructure is determined by the network requirements. According to EIR, an overall height of 15m is required at St Lukes Crescent, Milltown 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.9** 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 DCCAIE (Product of Collaboration with Department of Communications Energy and Natural Resources, Department of Transport Tourism and Sport, County and City Management Association, Office for Local Authority Management, National Roads Authority (TII)).
- The National Broadband Plan 2012 (and updated under Project Ireland 2040).

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

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

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

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

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

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

This strategic policy document refers under Chapter 11 that; *'In the information age, telecommunications networks play a crucial role in enabling social and economic activity. This RSES supports actions to strengthen communications links to develop a stable, innovative and secure digital communications and services infrastructure on an all-island basis'*.

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

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

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

Section 8.6 Communications Network and Digital Infrastructure

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

*The increasing use of digital technologies is impacting on every aspect of our lives: from transport, to education, leisure and entertainment and health services.*

*Infrastructure to deliver better connected services is vital to our continued growth, supporting businesses and enhancing our communities. As the digital economy grows, we must ensure that the business opportunities and benefits are felt throughout the Region from our capital city to every town, village and outlying rural area - author's emphasis.*

*The provision of next generation broadband services to rural areas is a key enabling support to ensure smaller urban areas and rural areas are not at a disadvantage in attracting and retaining enterprise and employment compared to larger urban centres. The National Broadband Plan will play an integral role in delivering this infrastructure and revitalising businesses and communities across rural Ireland. This is a fast moving and evolving infrastructure and the region will need to be able to respond and adapt to future communications networks and technology along with changing work practices and emerging economic models.*

Regional Policy Objective - RPO 8.25

Local authorities shall:

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

Regional Policy Objective - RPO 8.26

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

### **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.*

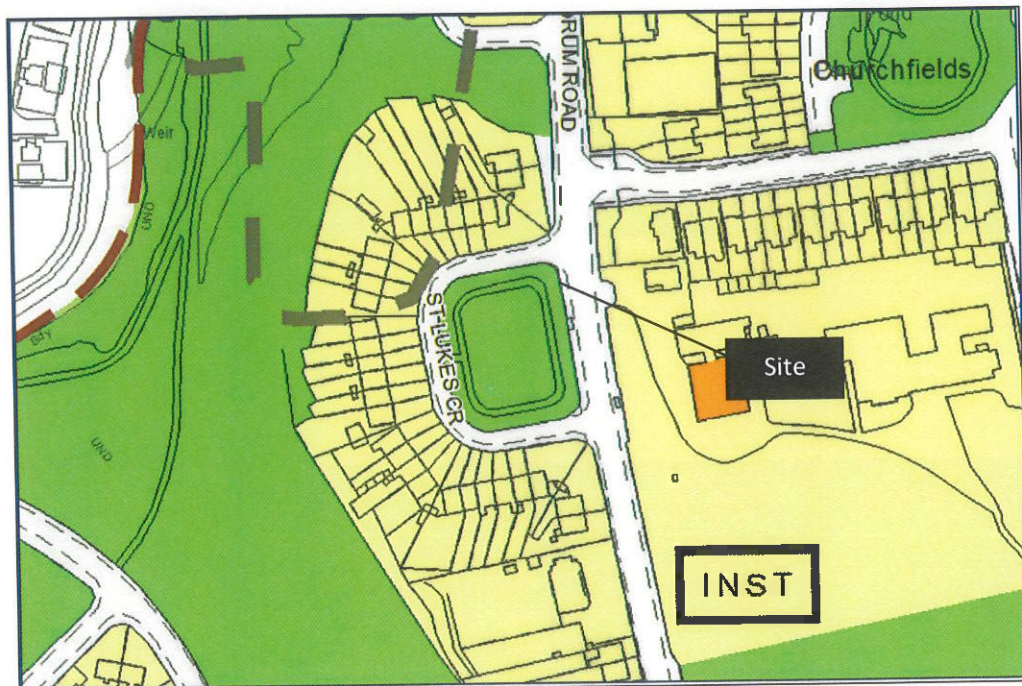
*The widespread availability of a high quality telecommunications network throughout Dún Laoghaire-Rathdown will be critical to the development of a knowledge economy, will help attract inward investment in hi-tech knowledge based industries and will engender the image of the County as the premier entrepreneurial 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 "To preserve and provide for open space with ancillary active recreational amenities". 'Public Services' are Open for Consideration under this zoning objective and the proposed development would fall under this description. 'Open for Consideration' are use which may be permitted where the planning authority is satisfied that the proposed development would be compatible with the overall policies and objectives for the zone, would not have undesirable effects, and

would otherwise be consistent with the proper planning and sustainable development of the area'. We submit to the Council that the proposed telecommunication structure will not materially detract from the amenity of the area. In this regard we submit that the provision of a slimline streetpole at the edge of area of open space which includes a number of mature trees as a backdrop, close to the road and in the vicinity of other typical tall street furniture is reasonable and will not materially detract from the amenity of this area.



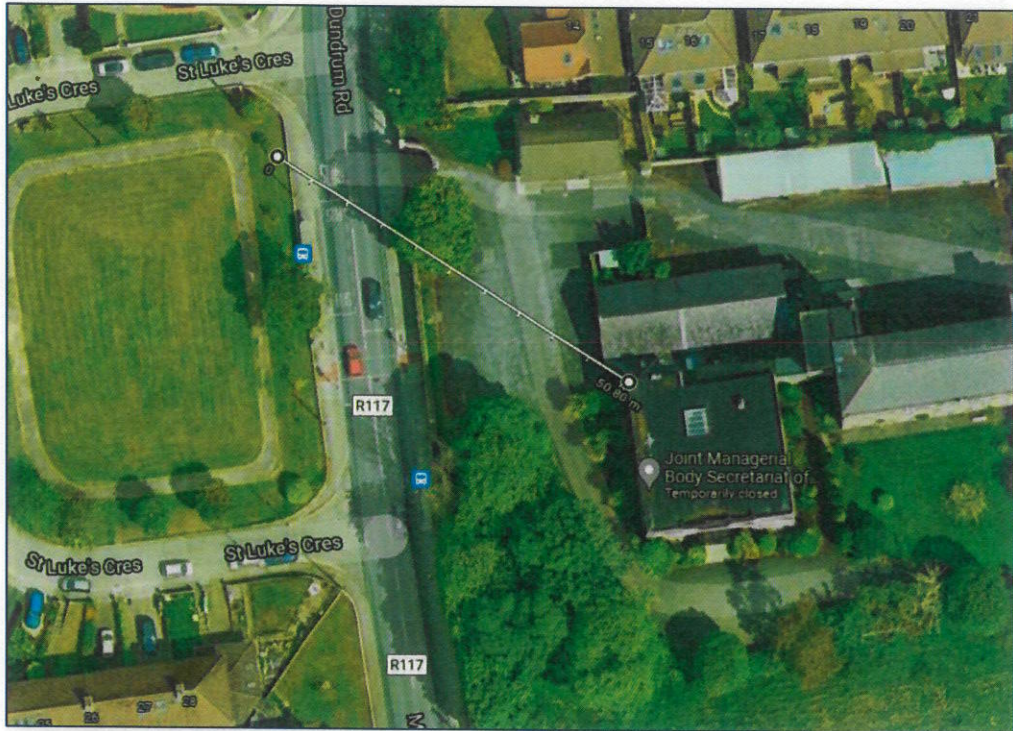
**Fig No.10** Extract from DLR Development Plan 2016-22 zoning map (Map No.1).

#### **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.

There is a Protected Structure to the east of the site at a distance of c.50m - RPS Ref. 18 (Emmet House). The primary façade of the Protected Structure faces south. The Protected Structure is screened from the site by a notably high boundary wall and a mature tree and together with the distance involved, it is

considered that the proposed development will not have a material negative impact on the character or setting of this Protected Structure.



**Fig Nos. 11 & 12** Location of Protected Structure to east of the site (c.50m) and current screening that exists.



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.

### **County Development Plan, 2022-2028**

Material Alterations to the Dún Laoghaire-Rathdown County Council Draft County Development Plan, 2022-2028 went on public display for an 8 week period from Thursday 11th November, 2021 to Monday 17th January, 2022.

The 'F' zoning objective for the site remains the same under this new Plan.

## **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 **5 no. Visual Reference Points** have been identified within a 107m radius of the site.

VRPs 1 -3 are taken from Dundrum Road, at distances of 107m, 80m and 34m, respectively, with VRP being a direct view of the proposed site. The pole and cabinet are visible from these locations. VRPs 4 & 5 are also taken from Dundrum Road at distances of 38m and 87m respectively. The pole is visible from these locations. Given the established context provided by the receiving environment which comprises lamp posts and street lights, 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.

## 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 will not be an incongruous insertion into the streetscape. 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. 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.

Established street poles, street lights and backdrop street trees have the effect of absorbing the proposed structure from many of the viewpoints.

The proposed pole structure and cabinet, which are proposed for this spatial context is a more stream-lined and sleek version of the structures, which were initially rolled out under the Section 254 Licence process. The proposed structure/equipment is testament to the objective of the Cellnex Company, Cignal, 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 St Lukes Crescent, Milltown, Dublin 14.

The principle of the proposed 15m streetpole structure has been accepted by numerous planning authorities and An Bord Pleanala, since the enactment of the legislation.

It is respectfully submitted that policy cited under the Dunlaoghaire Rathdown County Development Plan, 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 Dun Laoghaire Rathdown County Development Plan 2016-2022 clearly recognises the importance of the development of a high-quality telecommunications network and allows for same under the 'F' zoning objective. This same 'F' zoning objective still applies to the lands under the draft version of the new county development plan being prepared.

The proposed 15 metre streetpole solution will provide for optimum coverage as required in an area where there is a noted dearth in coverage. Additionally, given the current Covid 19 crisis, the newly acquired practices of wholesale 'Working from Home' have placed increasing demands on the network as noted by Government in recent Circulars and associated actions. It is also widely accepted that 'Working from Home' practices will become the new norm for a

significant time period into the future. Therefore, the immediate urgency of this type of telecommunications infrastructure to address coverage gaps in the network, in addition to increased demand, has never been so crucial to the ongoing economic and sustainable development of the Country.

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

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

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

The proposed development is also consistent with the main thrust of the Regional Assembly (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. Finally, the planning authority is also requested to consider the suitability of this type of spatial context for this infrastructure generally, i.e. arterial transport route/ proximate to nearby junction.

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

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

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

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



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



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](http://www.siteviewer.ie)) show that the levels of EMF radiation from mobile telecoms masts in Ireland ranges between 0.5-3V/m, well within the safe exposure limits advised by international experts.

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

**Internal Documentation References:**

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

**Statement Prepared By:** [REDACTED]

**Date:** 12/07/17



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

9<sup>th</sup> 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 28<sup>th</sup> 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

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: 4<sup>th</sup> Floor, 25-28 Adelaide Road, Dublin 2, Ireland, D02 RY98. Directors: [REDACTED]



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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,



Client Advisor  
Marsh Ireland Brokers Ltd

Direct Dial: [REDACTED]

E-mail: [REDACTED]

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

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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: Cignal Infrastructure Ltd**

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

An Authorised Person may:

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

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

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

Block DEF, Abbey Court, Irish Life Centre, Lower Abbey St, Dublin 1  
Bloc DEF, Cúirt na Mainistreach, Ionad Irish Life, Sraid Na Mainistreach locht, Baile Atna 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**

[Redacted]

**Name:**

[Redacted]

**Title/Position:**

**Analyst – Market Framework Division**

**Date:**

**3 March 2016**

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

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

E = 716066.986, N = 731433.376

### 15m Alpha 2.0 STREETPOLE

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#### NOT FOR CONSTRUCTION

Project Name: **15m Alpha 2.0 STREETPOLE**  
 Project Number: **DN\_3280**  
 Client: **DELMEC**  
 Date: **25.05.2022**

Scale: **1:1000**  
 Drawing No: **DN\_1668-100**  
 Revision: **F**  
 Date: **25.05.2022**



No.	Revision	Date	By	Clad
F	REVISED	25/05/22		
E	REVISED	19/12/21		
D	REVISED	28/08/21		
Cd	FINAL DESIGN/REVISIONS MADE IN RESPONSE TO CLIENT COMMENTS	07/07/21		
B	REVISED LOCATION	04/12/20		
A	INITIAL DESIGN	04/10/20		
A	PLANNING	04/10/20		

## DELMEC

20 Ballycane Business Park, Slattery Road, Danganooon, Carlow, R65 E907, Rep. of Ireland.



Cellnex Infrastructure Ltd, Suite 011, 13 Home, 76 Phoenix Place, Sandyford Industrial Estate, Dublin 18, D18 YV90, IRELAND.



James Redmond and Associates Consulting Engineers, 21 Lower Mount, Portlaoine, Co. Laois, R62 0021. Phone: +353 (0) 57 884215. Website: www.jra.ie Email: info@jra.ie

## PLANNING

Client site ID: **CIG-03622**

Operator site ID: **DN\_3280**

Site Name: **MILLTOWN CHIMNEY**

Site Address: **MILLTOWN CHIMNEY  
MILLTOWN  
DUBLIN 6**

Title: **CELLNEX SMART STREETPOLE  
SITE LOCATION MAP**

Designed: **DN** Date: **25.05.2022**

Drawn: **DN** Scale: **1:1000** Rev: **F**

Draw No: **DN\_1668-100**

DWG LOCATION: **CELLNEX SMART STREETPOLE SITE LOCATION MAP**

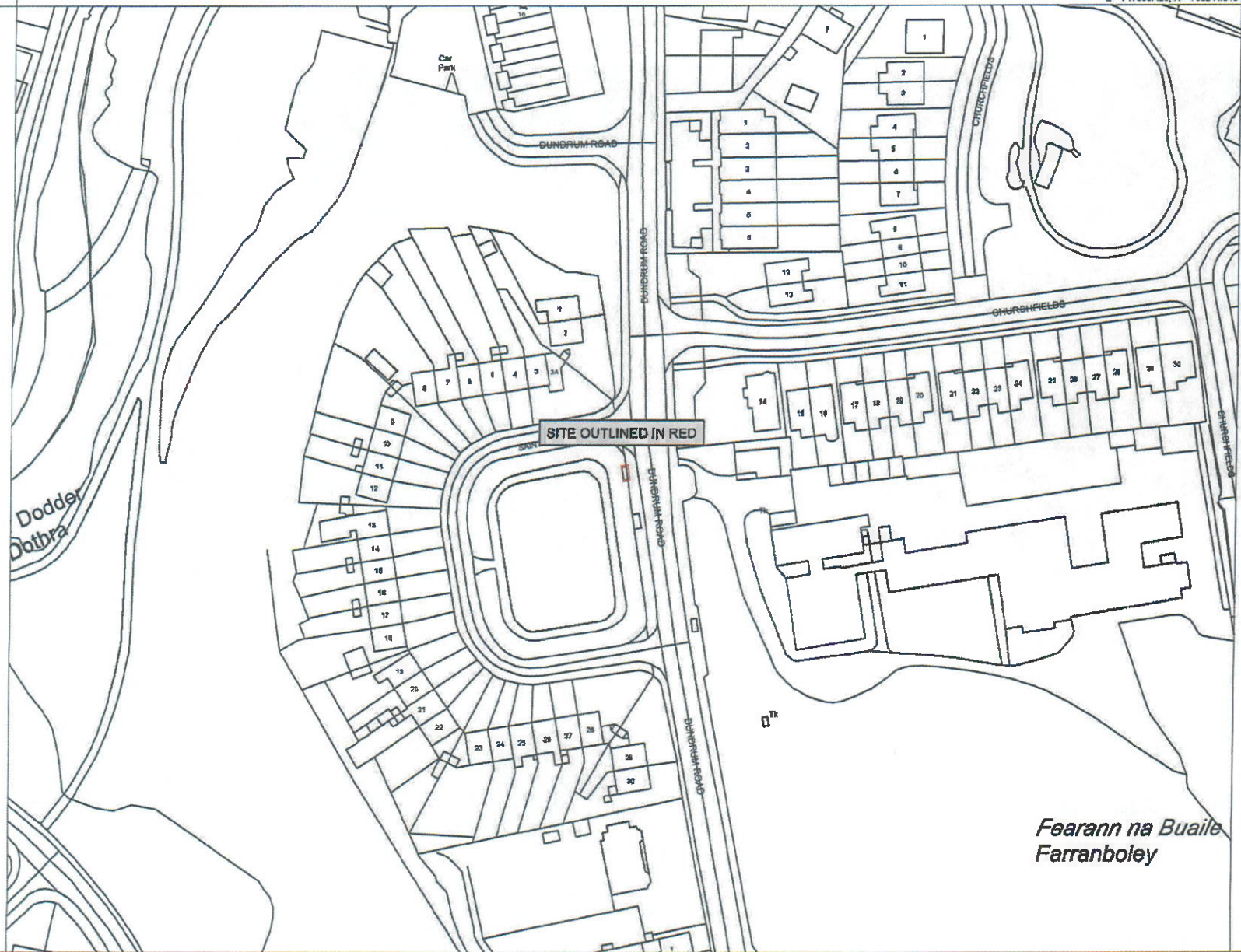


SITE OUTLINED IN RED

E = 716131.973, N = 728760.807

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E = 717006.428, N = 730244.810



E = 716686.858, N = 729976.616

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**NOT FOR CONSTRUCTION**

Client: Digital Communications Ltd (DCL)  
Project: Milltown Chimney (MC)  
Site Name: Milltown Chimney  
File Name: Milltown Chimney (MC)\_01.dwg  
Site Area: 1,000.00 sq.m  
Site Bound / Area of Interest (AOI):  
Easting: 716686.858, Northing: 729976.616  
Proposed / Actual Address:  
Proposed: Milltown Chimney, Farranboley  
Actual: Milltown Chimney, Farranboley  
Scale: 1:1000  
Date: 01/10/2023  
Author: JRA  
Checked: JRA  
Approved: JRA  
Revision: 1.0



No.	Revision	Date	By	Chk
1	ISSUE FOR CONSTRUCTION	01/10/23	JRA	JRA
2	REVISED LOCATION	01/10/23	JRA	JRA
3	REVISED LOCATION	01/10/23	JRA	JRA
4	REVISED LOCATION	01/10/23	JRA	JRA
5	REVISED LOCATION	01/10/23	JRA	JRA
6	REVISED LOCATION	01/10/23	JRA	JRA
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18	REVISED LOCATION	01/10/23	JRA	JRA
19	REVISED LOCATION	01/10/23	JRA	JRA
20	REVISED LOCATION	01/10/23	JRA	JRA
21	REVISED LOCATION	01/10/23	JRA	JRA
22	REVISED LOCATION	01/10/23	JRA	JRA
23	REVISED LOCATION	01/10/23	JRA	JRA
24	REVISED LOCATION	01/10/23	JRA	JRA
25	REVISED LOCATION	01/10/23	JRA	JRA
26	REVISED LOCATION	01/10/23	JRA	JRA
27	REVISED LOCATION	01/10/23	JRA	JRA
28	REVISED LOCATION	01/10/23	JRA	JRA
29	REVISED LOCATION	01/10/23	JRA	JRA
30	REVISED LOCATION	01/10/23	JRA	JRA
31	REVISED LOCATION	01/10/23	JRA	JRA
32	REVISED LOCATION	01/10/23	JRA	JRA
33	REVISED LOCATION	01/10/23	JRA	JRA
34	REVISED LOCATION	01/10/23	JRA	JRA
35	REVISED LOCATION	01/10/23	JRA	JRA
36	REVISED LOCATION	01/10/23	JRA	JRA
37	REVISED LOCATION	01/10/23	JRA	JRA
38	REVISED LOCATION	01/10/23	JRA	JRA
39	REVISED LOCATION	01/10/23	JRA	JRA
40	REVISED LOCATION	01/10/23	JRA	JRA
41	REVISED LOCATION	01/10/23	JRA	JRA
42	REVISED LOCATION	01/10/23	JRA	JRA
43	REVISED LOCATION	01/10/23	JRA	JRA
44	REVISED LOCATION	01/10/23	JRA	JRA
45	REVISED LOCATION	01/10/23	JRA	JRA
46	REVISED LOCATION	01/10/23	JRA	JRA
47	REVISED LOCATION	01/10/23	JRA	JRA
48	REVISED LOCATION	01/10/23	JRA	JRA
49	REVISED LOCATION	01/10/23	JRA	JRA
50	REVISED LOCATION	01/10/23	JRA	JRA

**DELMEC**  
20 Barrowville Business Park, Bally Road,  
Dublin 15, Co. Dublin, Ireland  
Tel: 01 856 8877

**cellnex**  
Driving Telecom Connectivity  
Signal Infrastructure Ltd.  
Suite 311, O'Connell Street West, Dublin 6,  
D06 Y006, IRELAND

**JRA**  
Consulting Engineers  
2000 National Road, Portlaoise, Co. Laois, E23 B2KH  
Phone: +353 02 27 882225  
Website: www.jra.ie

## PLANNING

Signal site ID: CIG-03622

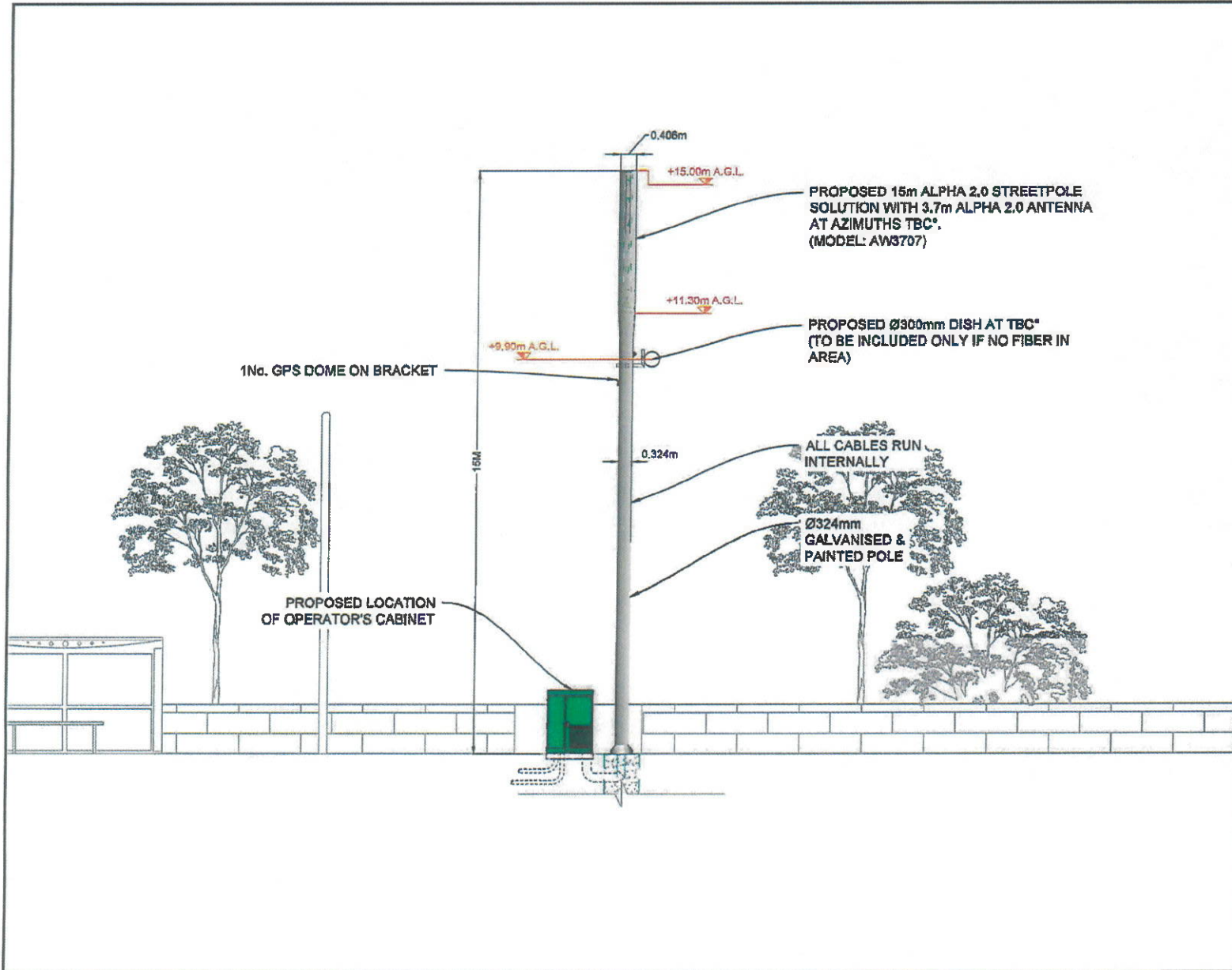
Operator site ID: DN\_3280

Site Name: MILLTOWN CHIMNEY

Site Address:  
MILLTOWN CHIMNEY  
MILLTOWN  
DUBLIN 6

Title:  
CELLNEX SMART STREETPOLE  
SITE LOCATION PLAN

Designed: JRA Date: 01/10/23  
Drawn: JRA Scale: 1:1000 Rev: F  
Dwg No.: DN\_1668-102



**ELEVATION**  
SCALE 1:100

**15m Alpha 2.0 STREETPOLE**

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**NOT FOR CONSTRUCTION**

F	PERMISSION	15/02/22		
E	PERMISSION	14/02/21		
D	PERMISSION	10/02/21		
401	THE CABINET AND TELECABINET ARE SIZES OF NETWORK CABLE	20/02/22		
B	ISSUED LOCATION	08/02/21		
A	ISSUED ISSUE	08/02/21		
A	PLANNING	08/02/21		
No.	Revision	Date	By	Cltd

**DELMEC**

10 Carronville Business Park, Steady Road,  
Drogheda, Co. Dub., N91 43W7,  
Rep. of Ireland.



Cellnex Infrastructure Ltd.  
Bally 211, Cl. House, 75 Paddy Road,  
Qualified Individual Estate, Dublin 14,  
D18 YV5L, IRELAND.



JRA Consulting Engineers  
James Robinson and Associates Consulting Engineers  
8 Lismore Court, Park Drive, Co. Louth, R22 1R2H  
Phone: +353 (0) 47 6882252  
Website: www.jra.ie Email: info@jra.ie

**PLANNING**

Signal site ID: CIG-03622

Operator site ID: DN\_3280

Site Name: **MILTOWN CHIMNEY**

Site Address:  
**MILTOWN CHIMNEY  
MILTOWN  
DUBLIN 6**

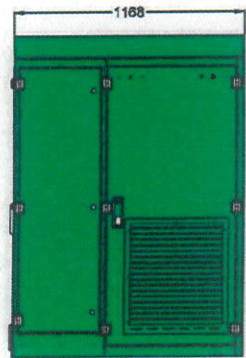
Title:  
**CELLNEX SMART STREETPOLE  
ELEVATION**

Designed: [ ] Date: 25.05.2022

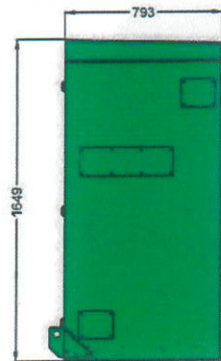
Drawn: [ ] Scale: 1:100 Rev: F

Dwg No. **DN\_1668-103A**

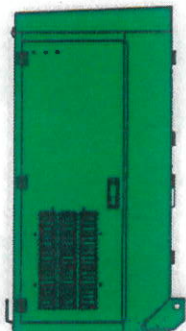




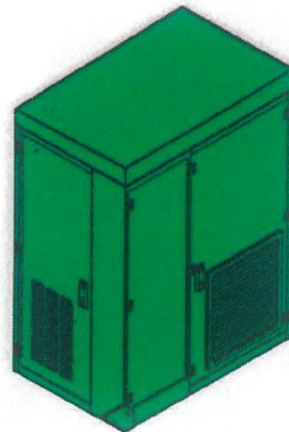
FRONT VIEW



R/H SIDE VIEW



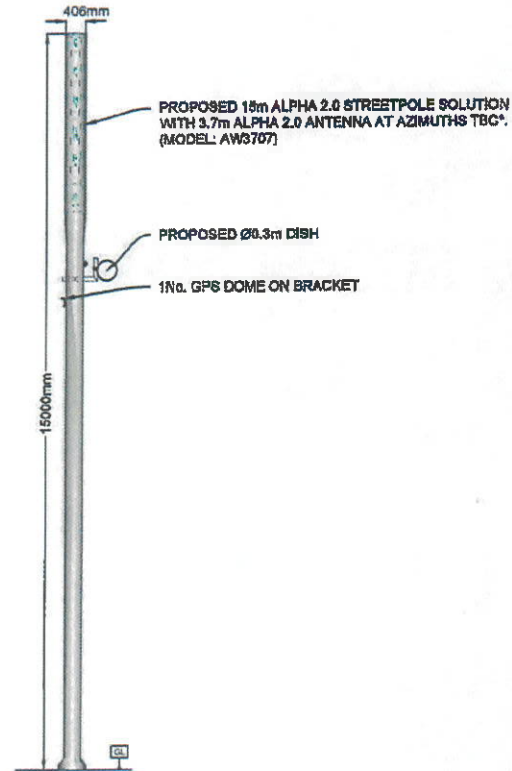
L/H SIDE VIEW



ISO. VIEW

**CABINET DETAILS**

SCALE 1:25



**TYPICAL POLE**

SCALE 1:100

**15m Alpha 2.0 STREETPOLE**

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**NOT FOR CONSTRUCTION**

F	PERIODIC	25/06/22	
E	PERIODIC	10/10/21	
D	PERIODIC	24/06/21	
REV	FINAL CABINET FOLLOWING REVISIONS BY JRA	02/06/21	
B	REVISED LOCATION	08/12/19	
A	INITIAL ISSUE	08/10/19	
A	PLANNING	08/10/19	
No.	Revision	Date	By

**DELMEC**

3D Barrowlands Business Park, Sandy Road, Clonsilla, Co. Wick, R93 ED97, Rep. of Ireland.

**cellnex**  
*driving ideas, connectivity*  
 Signal Infrastructure Ltd.  
 Suite 215, 23 Hogan, 70 Parnell Road,  
 Roselind Industrial Estate, Dublin 14,  
 D16 YV66, IRL/IND.

**JRA**  
 Consulting Engineers  
 Senior Technical and Associates Consulting Engineers  
 3 Leonard Court, Parklands, Co. Linn, N16 1K21  
 Phone: +353 (0) 1 852 2110  
 Website: www.jra.ie Email: info@jra.ie

**PLANNING**

Signal site ID: **CIG-03622**

Operator site ID: **DN\_3280**

Site Name: **MILLTOWN CHIMNEY**

Site Address: **MILLTOWN CHIMNEY  
 MILLTOWN  
 DUBLIN 6**

Title: **STANDARD ELEVATION AND DETAILS  
 SCHEMATIC ELEVATION**

Designed: [ ] Date: 15.05.2022

Drawn: [ ] Scale: A1 Rev: F

Dwg No. **DN\_1688-105**

DNW LOCATION: [ ]



**UNDERGROUND SERVICES**  
SCALE 1:100

**15m Alpha 2.0 STREETPOLE**

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**NOT FOR CONSTRUCTION**



1	ISSUED FOR PERMIT	08/2018		
2	ISSUED FOR PERMIT	10/2018		
3	ISSUED FOR PERMIT	10/2018		
001	PRELIMINARY PROVISIONS AS ISSUED BY DELMEC	08/2018		
0	ISSUED FOR PERMIT	08/2018		
A	ISSUED FOR PERMIT	08/2018		
J	ISSUED FOR PERMIT	08/2018		
No.	Revision	Date	By	Chk

**DELMEC**

50 Rossmore Business Park, Killy Road,  
Kilgarriff, Co. Wick, R54 2W7,  
Rep. of Ireland.



Cellnex Infrastructure Ltd.  
Suite 211, O'Connell St. Upper, Dublin 16,  
D16 Y980, IRELAND.

**Jason Redmond & Associates Consulting Engineers**

Old Crowland  
Project Management  
8 Limerick Court, Portlaoise,  
Co. Laois.  
PH: 05780 91140  
Email: info@jra.ie

Signal site ID	CKG_01600
Operator site ID	DN_1688

Site Name  
**MILTOWN CHIMNEY, MILTOWN  
DUBLIN 8**

Title  
**CRONAL SMART STREETPOLE  
ELEVATIONS**

Designed		Date	08/2018
Drawn		Scale	1:100 Rev. F
Dwg No.	DN_1688-501		
Dep location:			

# 15m Alpha 2.0 STREETPOLE

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NOT FOR CONSTRUCTION



C	ISSUED FOR CONSTRUCTION	15/03/21		
D	REVISED LOCATION	20/06/21		
CH	FINAL DIMENSIONS AND PLACEMENT LOCATIONS IN THE WORKING DRAWING	03/06/21		
S	REVISED LOCATION	05/12/20		
A	INITIAL DESIGN	05/11/20		
A	PLANNING	05/11/20		
No.	Revision	Date	By	Clkd

## DELMEC

10 Borrowdale Business Park, Shesky Road  
 Galleguonaven, Co. Wick, W93 8W7,  
 Rep. of Ireland.



Signal Infrastructure Ltd.  
 Suite 211, O'Hanlon, 76 Purge Road,  
 Sandyford Industrial Estate, Dublin 18,  
 D18 YU60, IRELAND.

Jason Redmond & Associates Consulting Engineers

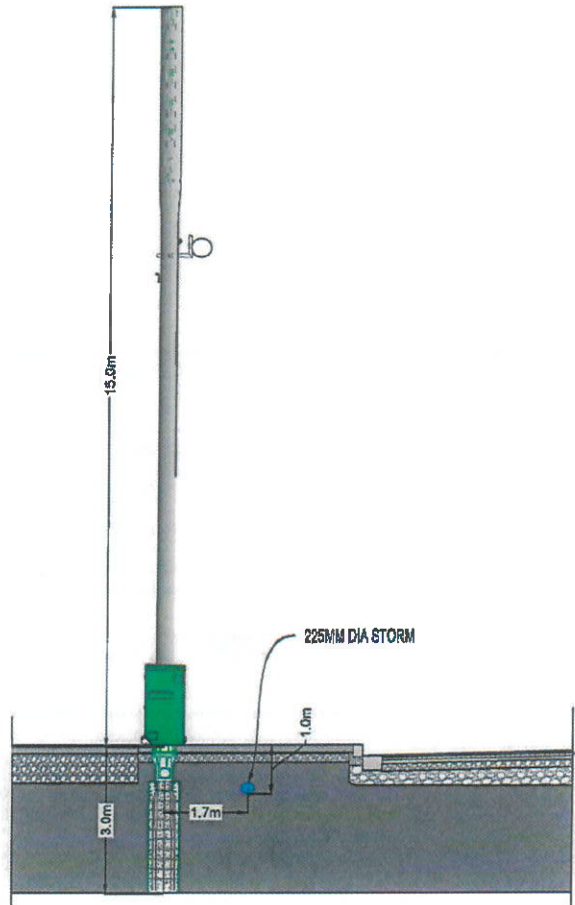
Civil Structural  
 Project Management  
 5 Linnard Court, Portlaoine,  
 Co. Laois  
 PH: 05786 61155  
 Email: info@jra.ie

Signal site ID	CIG_01600
Operator site ID	DN_1668

Site Name  
**MILLTOWN CHIMNEY, MILLTOWN  
 DUBLIN 8**

Title  
**SIGNAL SMART STREETPOLE  
 ELEVATIONS**

Designed		Date	04/03/2021
Drawn		Scale	1:100
Drawn No.	DN_1668-501	Rev.	E
Drawn Location			



**UNDERGROUND SERVICES**  
 SCALE 1:100



# 15m Alpha 2.0 STREETPOLE

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**NOT FOR CONSTRUCTION**

No.	Revision	Date	By	Clk
E	REVISION	09/2021		
D	REVISION	20/06/21		
CW	FINAL CHECK AND PRELIMINARY APPROVED SHEET WITH 20210525	09/06/21		
B	ISSUED LOCATION	09/06/21		
A	INITIAL ISSUE	09/06/21		
A	PLANNING	09/06/21		

## DELMEC

36 Riverwalk Parkland Park, Shany Road,  
 16th Floor, Dublin, D08 B9W7,  
 Rep. of Ireland.



Jason Redmond & Associates Consulting Engineers



Signal site ID: **CIG\_01600**  
 Operator site ID: **DN\_1668**

Site Name  
**MILTOWN CHIMNEY, MILTOWN  
 DUBLIN 6**

Title  
**SIGNAL SMART STREETPOLE  
 VRP INFORMATION**

Designed: [ ] Date: 03/06/21  
 Drawn: [ ] Scale: 1:1 Rev: E

Dwg No. **DN\_1668-VRP INFORMATION**



VRP2 - WITHOUT SOLUTION IN PLACE



VRP2 - WITH SOLUTION IN PLACE

### 15m Alpha 2.0 STREETPOLE

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**NOT FOR CONSTRUCTION**

E	REVISIONS	12/2021		
D	REVISIONS	10/2021		
CD	FILE NAME AND FILE LOCATION AS USED IN THE SYSTEMS	10/2021		
B	ISSUED LOCATION	05/2021		
A	ISSUABLE	05/2021		
A	PLANNING	05/2021		
No.	Revision	Date	By	Clk

## DELMEC

28 Surquatin Business Park, Sandy Road,  
 16th Floor, Dublin, D04 R0W7,  
 Rep. of Ireland.



Jason Redmond & Associates Consulting Engineers

**CRM Specialist**  
 Project Management  
 6 Lismont Court, Portlaoise,  
 Co. Dub.  
 POC: 05756 01156  
 Email: info@jrac.ie

Signal site ID **CIG\_01600**

Operator site ID **DN\_1668**

Site Name  
**MILLTOWN CHIMNEY, MILLTOWN  
 DUBLIN 8**

Title  
**SIGNAL SMART STREETPOLE  
 VRP 2**

Designed  Date 12/2021  
 Drawn  Scale 1:1 Rev. E

Dwg No. **DN\_1668-122**

Any location/ use subject to site survey and planning approval.



VRP4 - WITHOUT SOLUTION IN PLACE



VRP4 - WITH SOLUTION IN PLACE

### 15m Alpha 2.0 STREETPOLE

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1	ISSUED FOR PERMIT	01/2021		
2	ISSUED FOR PERMIT	02/2021		
3	ISSUED FOR PERMIT	03/2021		
4	ISSUED FOR PERMIT	04/2021		
5	ISSUED FOR PERMIT	05/2021		
6	ISSUED FOR PERMIT	06/2021		
7	ISSUED FOR PERMIT	07/2021		
8	ISSUED FOR PERMIT	08/2021		
9	ISSUED FOR PERMIT	09/2021		
10	ISSUED FOR PERMIT	10/2021		
11	ISSUED FOR PERMIT	11/2021		
12	ISSUED FOR PERMIT	12/2021		
No.	Revision	Date	By	Chk

### DELMEC

20 Riverside Business Park, Slater Road,  
 Glasnevin, Dublin, D15 E2W7,  
 Rep. of Ireland.

**cellnex**  
*driving telecom connectivity*  
 Cignal Networks Ltd.  
 Suite 311, 43 Mount, 76 Paddy Road,  
 Knocklyon Industrial Estate, Dublin 16,  
 D18 YV6A, IRELAND.

**Jason Redmond & Associates Consulting Engineers**

**Civil Structural  
 Project Management  
 & Litigation Court, Portlaoine,  
 Co. Louth  
 Tel: 047 875 8165  
 Email: info@jra.ie**

Signal site ID: **CIG\_01600**  
 Operator site ID: **DN\_1668**

Site Name:  
**MILLTOWN CHURNEY, MILLTOWN  
 DUBLIN 6**

Title:  
**SIGNAL SMART STREETPOLE  
 VRP 4**

Designed: [ ] Date: 15/08/21  
 Drawn: [ ] Scale: M Rev: E  
 Draw No. **DN\_1668-124**

E = 718996.006, N = 791439.378



SITE OUTLINED IN RED

### 15m Alpha 2.0 STREETPOLE

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#### NOT FOR CONSTRUCTION

Drawn by: **DelmeC Engineering Model (000)**  
 Project / Drawing: **DelmeC Alpha 2.0 (00)**  
 Date Issued / Reference: **15/03/2017**  
 File Name: **DelmeC Alpha 2.0 (00).DWG**  
 File Size: **1,200,000 Bytes**  
 Date of Issue / Issue No: **15/03/2017**  
 Issue No: **001**  
 Issue Date: **15/03/2017**  
 Issue Description: **Issue 001 - Initial Issue**  
 Issue No: **001**  
 Issue Date: **15/03/2017**  
 Issue Description: **Issue 001 - Initial Issue**  
 Issue No: **001**  
 Issue Date: **15/03/2017**  
 Issue Description: **Issue 001 - Initial Issue**



E	REVISION	15/03/2017		
D	REVISION	15/03/2017		
DN	REV. 001	15/03/2017		
S	REVISION	15/03/2017		
A	REVISION	15/03/2017		
P	REVISION	15/03/2017		
No.	Revision	Date	By	Clad

## DELMEC

10 Barrowfield Business Park, Slough Road, Gallogreen, Carlow, RD5 E9W7, Co. of Ireland.



City & Infrastructure Ltd, Suite 311, O'Connell's, 78 Parnell Road, Ballsbridge Park, Dublin 4, D08 Y166, IRELAND.

#### Jason Redmond & Associates Consulting Engineers

City & Infrastructure Ltd, Suite 311, O'Connell's, 78 Parnell Road, Ballsbridge Park, Dublin 4, D08 Y166, IRELAND.

## PLANNING

Signal site ID: **CIG-01600**

Operator site ID: **DN 1668**

Site Name: **MILDTOWN CHIMNEY, MILDTOWN DUBLIN 6**

Title: **CELLNEX SMART STREETPOLE SITE LOCATION MAP**

Designed: **[ ]** Date: **28/03/2017**

Drawn: **[ ]** Scale: **1:1000** Rev: **E**

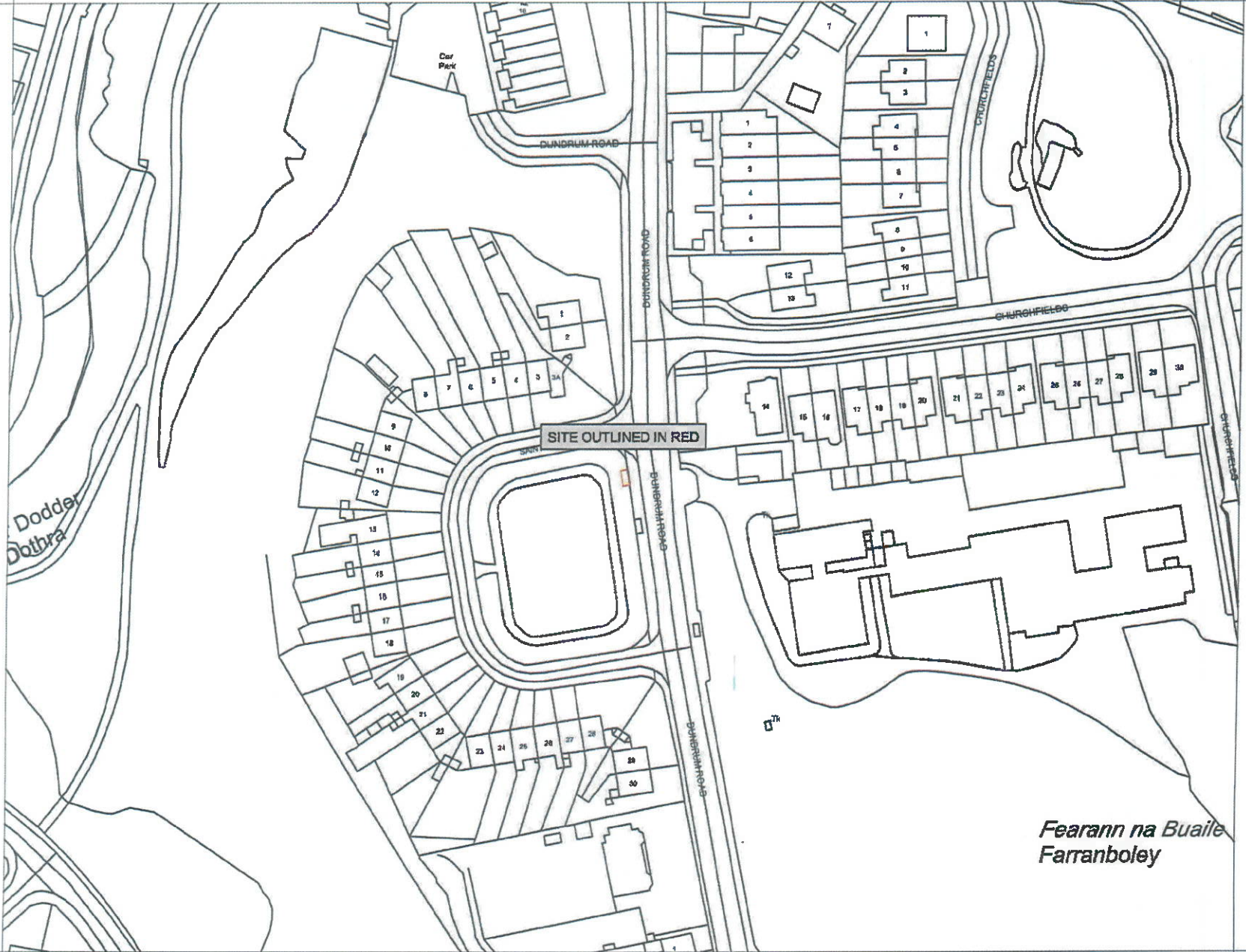
Dwg No. **DN 1668-100**

DN1 LOCATION: **[ ]**

E = 715131.973, N = 728790.837

Ordnance Survey Ireland Licence No. 01 600001  
Ordnance Survey Ireland/Department of Ireland  
Copyright

E = 717006.428, N = 730244.810



E = 716686.658, N = 729076.518

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**15m Alpha 2.0 STREETPOLE**

Not suitable for use with a conventional network. It requires a dedicated network (MPLS or SD-WAN) or a cloud-managed network (SD-WAN or SD-WAN).

NOT FOR CONSTRUCTION

Scale: 1:1000  
 Author: JRA  
 Date: 12/11/2021  
 Project: 15m Alpha 2.0 Streetpole  
 Location: Milltown Chimney, Milltown Dublin 6  
 Drawing No: DN 1668-102  
 Scale: 1:1000  
 Date: 12/11/2021



Code	Description	Date	By	Check
E	REVISION	12/11/2021		
D	REVISION	12/11/2021		
C1	REVISED AND CHECKED BY JRA	02/02/22		
3	REVISED LOCATION	02/02/22		
A	INITIAL ISSUE	02/02/22		
A	PLANNING	02/02/22		

**JELMEC**

10 Barnmore Business Park, Sionty Road,  
 Gallopscross, Carlow, R53 1367,  
 Rep. of Ireland.

**cellnex**  
 driving wireless connectivity  
 Cellnex Infrastructure Ltd,  
 Suite 211, Clonsilla, 78 Parnell Road,  
 Koyamohill, Dublin 16,  
 D16 YW60, IRELAND.

**Jason Redmond & Associates Consulting Engineers**

Civil Structural  
 Project Management  
 5 Linnard Court, Portlaoise,  
 Co. Lodi,  
 PH: 05750 81155  
 Email: info@jra.ie

**PLANNING**

Signal site ID: **CIG-01600**  
 Operator site ID: **DN\_1668**

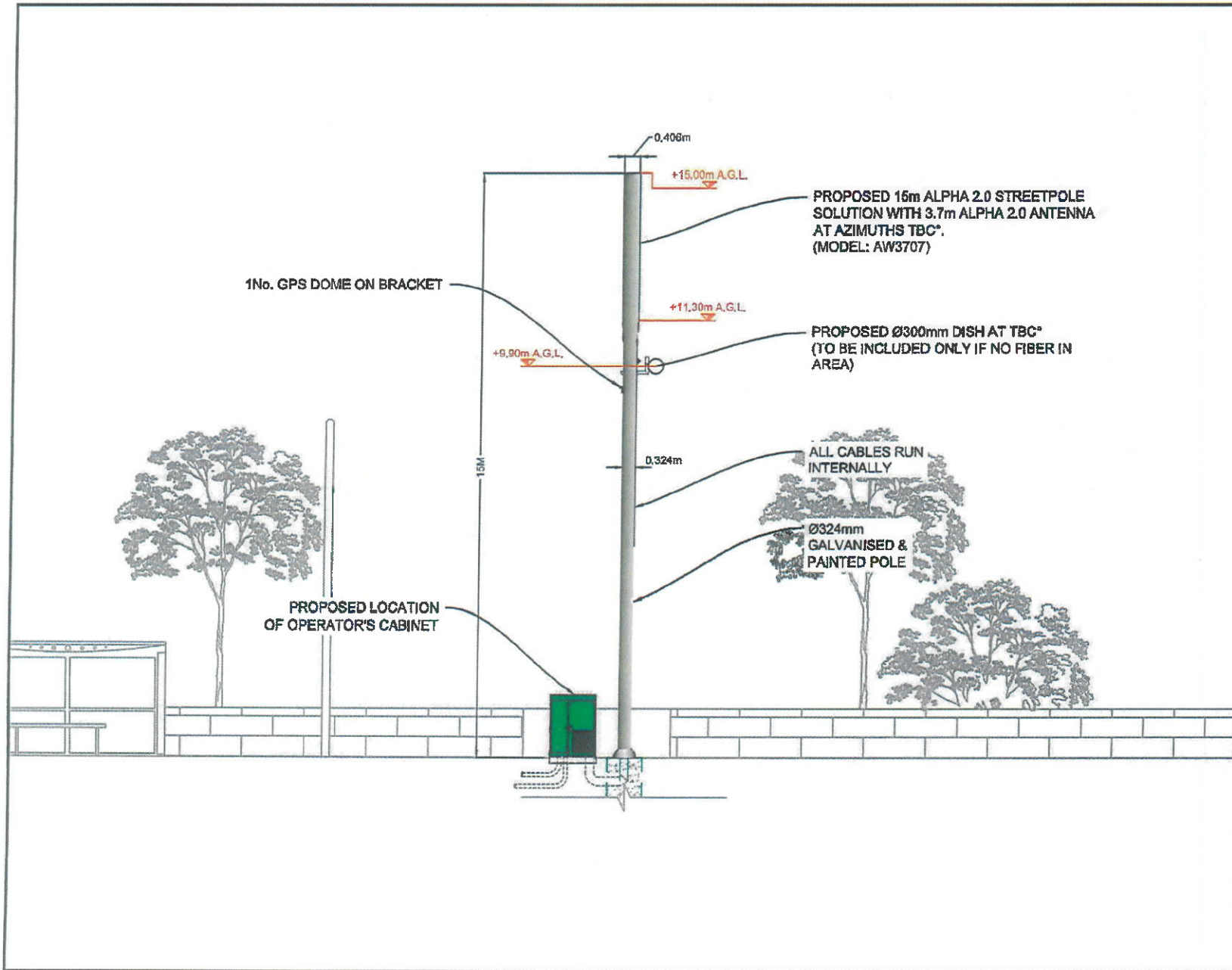
Site Name:  
**MILLTOWN CHIMNEY, MILLTOWN  
 DUBLIN 6**

Title:  
**CELLNEX SMART STREETPOLE  
 SITE LOCATION PLAN**

Designed: [ ] Date: 21/11/21  
 Drawn: [ ] Scale: 1:1000 Rev: E  
 Draw No.: DN 1668-102

ORIGIN: [ ]





1No. GPS DOME ON BRACKET

PROPOSED 15m ALPHA 2.0 STREETPOLE SOLUTION WITH 3.7m ALPHA 2.0 ANTENNA AT AZIMUTHS TBC\*. (MODEL: AW3707)

PROPOSED Ø300mm DISH AT TBC\* (TO BE INCLUDED ONLY IF NO FIBER IN AREA)

ALL CABLES RUN INTERNALLY

Ø324mm GALVANISED & PAINTED POLE

PROPOSED LOCATION OF OPERATOR'S CABINET

**ELEVATION**  
SCALE 1:100

**15m Alpha 2.0 STREETPOLE**

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NOT FOR CONSTRUCTION

1	15/01/2018	1/01/2018			
2	15/01/2018	15/01/2018			
3	REV. DATE 15/01/2018 (15/01/2018) 20/01/2018	20/01/2018			
4	REVISED LOCATION	09/12/18			
5	INITIAL ISSUE	05/11/18			
6	PLANNING	05/11/18			
No.	Revision	Date	By	Chk	

**JELMEC**

10 Harrowick Business Park, Steady Road,  
Galleguagh, Carrigrohane, B55 2XZ, Co. Wick, Ireland.

**cellnex**  
driving *the* connectivity

Digital Infrastructure Ltd,  
Suite 211, O'Connell's, 76 Parnass Road,  
Sandymount Industrial Estate, Dublin 11,  
D18 YV68, IRELAND.

Jason Redmond & Associates Consulting Engineers

Chief Structural  
Project Management  
8 Lismore Court, Portlaoise,  
Co. Laois,  
PH 05798 81155  
Email: jred@jra.ie

**PLANNING**

Signal site ID CIG-01600

Operator site ID DN\_1668

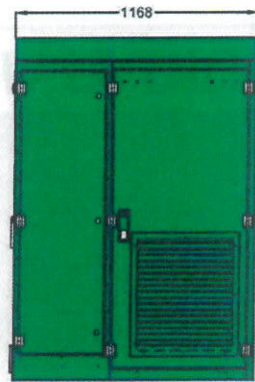
Site Name  
MILTOWN CHIMNEY, MILTOWN  
DUBLIN 8

Title  
CELLNEX SMARTKET STREETPOLE  
ELEVATION

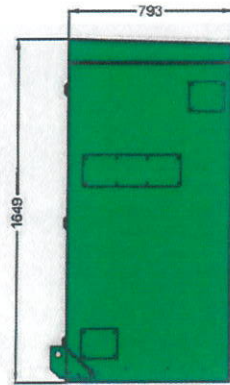
Designed [ ] Date 29.01.2018

Drawn [ ] Scale 1:100 Rev. E

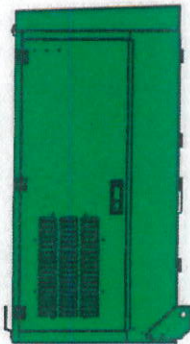
Dwg No. DN 1668-103A



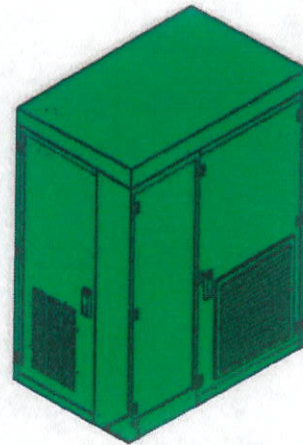
FRONT VIEW



R/H SIDE VIEW



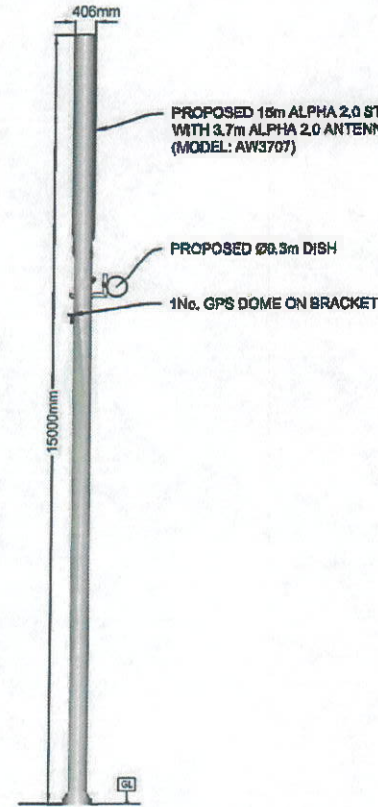
L/H SIDE VIEW



ISO. VIEW

**CABINET DETAILS**

SCALE 1:25



**TYPICAL POLE**

SCALE 1:100

**15m Alpha 2.0 STREETPOLE**

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CONTRACT NO. 15/16/17/18/19/20/21/22/23/24/25/26/27/28/29/30/31/32/33/34/35/36/37/38/39/40/41/42/43/44/45/46/47/48/49/50/51/52/53/54/55/56/57/58/59/60/61/62/63/64/65/66/67/68/69/70/71/72/73/74/75/76/77/78/79/80/81/82/83/84/85/86/87/88/89/90/91/92/93/94/95/96/97/98/99/100

PROJECT NO.

NOT FOR CONSTRUCTION

E	REVISION	18/01		
D	ISSUED FOR	13/01		
C	REV. DATE	10/01		
B	REV. DATE	09/01		
A	REV. DATE	08/01		
	REV. DATE	07/01		
	REV. DATE	06/01		
	REV. DATE	05/01		
	REV. DATE	04/01		
	REV. DATE	03/01		
	REV. DATE	02/01		
	REV. DATE	01/01		
No.	Revision	Date	By	Clk

**DELMEC**

23 Borrowdale Business Park, Clontarf, Co. Dublin, D15 E3W7, Rep. of Ireland.



Client Infrastructure Ltd, Suite 211, G House, 78 Finsboro Road, Sandyford Industrial Estate, Dublin 18, D18 YV80, IRELAND.

**Jason Redmond & Associates Consulting Engineers**

Chief Structural  
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**PLANNING**

Signal site ID CIG-01600

Operator site ID DN\_1688

Site Name  
**MILLTOWN CHIMNEY, MILLTOWN DUBLIN 6**

Title  
**CELLNEX SMART MARKET STREETPOLE STANDARD ELEVATION AND DETAILS**

Designed	Date	18/01/2017
Drawn	Scale	1:100
Dwg No.	Rev.	E

Dwg No. DN 1688-105

**Licence Number: CRM 246854**

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

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

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

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Dún Laoghaire-Rathdown County Council ("the Council") grants to

Signal Infrastructure Ltd. ("the Licensee")

a Licence to place and maintain 1 Telecommunications Cabinet  
measuring externally 1.527m<sup>3</sup> (0.793mL × 1.168mW × 1.649mH),  
and a pole area 0.082m<sup>2</sup> (height 15m)

subject to a minimum footpath clearance of 1.8m and the General Licence Conditions  
pertaining to the issue of this licence (see reverse) at the

**Dundrum Road near its west side junction with St. Luke's Crescent, Milltown, Dublin 14**

**Underwriter:** XL Insurance Company SE

**Public Liability Insurance:** Policy no. [REDACTED] Expiry Date: 28.02.2023

**Date of grant of licence:** 14/06/2022

**Expiry date of licence:** 13/06/2027

*James Phelan*

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**Senior Engineer**

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



The decision by the Council to grant a licence to the Licensee is made subject to the following conditions:

1. *Plans and Particulars* - The telecommunications street pole and associated operator cabinet shall be installed and completed in its entirety fully in accordance with the plans, particulars and specifications lodged with this Section 254 licence application, save as may be required by the other conditions set out in this licence, and the height and other dimensions as specified in those particulars shall not be exceeded.
2. The road network visibility or operation shall not be impacted or hindered by placement of tower at the proposed location.
3. The public footpath and bus stop shelter at the proposed location shall not be impacted or obstructed by the installation, inclusive of the opening of cabinet doors. A Minimum footpath width of 1.2m must remain when the doors of a cabinet are opened, and works are ongoing on the cabinet.
4. Any grassed areas disturbed are to be re-instated to satisfaction of Council. The existing grass area around street pole and cabinet shall be retained and planted with selected Trees in accordance with DLR Parks & Landscape Services requirements as detailed below:
  - Three x trees to be planted in open space surrounding cabinet. Feathered or Standard size 16-18 suggested Oak (Pedunculate/robur, Red Oak, and Liquidamber) not to be planted under overhead wires.

The Cabinet is to be installed in line with the existing boundary wall, not set back or protruding. The Pole/foundation to be installed as close to the boundary wall as possible. The existing boundary wall is to be reinstated / finished flush with side of the cabinet to the satisfaction of Council.

5. *Duration of Licence* - The duration of this agreement is for five years only. The agreement shall expire five years from the date of the grant of the licence. Within three months of the expiry date, the pole and cabinet shall be removed by the Licensee and the area reinstated to the satisfaction of the Council at the Licensee's expense and as specified in other conditions.
6. *Withdrawal of License* - Under section 254(4) of the Planning and Development Act 2000, the Council has the right to withdraw this licence and require the Licensee to remove the appliance, apparatus or structure at the Licensee's own expense where in the opinion of the Council by reason of the increase or alteration of traffic on the road or of the widening of the road or of any improvement of or relating to the road, the appliance, apparatus or structure causes an obstruction or becomes dangerous. In the event of a withdrawal of a licence under section 254(4) of the Planning and Development Act 2000, all reinstatement works shall comply with the "Guidelines for Managing Openings in Public Roads" unless specifically stated otherwise and in accordance with the requirements of the Council.
7. *Notice issued by Council* - Any notice issued by the Council to the Licensee to withdraw this Licence under section 254(4) of the Planning and Development Act 2000 or otherwise shall be in writing and shall be delivered by hand or sent by pre-paid ordinary post to the Licensee's registered office at Suite 311 Q House, 76 Furze Road, Sandyford Industrial Estate, Sandyford, Dublin 18, D18 YV50. Any such notices shall be deemed to have been delivered to the Licensee on the date of delivery of



the notice if the notice is delivered by hand or the date following the date of posting of the notice, if the notice is sent by ordinary pre-paid post.

8. *Obsolescence* - In the event of obsolescence of the installed infrastructure (telecommunications street pole, antenna and operator cabinet) or withdrawal or expiry of the license without renewal, the telecommunications street pole, antenna and associated operator cabinet shall be removed from the site and the site reinstated at the expense of the Licensee in accordance with the requirements of the Council. The Licensee shall reinstate and where appropriate repair any damage to the public area, with all works to the satisfaction of the Council at the Licensee's expense. All reinstatement works shall comply with the "Guidelines for Managing Openings in Public Roads" unless specifically stated otherwise and in accordance with the requirements of the Council.
9. *No additional dishes, antennae or other equipment* - No additional dishes, antennae or other equipment other than that demonstrated on the plans, particulars and specifications lodged with this Section 254 licence application, shall be attached to the telecommunications street pole and antenna unless agreed in writing between the Council and the Licensee.
10. *Installation and Drainage* - The installation of the telecommunication street pole and associated operator cabinets shall not impair the operation of the existing land and roadside drainage and the Licensee shall not interfere with roadside drainage without the prior written agreement of the Council.
11. *Road Opening License*: No works are to be carried on/in a public road until the Licensee is in receipt of a Road Opening License issued by the Council (Section 13(10)(b) of the Roads Act (1993)), providing all documentation is correctly submitted.
12. *Footpath and Cyclists* - The Licensee shall ensure that the telecommunications street pole and cabinet shall not obstruct pedestrians, cyclists and will not to create a road safety hazard. The specific location is to be prior agreed with the Council.
13. *Maintenance* - Access to the licence area for maintenance purposes by any statutory undertakers shall be available at all times.
14. *Change of Ownership* - The Licensee shall notify the Council in writing of any change of ownership, transfer to a new operator or any subsequent agreements to the sharing of the telecommunications street pole and associated operator cabinets.
15. *Legislation* - This licence is for the telecommunications street pole, antenna and cabinet and nothing in this licence shall be construed as negating the Licensee's statutory obligations or requirements under any other enactments or regulations, including planning legislation, building legislation and The Roads Act 1993.
16. *Payment of fee* - The granting of the licence is subject to payment of the appropriate fee and adherence to the requirements and does not automatically guarantee the renewal in subsequent years
17. *Sub-letting* - This Licence is personal to the Licensee and may not be assigned or sub-let, however the Licensee may permit third party customers of the Licensee to use the pole and Telecommunications cabinet subject to the terms of the Licence.
18. *Breach* - Any breach of the terms of the Licence by the Licensee's third party customers shall constitute a breach by the Licensee of this Licence and the Licensee shall remain fully liable for the



acts or omissions of any third party customers authorised to use the pole or Telecommunications cabinet including any negligence of the third party customers.

19. *Change in use* – A change in use of the licenced area will require the submission of a new licence application
20. *Maintenance during license* - The Licensee shall maintain the area used for the cabinet and pole, and the cabinet and pole in an acceptable condition so as not to constitute a nuisance e.g. free from graffiti
21. *Insurance* - Prior to the erection of any equipment under this licence, the Licensee shall provide evidence to the Council of public liability insurance to a minimum level of 7 million euro which indemnifies the Council for third party claim arising from the installation of the equipment. The Licensee must provide evidence of such insurance cover remaining in place for each year of the Licence. Failure to provide such annual updates of insurance cover to the Council will give grounds to the Council to withdraw this Licence from the Licensee.
22. If accidental damage is caused to the cabinet and pole or associated network, the Council will not be responsible for any claims made against it by the licensee or their customers.
23. The cabinet and pole shall be suitably anchored and of robust and stable construction to prevent movement in adverse wind conditions or when repair works etc are being carried out on the adjacent footpath.
24. The Licensee shall supply to the Council a contact name and number that is available at all times, including outside normal working hours so that any reports of damage to the structure can be passed to the licensee and rectified without delay.
25. Any works which require the use of a mobile crane or hoist will require the applicant to submit an application for a mobile crane and hoist licence prior to the commencement of the development. This is covered under a surface permit application. Any scaffolding requirements are also covered under a surface permit license.

