

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

Date: 4th August 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: Killiney DART
Location: Public footpath along Station Rd, Killiney, Co. Dublin

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

The Proposal

With reference to the attached plans you will note that it is proposed to provide a 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.

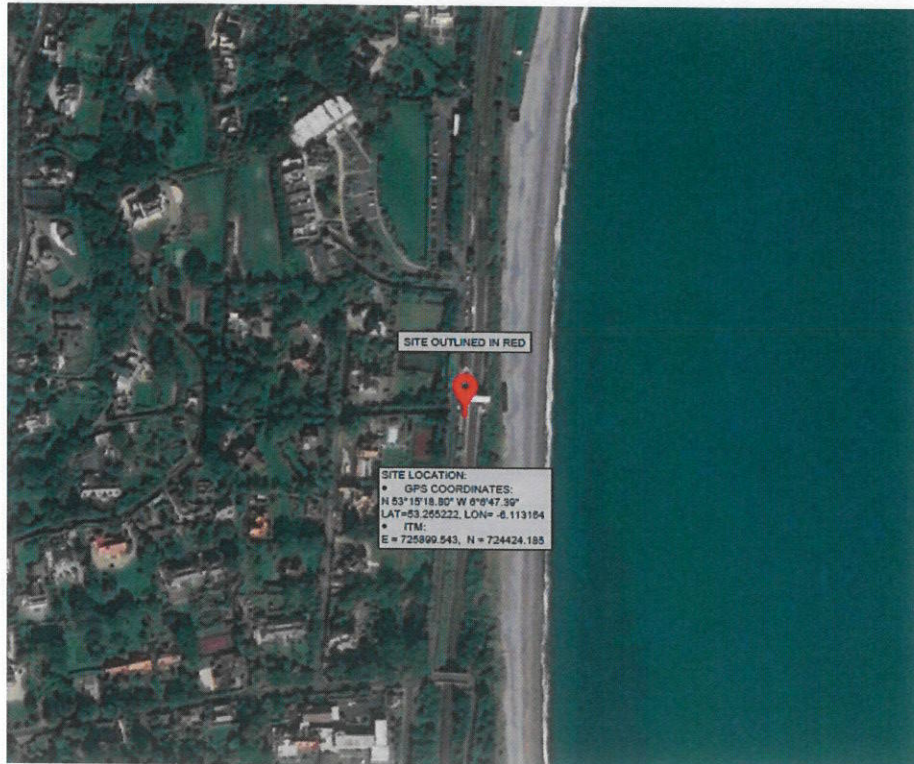


Fig 2. Aerial View Site Location

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

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

Yours Sincerely,

Chartered Engineer

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Company No: 493 133 Directors:

PLANNING STATEMENT

to support s.254 licence application for

TELECOMMUNICATIONS INFRASTRUCTURE

at

STATION ROAD, KILLINEY HILL, KILLINEY, CO. DUBLIN

Client: Signal Infrastructure Ltd.

4th August 2022



1.0 INTRODUCTION

David Mulcahy Planning Consultants Ltd have been instructed by **Cignal Infrastructure Ltd**¹ to prepare a planning statement to support a Section 254 licence application for a telecommunication structure at Station Road, Killiney Hill, Killiney, Co. Dublin.

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

This report should be read in conjunction with the drawings prepared by **Jason Redmond Associates, Consulting Engineers** who are the agents for this application. All correspondence should be sent to Jason Redmond Associates².

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

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

² Cignal 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 east side of Station Road, Killiney immediately south of Killiney DART station. Please refer to the site location map submitted with the application.

2.2 Description

The site currently consists of a notably wide, recessed public footpath.



Fig No.1 Photograph of subject site.



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

2.3 Ownership

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

2.4 Land Uses In the Vicinity

There are train tracks to the east of the site (separated from the site by a high stone wall).

There is a public footpath to the north and south of the site (continuation of the public footpath where the site is located).

Station Road is located to the west of the site.

There are no dwellings located in the vicinity of the site. The closest dwellings are located approximately [REDACTED]

████████████████████ They are well screened from the site by mature planting along their eastern property boundary.

There are numerous tall, slender structures in the vicinity including street lights and structures associated with the train station/rail line.

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).

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

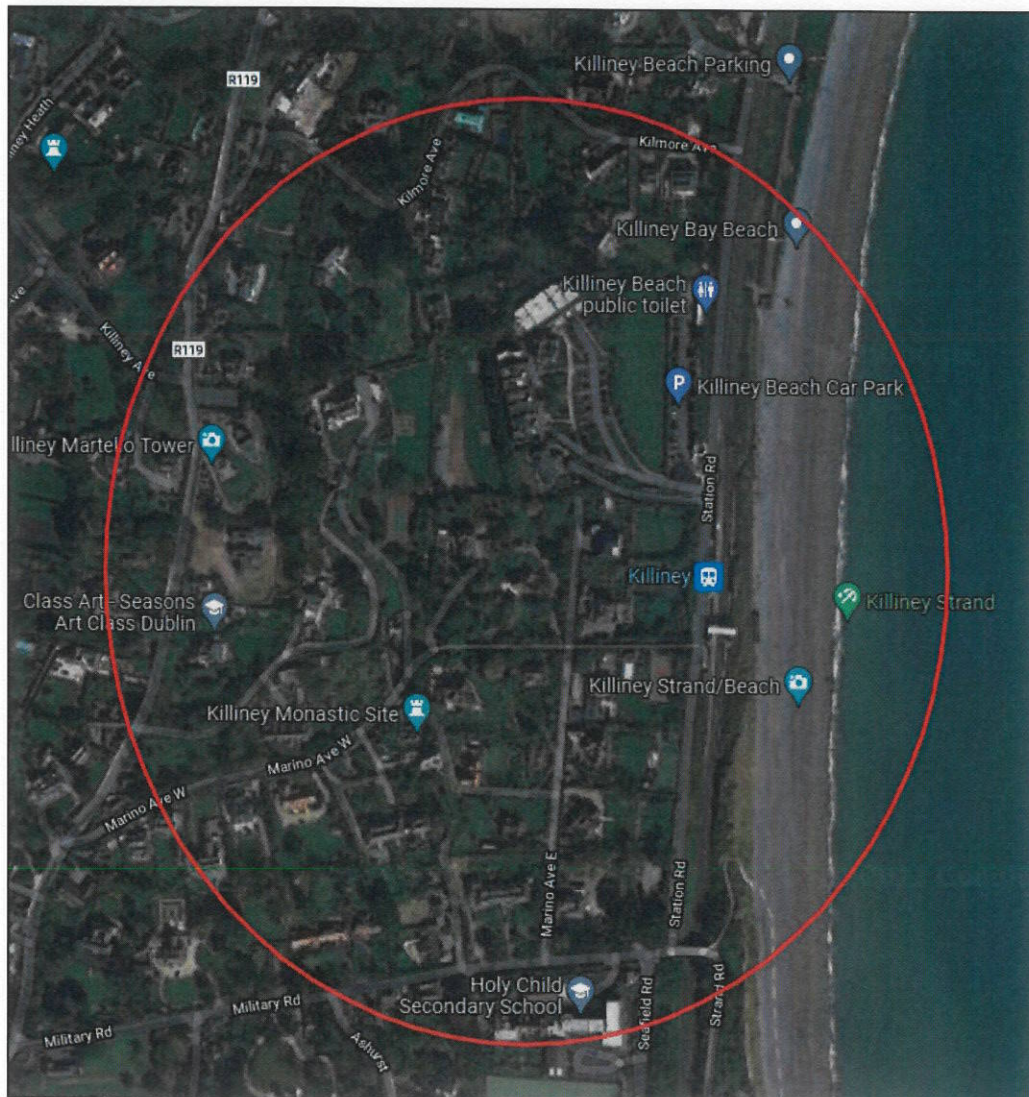


Fig No.3 Search Ring for subject site.

3.2.2 Reason why location was chosen:

The location at Station Road, Killiney Road was chosen because of the following:

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

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 Killiney.

Without a site in this part of Killiney, 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 poor data sessions which will also possibly limit people's ability to work from home on the Eir network in this area if we are unable to improve Eir's coverage in the area.

Areas improved will include but not limited to a large stretch of the Dart line from Seafield Court to Sorrento Point, Station Road , Killiney Dart Station , Coastal end of Military Road and Northern end of Seafield 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 notable absence of any indoor coverage around the site. (transparent areas)

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.

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 Signal site.

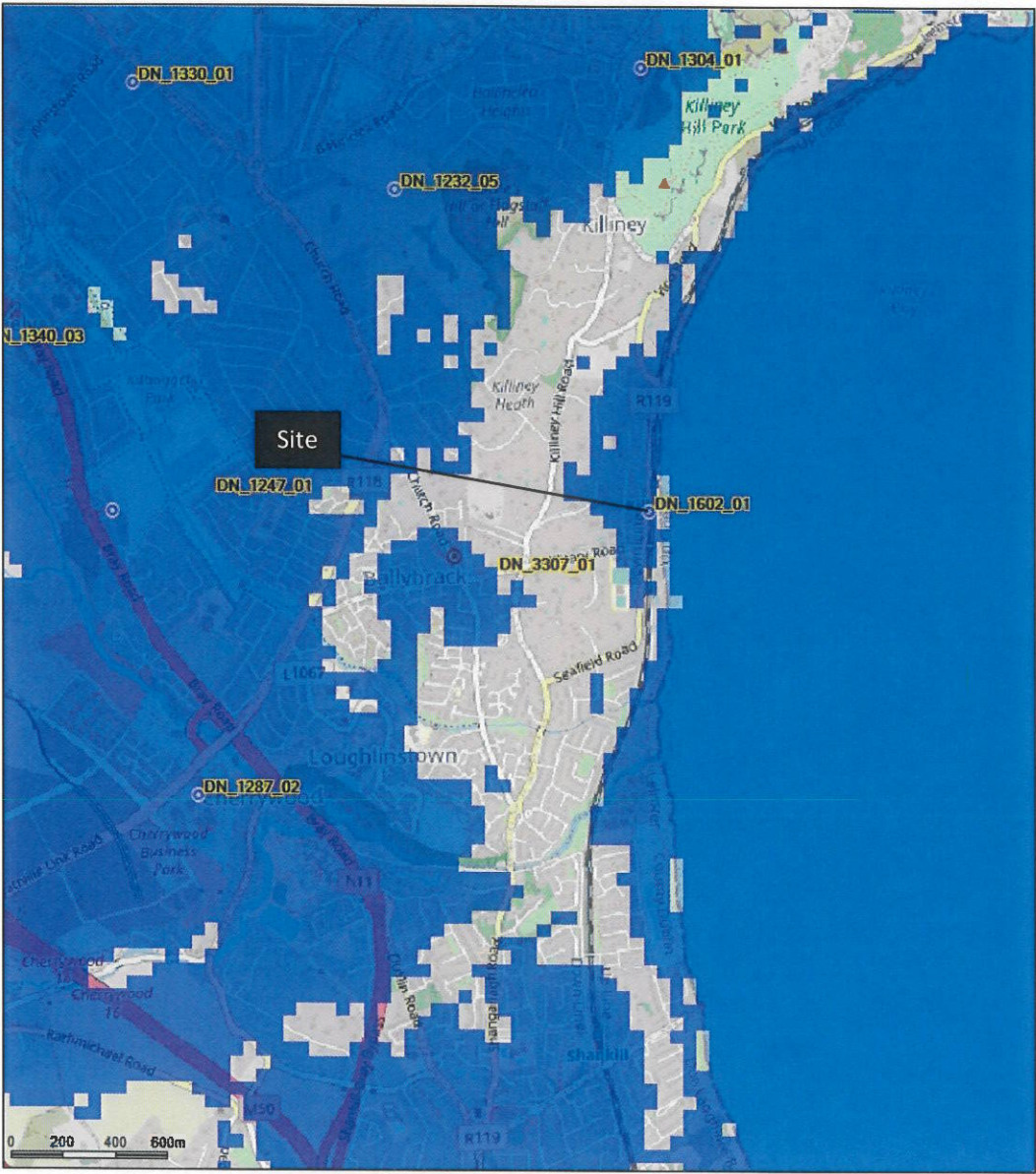


Figure 5: Predicted indoor coverage (blue) with new Signal Site.

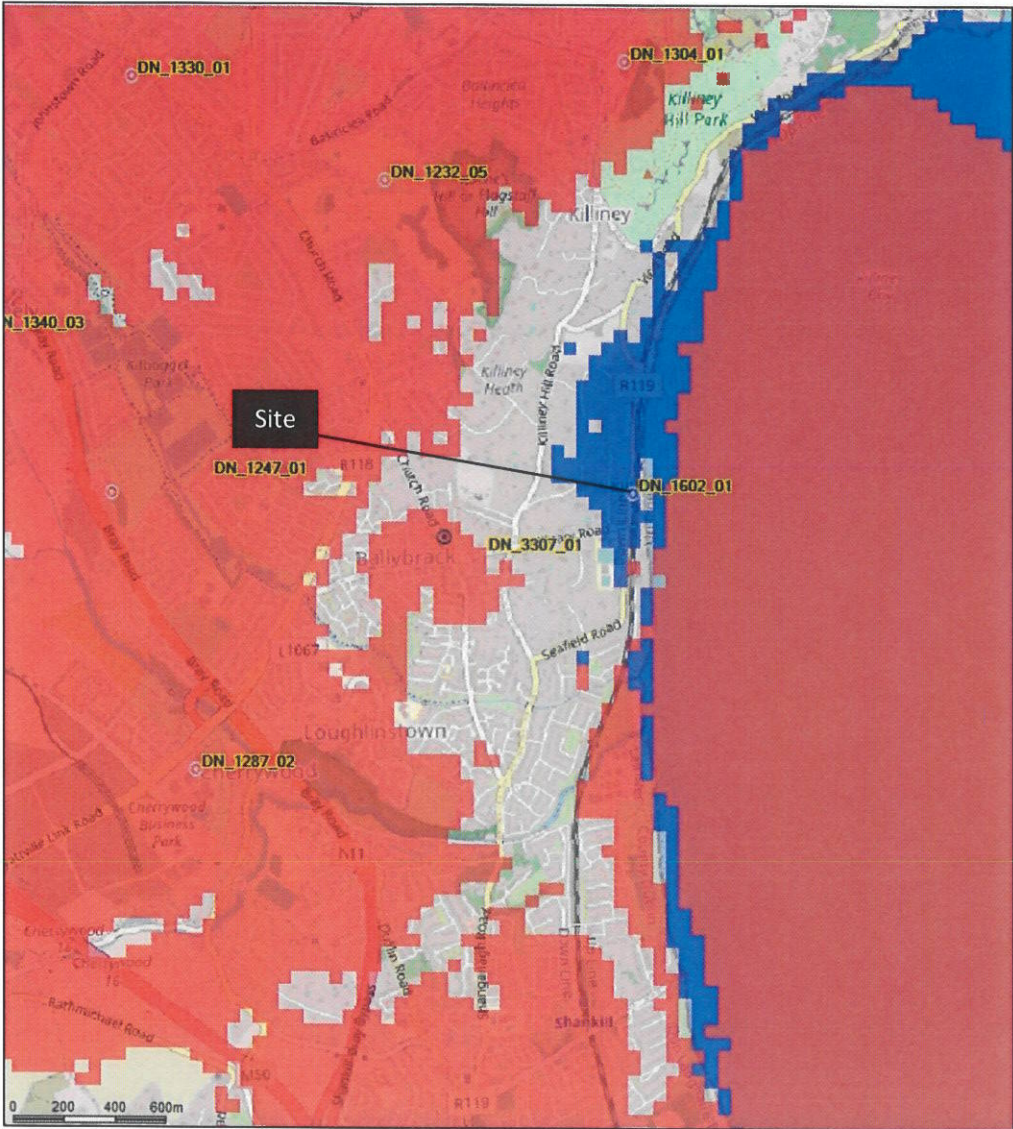


Figure 6: Comparison indoor coverage of existing signal and proposed signal (red) with new Cignal Site.

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.

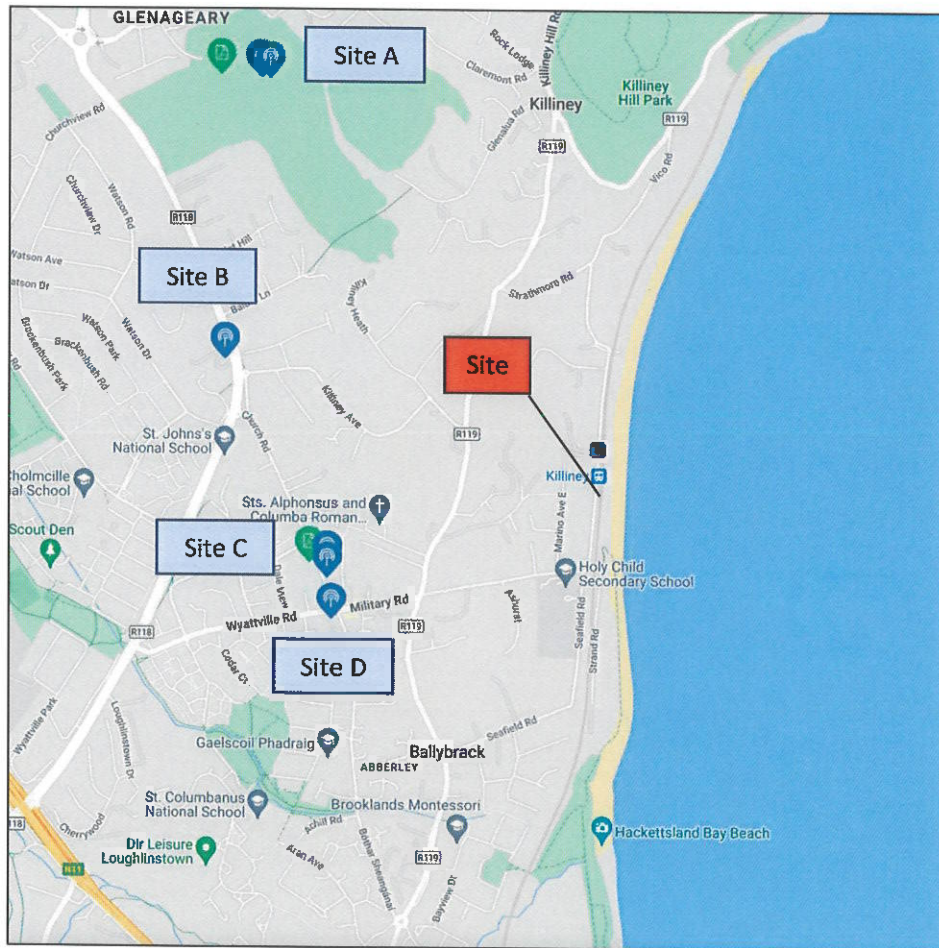


Fig. No.7 Comreg Maps of closest Existing Sites in General Area.

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 Killiney, Co Dublin. It must be noted that all of the sites identified are situated outside the required search ring, which has a diameter of c.650 metres.

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	METEOR DN-1232; VODAFONE_DN297; THREE_DU0227	1.5km	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	THREE_DU1334	1.1km	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 3307; THREE_DU0104	760m	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	VODAFONE DX237	810m	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.

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 Signal 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 in the Vicinity

There was a previous Section 254 Licence Application by the applicant in the subject local area which was refused - CTT.21.031 – Killiney Hill. The refusal was site specific and does not apply to the new revised location under the current licence – *"The Traffic section have reviewed the application and advised they object to the location of the tower and cabinet as its location hinders the use of the footpath at this point. The mast and cabinet will also hinder sight lines for drivers on Military Road looking left onto Seafield Road"*.

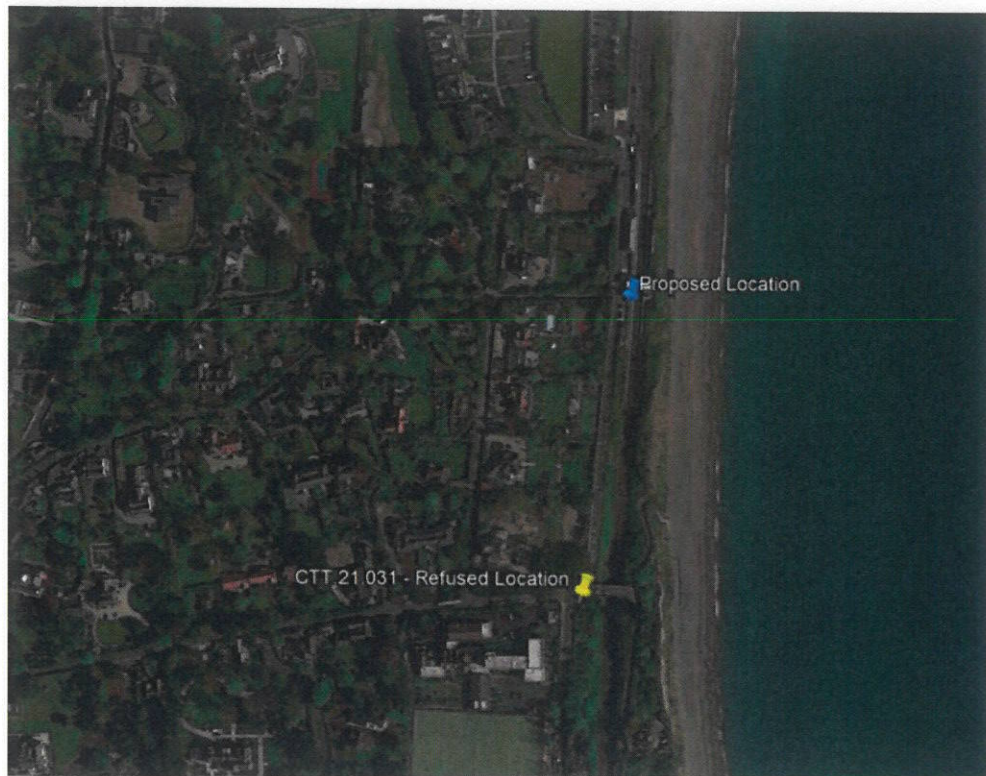


Fig. No. 7a Location of proposed streetpole relative to that refused (CTT.21.031).

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 description; 15 metre Alpha 2.0 pole and cabinet, in height and general dimensions.

We also refer the Council to a recent decision by An Bord Pleanála (ref. LC93.309598) dated 28th July 2021 concerning a proposed for a 15m high streetpole solution to address identified mobile and mobile broadband coverage blackspots at the Junction of St. John's Hill and The Folly, Waterford (Reg. Ref. 19/523).

The An Bord Pleanála Inspector noted that:

- *"The structure may briefly be of visual interest but would then become an accepted and normal part of the urban streetscape. These structures are becoming more common".*
- *"The structure will be very visible on the streetscape. However, a visual impact is unavoidable with telecommunications infrastructure such as this ... it would not have any undue adverse impact on the surrounding land uses or the protected structures".*

The Board are also referred to a recent decision by An Bord Pleanála to approve a Section 254 Licence to install 15 free-standing street pole with shrouded antenna on grass verge along Ballycullen Road, Dublin 24 - ref. ABP-311529-21. The ABP inspector noted the following:

"I acknowledge the proposed monopole would be slightly more prominent than some of the existing structures in the vicinity, including overhead powerlines, street lighting poles, and road signage, [but] I consider that it would not be so visually disruptive that it would seriously injure the visual and residential amenities of the receiving area".

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 DCCAIE (see www.dccae.ie) demonstrates various examples of such structures similar to the structure proposed herewith.

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

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

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

Fig.No.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 Station Road, Killiney 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.

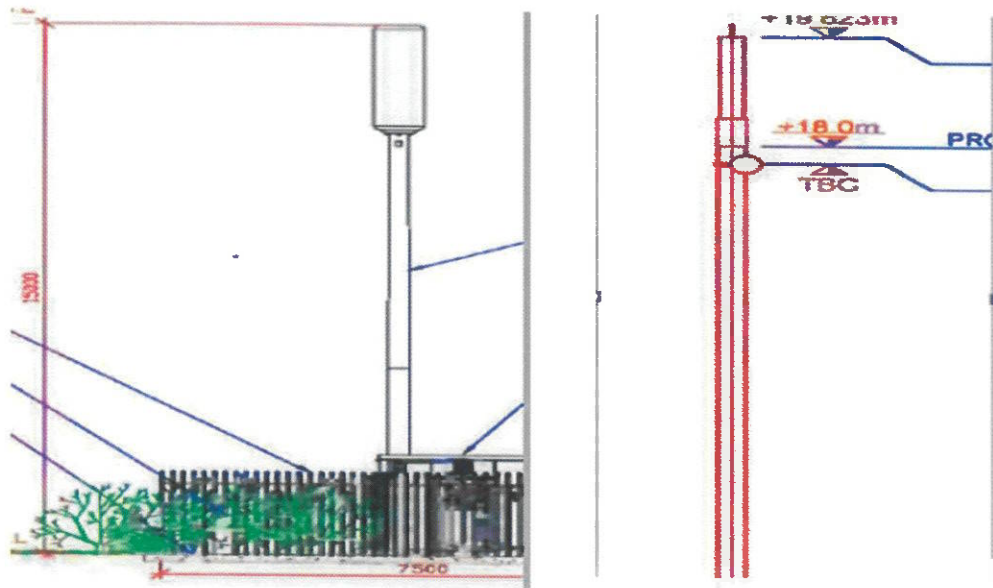


Fig No.9 Image 5 Examples of small and medium size Single Operator Sites Extracted from the Green Book Appendix A.

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 DCCAE (Product of Collaboration with Department of

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

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

5.7.1 Project Ireland 2040 – The National Planning Framework

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

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

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

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

5.7.3 East and Midlands RSES (Regional Spatial Economic Strategy)

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

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

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

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

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

Section 8.6 Communications Network and Digital Infrastructure

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

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

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

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

Regional Policy Objective - RPO 8.25

Local authorities shall:

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

Regional Policy Objective - RPO 8.26

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

5.7.4 Dún Laoghaire-Rathdown County Development Plan, 2022-2028

The County Development Plan 2022-2028 was adopted by the elected members at a Special County Development Plan meeting held on the 10th March 2022. The adopted Plan will come into force 6 weeks after it was adopted on the 21st April 2022.

12.9.8 Telecommunications

In the consideration of proposals for telecommunications antennae and support structures, applicants will be required to demonstrate:

Compliance with the Planning Guidelines for 'Telecommunications Antennae and Support Structures' (1996), and Circular Letter PL 08/12 issued by the Department of the Environment and Local Government (as may be amended from time to time), and to other publications and material as may be relevant in the circumstances.

*On a map the location of all existing telecommunications structures within a **1km radius** of the proposed site, stating reasons why (if not proposed) it is not feasible to share existing facilities having regard to the 'Code of Practice on Sharing of Radio Sites', issued by the Commission for Communications Regulation.*

To what degree the proposal will impact on the amenities of occupiers of nearby properties, or the amenities of the area - e.g. visual impacts of masts and associated equipment cabinets, security fencing treatment etc. – and the potential for mitigating visual impacts including low and mid – level landscape screening, tree-type masts being provided where appropriate, colouring, or painting of masts and antennae, and considered access arrangements.

Any impacts on rights-of-way and walking.

That the proposal shall not have a significant negative visual impact.

Zoning

The subject site is **not zoned**. The lands to the west of Station Road are zoned A - residential.

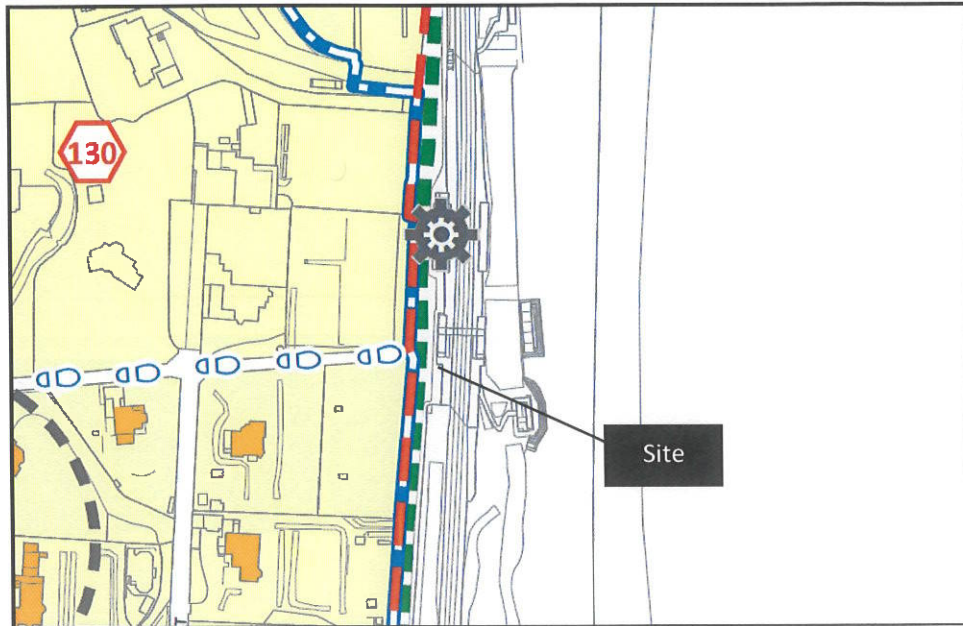


Fig No.10 Extract from DLR Development Plan 2022-28 zoning map (Map No.7).

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 SAC/SPA.

The green dashed line to the west indicates the Proposed Sutton to Sandycove walkway/Cycleway as a component part of the National East Coast Trail Cycle Route. The proposed development will have no impact on same.

The blue dashed line to the west indicates an Architectural Conservation Area. The proposed development will be very similar in nature to the existing streetlights in terms of physical appearance, albeit the streetpole will be taller. There are other utility type structures in the vicinity relating to the train station which will help assimilate the structure.

The red dashed line to the west indicates Boundary of Objective Area. The proposed development will have no impact on same.

[REDACTED] is a Protected Structure. It is considered that there will be no material impact on the character or setting of this Protected Structure owing to the significant separation distance from the proposed development, the existing screening that exists along the eastern boundary of the Protected Structure and the slimline nature of the proposed development.

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 118m radius of the site.

VRPs 1 -5 are taken from Station Road, at distances of 109m, 88m, 118m, 93m and 36m respectively. The pole and cabinet are both visible from VRPs 1-3 and the top of the pole is visible from VRPs 4 & 5. Given the established context provided by the receiving environment along with the slender nature of the structure, and the neutral sky grey colour, the visual impact is considered to be slight to moderate. It will read as part of the typical street furniture and will not be an incongruous insertion into the streetscape.

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 and backdrop development 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 Station Road, Killiney Hill, Killiney, Co. Dublin.

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

It is respectfully submitted that policy cited under the Dun Laoghaire-Rathdown County Development Plan 2022-2028, 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 2022-2028 clearly recognises the importance of the development of a high-quality telecommunications network.

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 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.

There is considered to be no material impact on the Protected Structure to the west of the site due to the distance involved, the existing screening and the slender nature of the proposed development.

The proposed development is also consistent with the main thrust of the East and Midlands RSES (Regional Spatial Economic Strategy)

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



Marsh Ireland Brokers Ltd
Marsh House
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Dublin 2
D02 RY98
Tel: 01 604 8100
www.marsh.ie

To Whom It May Concern

9th of March 2022

Dear Sir/Madam,

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

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

Business Description

Provides telecommunications infrastructure solutions

PUBLIC LIABILITY

INSURER: XL Insurance Company SE

POLICY NUMBER: [REDACTED]

PERIOD OF INSURANCE: 1st March 2022 to 28th February 2023 (both days inclusive)

LIMIT OF INDEMNITY: €7,000,000 (any one event and in the aggregate during the period of insurance)

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

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

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Marsh Ireland, Bowring Marsh, Charity Insurance, Echelon Claims Consultants, Guy Carpenter & Company, ILCS, Insolutions, Lloyd & Partners, Marsh Aviation Consulting, Marsh Claims Management Services, Marsh Claims Solutions, Marsh Specialty, Marsh Reclaim, and Marsh Risk Consulting are trading names of Marsh Ireland Brokers Limited. Marsh Ireland Brokers Limited is a private company limited by shares registered in Ireland under company number 169458. VAT Number IE 6569458D. Registered Office: 4th Floor, 25-28 Adelaide Road, Dublin 2, Ireland, D02 RY98. Directors: [REDACTED]



A business of Marsh McLennan

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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A business of Marsh McLennan



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T +353 1 671 4444
eir.ie

Radio Emissions Statement

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

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

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

Directors:

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

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

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

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

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

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

Internal Documentation References:

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

Statement Prepared By: [REDACTED]

Date: 12/07/17



Commission for
Communications Regulation
Coimisiún Um
Rialáil Cumarsáide

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

To whom it may concern

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

Authorised Person: Signal Infrastructure Ltd

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

An Authorised Person may:

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

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

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

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

Issued on behalf of the Commission for Communications Regulation by

Name:

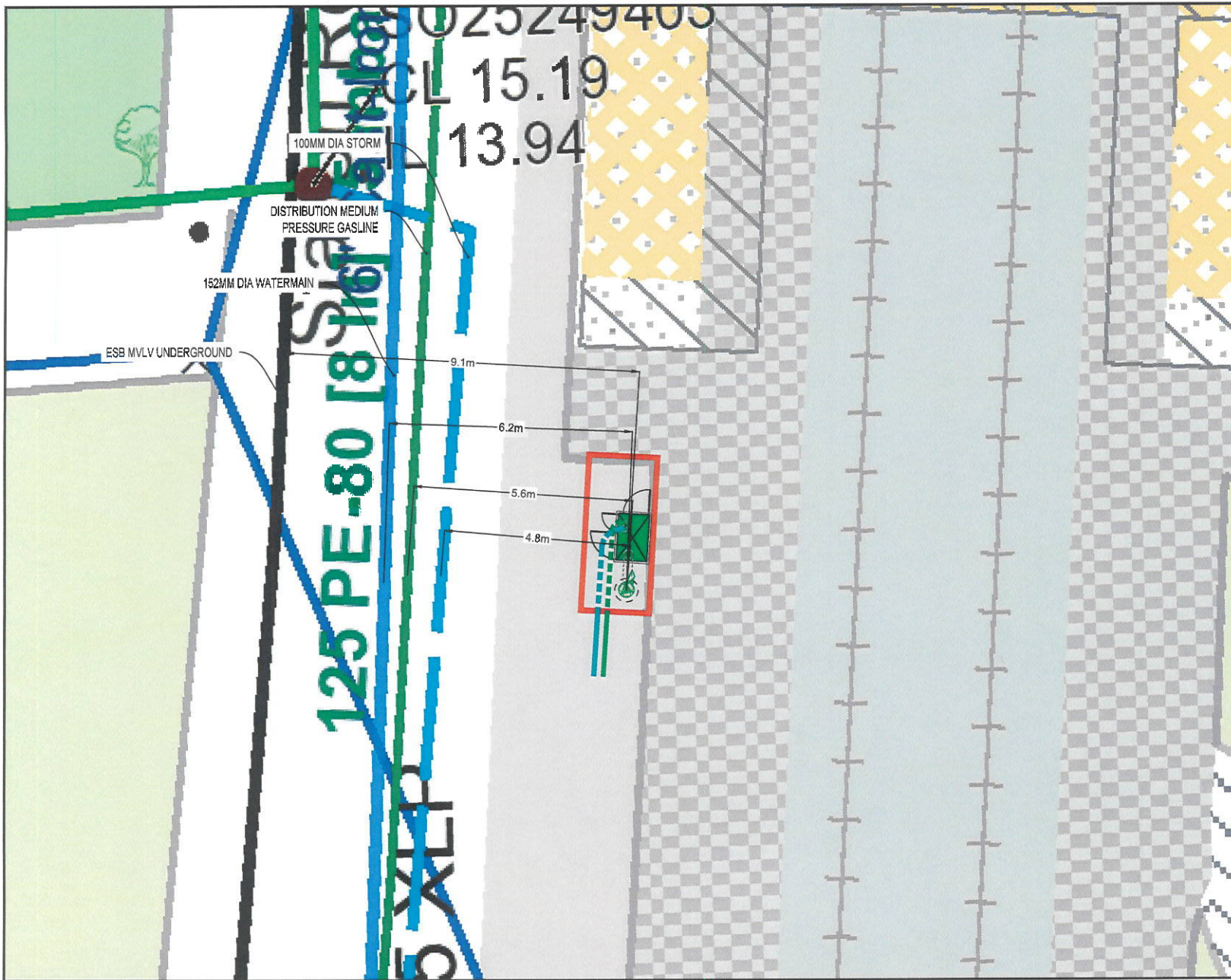


Title/Position: **Analyst – Market Framework Division**

Date: **3 March 2016**

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UNDERGROUND SERVICES

SCALE 1:100

15m Alpha 2.0 STREETPOLE

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C	REVISED LOCATION	20/06/22		
B	UPDATED ADDRESS	20/11/21		
A	ISSUED FOR PLANNING	20/02/21		
No.	Revision	Date	By	Ckd

JELMEC

10 Barrowside Business Park, Sleaty Road,
Graiguescullen, Carlow, R93 E9W7,
Rep. of Ireland.



Signal Infrastructure Ltd.
Suite 311, C House, 76 Furze Road,
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Joan Redmond and Associates Consulting Engineers
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Website: www.jrasc.ie Email: info@jrasc.ie

PLANNING

Signal site ID: CIG_03572

Operator site ID: DN_1602

Site Name: KILLINEY DART

Site Address: PUBLIC FOOTPATH ALONG STATION ROAD,
KILLINEY HILL,
CO. DUBLIN

Title: SIGNAL SMART STREETPOLE
SITE LAYOUT PLAN

Designed		Date	30.08.2022
Drawn		Scale	1:100
Dwg No.	DN_1602-500	Rev.	C

15m Alpha 2.0 STREETPOLE

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B	UPDATED ADDRESS	23/1/01		
A	ISSUED FOR PLANNING	20/10/01		
No.	Revision	Date	By	Clk

DELMEC

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PLANNING

Signal site ID **CIG_03572**

Operator site ID **DN_1602**

Site Name
KILLINEY DART

Site Address
**PUBLIC FOOTPATH ALONG STATION ROAD,
KILLINEY HILL,
CO. DUBLIN**

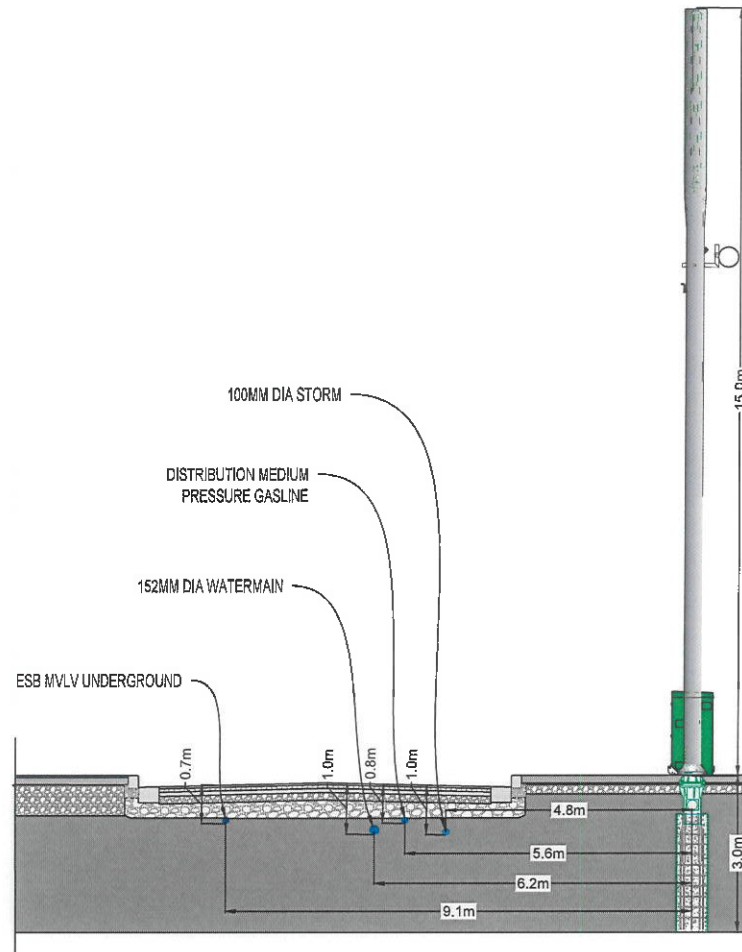
Title
**SIGNAL SMART STREETPOLE
ELEVATIONS**

Designed **[Redacted]** Date **30.06.2022**

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

Dwg No. **DN_1602-501**

Location



UNDERGROUND SERVICES

SCALE 1:100

15m Alpha 2.0 STREETPOLE

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VISUAL REFERENCE POINTS

DWG NO.	LOCATION	COORDINATES (ITM)	DISTANCE	BEARING	VISIBILITY
1	VRP 1	725882.3075, 724318.8638	109M	190°	Pole and cabinet visible.
2	VRP 2	725882.8812, 724339.2897	88M	192°	Pole and cabinet visible.
3	VRP 3	725892.1057, 724544.8778	118M	352°	Pole visible.
4	VRP 4	725901.3159, 724519.1436	93M	3°	Top of pole visible.
5	VRP 5	725899.6828, 724461.5792	36M	2°	Top of pole visible.

C	REVISED LOCATION	05/06/22		
B	UPDATED ADDRESS	22/10/21		
A	ISSUED FOR PLANNING	28/10/21		
No.	Revision	Date	By	Cltd

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PLANNING

Signal site ID **CIG_03572**

Operator site ID **DN_1602**

Site Name
KILLINEY DART

Site Address
**PUBLIC FOOTPATH ALONG STATION ROAD,
KILLINEY HILL,
CO.DUBLIN**

Title
**SIGNAL SMART STREETPOLE
VRP INFORMATION**

Designed **[Redacted]** Date **01.07.2022**
Drawn **[Redacted]** Scale **NA** Rev. **C**

Dwg No. **DN_1602-VRP INFORMATION**

DWG LOCATION: **[Redacted]**



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B	UPDATED ADDRESS	2011021		
A	ISSUED FOR PLANNING	2010021		
No.	Revision	Date	By	Ckd

DELMEC

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PLANNING

Cignal site ID **CIG_03572**

Operator site ID **DN_1602**

Site Name
KILLINEY DART

Site Address
**PUBLIC FOOTPATH ALONG STATION ROAD,
KILLINEY HILL,
CO.DUBLIN**

Title
**CIGNAL SMART STREETPOLE
VRP INFORMATION**

Designed **[Redacted]** Date 01.07.2022

Drawn **[Redacted]** Scale NA Rev. C

Dwg No. **DN_1602-VRP INFORMATION**

LOCATION: **[Redacted]**



VRP1 - WITHOUT SOLUTION IN PLACE



VRP1 - WITH SOLUTION IN PLACE

15m Alpha 2.0 STREETPOLE

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B	UPDATED ADDRESS	23/11/21		
A	ISSUED FOR PLANNING	28/10/21		
No.	Revision	Date	By	Ckd

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PLANNING

Signal site ID **CIG_03572**

Operator site ID **DN_1602**

Site Name
KILLINEY DART

Site Address
**PUBLIC FOOTPATH ALONG STATION ROAD,
 KILLINEY HILL,
 CO.DUBLIN**

Title
**SIGNAL SMART STREETPOLE
 VRP 1**

Designed **[Redacted]** Date **01.07.2022**
 Drawn **[Redacted]** Scale **NA** Rev. **C**

Dwg No. **DN_1602-121**
 Dwg LOCATION: **[Redacted]**



VRP2 - WITHOUT SOLUTION IN PLACE



VRP2 - WITH SOLUTION IN PLACE

15m Alpha 2.0 STREETPOLE

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C	REVISED LOCATION	20/06/22		
B	UPDATED ADDRESS	23/11/21		
A	ISSUED FOR PLANNING	28/10/21		
No.	Revision	Date	By	Clkd

DELMEC

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PLANNING

Signal site ID **CIG_03572**

Operator site ID **DN_1602**

Site Name
KILLINEY DART

Site Address
**PUBLIC FOOTPATH ALONG STATION ROAD,
KILLINEY HILL,
CO.DUBLIN**

Title
**SIGNAL SMART STREETPOLE
VRP 2**

Designed **[Redacted]** Date **01.07.2022**

Drawn **[Redacted]** Scale **NA** Rev. **C**

Dwg No. **DN_1602-122**

LOCATION: **[Redacted]**



VRP3 - WITHOUT SOLUTION IN PLACE



VRP3 - WITH SOLUTION IN PLACE

15m Alpha 2.0 STREETPOLE

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NOT FOR CONSTRUCTION

C	REVISED LOCATION	30/06/22		
B	UPDATED ADDRESS	23/11/21		
A	ISSUED FOR PLANNING	28/10/21		
No.	Revision	Date	By	Ckd

DELMEC

110 Garraunville Business Park, Slacks Road,
 Graiguecullen, Carlow, R93 E8W7,
 Rep. of Ireland.

cellnex
driving telecom connectivity
 Signal Infrastructure Ltd.
 Site 311, O House, 76 Furze Road,
 Sandford Industrial Estate, Dublin 15,
 D15 YV56, IRELAND.

JRA
 Consulting Engineers
 Jason Riddell and Associates Consulting Engineers
 9 Linnard Court, Portlaoine, Co. Laois, R12 1K12H
 Phone: +353 (0) 57 8681355
 Website: www.jra.ie Email: info@jra.ie

PLANNING

Signal site ID **CIG_03572**

Operator site ID **DN_1602**

Site Name
KILLINEY DART

Site Address
**PUBLIC FOOTPATH ALONG STATION ROAD,
 KILLINEY HILL,
 CO.DUBLIN**

Title
**SIGNAL SMART STREETPOLE
 VRP 3**

Designed **[Redacted]** Date **01.07.2022**
 Drawn **[Redacted]** Scale **NA** Rev. **C**

Dwg No. **DN_1602-123**
 LOCATION: **[Redacted]**



VRP4 - WITHOUT SOLUTION IN PLACE



VRP4 - WITH SOLUTION IN PLACE

15m Alpha 2.0 STREETPOLE

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C	REVISED LOCATION	3/29/22		
B	UPDATED ADDRESS	23/1/21		
A	ISSUED FOR PLANNING	28/1/21		
No.	Revision	Date	By	Clkd

DELMEC

10 Barrowlands Business Park, Sleaty Road,
Graiguesullen, Carlow, R63 E3W7,
Rep. of Ireland.

cellnex
driving telecom connectivity

Signal Infrastructure Ltd.
Suite 311, Q House, 76 Furze Road,
Sandymount Industrial Estate, Dublin 18,
D18 YV60, IRELAND.

JRA

Consulting Engineers
Jason Reilly and Associates Consulting Engineers
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Phone: +353 (0) 57 8641155
Website: www.jra.ie Email: info@jra.ie

PLANNING

Signal site ID CIG_03572

Operator site ID DN_1602

Site Name
KILLINEY DART

Site Address
PUBLIC FOOTPATH ALONG STATION ROAD,
KILLINEY HILL,
CO. DUBLIN

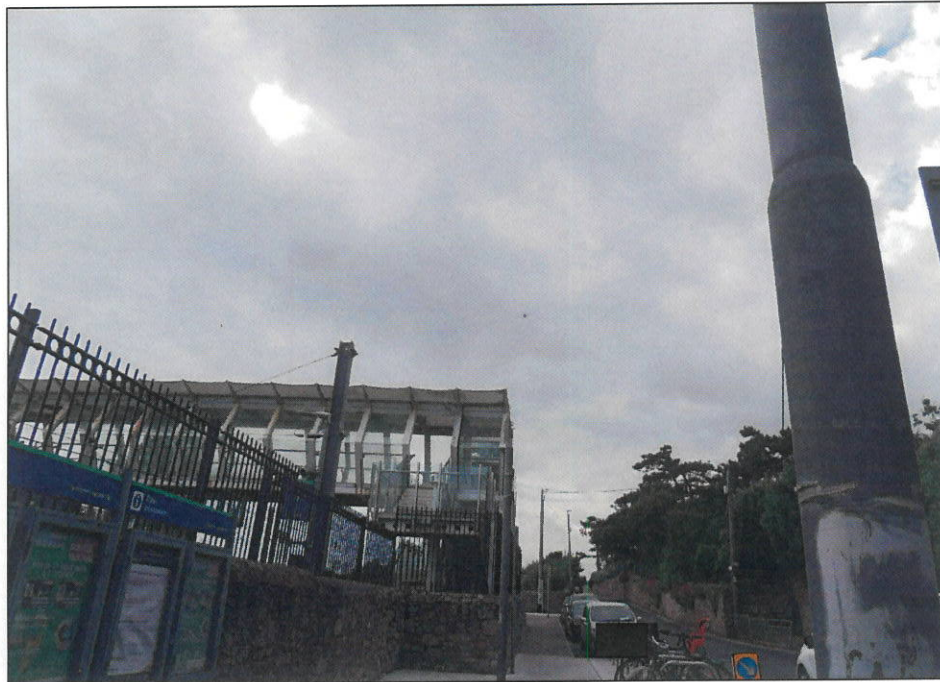
Title
SIGNAL SMART STREETPOLE
VRP 4

Designed [] Date: 01.07.2022

Drawn [] Scale NA Rev. C

Dwg No. DN_1602-124

LOCATION: []



VRP6 - WITHOUT SOLUTION IN PLACE

VRP5 - WITH SOLUTION IN PLACE

15m Alpha 2.0 STREETPOLE

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C	REVISED LOCATION	20/09/22		
B	UPDATED ADDRESS	23/11/21		
A	ISSUED FOR PLANNING	28/10/21		
No.	Revision	Date	By	Chk'd

DELMEC

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Graiguescullen, Carlow, R93 E9W7,
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Jason Redmond and Associates Consulting Engineers
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PLANNING

Signal site ID **CIG_03572**

Operator site ID **DN_1602**

Site Name
KILLINEY DART

Site Address
**PUBLIC FOOTPATH ALONG STATION ROAD,
KILLINEY HILL,
CO. DUBLIN**

Title
**SIGNAL SMART STREETPOLE
VRP 5**

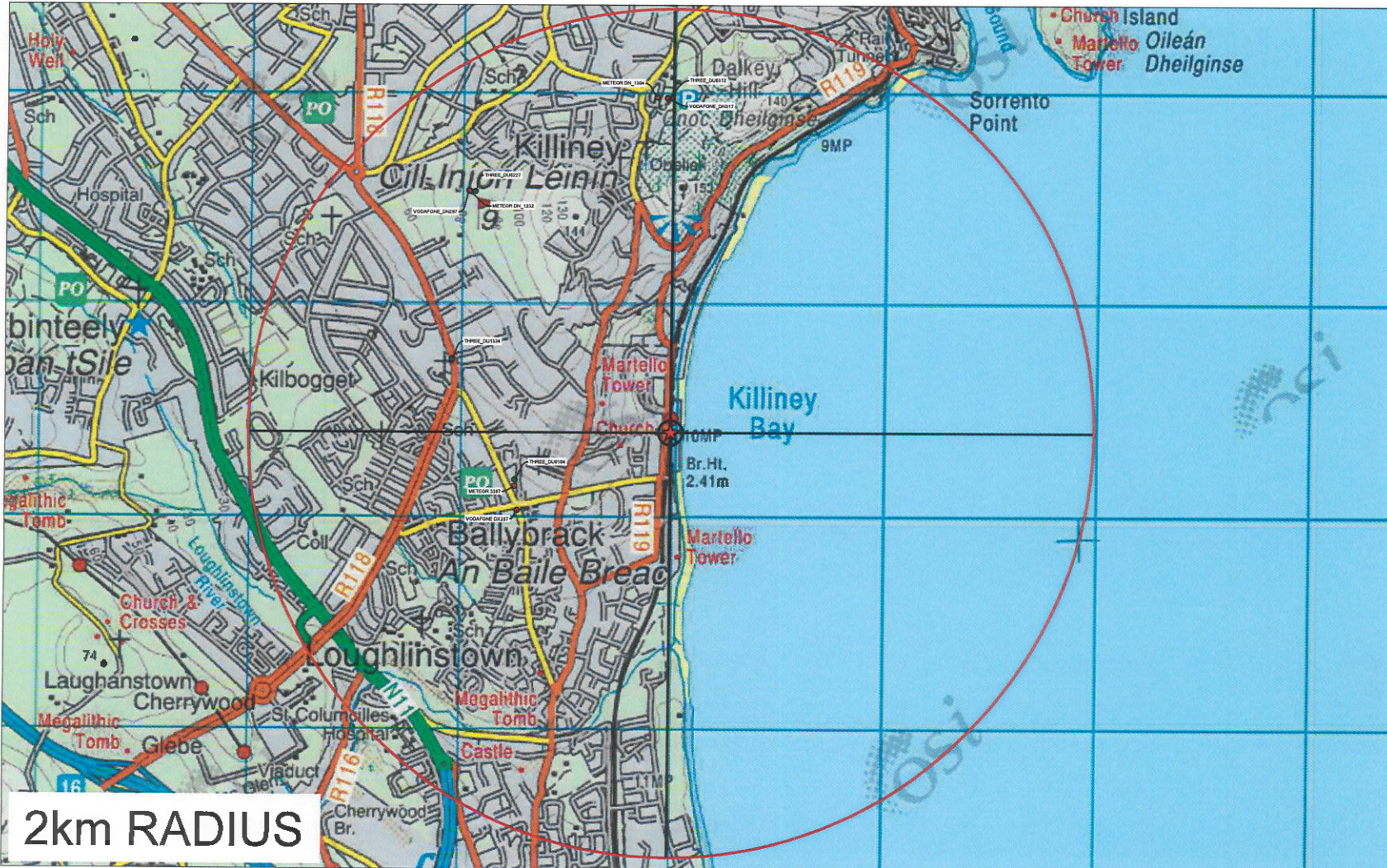
Designed **[Redacted]** Date **01.07.2022**

Drawn **[Redacted]** Scale **NA** Rev. **C**

Dwg No. **DN_1602-125**

DWG LOCATION **[Redacted]**

LEGEND:	
Search Ring Radius	○
Radius Area (2km)	○
Proposed Site SR- 0142	★
Existing Vodafone site shown thus	●
Existing EIR site shown thus	●
Existing H3Gi site shown thus	●



LOCATION MAP
SCALE 1:20,000

15m Alpha 2.0 STREETPOLE



C	REVISED LOCATION	30/06/22		
B	UPDATED ADDRESS	23/11/21		
A	ISSUED FOR PLANNING	28/02/21		
No.	Revision	Date	By	Cltd

DELMEC

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

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Signal Infrastructure Ltd.
Suite 311, Q House, 76 Furze Road,
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Phone: +353 (0) 57 8663185
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PLANNING

Signal site ID CIG_03572

Operator site ID DN_1602

Site Name KILLINEY DART

Site Address PUBLIC FOOTPATH ALONG STATION ROAD,
KILLINEY HILL,
CO.DUBLIN

Title CELLNEX SMART STREETPOLE
COMREG MAP

Designed Date 30.06.2022

Drawn Scale 1:20,000 Rev. C

Dwg No. DN_1602-107

DWG

LOCATION: 100% VERIFIED FOR EXISTING TELECOM INFRASTRUCTURE. MAP IS APPROXIMATELY ACCURATE TO 1:20,000 SCALE. ALL RIGHTS RESERVED BY JRA.

E = 727616.424, N = 725763.985



SITE OUTLINED IN RED

E = 724181.411, N = 723091.415

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15m Alpha 2.0 STREETPOLE

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Descriptions:
 Historic: 8th Edition Edition
 Publisher / Source: Ordnance Survey Ireland (OSI)
 Data Source / Reference: 89003
 Revision Date =
 Survey Date =
 Levelled Date = 31-Dec-1912
 89004
 Revision Date =
 Survey Date = 31-Dec-1937
 Levelled Date = 31-Dec-1940
 89005
 Revision Date =
 Survey Date = 31-Dec-1937
 Levelled Date = 31-Dec-1940
 File Format:
 Topographic Image File Format (TIFF)
 File Name:
 R_50277272_1.tif

Clip Extent / Area of Interest (AOI):
 UTM Easting: 725431.4481, 725508.7636
 UTM Northing: 725333.4481, 725408.7636
 UTM Zone: 725431.4481, 725408.7636
 Projection / Spatial Reference:
 EPSG:29901, Irish Transverse Mercator
 Centre Point Coordinates:
 X,Y = 725362.4481, 724421.7636
 Date Extraction Date:
 30-Jun-2022
 Product Version:
 1.3
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C	REVISED LOCATION	26/6/22		
B	UPDATED ADDRESS	23/1/21		
A	ISSUED FOR PLANNING	28/1/21		
No.	Revision	Date	By	Clkd

DELMEC

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 Phone: +353 (0) 5 8461155
 Website: www.jra.ie Email: info@jra.ie

PLANNING

Signal site ID: **CIG-03572**

Operator site ID: **DN_1602**

Site Name:
KILLINEY DART

Site Address:
**PUBLIC FOOTPATH ALONG STATION ROAD,
 KILLINEY HILL,
 CO. DUBLIN**

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

Designed: Date: 30.06.2022
 Drawn: Scale: 1:10,560 Rev. C

Dwg No. **DN_1602-100**

LOCATION: FROM OS/OSI OR OTHER AVAILABLE MAPS, COPY OF WHICH IS HELD BY JRA. TO BE USED IN ACCORDANCE WITH THE TERMS AND CONDITIONS OF THE LICENSE.



SITE OUTLINED IN RED

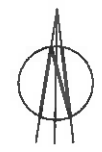
SITE LOCATION:
 • GPS COORDINATES:
 N 53°15'18.80" W 6°6'47.39"
 LAT=53.255222, LON=-6.113164
 • ITM:
 E = 725899.543, N = 724424.185

15m Alpha 2.0 STREETPOLE

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C	REVISED LOCATION	30/06/22		
B	UPDATED ADDRESS	23/11/21		
A	ISSUED FOR PLANNING	26/02/21		
No.	Revision	Date	By	Cltd

DELMEC

30 Riverside Business Park, Sleaty Road,
 Graiguecullen, Carlow, TD15 E3W7,
 Rep. of Ireland.



Signal Infrastructure Ltd
 Suite 211, O'Flanagan, 76 Frisco Road,
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 2 Linnard Court, Portlaoine, Co. Wick, N53 9H34
 Phone: +353 (0) 57 868155
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PLANNING

Signal site ID CIG-03572

Operator site ID DN_1602

Site Name
 KILLINEY DART

Site Address
 PUBLIC FOOTPATH ALONG STATION ROAD,
 KILLINEY HILL,
 CO. DUBLIN

Title
 CELLNEX SMART STREETPOLE
 SITE LOCATION MAP AERIAL PHOTO

Designed	Date	30.06.2022
Drawn	Scale	1:2500 Rev. C

Dwg No. DN_1602-101

E = 726058.785, N = 724551.846



E = 725739.015, N = 724303.554

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15m Alpha 2.0 STREETPOLE

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 Digital Landscape Model (DLM)
Publisher / Source:
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Data Source / Reference:
 PRIME2
File Format:
 Autodesk AutoCAD (DWG_R2013)
File Name:
 v_50277372_1.dwg
Clip Extent / Area of Interest (AOI):
 UTM.XMIN= 725600.9451, 724500.7836
 UTM.XMAX= 726183.9451, 724206.7836
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Projection / Spatial Reference:
 Projection= IRENETRS_Mah_Transverse_Mercator
Centre Point Coordinates:
 X,Y= 725692.4451,724423.7836
Reference Index:
 Map Series / Map Sheets
 1:1,000 | 3457-13
 1:1,000 | 3457-18
Data Extraction Date:
 Date= 30-Jun-2022
Source Data Release:
 DCMS Release V1, IS1.113
Product Version:
 Version= 1.4
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C	REVISED LOCATION	30/06/22	
B	UPDATED ADDRESS	23/11/21	
A	ISSUED FOR PLANNING	26/09/21	
No.	Revision	Date	By Ckd

DELMEC

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

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 5 Leonard Court, Portlaoise, Co. Laois, R32 N92H
 Phone: +353 (0) 57 6683155
 Website: www.jrasc.ie Email: info@jrasc.ie

PLANNING

Signal site ID: CIG-03572

Operator site ID: DN_1602

Site Name: KILLINEY DART

Site Address: PUBLIC FOOTPATH ALONG STATION ROAD,
 KILLINEY HILL,
 CO.DUBLIN

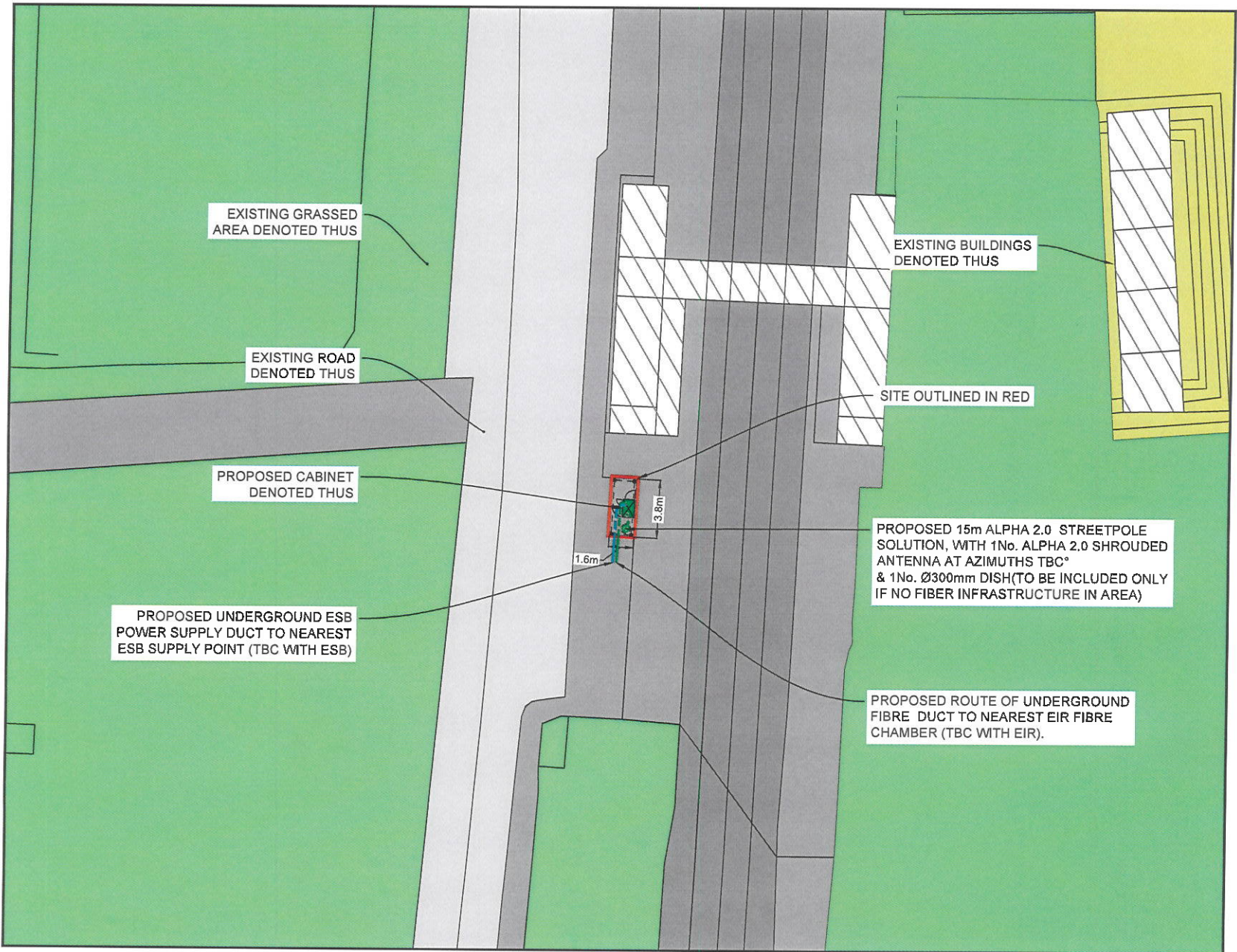
Title: CELLNEX SMART STREETPOLE
 SITE LOCATION PLAN

Designed: [Redacted] Date: 30.06.2022

Drawn: [Redacted] Scale: 1:1,000 Rev: C

Dwg No. DN_1602-102

DWG LOCATION: [Redacted]



SITE LAYOUT
SCALE 1:250

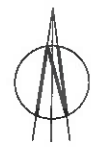
15m Alpha 2.0 STREETPOLE

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NOT FOR CONSTRUCTION

LEGEND

- EXISTING ROAD
- SITE OUTLINED THUS
- EXISTING BUILDING
- EXISTING GRASS VERGE
- EXISTING FOOTPATHS
- EXISTING HARDSTANDING



C	REVISED LOCATION	28/06/22		
B	UPDATED ADDRESS	23/11/21		
A	ISSUED FOR PLANNING	28/02/21		
No.	Revision	Date	By	Clid

DELMEC

10 Borrowside Business Park, Sleaty Road,
Graiguescullen, Carlow, R93 B9W7,
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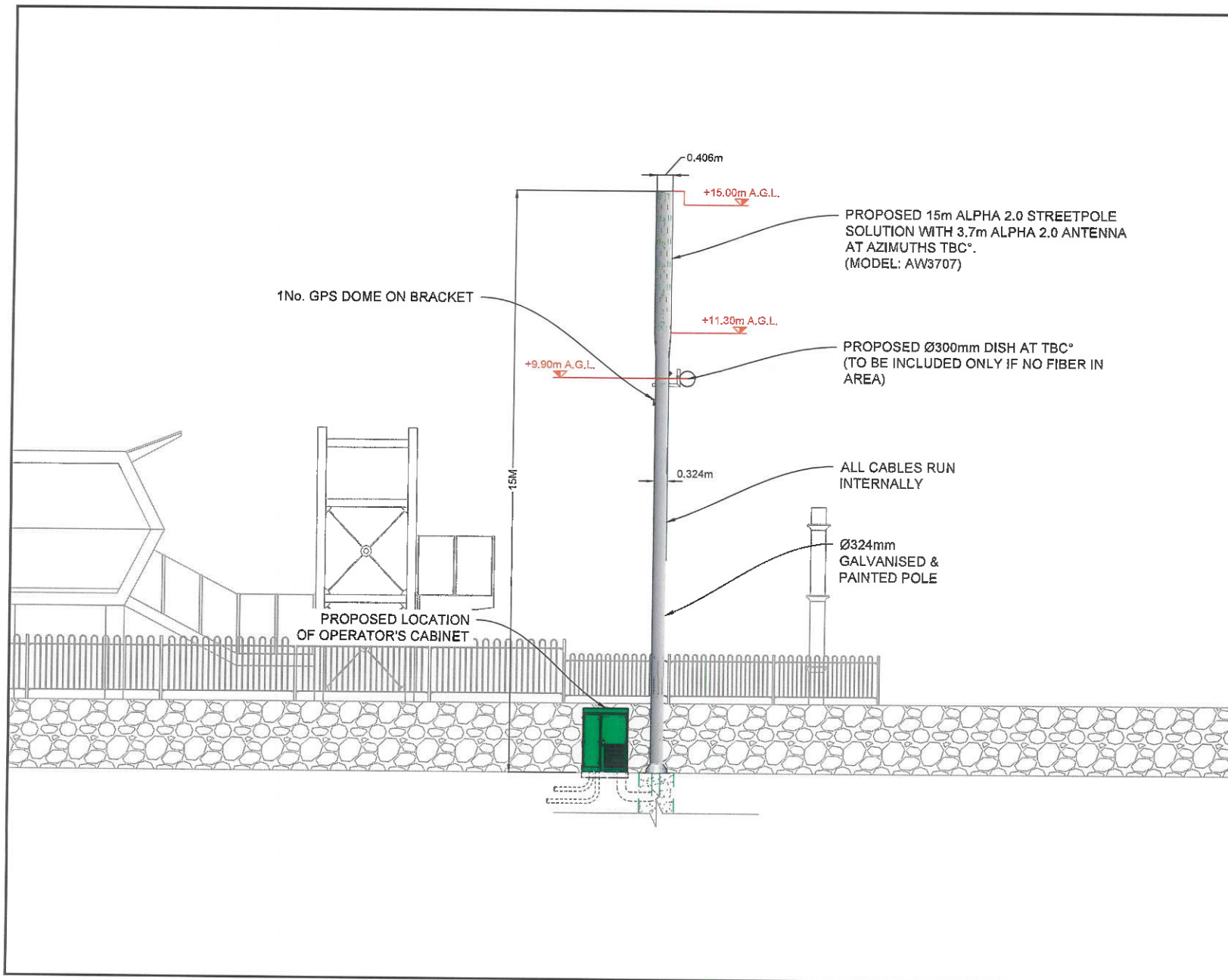
cellnex
driving telecom connectivity
Signal Infrastructure Ltd.
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JRA
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Phone: +353 (0) 57 8683130
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PLANNING

Signal site ID	CIG-03572
Operator site ID	DN_1602
Site Name	KILLINEY DART
Site Address	PUBLIC FOOTPATH ALONG STATION ROAD, KILLINEY HILL, CO. DUBLIN
Title	CELLNEX SMART STREETPOLE SITE LAYOUT PLAN

Designed		Date	30.06.2022
Drawn		Scale	1:250
Dwg No.	DN_1602-103	Rev.	C



ELEVATION
SCALE 1:100

15m Alpha 2.0 STREETPOLE

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C	REVISED LOCATION	30/06/22		
B	UPDATED ADDRESS	23/11/21		
A	ISSUED FOR PLANNING	28/02/21		
No.	Revision	Date	By	Ckd

DELMEC

10 Barrowside Business Park, Seely Road,
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Rep. of Ireland.

cellnex
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Cignal Infrastructure Ltd.
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Website: www.jrac.ie Email: info@jrac.ie

PLANNING

Cignal site ID	CIG-03572
Operator site ID	DN_1602
Site Name	KILLINEY DART
Site Address	PUBLIC FOOTPATH ALONG STATION ROAD, KILLINEY HILL, CO. DUBLIN
Title	CELLNEX SMART STREETPOLE ELEVATION

Designed	Date	30.06.2022
Drawn	Scale	1:100
Dwg No.	Rev.	C
Dwg No.	DN_1602-103A	



15m Alpha 2.0 STREETPOLE

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C	REVISED LOCATION	10/06/22		
B	UPDATED ADDRESS	22/11/21		
A	ISSUED FOR PLANNING	26/10/21		
No.	Revision	Date	By	Ckd

DELMEC

10 Barrowside Business Park, Sixty Road,
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cellnex

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Signal Infrastructure Ltd.
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Phone: +353 (0) 57 868325
Website: www.jra.ie Email: info@jra.ie

PLANNING

Signal site ID **CIG-03572**

Operator site ID **DN_1602**

Site Name
KILLINEY DART

Site Address
**PUBLIC FOOTPATH ALONG STATION ROAD,
KILLINEY HILL,
CO.DUBLIN**

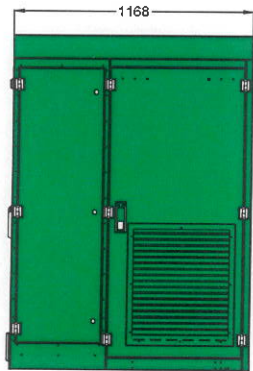
Title
**CELLNEX SMART STREETPOLE
SCHEMATIC ELEVATION**

Designed **[]** Date **30.06.2022**

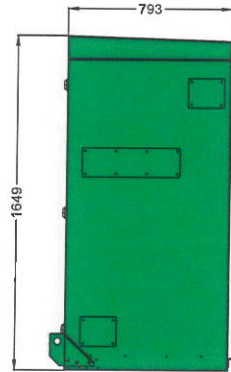
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Dwg No. **DN_1602-104**

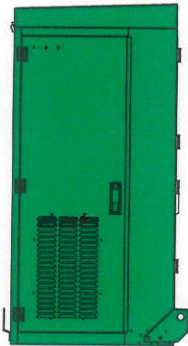
DWG LOCATION: FROM: 000010 TO: 000100



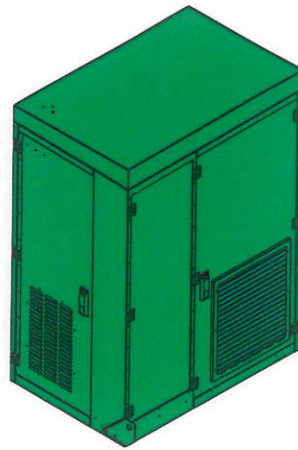
FRONT VIEW



R/H SIDE VIEW



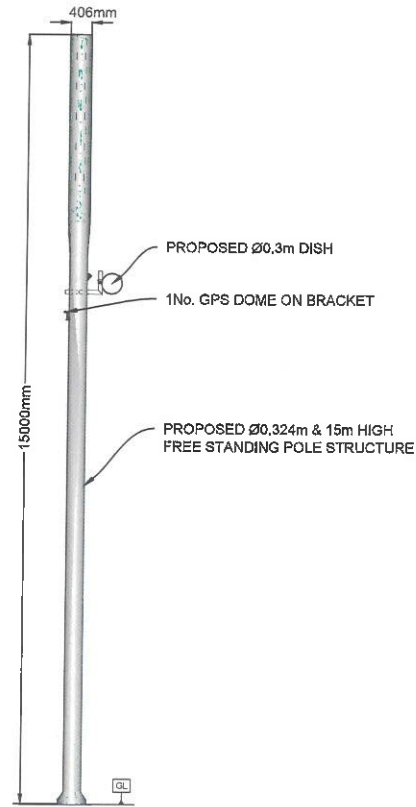
L/H SIDE VIEW



ISO. VIEW

CABINET DETAILS

SCALE 1:25



TYPICAL POLE

SCALE 1:100

15m Alpha 2.0 STREETPOLE

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

NOT FOR CONSTRUCTION

C	REBID LOCATION	28/06/22		
B	UPDATED ADDRESS	23/11/21		
A	ISSUED FOR PLANNING	28/10/21		
No.	Revision	Date	By	Ckd

DELMEC

10 Barrowside Business Park, Sleafy Road,
Grainnecollen, Carlow, R93 E8W7,
Rep. of Ireland.

cellnex
driving telecom connectivity

Signal Infrastructure Ltd.
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Consulting Engineers

James Redmond and Associates Consulting Engineers
5 Unimod Court, Portlaoise, Co. Laois, R52 NH2H
Phone: +353 (0) 51 688155
Website: www.jras.ie Email: info@jras.ie

PLANNING

Signal site ID **CIG-03572**

Operator site ID **DN_1602**

Site Name
KILLINEY DART

Site Address
**PUBLIC FOOTPATH ALONG STATION ROAD,
KILLINEY HILL,
CO.DUBLIN**

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

Designed **[Redacted]** Date **31/05/2022**
Drawn **[Redacted]** Scale **A5** Rev. **C**

Dwg No. **DN_1602-105**
DWG LOCATION: **[Redacted]**

Date: 01/12/2022

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

Re: Section 254 Application- Proposed Telecommunications Streetworks Solution

Date Received: 04.08.2022

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

Site Name: Killiney DART

Location: Public footpath along Station Rd, Killiney, Co. Dublin

dlr Application Reference: CTT.22.043-263502 - Station Road, Killiney Hill, Killiney

Dear Sir/Madam,

I am writing to you in response to the application made on behalf of Cignal Infrastructure Ltd under the provisions of Section 254 of the Planning and Development Act, 2000 (as amended) for the installation of communications infrastructure under a license from Dun Laoghaire Rathdown County Council at Station Road, Killiney, Co. Dublin.

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

There were no objections from relevant departments within Dún Laoghaire-Rathdown County Council in relation to this application, but after examination of the location and planning report provided for the application for Station Road, Killiney - Dún Laoghaire-Rathdown County Council are not in the position to issue a licence for this location on the basis of the information provided as there is a significant interface with Irish Rail infrastructure at the proposed location.

Dún Laoghaire-Rathdown County Council would require copies of Irish Rail approvals for this location. These documents were requested by Dún Laoghaire-Rathdown County Council from the Applicant but were not provided.

Furthermore, the proposed location is adjacent to a retaining wall structure associated with the railway line and a structural assessment would be required to verify the proposed installation does not interfere with the retaining wall structure. Dún Laoghaire-Rathdown County Council requested a copy of this assessment for review which was also not provided.

Yours faithfully,

M. O' Carroll

Margaret O'Carroll,
Clerical Officer
Roads Maintenance