

Dun Laoghaire-Rathdown County Council
County Hall
Marine Road
Dun Laoghaire
Co. Dublin
A96 K6C9

Our Ref: PTI: DN_2968 Roebuck Road

05/08/2022

By Email Only

APPLICATION FOR SECTION 254 LICENSE

APPLICATION UNDER PLANNING & DEVELOPMENT ACT 2000 (AS AMENDED) (SECTION 254)

INSTALLATION AT R112/ROEBUCK ROAD, ROEBUCK, DUBLIN 14 (E: 718684, N: 729121, ITM).

Dear Sir/Madam,

Please find attached an application for a Section 254 License, submitted on behalf of the applicant, namely, Emerald Tower Limited, 1st Floor, Marketing Suite Building, Lake Drive, Citywest Business Campus, Dublin D24 YXW2. This application is being submitted by the applicant's planning consultant, namely, Entrust Planning & Environmental, Unit 1D Deerpark Business Centre, Oranmore, Co. Galway H91 X599.

This License Application comprises:

- Cover Letter & Planning Statement (this document);
- Utility Maps (Eir, ESB, Gas, Irish Water, Virgin Media);
- Section 254 Drawings;
- Photomontage Report;
- Letter from Applicant confirming Safety Statement is in place;
- Confirmation of Public Liability and Employers Liability Insurance of €13 million each;
- Letter of indemnity for Dun Laoghaire-Rathdown County Council;
- Eir ICNIRP Declaration;
- License Fee in the sum of €125.00, payable by electronic transfer as agreed with Margaret O'Carroll.

As per the Council requirements it is confirmed that the following information is included:

- Application Letter (this document);
- Insurance Certificate (included above);
- Comreg Authorisation (see section 2.3 of this document);
- Site Assessment (see sections 3,4 & 5 of this document);
- Location Map and associated plans, elevations and photomontages attached;
- Payment Confirmation by electronic transfer as agreed with Margaret O'Carroll;
- Radio emissions compliance statement (Eir ICNIRP Declaration) attached.

Schedule of Drawings

No.	Title	Drawing No.	Scale
1	Overview Map	DN-2968-01-PD-01	1:1000
2	Site Layout Plan	DN-2968-01-PD-02	1:100
3	North-East Elevation Plan	DN-2968-01-PD-03	1:100
4	South-West Elevation Plan	DN-2968-01-PD-04	1:100
5	Equipment Details	DN-2968-01-PD-05	1:50

We write in connection with a proposal for a Section 254 License to install a 'Streetworks Pole' for the co-location of two separate operators equipment within the same pole, in order to provide high speed broadband and data services to the local community by two operators from a single pole, thus obviating the need for two separate structures, which is in accordance with the 'Telecommunications Antenna and Support Structures, Guidelines for Planning Authorities', 1996, which are strongly supported by the County Development Plan, in order to prevent a proliferation of new telecommunications structures.

The enclosed application is identified as the most suitable option and design that balances operational need with local planning policies and national planning policy guidance.

We are committed to maintaining a positive relationship with all Local Authorities and we would be happy to provide any additional information in relation to this application.

We look forward to receiving your acknowledgement and decision in due course.

Yours faithfully



For and on behalf of:
Emerald Tower Limited

Tel: [REDACTED]

Email: [REDACTED]

**WIRELESS BROADBAND & DATA
COMMUNICATIONS
STREETWORKS POLE**

**INSTALLATION AT
R112/ROEBUCK ROAD
ROEBUCK
DUBLIN 14**

**PLANNING STATEMENT
INCORPORATING ENVIRONMENTAL CONSIDERATIONS**

Prepared by

Entrust Limited

August 2022

1. Introduction

- 1.1. This Planning Statement incorporating Environmental Considerations (**the Statement**) has been prepared by Entrust Limited, a firm of Chartered Planning Consultants, that specialises in infrastructure planning (**the Agent**), on behalf of Emerald Tower Limited (**the Applicant**), in support of an application for a Section 254 License (**the License**) to Dun Laoghaire County Council (**the Local Authority**) for; the installation of a 18m dual operator pole, associated equipment, together with ground-based equipment cabinets and all associated site development works for wireless data and broadband services (**the Proposed Development**).
- 1.2. The Proposed Development will be installed on the R112 / Roebuck Road, Roebuck, Dublin 14 (**the Site**).

2. Background

Applicant

- 2.1. This request is being made on behalf of the applicant, namely, Emerald Tower Limited, of 1st Floor, 30313 Lake Drive, City West, Dublin 22, to provide coverage initially for Eir Mobile and then subsequently for a second operator to be co-located on the same pole as Eir Mobile.
- 2.2. Emerald Tower Limited (applicant) is a wholly owned subsidiary of Phoenix Tower International (PTI), the operating company for its Irish operations. PTI is a United States headquartered company with operations in 18 countries worldwide including in Europe (Ireland, Cyprus, France, Malta, Italy and Spain). PTI owns and operates approximately 14,600 telecommunications sites across the world including the Eir Mobile portfolio of approximately 650 telecommunications sites it purchased in 2020. In Ireland, PTI works by leasing space on its portfolio of telecommunications sites to different mobile operators and other providers including wireless broadband providers, ensuring the optimum environmental solution is achieved by the co-location of different operators on PTI's sites.
- 2.3. Emerald Tower Limited is authorized by ComReg to provide Electronic Communications Services and Networks, which allows them to apply for a license under section 254 (1) of the Planning and Development Act, 2000 (as amended), for the establishment of overground electronic communications infrastructure and associated physical infrastructure. Please see ComReg's website for further details at <https://serviceregister.comreg.ie/Services/Search?q=Emerald>

Operator

- 2.4. The Operator, namely Eircom Limited, trading as eir, is the largest communications provider in Ireland providing an essential public service throughout the country. Its three divisions include a wholesale fixed-line network through its OpenEir unit, providing copper and fibre-based access products to a wide range of Irish telecommunications companies from its telephone exchange network. The company's retail division provides services including fibre broadband and digital TV services for Irish homes and businesses. Eir also operates a national wireless data and broadband network under its own Eir brand and under the GoMo brand, which this proposal is for, and which proposes to become a crucial network point in its national wireless high-speed data and broadband network.

3. Proposed Development

Site Location

- 3.1. The site is located at a major road junction at Foster Avenue / Mount Anville Road / Roebuck Road and Callary Road, on a wide footpath. There are three storey apartments behind the proposal to the south-west of the site. The precise location is where the proposal will not be in direct view of any apartments windows and where it also avails of tree screening within the landscaped area behind the site location. The chosen location is considered to be the optimum location following receipt of the confined search ring provided by Eir as shown in section 4.2 of this document.
- 3.2. There are a lot of urban vertical structures in the immediate area such as signage, traffic lights, streetlights, and electricity/telegraph poles with overhead cables in close proximity at this large road junction. There are also a lot of mature and semi-mature trees in the area, along the roads.



Figure 1 Site Location

Figure 2 Site Elevation



Site Ownership

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

Design

- 3.4. The proposal is to install a new 'Streetworks Pole' with Eir's antennas to be encased inside the top of the pole, with space for a second operator's antennas below the eir antennas, a cabinet for Eir Mobile and provision for a second cabinet for a subsequent operator to be co-located onto this installation in future. The existing streetlight pole may be removed or not and the light relocated onto the proposed structure. The equipment dimensions are as follows:

Streetworks Pole		Cabinets (1 & 2)	
Height	18m	Height	1) 1.65m, 2) 1.65m
Diameter or Width	406mm (Diameter)	Length	1) 1.3m, 2) 1.9m
		Depth	1) 0.8m, 2) 0.8m
Area	0.13m ²	Area	1) 1.04m ² , 2) 1.52m ²
Volume	2.33m ³	Volume	1) 1.768m ³ , 2) 2.584m ³
Colour	Galvanised	Colour	Dark Fir Green

Total Streetworks Pole & Cabinets			
Area	2.69m ²	Volume	6.682m ³
Footpath Width 3.9m (shortest), Cabinet Doors Open 2.3m, Cabinet Doors Closed 3m			

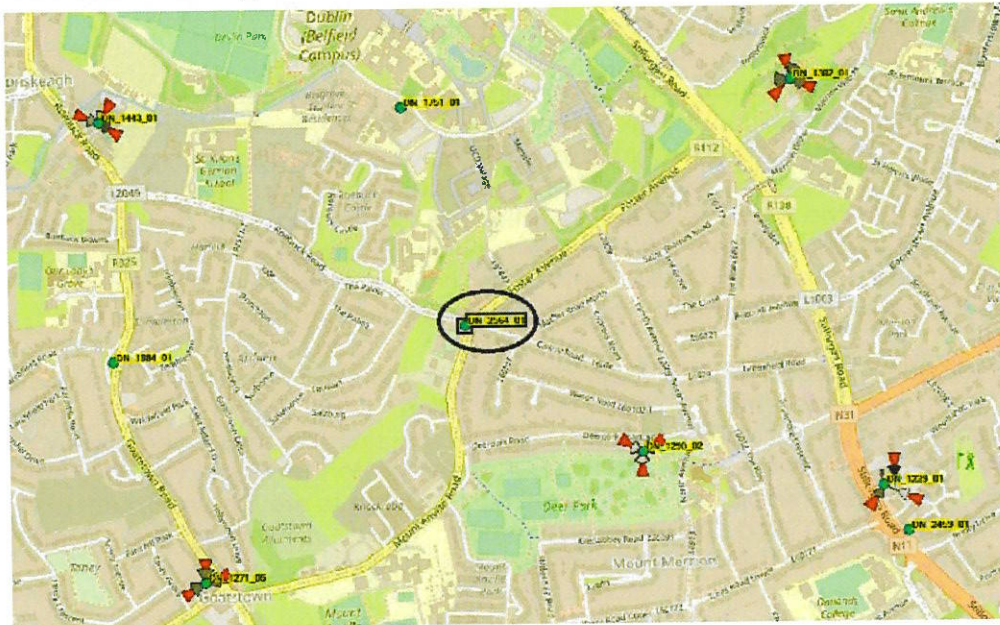
Dishes (2)	300mm (Diameter)	Antennas (encased inside pole)	4m H x 406mm (Diameter)
Colour	Goose Grey	Colour	Galvanised

- 3.5. Great care and attention have been given to the design of the Proposed Development.
- It is proposed that the structure will be coloured in a galvanised (CL 3093W) finish and will assimilate with the typical sky colour in Ireland and surrounding street infrastructure, however, it is possible for the proposed development to be painted in any colour including a dark fir green or black finish which could be requested by way of a conditional License;
 - Slimline, slender and un-fussy design to minimise any negative visual impacts;
 - Pole design to blend in with existing street infrastructure such as street lighting, road signs poles and traffic lights poles;
 - Sited in relatively close proximity to existing vertical street infrastructure along Roebuck Road for easily assimilation into the streetscene;
 - Located not to be in direct view of any apartment windows and where tree screening is available between the proposal and apartments.
- 3.6. As part of Eir Mobile's continued network improvement programme, there is now an urgent requirement in this area to provide new and improved high-speed data and broadband services, for the operator to improve overall network coverage. The site following the proposed installation will be capable of accommodating new, more advanced technologies for two separate operators within the surrounding area. The proposed pole, at an overall height of 18m is the absolute minimum available to support two operators' equipment that will allow all these criteria to be met and to achieve antenna 'line of sight' above the surrounding landscape topography, built form and vegetation.
- 3.7. Consideration has been given to technical, engineering, environmental, health and safety and land use planning viability in the siting and design of the proposed telecommunication's installation. The height of the structure has been driven by the requirement to achieve the desired level of coverage to the wider area. The proposed location, in our view, would provide the optimum location to site this equipment achieving the desired area and level of coverage, whilst minimising the number of telecommunications installations and minimising visual impact.
- 3.8. In light of the applicant's efforts to design the best solution for this particular site so as to minimise the impact of the development on the environment, it is considered that the appearance of the proposed structure would not seriously impact upon the visual or residential amenity of the area, nor would it form an obtrusive feature within the surrounding area. The proposal strikes a good balance between environmental impact and operational considerations. The proposed height, colour and design represent the best compromise between the visual impact of the proposal on the surrounding area and meeting the technical requirements for the Site. Taking all matters into account, it is considered that this proposal which is to provide new and improved high-speed broadband and data services, initially for Eir Mobile and a second operator on a single structure as opposed to having eventually two separate structures in this area, would not be discordant within the local environment.

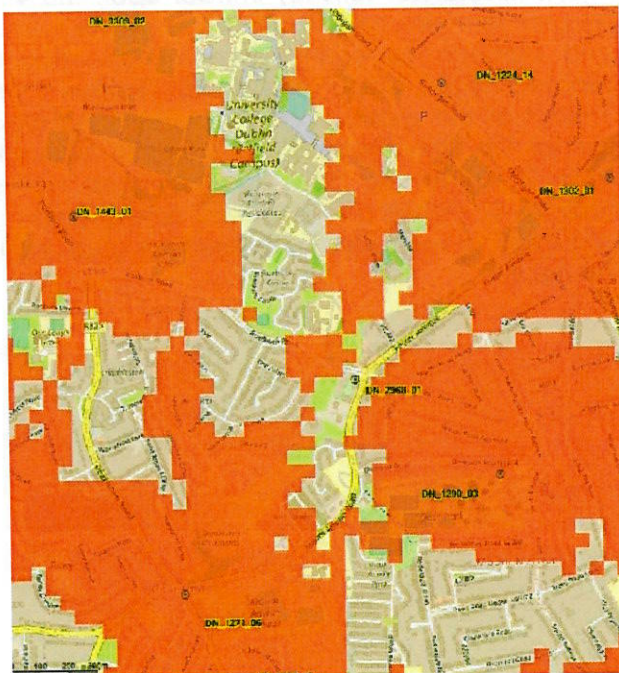
4. Technical Justification

4.1. Eir has stated that "As part of Eir Ltd licensing requirements and the continuing rollout of their 3G and 4G networks, Eir requires a site in this area of Roebuck Road, Clonskeagh Dublin 14. The current sites in the area for Eir do not provide adequate indoor service for high-speed mobile broadband in and around the area. Eir's current coverage in this area specifically around southern parts of UCD and Roebuck Castle, Fosters Avenue, Mount Anville Road, Callary Road, The Palms and Roebuck Hill are all areas that experience reduced quality of service and capacity and a Mobile base station deployment at the proposed location would greatly support Eir customers in the area."

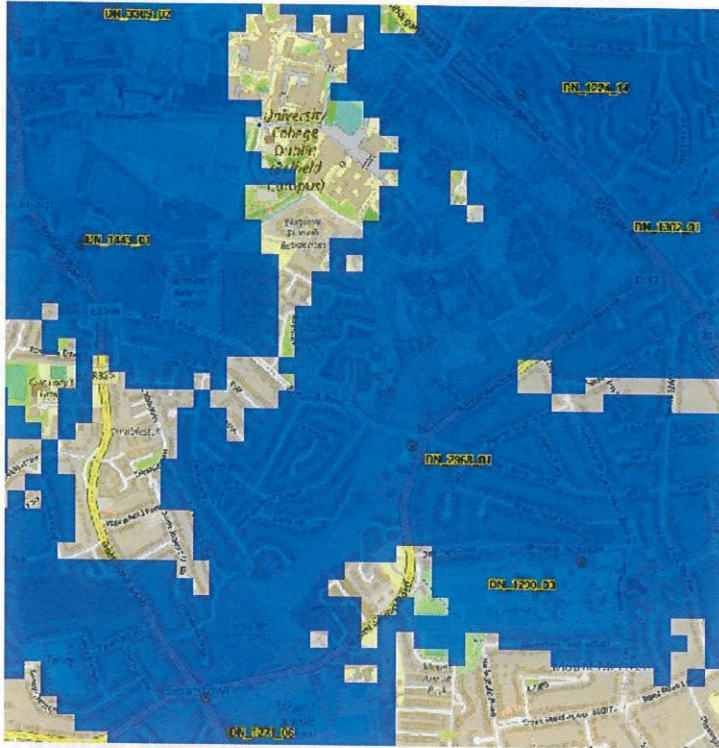
4.2. Eir Search Ring DN_2968



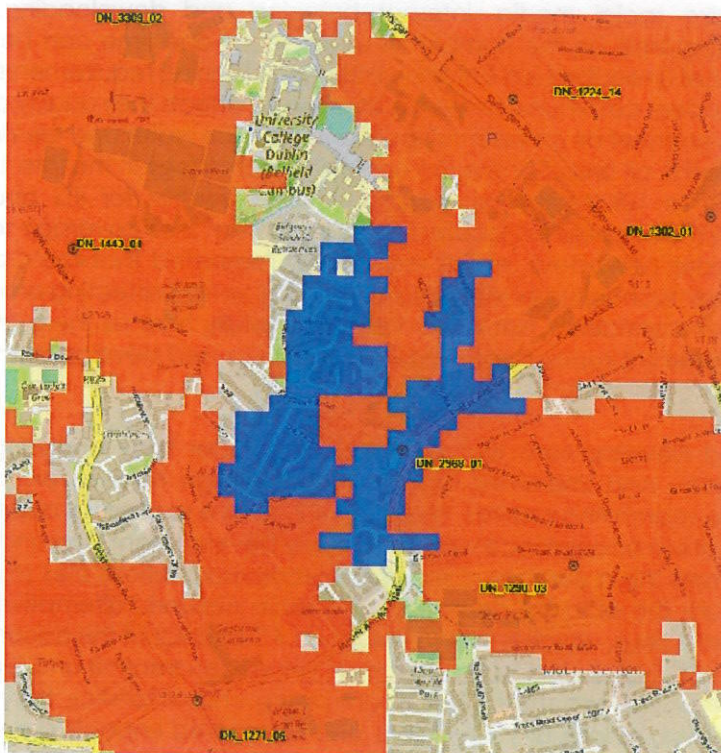
4.3. Existing Indoor Coverage without DN_2968



4.4. Predicted New Indoor Coverage with DN_2968



4.5. Existing and Predicted Indoor Coverage with DN_2968



5. Site Selection Process and Discounted Options

- 5.1. Eir will always co-locate on an existing telecommunications structure as a first choice if a suitable existing structure exists, as it has done on many hundreds of its sites in its radio network to date and which it has already done here at the nearest existing 3 out of 5 telecommunications structures as shown below in table 1.
- 5.2. There are no suitable existing structures in this search area to locate Eir's equipment and the local community in this densely populated area currently suffer from a severe lack of high-speed wireless broadband and data services. Eir would not be looking to provide the much-needed coverage here if it could do so by its two existing three structures. Due to the sheer amount of intervening vegetation and built form as well as the increasing capacity issues on its network as a result of increasing demand here in this densely populated residential area for data services, means Eir cannot meet its wireless broadband and data objectives here without having a new structure which is proposed as a last resort in accordance with the sequencing approach to finding a site in accordance with the 1996 Government Guidelines. The location has been selected on the basis that it is the optimum location in this search area and the only option which is a last resort. The height is the lowest height possible to 'see' over surrounding high trees and built form in the area for two operators to share the same pole.
- 5.3. To avoid any confusion as to why a new telecommunications installation is required here which is a central point in this application, all the mobile operators namely Three, Eir and Vodafone have an obligation to provide 100% coverage throughout the country, including at this location. The nearest existing sites are too far away for the newer technologies to work including 4G and 5G technologies and to a large extent 3G, due to the required data speeds for applications like social media, internet browsing and downloading, the technology range which depends on the number of users at any one time can be only several hundred metres. What is required is a balance between planning requirements and people's entitlements to modern communications facilities which affects their quality of life, which is classed by the government as an essential public service like water and electricity, so these services are required in all areas. Unlike the earlier 2G technology in the late 1990's which had a range of up to 10KM and not several hundred metres for 4G and 5G technologies, so back then masts could be located miles away from their coverage target area, but that is not the case nowadays, so it is respectfully requested that the Council show's flexibility for the newer technologies with regards to siting, whilst protecting amenity, which is what the applicant considers it has done very successfully here as there are no resulting significant environmental impacts resulting from the proposed development as is demonstrated in this planning statement.
- 5.4. The siting of the Proposed Development was decided upon after firstly analysing the requirements to provide new and improved broadband coverage here as explained above and in particular the search ring provide in section 4.2. Then a sequential approach was taken to choosing the site in accordance with the County Development Plan and 1996 Government Guidelines. From this a number of existing telecommunications sites (table 1) were investigated. To ensure the efficient operation of a radio network, alternative sites must be within the cell search area, which is shown in section 4.1 and 4.2 of this document. These sites must be at relatively high points to ensure the antennas can transmit and receive over the proposed cell area. Sites also must have the following characteristics, they must be environmentally suitable i.e. where any inevitable and associated impacts are within acceptable parameters;
- Within search ring to meet wireless broadband coverage objectives;
 - Be capable of being developed; sufficient space for pole and cabinets, avoiding underground utilities and free of overhead obstructions like cables;
 - Sufficient pavement space for wheelchair access and buggys/prams;
 - Available power and fibre connections nearby.

5.5. In compliance with each operator’s license, all attempts to utilise any existing telecommunications structures where they represent the optimum environmental solution have been employed. The ComReg site Finder mast register was used to search for existing sites in the area which is the most up to date source of information and is shown in the table 1 below.

No.	Site Location	Location	Reason
1		E: 317766 N: 229670	This site is significantly outside the search ring. Eir, Vodafone, Three Ireland are already co-located on the rooftop of the shopping centre, so it would not meet Eir’s coverage objective here.
2	The Topaz Building, Taney Road, Goastown	E: 318044 N: 228394	This site is significantly outside the search ring. Vodafone is located on this site, and it is in close proximity to an Eir site (No 3), so it would not meet Eir’s coverage objective here.
3	Mount Anville Road, Mountanville	E: 318140 N: 228350	This site is significantly outside the search ring. Eir is already located at this site so this site would not meet Eir’s coverage objective here.
4	The Goat Centre, Lower Kilmacud Road, Goatstown	E: 318125 N: 228314	This site is significantly outside the search ring. Three is located on this site, and it is in close proximity to an Eir site (No 3), so it would not meet Eir’s coverage objective here.
5	Deerpark Road, Mount Merrion	E: 319240 N: 228757	This site is significantly outside the search ring. Eir is already located at this site so this site would not meet Eir’s coverage objective here.

5.6. During the alternative sites assessment, there were no suitable existing telecommunications sites identified which would be capable of providing the coverage required in this instance. As you can clearly see in the Comreg map below there is a total absence of existing telecommunications sites in this area at the road junction of Roebuck Road and the R112 Road, hence why Eir requires a site here.

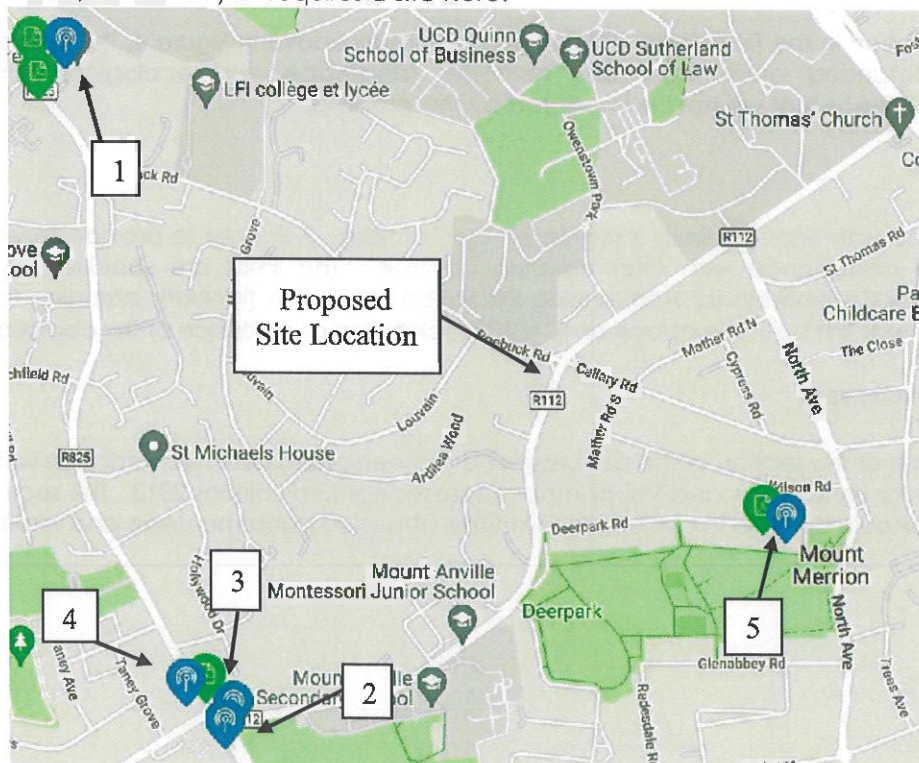


Figure 3 ComReg Site Finder depicting existing telecommunications sites in the area.

6. Environmental Considerations

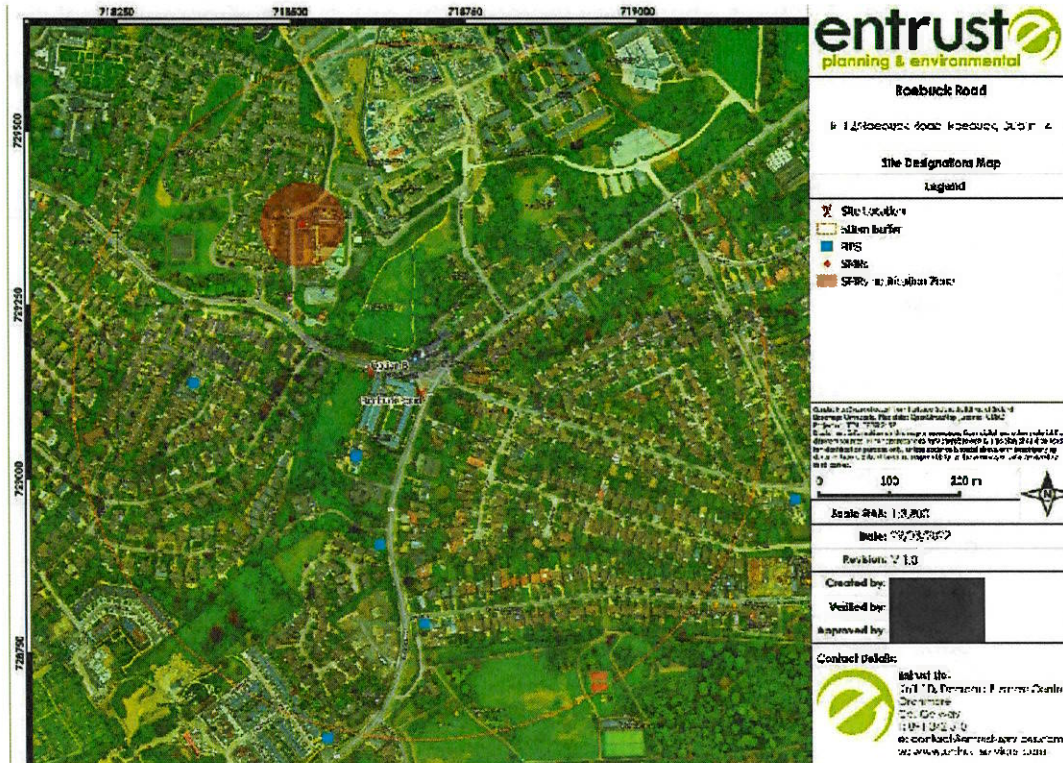


Figure 4: Environmental Designations Map

Heritage, Ecology and Landscape

- 6.1. As can be seen in the Environmental Designations Map above in Figure 4, the proposal is suitably distanced away from any heritage, landscape and ecological sensitive designated areas that will not be impacted by the proposal.

Health

- 6.2. Compliance with emission limits is regulated by ComReg. A license to provide services is subject to compliance with strict emission controls. The limits are specified by the International Commission for Non-Ionising Radiation Protection (ICNIRP), including for this site since it was first built. We attach an ICNIRP Declaration as evidence of this compliance.

Visual Assessment

- 6.3. The contents of this section of the document have been prepared in accordance with the Guidelines for Landscape and Visual Impact Assessment (3rd Edition) 2013. This section of the report should be read in conjunction with the attached photomontage and wireframe report.

Sensitivity	Typical descriptors
High	Receptors with proprietary interest in the view such as residential properties, and receptors undertaking recreating where the view is a key reason for the activity, e.g. user of public footpaths and bridleways and open access land.
Medium	Receptors with moderate interest in their environment, e.g. workers, pedestrian cyclists and other non-motorised users of major movement corridors and people taking part in outdoor sports
Low	Receptors with passing of momentary interest in their environment, e.g. motorists.

Table 2: Visual Sensitivity

- 6.4. The sensitivity of a visual receptor is determined by a combination of the value of the view and the susceptibility of the visual receptors to the change that the Proposed Development will have on the view. Visual receptors are the people who will be experiencing the views.
- 6.5. Magnitude of Change is an expression of the extent of the effect on the visual receptors that will result from the introduction of the Proposed Development. The magnitude of change is assessed in terms of the size and scale of the effect and the geographical extent of the area influenced.
- 6.6. Levels of magnitude of change - high, medium to high, medium, medium to low and low - are applied in order that the judgement used in the process of appraisal is made clear. The criteria used to determine magnitude of change differ for the effects on landscape receptors and visual receptors, as well as the cumulative effects on both.

Magnitude	Description of Change
Large	Total loss or major alteration to key landscape elements/features/characteristics such that post development the landscape character area would be fundamentally changed.
Medium	Partial loss or alteration to one or more key landscape elements/features/characteristics such that post development the landscape character area would be partially changed
Low	Minor loss or alteration to one or more key landscape elements/features/characteristics such that post development the change/loss would be discernible, but the landscape character would be similar to the baseline.
Negligible	Very minor loss of alteration to one or more key landscape elements/features/characteristics of the baseline conditions. Change would be barely distinguishable approximating to no change.

Table 3: Magnitude of Change

- 6.7. The magnitude of change resulting from the Proposed Development on a visual receptor is made by combining the assessment of size or scale of the change in views and the geographical extent over which such changes occur.
- 6.8. Effects on Visual Receptors - The level of the effect is determined through the combination of the sensitivity with the magnitude of change that will be brought about by the Proposed Development. The appraisal applies professional judgement and identifies the level of effect defined as being minor, moderate or major. Intermediate levels may also be applied such as minor-moderate and moderate major.

Magnitude of Change → Visual Sensitivity ↓	High	Medium-High	Medium	Medium-Low	Low	Negligible
High	Major	Major	Moderate /Low	Moderate/Low	Moderate/Low	Negligible
Medium-High	Major	Major-Moderate /Low	Major-Moderate /Low	Moderate/Low	Moderate/Low or Moderate-Minor	Negligible
Medium	Major-Moderate /Low	Major-Moderate /Low	Moderate /Low	Moderate/Low or Moderate-Minor	Moderate/Low -Minor	Negligible
Medium-Low	Major-Moderate /Low	Moderate /Low	Moderate /Low or Moderate -Minor	Moderate/Low -Minor	Moderate/Low or Moderate-Minor	Negligible
Low	Moderate /Low	Moderate /Low or Moderate -Minor	Moderate /Low - Minor	Moderate /Low or Moderate-Minor	Minor	Negligible

Table 5: Illustrative Matrix of Effects

- 6.9. Where the visual effect has been classified as Major or Major/Moderate significant effects may occur. Effects identified as moderate or less are not considered to be significant. As with many aspects of visual assessment, significance of effect also needs to be quantified with respect to the scale over which it is felt. An effect may be locally significant, or significant with respect to a small number of receptors, but not significant when judged in a wider context.
- 6.10. Any effect may be described as temporary or permanent, direct or indirect, positive or negative and cumulative and these various types of effect described below have a bearing on the acceptability or otherwise of any impact. Visual effects can be described as temporary or permanent and reversible or irreversible. Due to the long-term nature of telecommunications structures, they are generally regarded as a long-term reversible addition to the landscape preserving the choice for future generations whether or not to retain what might be regarded as the landscape fabric of today.
- 6.11. It is possible to identify a number of sensitive receptors within the study area, which should then be further investigated through field visits and the production of photomontages and wirelines. The most important viewpoints (VPs) are identified as being points whereby the Proposed Development is likely to show the greatest amount of visibility or impact on the largest number of users and as such these warranted further investigation.
- These VP's are:
- VP1 – Foster Avenue northeast of the site
 - VP2 – Mount Anville Road south of the site
 - VP3 – Roebuck Road west of the site
 - VP4 – Callary Road northeast of the site
- 6.12. The photomontages attached will illustrate the views from locations where the proposed communications mast would be theoretically visible. This in turn has informed the locations of the final viewpoints. The viewpoints were selected where theoretical points of visibility intersected public roads, residential areas, cultural heritage assets and public rights of way (PROWs).

- 6.13. Visual impact assessment in relation to the Proposed Development. It is ascertained, however, that the considered viewpoints are locations which are publicly accessible and expose the development in its fullest form in order to assess the highest possible impact of the proposal. The remainder of this section now considers each of these viewpoints in turn and discusses the potential impact of the Proposed Development and comments on its potential significance.

Table 6: Viewpoints Analysis

Viewpoint 1	VP1 – Foster Avenue northeast of the site E: 718743 N: 729171 Distance to Proposal: 75.1m
Existing Character	This viewpoint (VP) is taken along Foster Avenue, approx. 75m northeast of the site. This is the main junction between Roebuck Road, Callary Road, Mount Anville Road and Foster Avenue.
Receptor Type and Sensitivity	The typical receptor at this location would be road users such as pedestrians, motorists and cyclists. The sensitivity is therefore medium.
Nature of Change	From this viewpoint, the proposal is visible given the very close proximity of the viewpoint to it. While the proposal is visible, it does assimilate very well into its host location due the existing streetlights, street poles and overhead cables in the surrounding area which successfully absorbs and assimilates the proposal into the streetscene without the proposal appearing as a dominant feature. The design of the proposal is also similar to the existing vertical infrastructure.
Magnitude of Change	In relation to the view at this VP, the magnitude of change is considered to be medium as the proposed development will result in a partial loss or alteration to one or more key landscape elements/features/characteristics such that post development the landscape character area would be partially changed.
Summary of Visual Assessment	Sensitivity: Medium (Road users) Magnitude: Medium Level of effect: Moderate-Low
Significant effect?	No

Viewpoint 2	VP2 – Mount Anville Road south of the site E: 718649 N: 728978 Distance to Proposal: 151.6m
Existing Character	This viewpoint (VP) is taken along Mount Anville Road approx. 151m south of the site. The view is dominated by trees, streetlights, and an apartment development.
Receptor Type and Sensitivity	The typical receptor at this location would be road users such as pedestrians, motorists and cyclists. The sensitivity is therefore medium.
Nature of Change	The proposed development will be visible from the perspective of this viewpoint given its relative close proximity to the viewpoint. However, the proposal is considered to fit in comfortably to its host environment here as it is absorbed and assimilated into its location by the presence of existing street lighting poles which helps to ensure the proposal is not seen as a dominating structure and instead is viewed at the same or similar height to the existing street lighting poles along Mount Anville Road due to the topography of the site location being lower than where the viewpoint is.
Magnitude of Change	In relation to the view at this VP, the magnitude of change is considered to be low as the proposal results in minor loss or alteration to one or more key landscape elements/features/characteristics such that post development the change/loss would be discernible, but the landscape character would be similar to the baseline.
Summary of Visual Assessment	Sensitivity: Medium (Road users) Magnitude: Low

	Level of effect: Moderate-Low
Significant effect?	No

Viewpoint 3	VP3 – Roebuck Road west of the site E: 718524 N: 729187 Distance to Proposal: 170.6m
Existing Character	This view is located on Roebuck Road approx. 170m east of the site. There are mature trees in the foreground from this viewpoint along both sides of the road which dominates the view. The viewpoint also has a green space on the left-hand side of Roebuck Road and existing vertical infrastructure items along both sides of the road.
Receptor Type and Sensitivity	Primary receptors at this location would be road users such as motorists, pedestrians, and cyclists. The sensitivity is therefore medium.
Nature of Change	From this VP, only the tip of the proposed development will be in view from this direction, seen protruding above the apartment complex. It would be almost completely screened by the presence of an existing development and the proposal would be easily absorbed into the streetscape.
Magnitude of Change	In relation to the view at this VP, the magnitude of change is considered to be negligible with a very minor loss of alteration to one or more key landscape elements/features/characteristics of the baseline conditions. Change would be barely distinguishable approximating to no change.
Summary of Visual Assessment	Sensitivity: Medium (Road users) Magnitude: Negligible Level of effect: Negligible
Significant effect?	No

Viewpoint 4	VP4 – Callary Road northeast of the site E: 718833 N: 729105 Distance to Proposal: 151.2m
Existing Character	This viewpoint is located approximately 151m from the proposal to the northeast on Callary Road. This is a residential area and there are many semi-mature and mature trees present along Callary Road.
Receptor Type and Sensitivity	Primary receptors at this location would be the adjacent residential dwellings along with road users such as motorists, pedestrians, and cyclists. The sensitivity is therefore high.
Nature of Change	The proposed development will not be visible from this viewpoint. The proposed development will be screened by the existing mature trees along Callary Road and therefore, the nature of change is considered to be Negligible.
Magnitude of Change	In relation to the view at this exact VP, the magnitude of change is considered to be negligible with a very minor loss of alteration to one or more key landscape elements/features/characteristics of the baseline conditions. Change would be barely distinguishable approximating to no change.
Summary of Visual Assessment	Sensitivity: High (Residential Dwellings) Magnitude: Negligible Level of effect: Negligible
Significant effect?	No

7. Relevant Planning Policy and Guidance

National Planning Framework (NPF)

- 7.1. Under the NPF, one of the 10 goals or national strategic outcomes is to create a strong economy that can foster enterprise and innovation and attract talent and investment. It states that delivering this outcome will require the coordination of growth and place making with investment in world class infrastructure including digital connectivity, which this application supports. It also supports a second goal regarding international connectivity.
- 7.2. Under the NPF, in Chapter 4, regarding Urban Places, this well designed and located proposal supports Objective 4 to ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.
- 7.3. Within the NPF it is emphasised how in the information age, telecommunications networks play a crucial role in enabling social and economic activity. In section 2.2, one of the NPF's strategies is to strengthen Ireland's digital connectivity by 5 measures, one of which is to improve local connectivity to principal communications (broadband) networks.
- 7.4. In section 5.1 the NPF states that a major focus will be on addressing connectivity gaps in communications infrastructure.
- 7.5. **Analysis:** this proposal supports two of the ten goals of the NPF in improving digital connectivity, including international connectivity for not only a strong local economy but also to encourage social interaction. Ever since the original 2G mobile networks were built in the late 1990's, national and local policy has changed since then from acknowledging the economic benefits of the then wireless voice communications networks to nowadays acknowledging the social benefits of modern day wireless broadband communications networks which has recently been most evident during the Covid pandemic where many people's only social interaction with family and friends was through hand held digital devices like mobile phones, tablets and laptops. There has never been a greater socio-economic appreciation or need for wireless broadband with home working / hybrid working as well as for social interaction and helping to alleviate social isolation, which this proposal strongly supports and as such will help to improve the quality of the lives of the local community here.

Regional Planning Guidelines for the Greater Dublin Area 2010-2022 (RPG)

Connectivity Infrastructure – Telecommunications (Section 3.5.7)

- 7.6. Advanced telecommunications services are critical for the attraction of foreign direct investment, for the development of indigenous industry and the promotion of the knowledge economy. The increasing importance of services to the economy, in particular those that are structured around electronic transactions and information flows, makes it essential that the region has access to advanced and cost competitive communications services. For SMEs, effective use of ICT allows them to compete more effectively with their counterparts in other markets, for example by reducing costs and improving the quality of services to their customer base.

Energy & Communications (Section 6.6)

- 7.7. The provision of advanced telecommunication networks and services, including Next Generation Networks, is critical to ensuring that the GDA places itself in the right position to capitalise on emerging markets, business opportunities and to attract skilled workers.

Access to advanced and cost competitive telecommunication services will help the GDA region become more competitive within global markets.

Telecommunications (Section 6.6.3)

- 7.8. Broadband infrastructure development remains an area which requires continuing ongoing investment. Broadband and in particular next generation connectivity are integral to further developing the competitiveness of the Irish economy.
- 7.9. **Analysis:** The proposal ensures the continuing investment in new and improved broadband in this area for the socio-economic benefit of the local community and for the wider economic competitiveness of the Greater Dublin Area.

Dun Laoghaire-Rathdown County Development Plan 2012-2028 (CDP)

Telecommunications (Section 10.6.1)

- 7.10. The widespread availability of a high-quality telecommunications network throughout DLR is 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. It will also assist home working thereby reducing commuting.
- 7.11. It is a Policy Objective to promote and facilitate the provision of an appropriate telecommunications infrastructure, including broadband, fibre optic connectivity and other technologies, within the County.

Telecommunications (Section 12.9.8)

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

Zoning

- 7.13. The site which forms part of the local road infrastructure is not zoned.

Analysis: The Dun Laoghaire-Rathdown County Development Plan 2022-2028 (CDP) underlines that telecommunications infrastructure is a key requirement within the County. The availability of services such as high-speed broadband is essential to the national

economy but also to local communities in everyday life. It is considered by the applicant that this proposal fully adheres to; Policy Objective EI20 as the proposal promotes and facilitates the provision of an appropriate telecommunications infrastructure. The proposal is fully compliant with the Planning Guidelines for 'Telecommunications Antennae and Support Structures' (1996) as is shown below. It has been demonstrated that in Figure 3 and Table 1 of this document why the nearest existing telecommunications structures of which Eir is located on three of them cannot be used, the predicted visual impact has been described in section 6 of this document supported by the accompanying photomontage report which predicts a maximum level of moderate-low visual impact in the area immediately surrounding the proposal in two viewpoints and a negligible visual impact in the other two viewpoints. In section 3.5 and 3.6, the proposed design of the structure was discussed where it was confirmed that the pole can be painted in any colour that the Planning Authority may prefer however a galvanised colour is proposed to match existing streetlights and to blend in with the typical sky colour. It is proposed that the cabinets are to be green but may be any colour including galvanized. It is also intentionally sited not to be in direct view of any apartment window at a location which has tree screening directly behind the proposal as well as across the street for maximum screening purposes.

**Department of Environment Heritage and Local Government,
Telecommunications, Antenna and Support Structures (Guidelines for Planning
Authorities – 1996) and Circular PL07/12**

- 7.14. Government policy for the development of telecommunications infrastructure is set out in the Department of Environment, Heritage and Local Government Telecommunications Antennae and Support Structures (1996) and Circular Letter PL07/12 which updated certain sections of the Guidelines.
- 7.15. Paragraph 1.2 states that: *'The Government's telecommunications policy aims to place Ireland in the top quartile of OECD economies as regards the availability, price and quality of telecommunications services in order to promote industrial and commercial development, to improve personal and household security and to enhance social interchange and mobility.'*
- 7.16. With regards to visual impact, the Guidelines detail that: *'In most cases the applicant will only have limited flexibility as regards location, given the constraints arising from radio planning parameters, etc., already referred to.'*
- 7.17. The guidelines recommend a hierarchy of suitable locations for telecommunications equipment which has been followed here as part of the site selection process, and which has been demonstrated has a lack of existing telecommunications structures within this search area.
- 7.18. In regard to co-location and sharing, section 4.5 states that 'Sharing of installations (antennae support structures) will normally reduce the visual impact on the landscape' and 'All applicants will be encouraged to share and will have to satisfy the authority that they have made a reasonable effort to share'. It is confirmed that Emerald Tower Limited actively encourages the sharing of all infrastructure in its portfolio which is the case for this proposal also.

**Report of the Mobile and Broadband Taskforce and Action Plan for Rural
Development**

- 7.19. The purpose of the taskforce report (published by the Department of Communications, Climate Action and Environment) and the Action Plan for Rural Development (published by the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs) in 2016 is to

deliver the National Broadband Plan (NBP) in the shortest time possible and to reduce Ireland's urban-rural divide.

- 7.20. There are 40 actions contained within the taskforce report which require the co-operation of multiple stakeholders from government departments to industry providers. The actions contained within the report serve to eliminate barriers to the timely development of communications infrastructure in advance of, and in tandem with NBP State-led intervention.
- 7.21. The Section 254 licensing process emerged from this taskforce to help deliver broadband infrastructure more quickly by removing barriers to its deployment. It differs from the Planning and Development Regulations 2001 (as amended), Schedule 2, Class 31 Telecommunications, in that Section 254 licensing relates solely to public roads and not to other property under the Regulations. Section 254 requires high standards of design and adherence to the proper planning and sustainable development of the area which this proposal fully complies with as is set out within this document.

8. Conclusions

- 8.1. Taking into consideration all the relevant factors set out herein in this document, it is considered that this proposed telecommunications pole is the optimum solution in terms of providing the required technology coverage, minimising any adverse impacts on local amenity and the surrounding townscape. The site is considered to be appropriately located as it is not located within any sensitive landscape designation. The site location of the proposed development benefits from the presence of mature trees along with streetlights close by along the R112 Road and Roebuck Road and is located where it will have the least possible impact on residential amenity locally. It is considered that the proposal is at the minimum height possible for the co-location of two separate operators on the same pole in an area of low topography, is able to be absorbed comfortably by its host environment as it is similar in design to existing signage, road signs and electricity/telegraph poles with overhead cables in the immediate vicinity of the site at this major road junction. Given the constrained search ring provided by Eir as shown in section 4.2, and having done a rigorous search in this search ring, it is considered that the optimum location has been chosen which ensures the protection of residential amenity as much as possible in terms of micro siting and design.
- 8.2. The height proposed at 18m is the lowest possible height for two operators to be co-located on the same pole to provide the required technology coverage by having 'line of sight' above the immediate built form and vegetation. The site location is of low topography.
- 8.3. It has been shown in section 6 of the document, that there are *No Significant Environmental Impacts* predicted as a result of the Proposed Development. The attached photomontage report demonstrates that there will not be any significant visual impacts as a result of this proposal, however, there are *Significant Benefits* to be provided by the Proposed Development for the local community by having access to the most up to date wireless broadband and data services, to be provided by a national mobile broadband operator on a slender structure, and making provision for another operator, thus obviating the need for up to two separate structures in the same area and the environmental damage it would cause, which it is considered should be considered carefully in determining the planning 'balance' by the Planning Authority.
- 8.4. Broadband is now considered an essential public service like water and electricity and the applicant urges the Planning Authority to assess the planning balance carefully here in terms of the public benefits associated with the proposal as opposed to the limited dis-

benefits (limited visual impact) which are considered to be far outweighed in accordance with national and local policy.

- 8.5. As has been demonstrated in section 7 of this document, this proposal is in full accordance with the aforementioned policies and guidance, including the 1996 Government Guidelines and Development Plan, with regards to the sequential approach to locating telecommunications equipment and which actively encourages co-location, to prevent the proliferation of masts, which this application proposes.
- 8.6. Therefore, in the absence of any significant harm to the site and its surrounds and in view of supporting policy at national and local level in favour of this proposal, the applicant therefore respectfully asks the Local Authority to grant a license for this proposal.



**PHOENIX TOWER
INTERNATIONAL**

Date: 25/05/2022

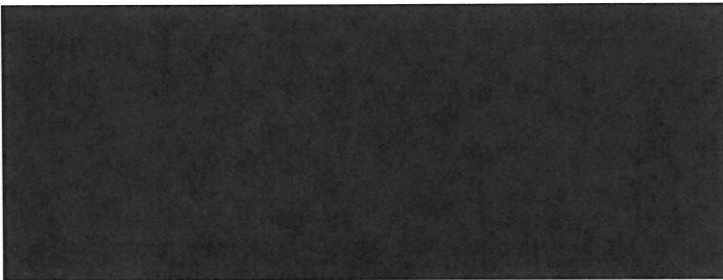
To whom it may concern,

I can confirm that Emerald Tower Limited (and its group companies; Phoenix Ireland HoldCo Limited and Phoenix Tower Ireland Limited) has a current Safety Statement in place.

The registered office of Emerald Tower Limited is 10 Earlsfort Terrace, Dublin D02 T380.

If I can be of any further assistance, please do not hesitate to contact me.

Yours faithfully



Phone



Email:





Date: 04/07/2022

Client Code: [REDACTED]

To Whom It May Concern,

Re: Insured - Emerald Tower Limited and/or Phoenix Ireland HoldCo Limited and/or Phoenix Tower Ireland Limited

Business Description: Owning, leasing and management of wireless infrastructure

We confirm we act as insurance brokers for the above-mentioned client and set out on the attached details of the insurances we have arranged on their behalf:

Policy Type:	Combined Liability
Name of Primary Insurer:	Chubb Insurance Co.
Primary Policy Number:	[REDACTED]
Cover Period:	23 rd April 2022 to 22 nd April 2023 both days inclusive
Name of Policyholder:	Emerald Tower Limited and/or Phoenix Ireland HoldCo Limited and/or Phoenix Tower Ireland Limited
Insured Business Description:	Owning, leasing and management of wireless infrastructure
Name of Excess Insurer:	Convex Insurance UK Ltd
Policy Number:	[REDACTED]
Policy Period:	23 rd April 2022 to 22 nd April 2023 both days inclusive
Total Limit of Indemnity:	<ul style="list-style-type: none">Public/Products Liability: €13,000,000

O'LEARY INSURANCES LTD.

is regulated by the Central Bank of Ireland.

Lough Mahon House, Blackrock, Cork, T12 C43C, Tel: 021 4536800, Fax: 021 4536801, Email: info@oli.ie, Website: www.olearyinsurances.ie
Telephone calls are recorded for training quality and verification purposes.



O'LEARY

INSURANCE GROUP

Insurance Brokers & Consultants . Est. 1961.

any one occurrence unlimited any one period of insurance but in the aggregate in respect of Products Liability.

Extension:

Specific Indemnity to each of the below has been included on the policy:

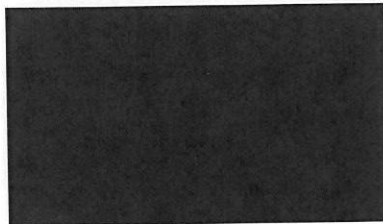
- Cork City Council
- Cork County Council
- Dublin City Council
- Dun Laoghaire Rathdown County Council
- Fingal County Council
- Limerick City & County Council
- Galway City Council
- Meath County Council
- South Dublin County Council
- Waterford City & County Council

Subject to policy terms, conditions and exclusions.

Subject to policy terms, conditions and exclusions.

Trusting this is the information you require.

Yours sincerely,



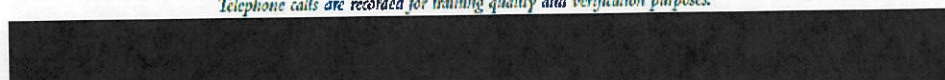
Tel. 

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INSURANCE GROUP

Insurance Brokers & Consultants, Est. 1961.

Date: 12/01/2022

Client Code: [REDACTED]

To Whom It May Concern,

Re: Insured - Emerald Tower Limited and/or Phoenix Ireland HoldCo Limited and/or Phoenix Tower Ireland Limited

Business Description: Owning, leasing and management of wireless infrastructure internationally

We confirm we act as insurance brokers for the above-mentioned client and set out on the attached details of the insurances we have arranged on their behalf:

Subject to policy terms, conditions and exclusions.

Trusting this is the information you require.

Yours sincerely,

[REDACTED]

Tel. [REDACTED]

O'LEARY INSURANCES LTD.

is regulated by the Central Bank of Ireland.

Lough Malton House, Blackrock, Cork, T12 C43C, Tel: 021 4536800, Fax: 021 4536801, Email: info@oli.ie, Website: www.olearyinsurances.ie.

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INSURANCE GROUP
Insurance Brokers & Consultants . Est. 1961 .

Policy Type: Combined Liability

Policy Holder: Emerald Tower Limited and/or Phoenix Ireland HoldCo Limited and/or Phoenix Tower Ireland Limited

Insurer & Policy Number:



Policy Period: 18th July 2021 to 22nd April 2022 both days inclusive

Insurer & Policy Number: Excess Public/Products Liability
Convex Insurance UK Ltd – TBC

Policy Period: 11th January 2022 to 22nd April 2022 both days inclusive

Total Limits of Indemnity:

- Employers Liability: €13,000,000
any one occurrence / unlimited in the period of insurance.
- Public/Products Liability: €13,000,000
any one occurrence unlimited any one period of insurance but in the aggregate in respect of Products Liability.

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Indemnity to Principals and Others

The Company will also indemnify in the terms of this Policy

1.1 in the event of the death of the Insured his/her legal personal representative in respect of liability incurred by the Insured

1.2 any principal with whom the Insured has entered into an agreement to the extent required by such agreement but only in respect of liability for which the Insured would have been entitled to indemnity under this Policy if the claim had been made against the Insured and at the request of the Insured

1.3 any officer or member of the Insured's catering sports social and welfare organisations and fire first-aid or ambulance services

1.4 any director partner or employee of the Insured in respect of liability for which the Insured would have been entitled to indemnity under this Policy if the claim had been made against the Insured

1.5 any director partner or employee of the Insured in respect of liability for private work undertaken by Employees with the consent of the Insured Provided that

- a) such person(s) shall not be entitled to indemnity under any other policy
- b) such principal/person(s) shall as though he/they were the Insured be subject to the terms of this Policy in so far as they can apply
- c) the Limit of Liability shall not be increased hereby.

Subject to policy terms, conditions and exclusions.

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2022 Bianconi Avenue
Citywest Business Campus
Dublin 24 D24 HX03
T +353 1 671 4444
eir.ie

Radio Emissions Statement

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

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

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

Directors:

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

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

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

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

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

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

Internal Documentation References:

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

Statement Prepared By: [REDACTED]

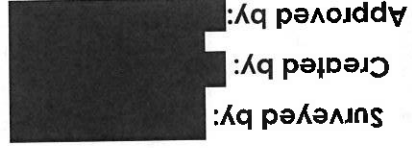
Date: 12/07/17

Telecommunications Development Photomontage Report

Report Date: 03/08/2022

Project: DN 2968 Roebuck Road

Surveyed by:



Created by:

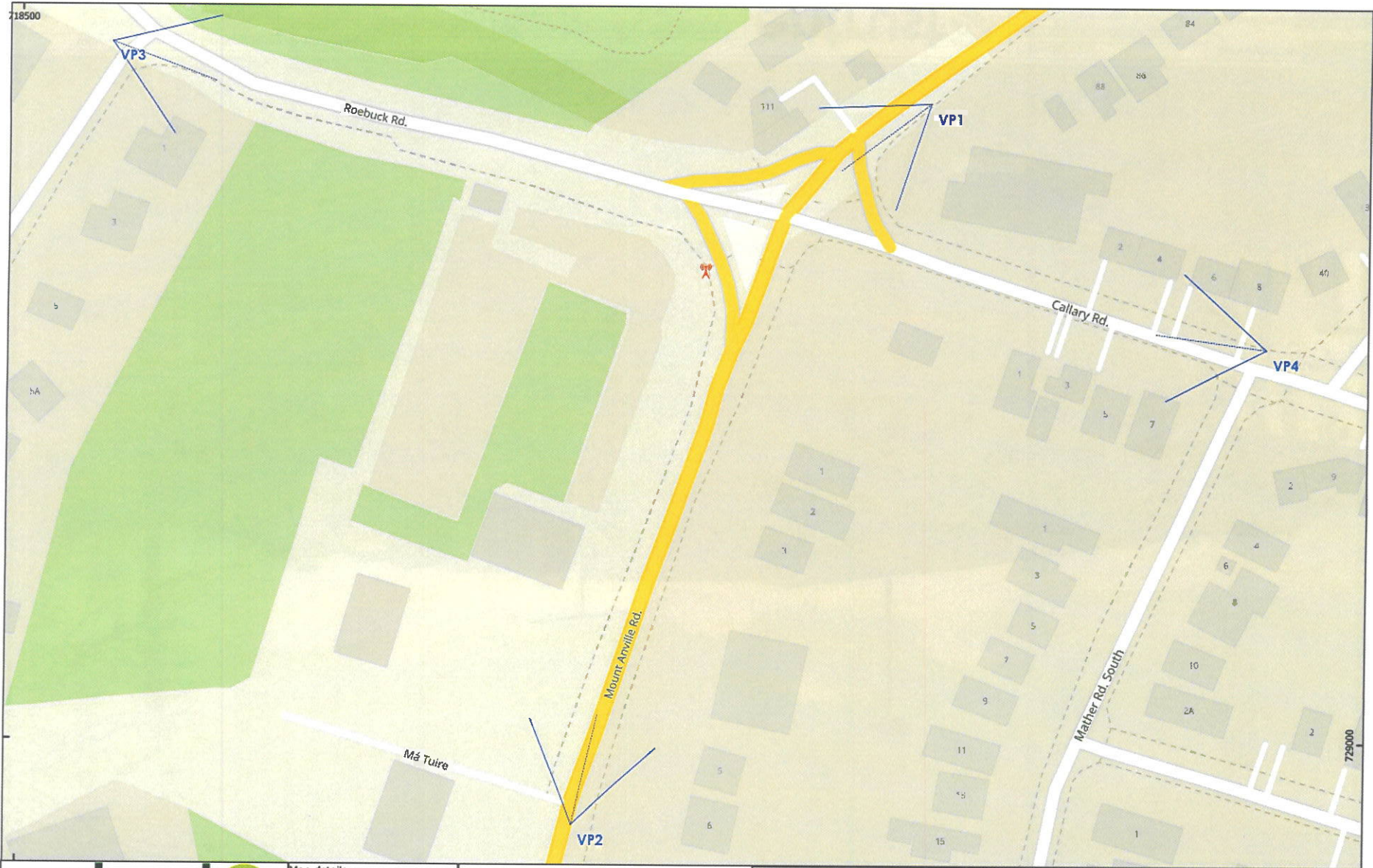
Approved by:

Client:



Provided by:





Map details:
 Projection: Irish ITM EPSG 2157
 Scale: 1:898

Viewpoint Location Map

Number of Viewpoints: 4
 Proposed Development: Telecom Mast
 Mast Height (metres): 18
 Location: E:718684, N:729121

Site Name: Roebuck Road
 Address: R112/ Roebuck Road, Roebuck, Dublin 14



View Point Name		Existing View of Viewpoint 1					
Site ID	Viewpoint No.	Eastings	Northing	Elevation (AOD)m	Direction-Degrees(N)	Distance (m)	
DN_2968	VP1	718743	729171	45.8	-123.9822935	75.1	
Viewing Distance: 300mm			Height above ground: 1.5m				
Page size: A3			Camera & Lens: Canon 6D - 50mm Focal Length				



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 Galway, H91 X599

Surveyed by: [REDACTED]
Created by: [REDACTED]
Approved by: [REDACTED]



View Point Name		Proposed View of Viewpoint 1				
Site ID	Viewpoint No.	Eastings	Northing	Elevation (AOD)m	Direction-Degrees(N)	Distance (m)
DN_2968	VP1	718743	729171	45.8	-123.9822935	75.1
Viewing Distance: 300mm			Height above ground: 1.5m			
Page size: A3			Camera & Lens: Canon 6D - 50mm Focal Length			



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 Created by: [REDACTED]
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View Point Name		Existing View of Viewpoint 2					
Site ID	Viewpoint No.	Easting	Northing	Elevation (AOD)m	Direction-Degrees(N)	Distance (m)	
DN_2968	VP2	718649	728978	56.4	15.29808697	151.6	
Viewing Distance: 300mm			Height above ground: 1.5m				
Page size: A3			Camera & Lens: Canon 6D - 50mm Focal Length				



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 Approved by: [Redacted]



View Point Name		Proposed View of Viewpoint 2				
Site ID	Viewpoint No.	Easting	Northing	Elevation (AOD)m	Direction-Degrees(N)	Distance (m)
DN_2968	VP2	718649	728978	56.4	15.29808697	151.6
Viewing Distance: 300mm			Height above ground: 1.5m			
Page size: A3			Camera & Lens: Canon 6D - 50mm Focal Length			

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Created by: [REDACTED]

Approved by: [REDACTED]



View Point Name		Existing View of Viewpoint 3				
Site ID	Viewpoint No.	Easting	Northing	Elevation (AOD)m	Direction-Degrees(N)	Distance (m)
DN_2968	VP3	718524	729187	40.5	111.1473382	170.6
Viewing Distance: 300mm			Height above ground: 1.5m			
Page size: A3			Camera & Lens: Canon 6D - 50mm Focal Length			



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 Created by: [Redacted]
 Approved by: [Redacted]



View Point Name		Proposed View of Viewpoint 3 (partially visible)				
Site ID	Viewpoint No.	Easting	Northing	Elevation (AOD)m	Direction-Degrees(N)	Distance (m)
DN_2968	VP3	718524	729187	40.5	111.1473382	170.6
Viewing Distance: 300mm			Height above ground: 1.5m			
Page size: A3			Camera & Lens: Canon 6D - 50mm Focal Length			



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 Created by: [REDACTED]
 Approved by: [REDACTED]



View Point Name		Existing View of Viewpoint 4				
Site ID	Viewpoint No.	Easting	Northing	Elevation (AOD)m	Direction-Degrees(N)	Distance (m)
DN_2968	VP4	718833	729105	50.8	-81.53635673	151.2
Viewing Distance: 300mm			Height above ground: 1.5m			
Page size: A3			Camera & Lens: Canon 6D - 50mm Focal Length			



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Surveyed by: [REDACTED]
 Created by: [REDACTED]
 Approved by: [REDACTED]

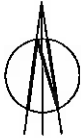


View Point Name		Proposed View of Viewpoint 4 (not visible)				
Site ID	Viewpoint No.	Easting	Northing	Elevation (AOD)m	Direction-Degrees(N)	Distance (m)
DN_2968	VP4	718833	729105	50.8	-81.53635673	151.2
Viewing Distance: 300mm			Height above ground: 1.5m			
Page size: A3			Camera & Lens: Canon 6D - 50mm Focal Length			

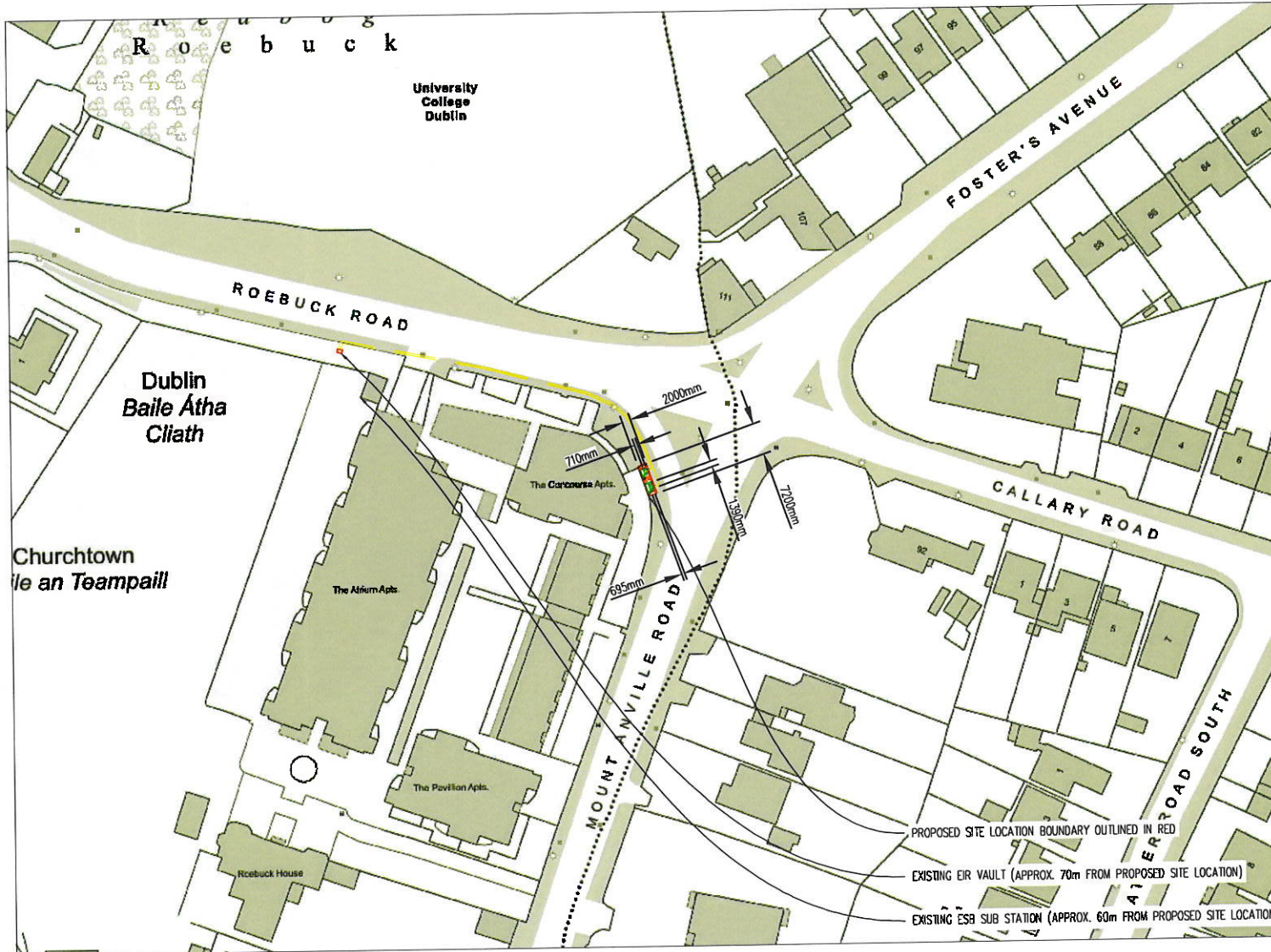


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Surveyed by: [REDACTED]
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718828m E, 729232m N



718536m E, 729017m N

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OVERVIEW MAP
SCALE: 1:1000

SITE COORDINATES											
LATITUDE:	53° 17' 56.672" N	IC EASTING:	208743								
LONGITUDE:	06° 13' 16.1532" W	IC NORTHING:	228906								
		10M EASTING:	718884								
		10M NORTHING:	729232								
<table border="1"> <tr> <td>— LICENSE DRAWINGS</td> <td>15.08.22</td> <td></td> <td></td> </tr> <tr> <td>No.</td> <td>Revision</td> <td>Date</td> <td>By Ckd</td> </tr> </table>				— LICENSE DRAWINGS	15.08.22			No.	Revision	Date	By Ckd
— LICENSE DRAWINGS	15.08.22										
No.	Revision	Date	By Ckd								
<p>Drawings prepared by [Redacted] ENTRUST LTD, Unit 1D, Dargrath Business Centre, Clonsilla, Co. Galway, H91 X599, TEL: +353 (0) 91 342 510 contact@entrust-services.com</p>											
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SECTION 254											
Site Code:	DN-2968-01										
S.P. Ref:	N/A										
Site Address:	R112/ROEBUCK ROAD, ROEBUCK, DUBLIN 14										
Title:	SITE LOCATION MAP 1:1000 MAP										
Designed:	[Redacted]	Date:	15/08/2022								
Drawn:	[Redacted]	Scale:	AS SHOWN								
		Rev.:	A								
Dwg No.:	DN-2968-01-PD-01										

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 OS MAP No. 3320-24, 5872-04 (1:1000)

PROPOSED FUTURE OPERATOR 2 ROUTE OF UNDERGROUND FIBRE DUCT
 TO NEAREST EIR FIBRE CHAMBER (TBC WITH EIR) LENGTH APPROX. 75m

PROPOSED OPERATOR 1 ROUTE OF UNDERGROUND FIBRE DUCT TO
 NEAREST EIR FIBRE CHAMBER (TBC WITH EIR) LENGTH APPROX. 70m

EXISTING TRAFFIC LIGHT

PROPOSED SITE OUTLINED IN RED

PROPOSED 4No. EARTHING PIT

PROPOSED EARTHING TAPE

PROPOSED LOCATION OF OPERATOR 1 OUTDOOR CABINET

PROPOSED 2No. 300mm LINK DISHS

PROPOSED FEEDER DUCT

PROPOSED 18.0m HIGH ALPHA STREETPOLE SOLUTION
 WITH 3No. 4.0m LONG ALPHA ANTENNAS

PROPOSED 2No. GPS BEACON

PROPOSED FEEDER DUCT

PROPOSED LOCATION OF FUTURE OPERATOR 2 OUTDOOR CABINET

PROPOSED FUTURE OPERATOR 2 UNDERGROUND ESB POWER SUPPLY
 DUCT TO NEAREST ESB SUPPLY POINT AS IDENTIFIED BY ESB (TBC)

EXISTING SIGN BOARD

EXISTING FOOTPATH

3670mm

2000mm

710mm

710mm

44m A.S.L.

1350mm

695mm

4000mm

718699m E, 729138m N

EXISTING TRAFFIC LIGHT

EXISTING TRAFFIC LIGHT

EXISTING STREET LIGHT POLE

PROPOSED OPERATOR 1 UNDERGROUND ESB POWER SUPPLY DUCT
 TO NEAREST ESB SUPPLY POINT AS IDENTIFIED BY ESB (TBC)

PROPOSED 600x600mm VAULT

SITE COORDINATES

LATITUDE:	53° 17' 56.8772" N	IG EASTING:	318743	ITM EASTING:	718684
LONGITUDE:	06° 13' 10.1532" W	IG NORTHING:	229095	ITM NORTHING:	729123

LEGEND

-	LICENSE DRAWINGS	15.08.22		
No.	Revision	Date	By	Ckd

entrust
 planning & environmental

Drawings prepared by [Redacted]
 ENTRUST LTD, Unit 10, Deerpark Business Centre, Oranmore,
 Co. Dubway, H91 X5B9, TEL+353 (0) 91 342 510
 contact@entrust-services.com

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 is highlighted in red.

PHOENIX TOWER
 INTERNATIONAL

GLENLINE
 telecoms

SECTION 254

Site Code:	DN-2968-01
S.P. Ref:	N/A
Site Address	R112/ROEBUCK ROAD, ROEBUCK, DUBLIN 14

Title
 P11 SMART STREETPOLE
 SITE LAYOUT PLAN

Designed		Date	15/08/2022
Drawn		Scale	A5 3/0M Rev. A
Dwg No.	DN-2968-01-PD-02		

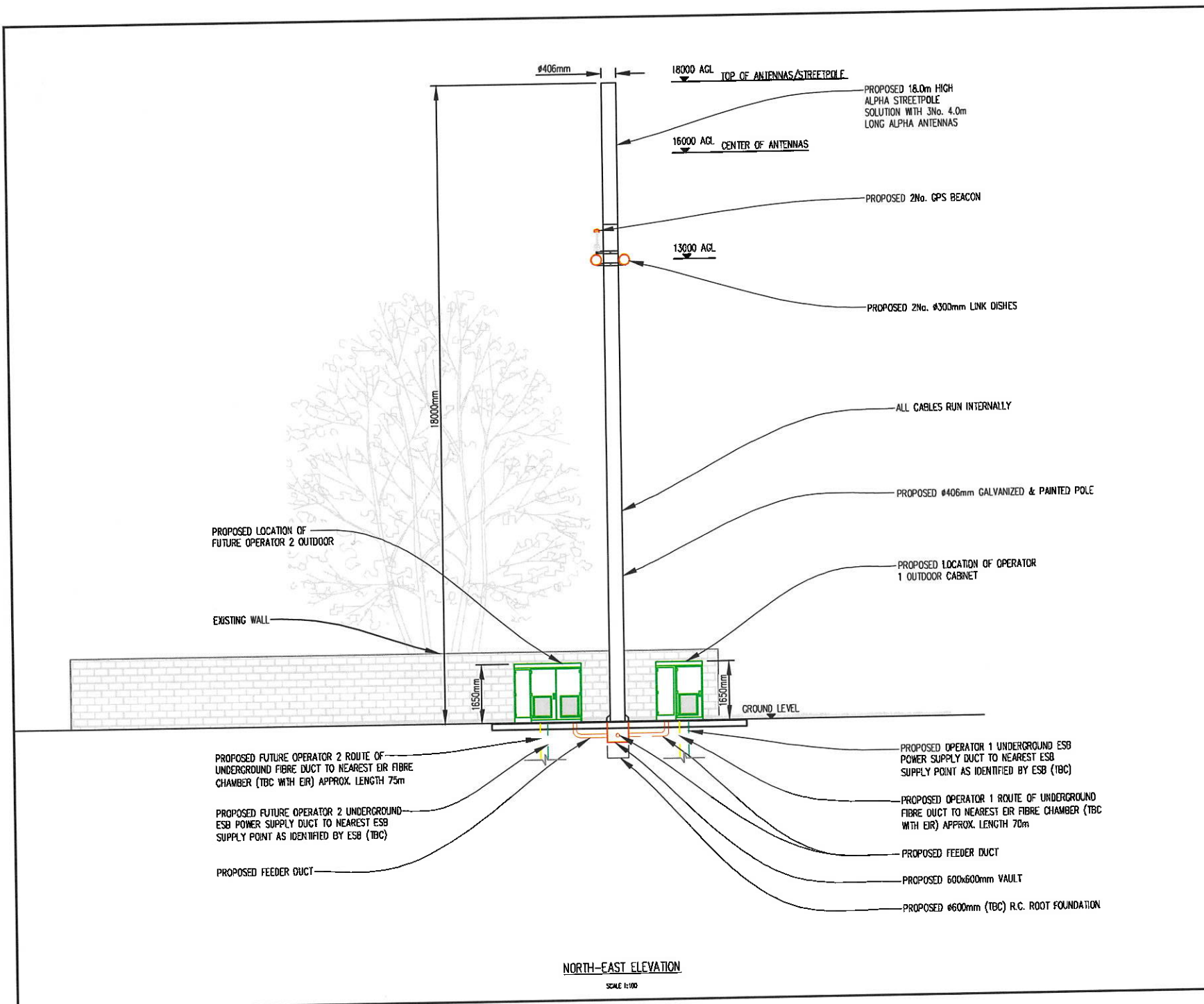


718665m E, 729111m N

SITE LAYOUT PLAN

SCALE 1:100

MOUNT ANVILLE ROAD



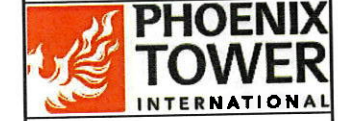
SITE COORDINATES			
LATITUDE:	53° 17' 36.672" N	IG EASTING:	332743
LONGITUDE:	06° 13' 10.1532" W	IG NORTHING:	229096
		IGN EASTING:	718884
		IGN NORTHING:	729121

- LICENSE DRAWINGS			
No.	Revision	Date	By Ckd

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Drawings prepared by [Redacted]
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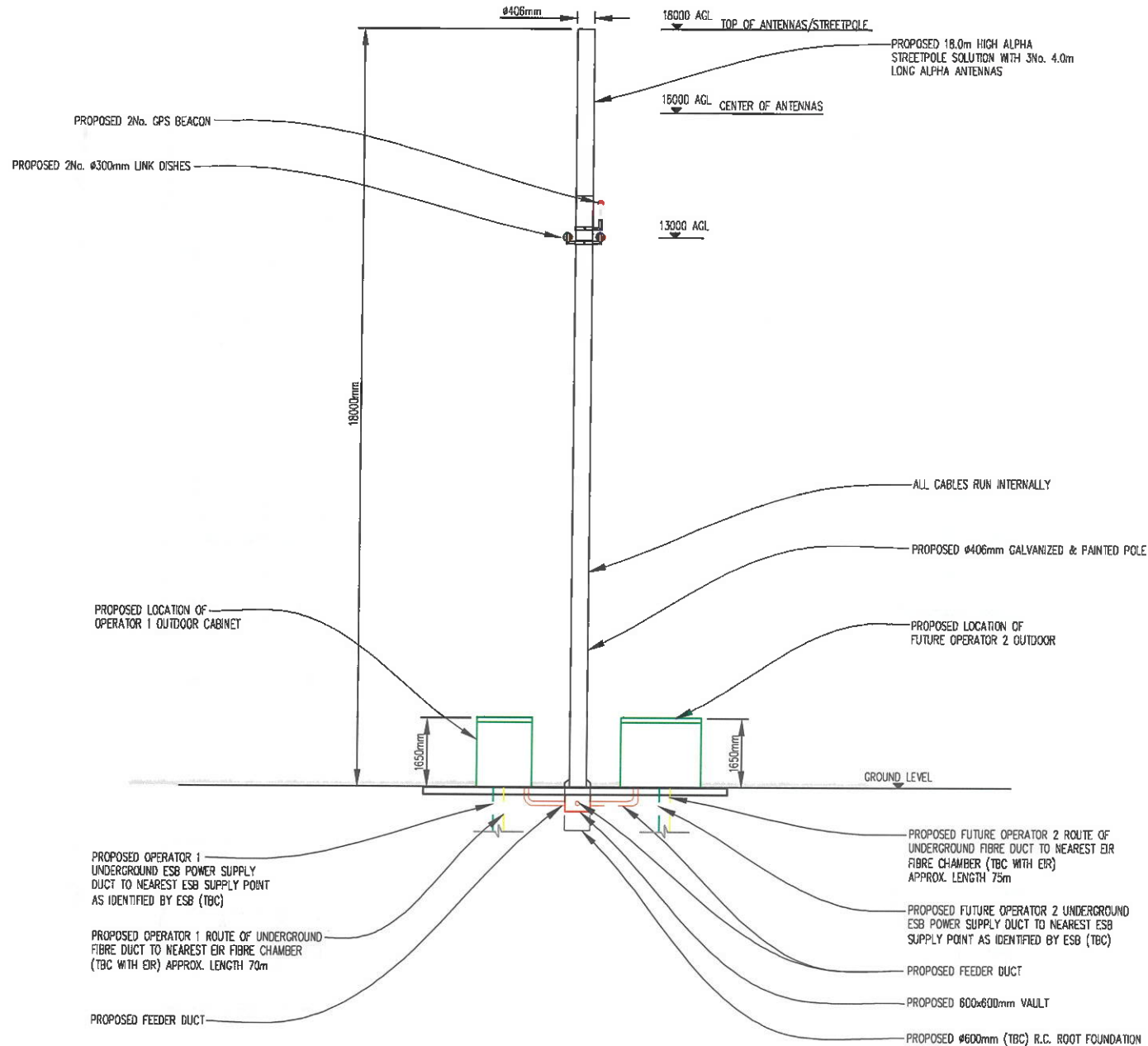
SECTION 254

Site Code:	DN-2968-01
S.P. Ref:	N/A

Site Address	R112/ROEBUCK ROAD, ROEBUCK, DUBLIN 14
--------------	---------------------------------------------

Title	PTI SMART STREETPOLE NORTH-EAST ELEVATION
-------	----------------------------------------------

Designed	[Redacted]	Date	15/06/2022
Drawn	[Redacted]	Scale	A5 30MM
Dwg No.	DN-2968-01-PD-03	Rev.	A



SITE COORDINATES			
LATITUDE:	53° 17' 56.6777" N	° EASTING:	39743 11M EASTING: 73864
LONGITUDE:	06° 15' 10.1532" W	° NORTHING:	22006 11M NORTHING: 72921

LICENSE DRAWINGS			
No.	Revision	Date	By Ckd



Drawings prepared by [Redacted]
 ENTRUST LTD. Unit 10, Deerpark Business Centre, Drinmore, Co. Galway, H91 X599, TEL: +353 (0) 91 342 510
 contact@entrust-services.com

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SECTION 254

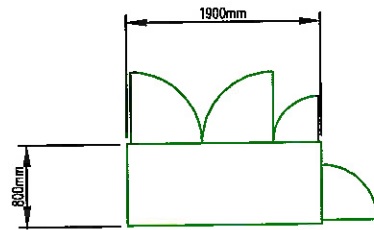
Site Code: DN-2968-01
 S.P. Ref: N/A

Site Address
 R112/ROEBUCK ROAD,
 ROEBUCK,
 DUBLIN 14

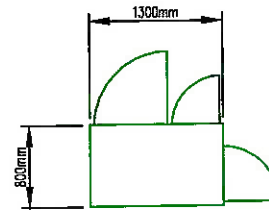
Title
 PTI SMART STREETPOLE
 SOUTH-WEST ELEVATION

Designed	Date 15/06/2022
Drawn	Scale AS SHOWN Rev. A

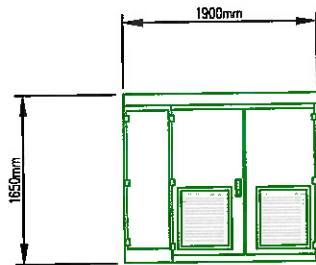
Dwg No. DN-2968-01-PD-04



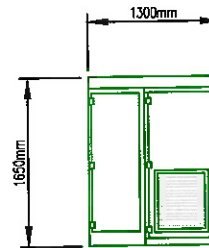
Top View



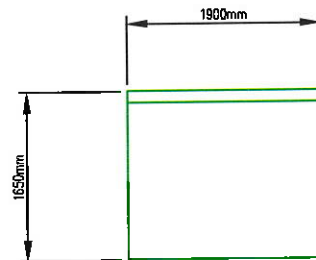
Top View



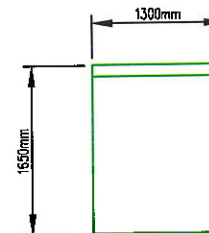
Front View



Front View



Back View



Back View

EQUIPMENT DETAILS
SCALE 1:50

SITE COORDINATES

LATITUDE	53° 17' 35.6772" N	IG EASTING	318743	11M EASTING	716684
LONGITUDE	06° 15' 10.1532" W	IG NORTHING	220796	11M NORTHING	729120

-	LICENSE DRAWINGS	15.08.22			
No.	Revision	Date	By	Clkd	



Drawings prepared by [redacted]
ENTRUST LTD, Unit 10, Deepmark Business Centre, Droonmore,
Co. Galway, H91 XS99, TEL: +353 (0) 91 342 510
contact@entrust-services.com

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SECTION 254

Site Code: DN-2968-01
S.P. Ref: N/A

Site Address
R112/ROEBUCK ROAD,
ROEBUCK,
DUBLIN 14

Title
PTI SMART STREETPOLE
EQUIPMENT DETAILS

Designed	[redacted]	Date	15/08/2022
Drawn	[redacted]	Scale	AS SHOWN
Dwg No.	DN-2968-01-PD-05	Rev.	A



TITLE: 20220201-013_A3

- COLOUR CODE:
- BLACK - 38KV & HIGHER VOLTAGE OVERHEAD LINES
 - GREEN - MV(10KV/20KV) OVERHEAD LINES
 - BLUE - LV (400V/230V) OVERHEAD LINES
 - CYAN - 38KV & HIGHER VOLTAGE UNDERGROUND CABLE ROUTES
 - RED - MV/LV (10KV/20KV/400V/230V) UNDERGROUND CABLE ROUTES

DATE: 01-Feb-2022

** SCALE: 1:1100

** SCALE WHEN PRINTED ON AN A3 PAGE
XY COORDINATES DISPLAYED IN IRISH GRID COORDINATE SYSTEM

WARNING

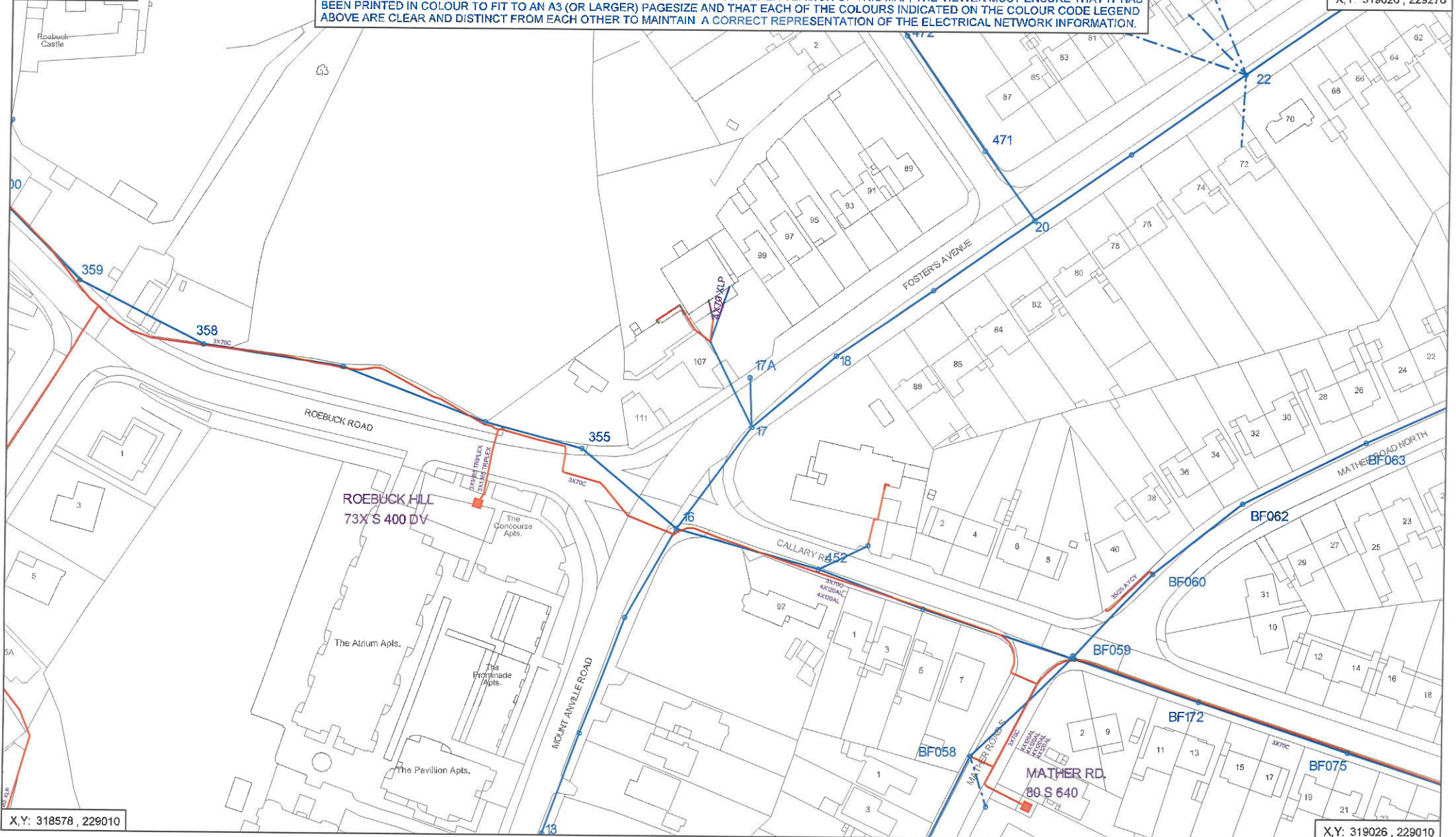
THIS MAP INDICATES THE APPROXIMATE LOCATION OF ESB TRANSMISSION (400KV, 220KV, 110KV, 38KV) AND DISTRIBUTION (20KV, 10KV, 230V/400V) UNDERGROUND CABLES AND OVERHEAD LINES IN THE GENERAL AREA OF THE PROPOSED WORKS. ESB NETWORKS TAKES NO RESPONSIBILITY FOR THE ACCURACY OR COMPLETENESS OF THE MAP. IT IS THE USER'S RESPONSIBILITY TO INDEPENDENTLY VERIFY THE INFORMATION AND THE LOCATION OF UNDERGROUND CABLES AND OVERHEAD LINES. LOW VOLTAGE (230V/400V) SERVICE CABLES (E.G. HOUSE SERVICES, FACTORY/SHOP SERVICES, PUBLIC LIGHTING LAMP SERVICES, ETC) ARE NOT INCLUDED BUT THEIR PRESENCE SHOULD BE ANTICIPATED. THE DEPTHS OF UNDERGROUND CABLES MUST NEVER BE ASSUMED. ADDITIONAL MORE DETAILED INFORMATION IS AVAILABLE FOR HIGH VOLTAGE TRANSMISSION UNDERGROUND CABLES (38KV, 110KV, 220KV, 400KV) FROM THE LOCAL ESB NETWORKS TRANSMISSION REPRESENTATIVE - SEE ATTACHED LIST FOR CONTACT DETAILS OR CALL 1850 372 757. NO WORK SHOULD BE CARRIED OUT IN THE VICINITY OF 38KV OR HIGHER VOLTAGE UNDERGROUND CABLES WITHOUT PRIOR CONSULTATION WITH ESB NETWORKS. BEFORE ANY MECHANICAL EXCAVATION IS UNDERTAKEN, THE ACTUAL LOCATION OF ALL UNDERGROUND ELECTRICITY CABLES MUST BE ESTABLISHED AND VERIFIED ON THE SITE USING: (A) UP-TO-DATE MAP RECORDS, (B) CABLE LOCATOR EQUIPMENT OPERATED IN BOTH POWER AND RADIO MODES, (C) CAREFUL HAND DIGGING OF TRIAL HOLES USING 'SAFE DIGGING PRACTICE'. REFER ALSO TO 'HSA CODE OF PRACTICE FOR AVOIDING DANGER FROM UNDERGROUND SERVICES'. ESB TAKES NO RESPONSIBILITY FOR AND SHALL BEAR NO LIABILITY, HOWSOEVER ARISING, IN RELATION TO ANY DAMAGE, INJURY/DEATH OR LOSS OF SUPPLY AS A RESULT OF DAMAGE OR INTERFERENCE WITH ITS NETWORKS.

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X,Y: 318578 , 229276

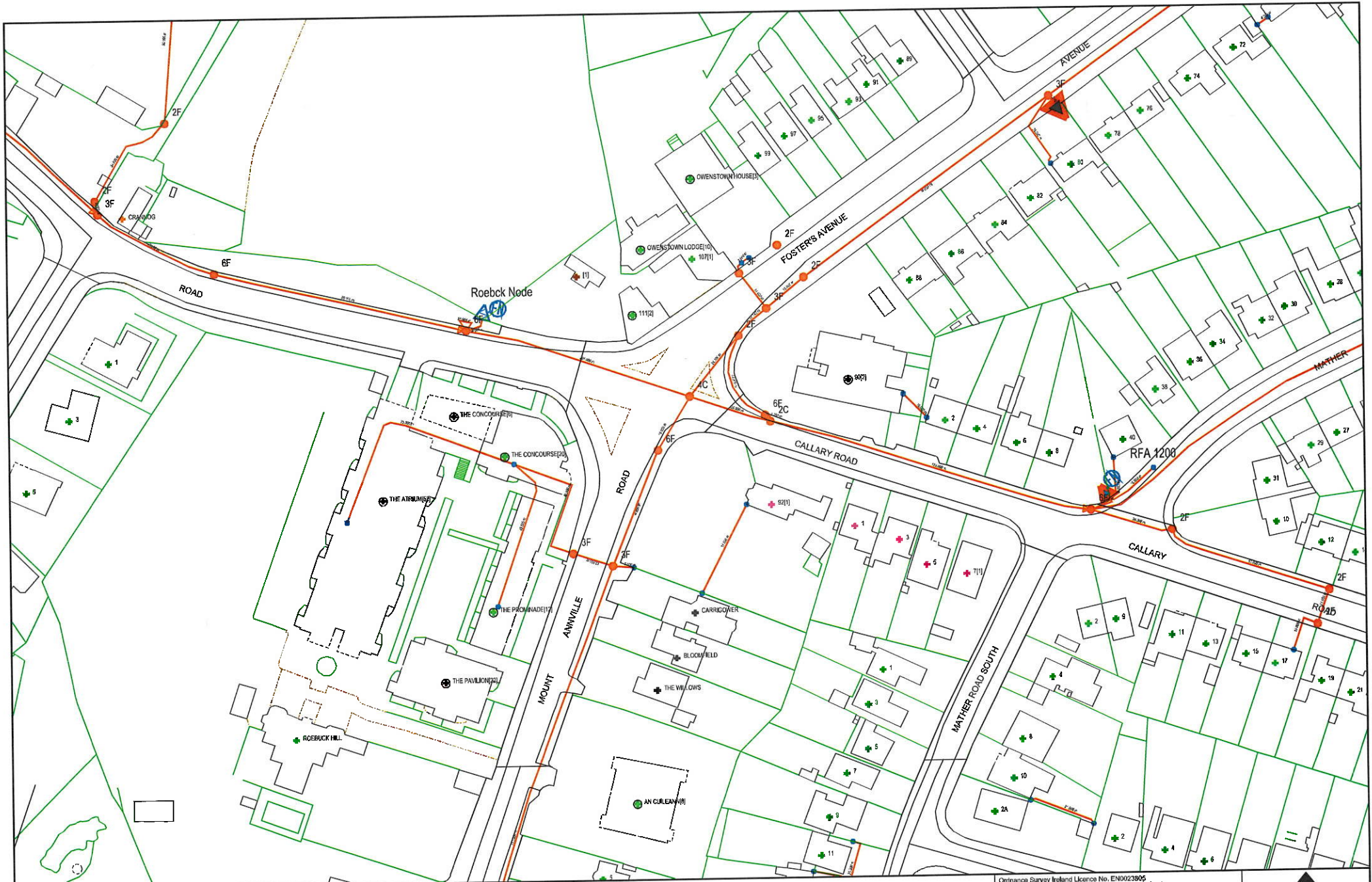
ESB NETWORKS HAS ISSUED THIS MAP AS A PDF DOCUMENT. IF VIEWING A PAPER VERSION OF THIS MAP, THE VIEWER MUST ENSURE THAT IT HAS BEEN PRINTED IN COLOUR TO FIT TO AN A3 (OR LARGER) PAGESIZE AND THAT EACH OF THE COLOURS INDICATED ON THE COLOUR CODE LEGEND ABOVE ARE CLEAR AND DISTINCT FROM EACH OTHER TO MAINTAIN A CORRECT REPRESENTATION OF THE ELECTRICAL NETWORK INFORMATION.

X,Y: 319026 , 229276



X,Y: 318578 , 229010

X,Y: 319026 , 229010



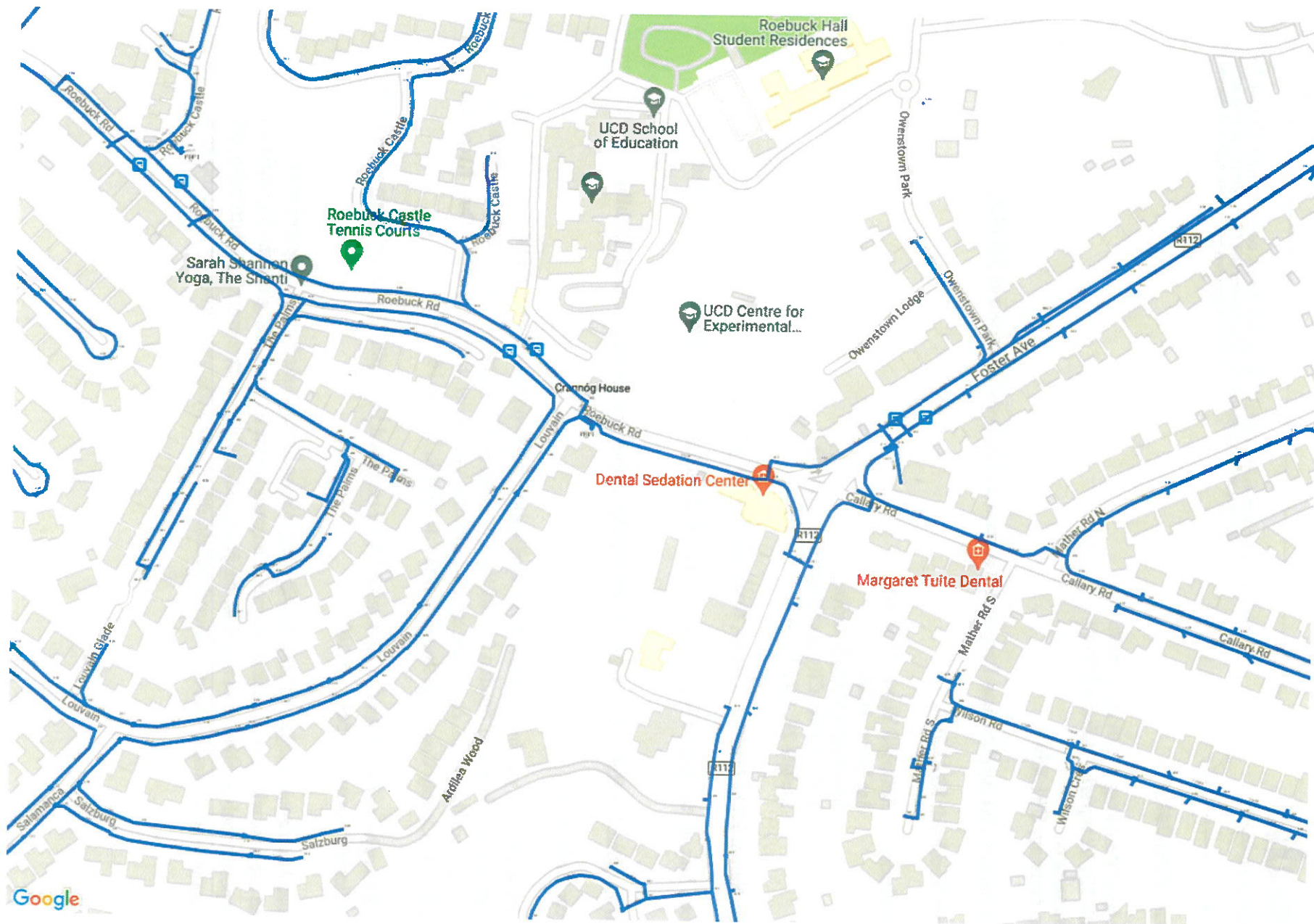
Unit 7,
Westgate Business Park,
Ballymount,
Dublin 24,

PROJECT NAME
DESIGNED BY:

Ordnance Survey Ireland Licence No. EN0023805
(c) Ordnance Survey Ireland and Government of Ireland

Produced on: 02/08/2022





Google

Date: 18/01/2023

**Entrust Planning & Environmental
Unit 1D, Deerpark Business Centre
Oranmore,
Co. Galway, H91 X599**

Re: Section 254 Application- Proposed Telecommunications Streetworks Solution

Date Received: 03.11.2022

**Applicant: Emerald Tower Limited
1st Floor, 3013,
Marketing Suite Building,
Lake Drive, Citywest Business Campus
Dublin 24, D24 YXW2**

Site Name: R112 / Roebuck Road, Roebuck, Dublin 14

Location: on the footpath at the junction of Roebuck Road and Mount Anville Road.

dlr Application Reference: CTT.22.048-272288 - Roebuck Road, Roebuck, Dublin

Dear Sir/Madam,

I am writing to you in response to the application made on behalf of Emerald Tower Limited 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 Roebuck Road, Roebuck, Dublin 14.

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

Road Maintenance object to the proposed location on the grounds that the proposed pole and cabinets will have significant negative impacts on the accessibility given the dimensions of proposed double cabinets. In addition, the proposed double cabinets create an obstruction and become a safety hazard to both pedestrians and other road users given its close proximity to a



busy urban pedestrian crossing point. It is therefore recommended to locate them to other suitable locations as unobtrusively as possible.

Traffic objects to the proposed location of the pole and cabinets, as its location hinders the visibility for both pedestrians, cyclists and vehicles approaching to the signalised crossing on the junction of Roebuck Road and Mount Anville Road.

Active Travel have also stated that they are currently undergoing detailed design on the Taney Road to N11 Active Travel Scheme (([Traffic & Road Safety: Taney Road to N11 Active Travel Route - Dún Laoghaire-Rathdown County Council - Citizen Space](#))). This scheme will reconfigure the Roebuck Road junction and the installation of this equipment should not proceed in advance of this scheme being completed.

Please find accompanying memo from Road Maintenance, Traffic Section and Active Travel which detail the reasons for refusal.

Yours faithfully,



Margaret O'Carroll
Clerical Officer
Roads Maintenance

