

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

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Our Ref: PTI: DN\_2967 Dalkey

05/09/2022

By Email Only

## **APPLICATION FOR SECTION 254 LICENSE**

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

**INSTALLATION AT COLIEMORE ROAD, DALKEY, CO. DUBLIN (E: 727052, N: 726738, ITM).**

Dear Sir/Madam,

Please find attached an application for a Section 254 License, submitted on behalf of the applicant, namely, Emerald Tower Limited, 1<sup>st</sup> 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, Gas, Irish Water);
- 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-2967-01-PD-01	1:1000
2	Site Layout Plan	DN-2967-01-PD-02	1:100
3	South-West Elevation Plan	DN-2967-01-PD-03	1:100
4	North-West Elevation Plan	DN-2967-01-PD-04	1:100
5	Equipment Details	DN-2967-01-PD-05	1:50

We write in connection with a proposal for a Section 254 License to install a 'Streetworks Pole' for the location of one operator's equipment (due to the difficulties in providing a dual operator pole at this location), in order to provide high speed broadband and data services to the local community, 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:   
Email:

**WIRELESS BROADBAND & DATA  
COMMUNICATIONS  
STREETWORKS POLE**

**INSTALLATION AT  
COLIEMORE ROAD  
DALKEY  
CO. DUBLIN**

**PLANNING STATEMENT  
INCORPORATING ENVIRONMENTAL CONSIDERATIONS**

**Prepared by**

**Entrust Limited**

**September 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 10.8m single 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 Coliemore Road, Dalkey, Co. Dublin (**the Site**).

## 2. Background

### Applicant

- 2.1. This request is being made on behalf of the applicant, namely, Emerald Tower Limited, of 1<sup>st</sup> Floor, 30313 Lake Drive, City West, Dublin 22, to provide coverage for 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 adjacent to Coliemore Road. The site is situated on an undulating landscape which slopes downwards towards the east, towards the coastal area. There are a number of semi-mature and mature trees along the roadsides. There are also a lot of streetlights/telegraph/electricity poles with overhead cables in the area. The Loreto Abbey Dalkey Sports Hall is located approx. 490m northwest of the site and the Dalkey Train Station is approx. 560m west of the site. Due to the relatively close proximity of dwellings in the surrounding area it was decided to proceed with a low height 10.8m aesthetic single operator pole as opposed to the standard 18m dual operator pole.
- 3.2. The chosen site is considered to be the optimum location following a very rigorous site search of the coverage search area provided by Eir which is shown in section 4.2 in which a number of potential options were put forward, but all failed for various reasons as is shown in section 5.7 of this document.



Figure 1 Site Location

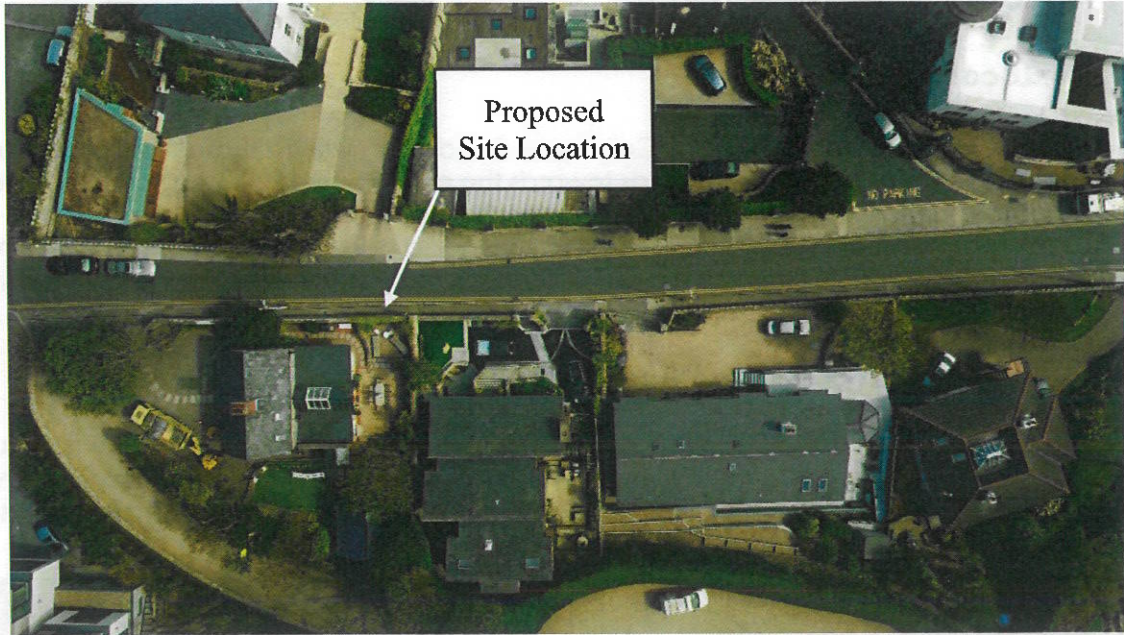


Figure 2 Aerial Photograph of Site

**Site Ownership**

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

**Design**

3.4. It is confirmed that Emerald Tower Limited actively encourages the sharing of all infrastructure in its portfolio, however for this location it was considered that there is not sufficient space for two cabinets and a dual operator pole height of between 15m and 18m would be too high, so unfortunately a single operator 10m pole is proposed here.

3.5. The proposal is to install a new 'Streetworks Pole' with Eir's antennas to be encased inside the top of the pole, and a cabinet for Eir Mobile. The equipment dimensions are as follows:

Streetworks Pole		Cabinet (1)	
Height	10.8m	Height	1) 1.26m
Diameter or Width	273mm (Diameter)	Length	1) 1.55m
		Depth	1) 0.681m
Colour	Black	Area	1) 1.33m <sup>2</sup>
		Volume	1) 1.68m <sup>3</sup>
		Colour	Dark Fir Green or Black

Total Streetworks Pole & Cabinets			
Area	1.33m <sup>2</sup>	Volume	4.28m <sup>3</sup>
Footpath Width 2.45m, Cabinet Doors Open 1.25m, Cabinet Doors Closed 1.819m			

Dish (1)	300mm (Diameter)	Antennas (encased inside pole)	10.2m to 10.81m inside pole
Colour	Black	Colour	Inside pole (not visible)

3.6. 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 black finish and will assimilate with Victorian street furniture, however, it is possible for the proposed development to be painted in any colour including a dark fir green or galvanized 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 trees for maximum screening purposes along the streetscene;
  - It was decided to locate the proposal adjacent to Colieman Road as there was no other possible location for it in the search area here.
- 3.7. 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 Eir within the surrounding area. The proposed pole, at an overall height of 10.8m, is below the standard height of 18m as this will allow all these criteria to be met and to achieve antenna 'line of sight' above the surrounding landscape topography, built form and vegetation, particularly the mature trees and existing streetlights along Colieman Road.
- 3.8. 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.
- 3.9. 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 c. 10m 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 for eir Mobile would not be discordant within the local environment.

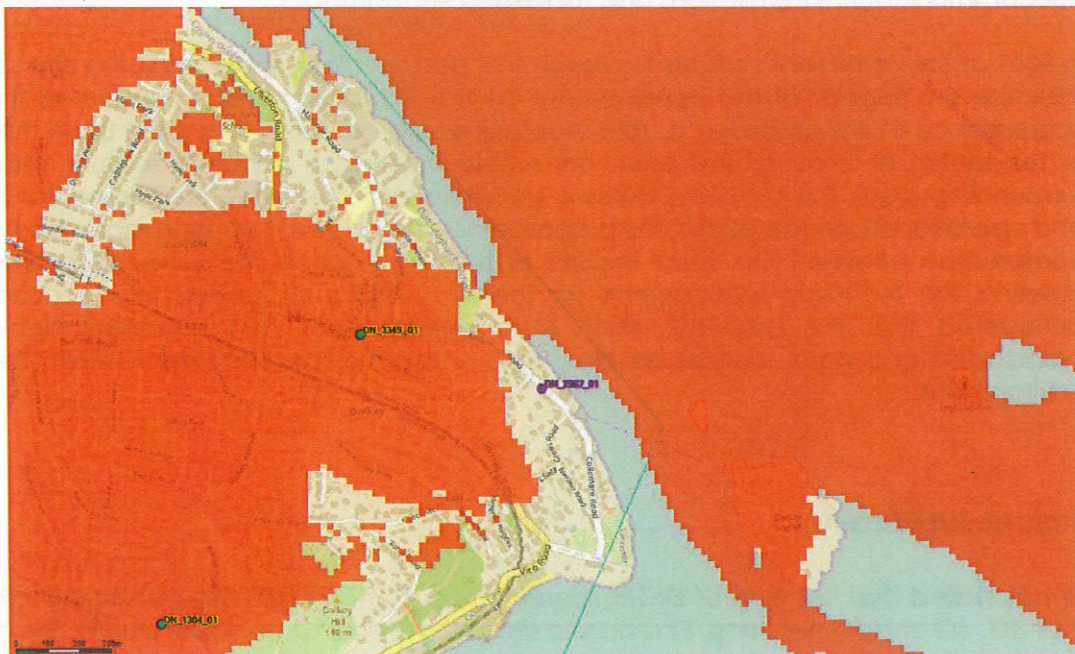
#### **4. Technical Justification**

- 4.1. *Eir has stated that "As part of Eir Ltd licensing requirements and the continuing rollout of their 3G, 4G and 5G networks, Eir require a site in this area of Dalkey, Co. Dublin. The current sites in the area for Eir do not provide adequate indoor service for highspeed mobile broadband in and around the area due to hilly terrain and steep drop towards the coast. Eir's current coverage in this area specifically around Colieman Road, Victoria Road, Green Road, Nerano Road and surrounding areas 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\_2967

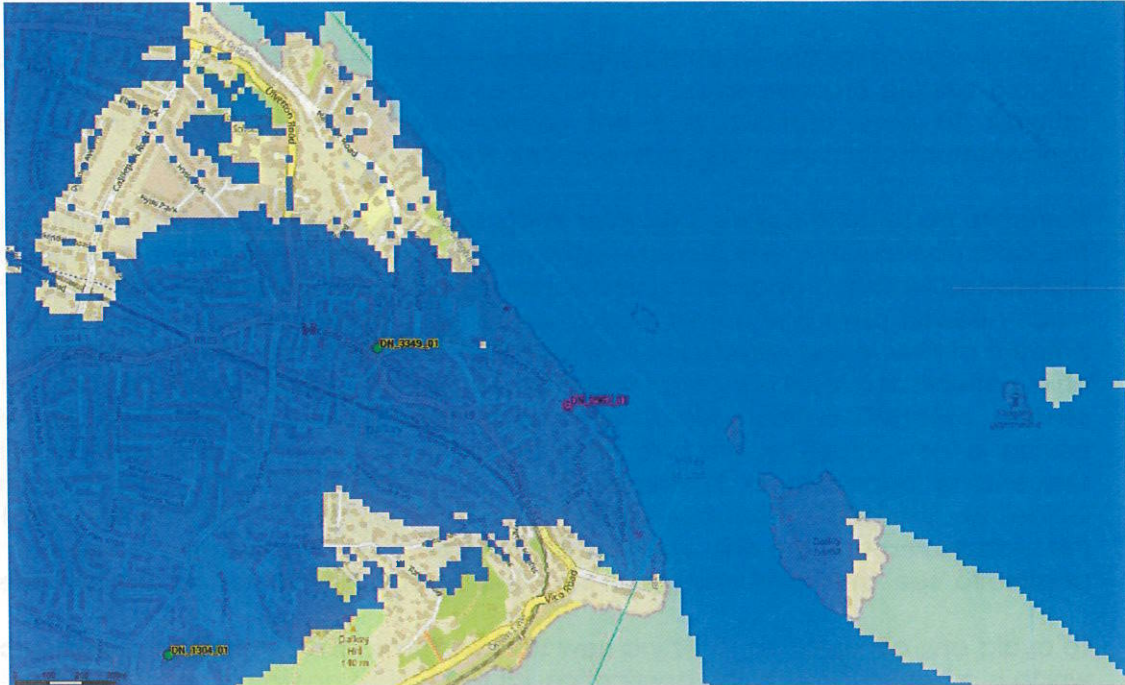


4.3. Existing Indoor Coverage without DN\_2967

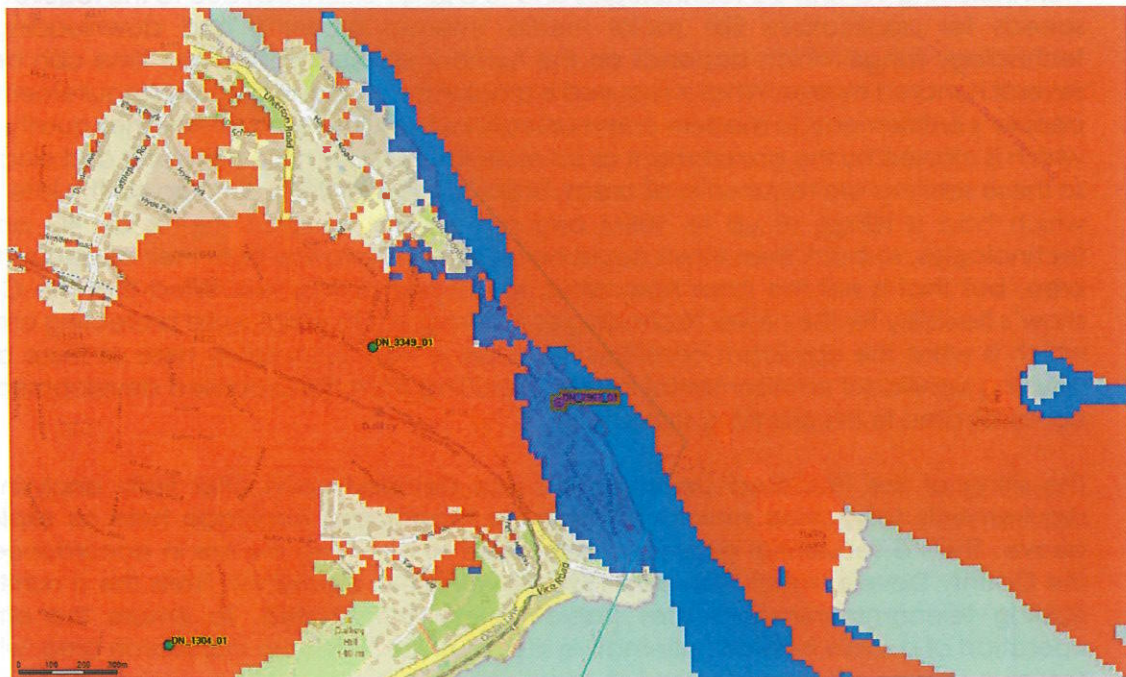




4.4. Predicted New Indoor Coverage with DN\_2967



4.5. Existing and Predicted Indoor Coverage with DN\_2967



## 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 2 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 existing 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 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 only one operator.
- 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. 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 (table1) 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 4.2 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	Castle St, Dalkey, Co. Dublin,	E: 326557 N: 226868	This site is significantly outside the search ring. Eir, Vodafone and Three Ireland are already co-located at this site, so it would not meet Eir's coverage objective here.
2	Killiney Hill Rd, Scalpwilliam, Killiney, Co. Dublin,	E: 325948 N: 225977	This site is significantly outside the search ring. Eir, Vodafone and Three Ireland are already co-located at this site, so it 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 along Coliemore Road, hence why Eir requires a site here.

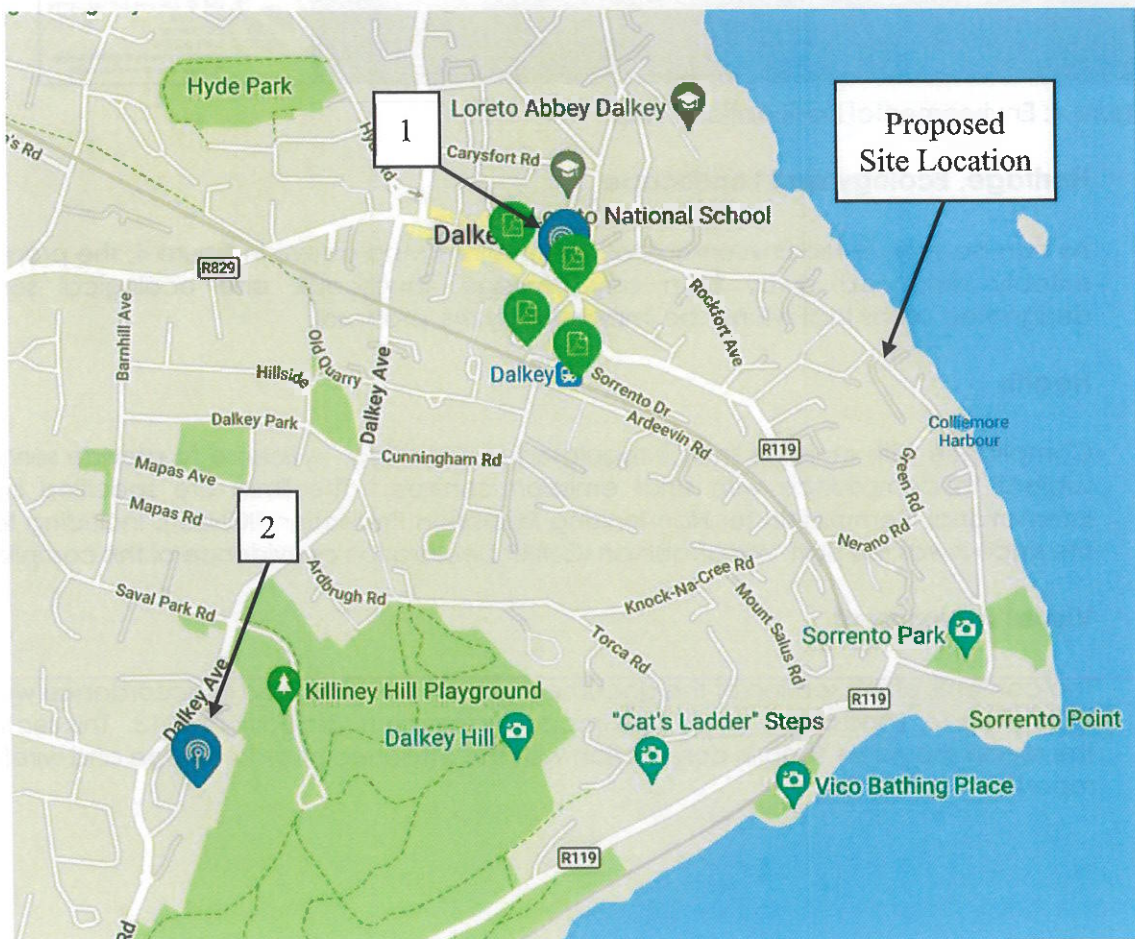




Figure 3 ComReg Site Finder depicting existing telecommunications sites in the area.

## 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
<b>High</b>	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.
<b>Medium</b>	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
<b>Low</b>	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
<b>Large</b>	Total loss or major alteration to key landscape elements/features/characteristics such that post development the landscape character area would be fundamentally changed.
<b>Medium</b>	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
<b>Low</b>	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.
<b>Negligible</b>	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 – Coliemore Road northwest of the site
  - VP2 – Junction of Coliemore Road and Victoria Road northwest of the site
  - VP3 – Coliemore Road southeast 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 – Coliemore Road northwest of the site E: 726950 N: 726826 Distance to Proposal: 138.4m
<b>Existing Character</b>	This viewpoint (VP) is taken along the Coliemore Road, adjacent to residential houses. In the foreground are residential dwellings and multiple streetlights and electricity poles with overhead cables which extend into the background, where there are mature trees and vegetation.
<b>Receptor Type and Sensitivity</b>	The typical receptor at this location would be residential dwellings, along with road users such as pedestrians, motorists, and cyclists. The sensitivity is therefore high.
<b>Nature of Change</b>	From this viewpoint, the proposal is visible 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 Coliemore Road.
<b>Magnitude of Change</b>	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.
<b>Summary of Visual Assessment</b>	Sensitivity: High (Residential Dwelling, Road users)
	Magnitude: Low
	Level of effect: Moderate-Low
<b>Significant effect?</b>	<b>No</b>

Viewpoint 2	VP2 – Junction of Coliemore Road and Victoria Road northwest of the site E: 727003 N: 726779 Distance to Proposal: 67.6m
<b>Existing Character</b>	This viewpoint (VP) is taken along the Coliemore Road northwest of the site approx. 67.6m away. The area is dominated by existing signage, streetlights, overhead cables, and vegetation.
<b>Receptor Type and Sensitivity</b>	The typical receptor at this location would be residential dwellings, along with road users such as pedestrians, motorists, and cyclists. The sensitivity is therefore high.
<b>Nature of Change</b>	Given the close proximity, the proposed development will be visible from the perspective of this viewpoint. However, the proposal is considered to fit seamlessly into its host environment here as it is absorbed and integrated into the location by the presence of existing streetlights 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 Coliemore Road.
<b>Magnitude of Change</b>	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.
<b>Summary of Visual Assessment</b>	Sensitivity: High (Residential Dwelling, Road users)
	Magnitude: Low

	Level of effect: Moderate-Low
<b>Significant effect?</b>	<b>No</b>

<b>Viewpoint 3</b>	VP3 – Colliemore Road southeast of the site E: 727164 N: 726616 <span style="float: right;">Distance to Proposal: 162m</span>
<b>Existing Character</b>	This viewpoint is located along the Colliemore Road northwest of the site approx. 162m away. The area is dominated by existing signage, streetlights, overhead cables, and vegetation.
<b>Receptor Type and Sensitivity</b>	Primary receptors at this location would be residential dwellings along with road users such as motorists, pedestrians, and cyclists. The sensitivity is therefore high.
<b>Nature of Change</b>	From this viewpoint, the proposed development will be in view from this direction. It would be partially obscured by the presence of a mature tree and the presence of existing street light poles help to absorb the proposal into the streetscape, thereby not resulting in any noticeable change to the character of the area.
<b>Magnitude of Change</b>	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.
<b>Summary of Visual Assessment</b>	Sensitivity: High (Residential Dwelling, Road users)
	Magnitude: Low
	Level of effect: Moderate - Low
<b>Significant effect?</b>	<b>No</b>

## 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 2022-2028 (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.
- 7.14. **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 two 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 all three 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 black colour is proposed to match Victorian street furniture here. It is proposed that the cabinets are to be green but may be painted any colour including black. It is also intentionally sited close to mature trees for maximum screening purposes and is an acceptable distance from any surrounding dwellings in the area to protect residential amenity.

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

- 7.15. 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.
- 7.16. 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.'*
- 7.17. 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.'*
- 7.18. 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.
- 7.19. 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, however for this location it was considered that there is not sufficient space for two cabinets and a dual operator pole height of between 15m and 18m would be too high so unfortunately a single operator 10m pole is proposed here.

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

- 7.20. 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.
- 7.21. 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.
- 7.22. 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 full complies with as is set out within this document



## 8. Conclusions

- 8.1. Taking into consideration all the relevant factors set out herein 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 and multiple streetlights and electricity poles with overhead cables along Coliemore Road that will allow the proposal to seamlessly integrate into the streetscape. It is considered that the proposal is at the best so it is able to be absorbed comfortably by its host environment as it is similar in design to existing roads vertical infrastructure including street lighting poles.
- 8.2. The proposed development is at a height of 10.8m and is an aesthetically designed black pole which will provide the required technology coverage by having 'line of sight' above the immediate built form and vegetation. It is confirmed that Emerald Tower Limited actively encourages the sharing of all infrastructure in its portfolio, however for this location it was considered that there is not sufficient space for two cabinets and a dual operator pole height of between 15m and 18m would be too high so unfortunately a single operator 10m pole is proposed here.
- 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, that 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.

2

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

**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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Lough Mahon House, Blackrock, Cork, T12 C43C, Tel: 021 4536800, Fax: 021 4536801, Email: [info@oli.ie](mailto:info@oli.ie), Website: [www.olearyinsurances.ie](http://www.olearyinsurances.ie).

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*Registered in Ireland. Company Registration No. 18930. Registered Office: Lough Mahon House, Blackrock, Cork, T12 C43C, Ireland.*





**O'LEARY**  
INSURANCE GROUP  
*Insurance Brokers & Consultants . Est. 1961.*

3

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**

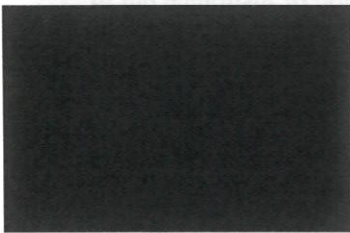
**Business Description:** Owning, leasing and management of wireless infrastructure internationally

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,



Tel. [REDACTED]

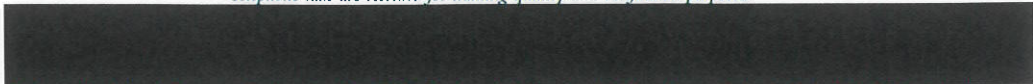
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*Telephone calls are recorded for training quality and verification purposes.*





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**Policy Type:** Combined Liability

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

**Insurer & Policy Number:** Employers Liability and Primary Public/Products Liability Chubb Insurance Co. [REDACTED]

**Policy Period:** 18<sup>th</sup> July 2021 to 22<sup>nd</sup> April 2022 both days inclusive

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

**Policy Period:** 11<sup>th</sup> January 2022 to 22<sup>nd</sup> 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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Lough Mahon House, Blackrock, Cork, T12 C43C, Tel: 021 4536800, Fax: 021 4536801, Email: [info@oli.ie](mailto:info@oli.ie), Website: [www.olearyinsurances.ie](http://www.olearyinsurances.ie).

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

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

4

## 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: [REDACTED]

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

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

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

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

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

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

**Internal Documentation References:**

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

**Statement Prepared By:** [REDACTED]

**Date:** 12/07/17





**PHOENIX TOWER  
INTERNATIONAL**

Date: 25/05/2022

5

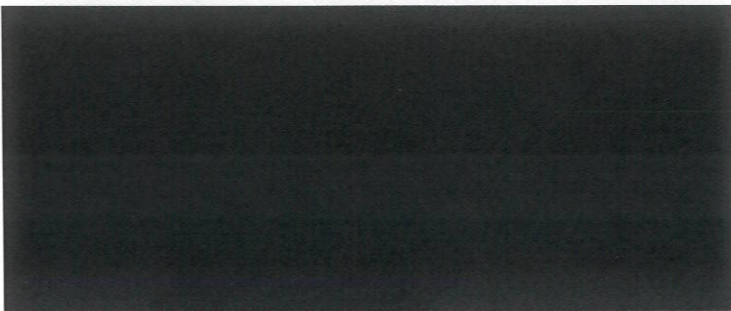
**To whom it may concern,**

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.

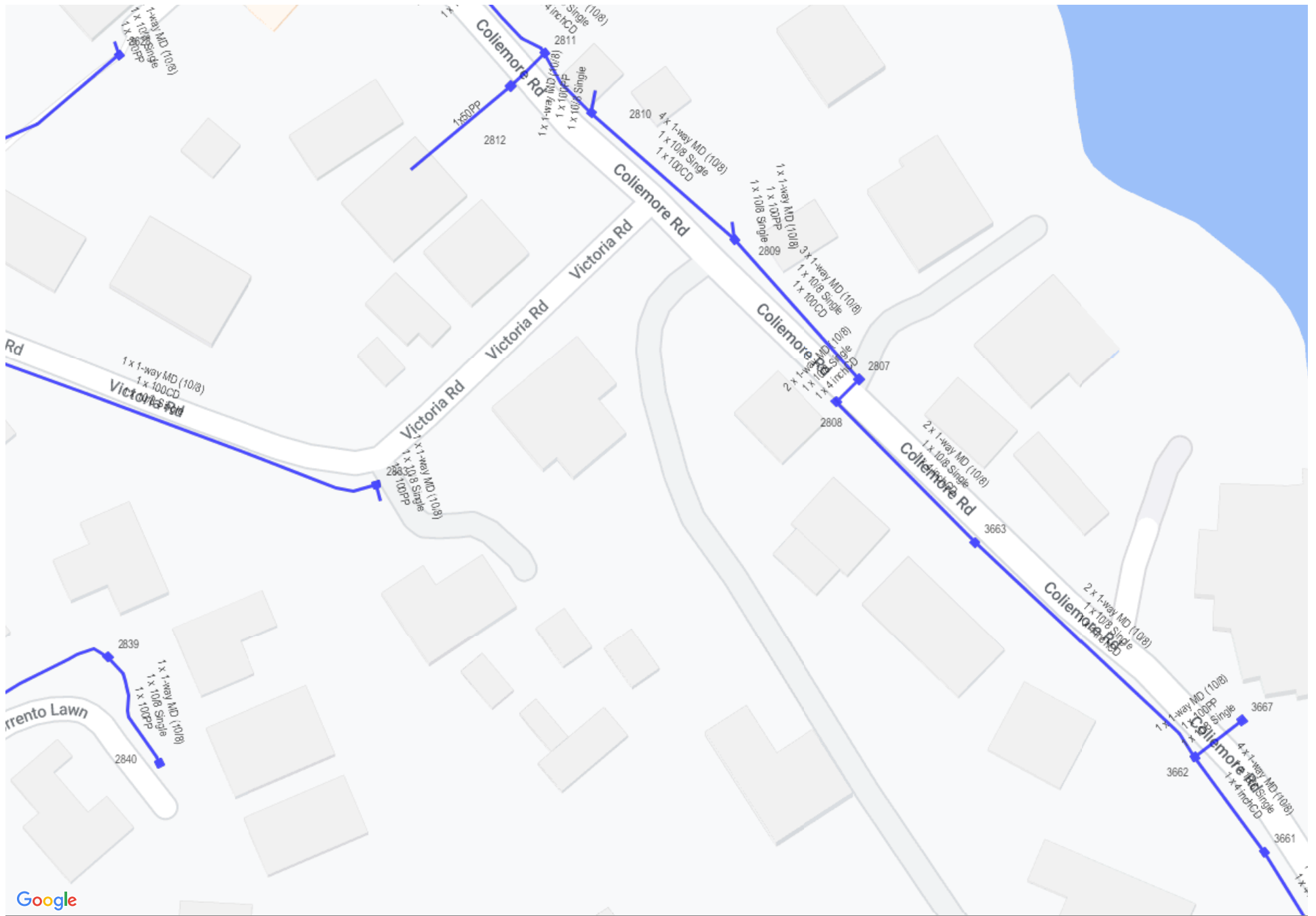
Yours faithfully

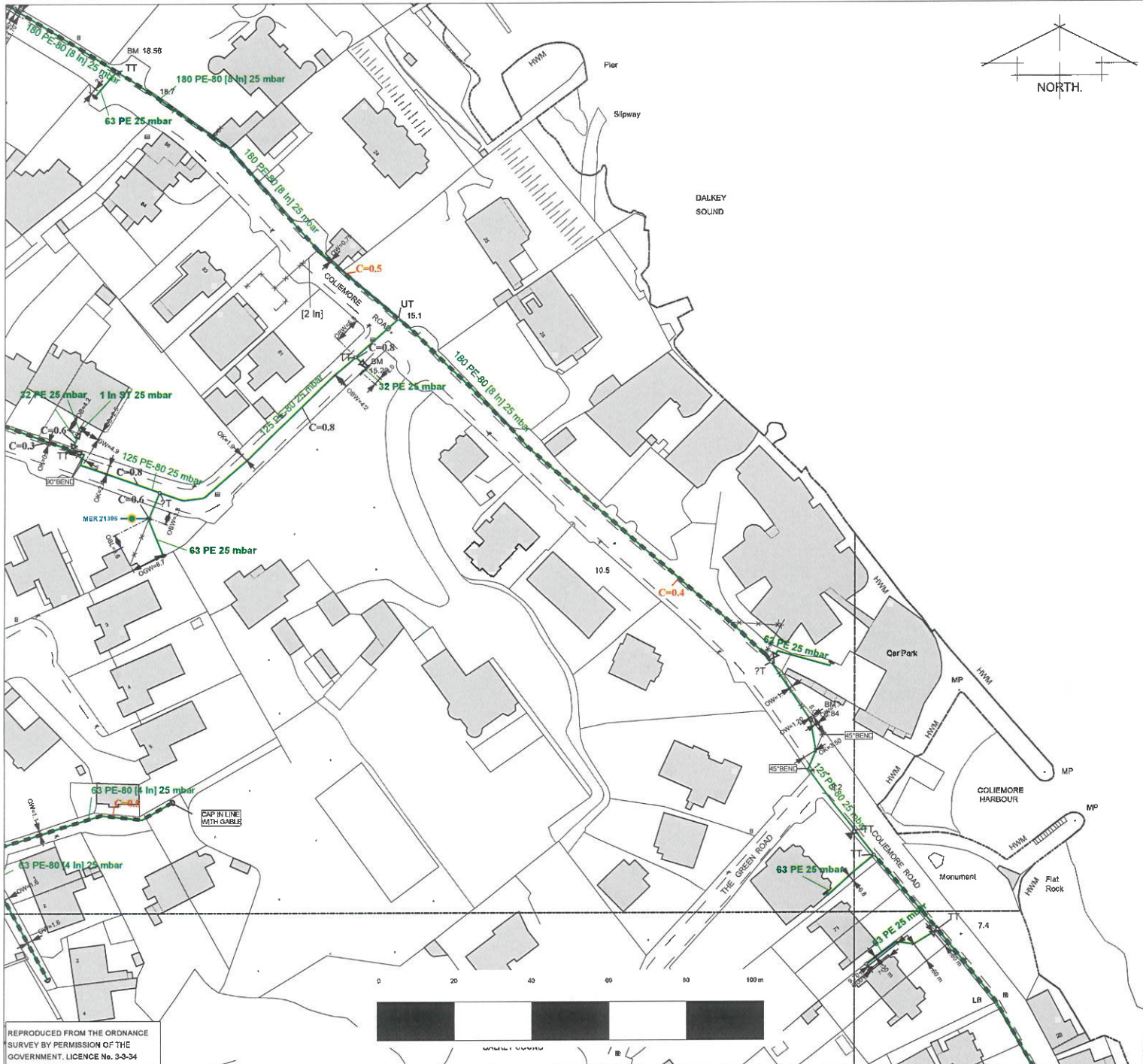


Phone: [Redacted]

Email: [Redacted]







**Important Safety Notices:**

Damage to gas pipelines can result in serious injury or death. Gas network information is provided as a general guide. The exact location and depth of medium or low pressure distribution gas pipes must be verified on site by carrying out necessary investigations, including, for example, hand digging trial holes along the route of the pipe. Service pipes are not generally shown but their presence should always be anticipated.

High pressure transmission pipelines are shown in red. If a transmission pipeline is identified within 10m of any intended excavations then work must not proceed before GNI has been consulted. The true location and depth of a transmission pipeline must be verified on site by a representative of GNI. Contact can be made through 1800 427 747.

All work in the vicinity of the gas network must be completed in accordance with the current edition of the Health & Safety Authority publication, Code of Practice For Avoiding Danger From Underground Services which is available from the Health and Safety Authority (01 614 7000) or can be downloaded at [www.hsa.ie](http://www.hsa.ie).

**Legal Notice:**

Gas Networks Ireland (GNI) and its affiliates, accept no responsibility for the accuracy of any information contained in this document including data concerning location and technical designation of the gas distribution and transmission network (the Information). The Information should not be relied on for accurate distance or depth of cover measurements.

Any representations and warranties, express or implied, are excluded to the fullest extent permitted by law. No liability shall be accepted for any loss or damage including, without limitation, direct, indirect or consequential loss, arising out of or in connection with the use or re-use of the Information.

- Aurora Telecom Fibre Optic Cable
- Aurora Telecom Duct
- Aurora Telecom Sub-duct
- Aurora Telecom Inserted Gas Pipe

Contact Aurora Telecom on 1800-427-399 or (01)203-0120.

- Transmission Pipe (High Pressure)
- Transmission Pipe (Construction Issue)
- Distribution Pipe (Medium Pressure)
- Distribution Pipe (Low Pressure)
- Service Pipe (Medium Pressure)
- Service Pipe (Low Pressure)
- Strategic Pipe (Medium Pressure)
- Strategic Pipe (Low Pressure)
- Inserted Pipe (Medium Pressure)
- Inserted Pipe (Low Pressure)
- Distribution Pipe (Abandoned)

- Cover (depth in meters)
- CP Test Point
- End Cap
- Hot Tap
- Installation
- Valve
- Mains Verification \*\*
- Pressure Monitor
- Protection (Sleeve)
- Protection (Slabbing)
- Reducer
- Service Terminator
- Tee
- Transition

\*\* Please contact GNI on 1800-427747 for specific information.

Design Department - DUBLIN

**GAS NETWORK INFORMATION**

Issue: Glenline

Location: Coliemore Road Dalkey

Plot Date: 02/08/2022 Contact:

Plotted by: Scale: 1:1000

REPRODUCED FROM THE ORDNANCE SURVEY BY PERMISSION OF THE GOVERNMENT. LICENCE No. 3-3-34

Not Archived - Alternative: [Network Maintenance Dublin]2022\_Kevin\_Plots

- SewerStormWaterNetwork wms
- WaterDistributionNetwork wms
- Streets





**Telecommunications Development Photomontage Report**

**Report Date: 13/09/2022**

**Project: DN 2967 Dalkey**

**Surveyed by:** [REDACTED]

**Created by:** [REDACTED]

**Approved by:** [REDACTED]

**Client:**



**Provided by:**





Map details:  
Projection: Irish ITM EPSG:2157  
Scale: 1:984.5

**Viewpoint Location Map**

Number of Viewpoints: 3  
Proposed Development: Telecom Mast  
Mast Height (metres): 10  
Location: E:327111, N:226712

Site Name: Dalkey  
Address: Coliemore Road, Dalkey, Co. Dublin





View Point Name		Existing View of Viewpoint 1				
Site ID	Viewpoint No.	Easting	Northing	Elevation (AOD)m	Direction-Degrees(N)	Distance (m)
DN_2967	VP1	726950	726826	17.9	130.18	138.4
Viewing Distance: 300mm			Height above ground: 1.5m			
Page size: A3			Camera & Lens: Canon 6D - 50mm Focal Length			



Provided by:  
[www.entrust-services.com](http://www.entrust-services.com)  
 Unit 11D, Deerpark Business  
 Centre, Oranmore, Co.  
 Galway, H91 X599

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





View Point Name		Proposed View of Viewpoint 1				
Site ID	Viewpoint No.	Easting	Northing	Elevation (AOD)m	Direction-Degrees(N)	Distance (m)
DN_2967	VP1	726950	726826	17.9	130.18	138.4
Viewing Distance: 300mm			Height above ground: 1.5m			
Page size: A3			Camera & Lens: Canon 6D - 50mm Focal Length			

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Centre, Oranmore, Co.  
Galway, H91 X599

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





View Point Name		Existing View of Viewpoint 2				
Site ID	Viewpoint No.	Easting	Northing	Elevation (AOD)m	Direction-Degrees(N)	Distance (m)
DN_2967	VP2	727003	726779	17.4	130.16	67.6
Viewing Distance: 300mm			Height above ground: 1.5m			
Page size: A3			Camera & Lens: Canon 6D - 50mm Focal Length			



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 Centre, Oranmore, Co.  
 Galway, H91 X599

Surveyed by: [REDACTED]  
 Created by: [REDACTED]  
 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_2967	VP2	727003	726779	17.4	130.16	67.6
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		Existing View of Viewpoint 3					
Site ID	Viewpoint No.	Easting	Northing	Elevation (AOD)m	Direction-Degrees(N)	Distance (m)	
DN_2967	VP3	727164	726616	10	-42.38	162	
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 3					
Site ID	Viewpoint No.	Easting	Northing	Elevation (AOD)m	Direction-Degrees(N)	Distance (m)	
DN_2967	VP3	727164	726616	10	-42.38	162	
Viewing Distance: 300mm			Height above ground: 1.5m				
Page size: A3			Camera & Lens: Canon 6D - 50mm Focal Length				



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 Centre, Oranmore, Co.  
 Galway, H91 X599

**Surveyed by:** [Redacted]  
**Created by:** [Redacted]  
**Approved by:** [Redacted]





727198m E, 726843m N



- EXISTING AIR VAULT (APPROX. 40.0m AWAY)
- PROPOSED SITE LOCATION BOUNDARY OUTLINED IN RED
- EXISTING ESB POLE (APPROX. 12.0m AWAY)

Dublin  
Baile Átha  
Cliath

726906m E, 726630m N

Revised Dec 08 Map 62200 with the approval of  
Dublin City Council 2008, 2009, 2010, 2011, 2012  
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OVERVIEW MAP  
Scale 1:1000

**SITE COORDINATES**

Latitude	72° 47' 58.97" N	Longitude	11° 58' 43.50" W
Latitude	72° 47' 58.97" N	Longitude	11° 58' 43.50" W

Rev.	Revision	Date	By	Check

**entrust**  
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Company registered by  
ENTRUST LTD, Unit 10, Harcourt Business Centre, Harcourt  
Co. Galway, H91 2G9, 091-291 291  
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is highlighted in red.

**PHOENIX TOWER  
INTERNATIONAL**

**GLENLINE  
telecoms**

**SECTION 25.4**

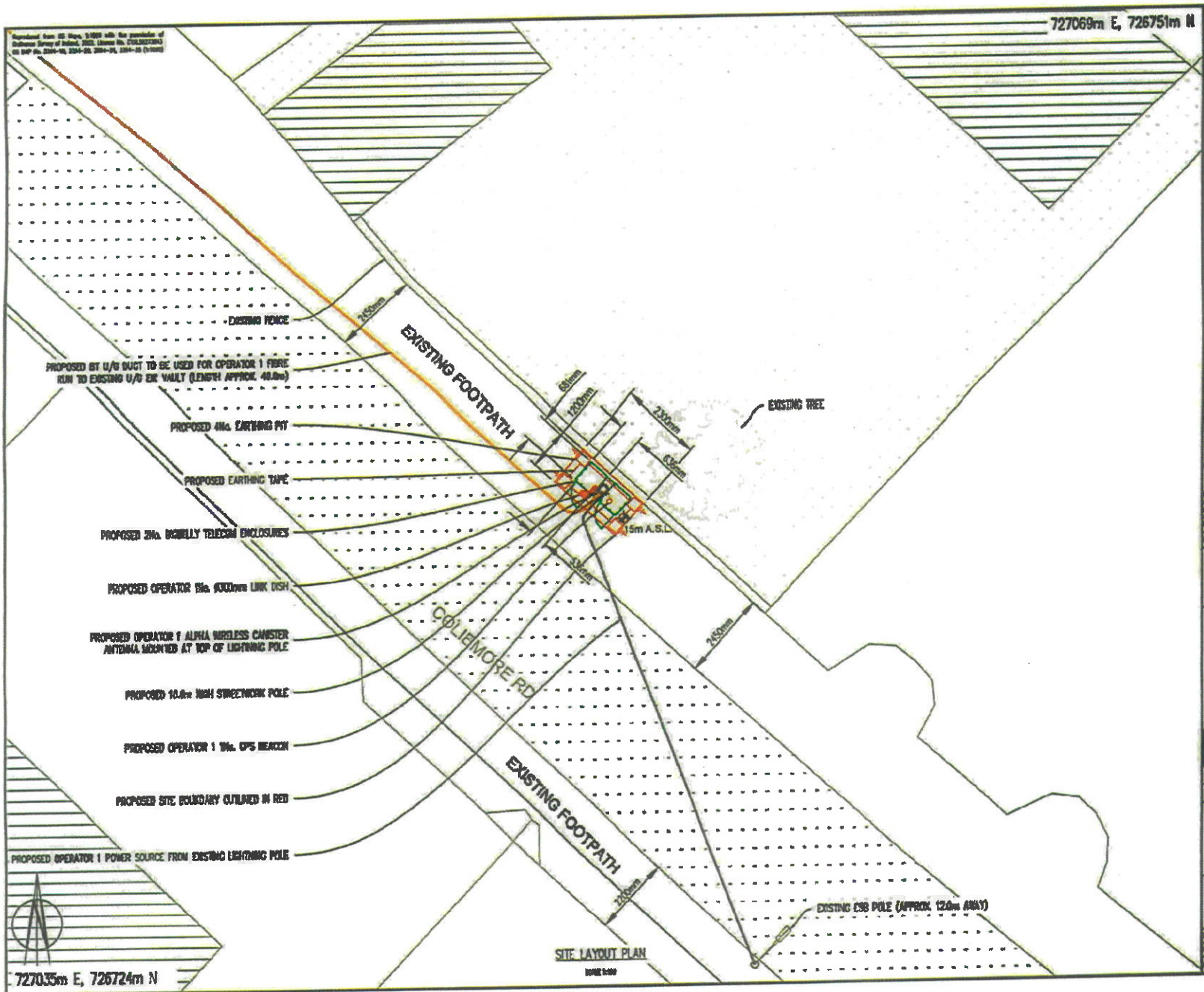
Site Code: DN-2967-01  
S.P. Ref: N/A

Site Address  
COLIEMORE ROAD,  
DALKEY  
CO. DUBLIN

Title  
SITE LOCATION MAP  
1:1000 MAP

Designed	Date: 16/01/2012
Drawn	Scale: AS SHOWN (Rev. A)
Drawn No:	DN-2967-01-PD-01





**SITE COORDINATES**

UTM	ZONE	COORDINATE	UNIT

LEGEND

Site Plan

REV	ISSUE	DATE	BY	CHKD

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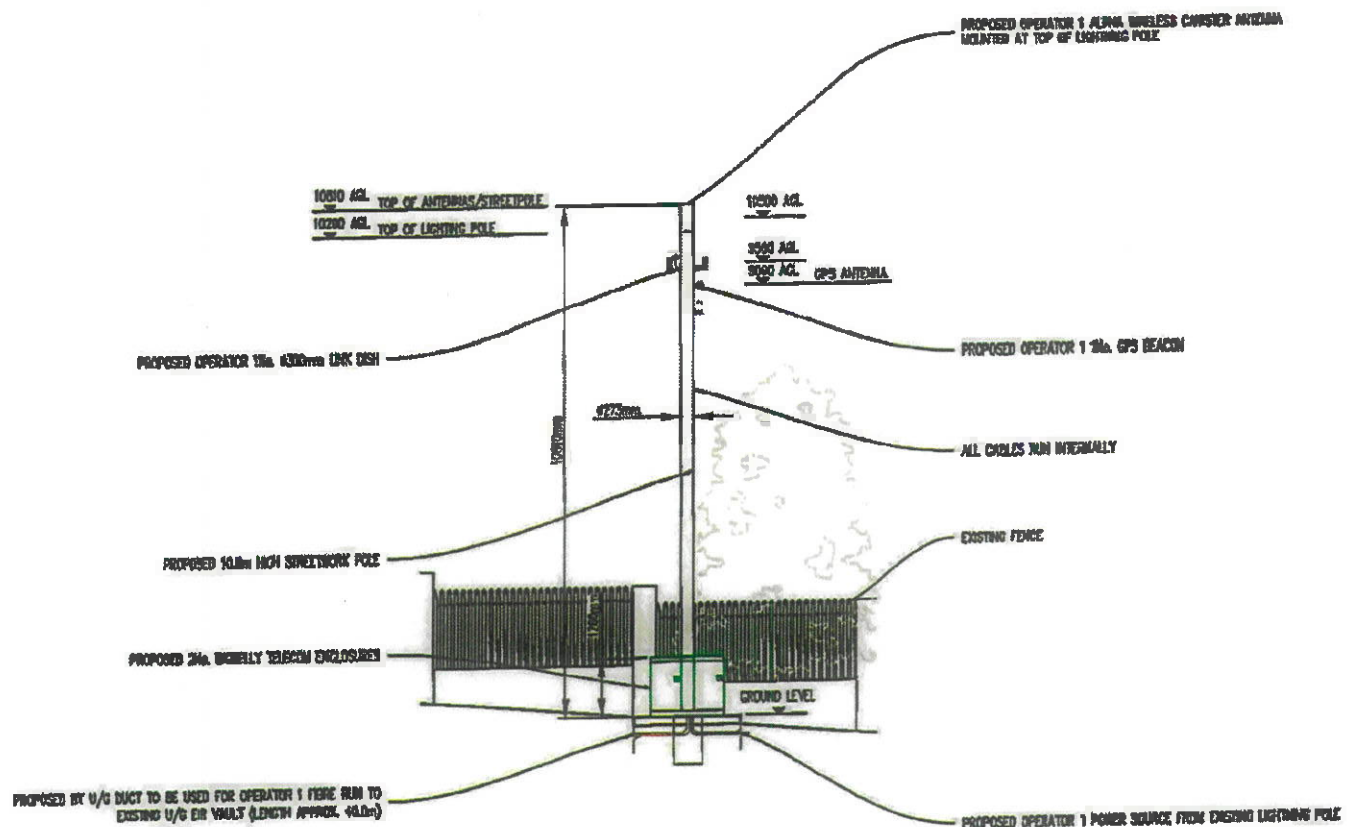
Developed prepared by [redacted]  
ENTRUST Pty Ltd, 15/Sheppard Avenue East, Toronto, ON, Canada M4J 2W6, TEL: 416-363-0131, FAX: 416-363-0132, contact@entrust-services.com

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**SECTION 254**

Site Code:	DN-2967-01
S.P. Sub:	N/A
Site Address:	COLEMORE ROAD, BAUNEY CO. DUBLIN
Title:	PT SMART STREETPOLE SITE LAYOUT PLAN
Designed:	Date: 04/10/10
Drawn:	Scale: AS SHOWN (rev. A)
Dwg No.:	DN-2967-01-PD-02



**SOUTH-WEST ELEVATION**  
SCALE 1:100

**SITE COORDINATES**

UTM	Easting	Northing	Zone

NO.	REVISION	DATE	BY	CHK

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Drawings prepared by: [Redacted]  
ENTRUST LTD, Unit 10, [Redacted] [Redacted] [Redacted],  
Co. Galway, NBT 8585, TEL: +353 (0) 91 842 810  
www.entrust-services.com

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**PHOENIX TOWER INTERNATIONAL**

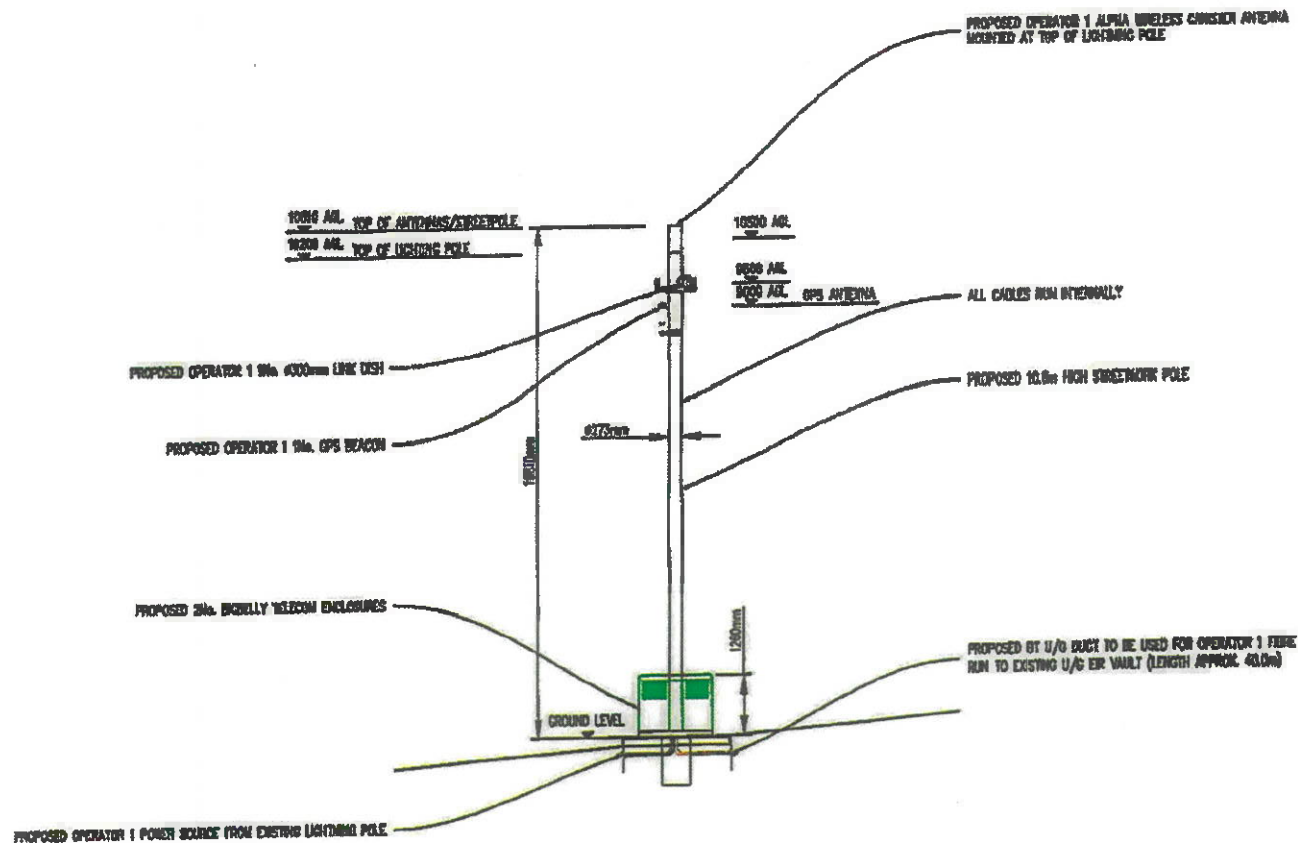
**GLENLINE telecoms**

**SECTION 25.4**

Site Code:	DN-2967-01
S.P. Ref:	N/A
Site Address:	COLEMORE ROAD, DALREY CO. DUBLIN

Title: **PT SMART STREETPOLE SOUTH-WEST ELEVATION**

Designed:	Date: 14/10/2011
Drawn:	Scale: AS SHOWN Rev: A
Proj. No.:	DN-2967-01-PD-03



SITE COORDINATES			
LONGITUDE	OF 1000000	IN DECIMALS	FROM 1000000
LATITUDE	OF 1000000	IN DECIMALS	FROM 1000000

No.	Revision	Date	By	Chk



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entrust ltd, Unit 10, Blackrock Business Centre, Blackrock, Co. Dublin, D18 1X99, TEL: +353 (0) 01 542 910  
www.entrust-ireland.com



SECTION 254

Site Code: DN-2967-01

S.P. Ref: N/A

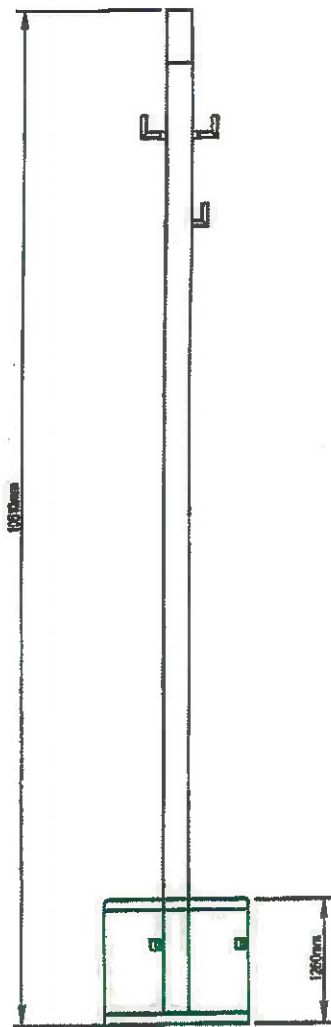
Site Address:  
COLEMORE ROAD,  
DALKEY  
CO. DUBLIN

Title:  
P11 SMART STREETPOLE  
NORTH-EAST ELEVATION

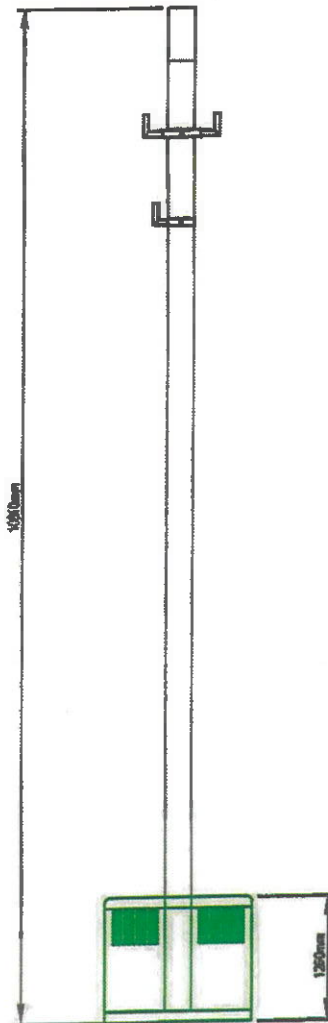
Designed	Date: 14/10/2012
Drawn	Scale: AS SHOWN Rev: A
Proj No. DN-2967-01-PD-04	

NORTH-EAST ELEVATION  
SCALE 0:10





Rear View



Front View

EQUIPMENT DETAILS - STREETWORK POLE & RIGBELLY TELECOM ENCLOSURES

2002 101

SITE COORDINATES			
Latitude	Longitude	U.T.M. Zone	U.T.M. Easting

LOG SHEET			
No.	Revision	Date	By / Ctd

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**PHOENIX TOWER INTERNATIONAL**

**GLENLINE**  
telecoms

SECTION 25.4

Site Code: DN-2967-01  
R.F. Ref: N/A

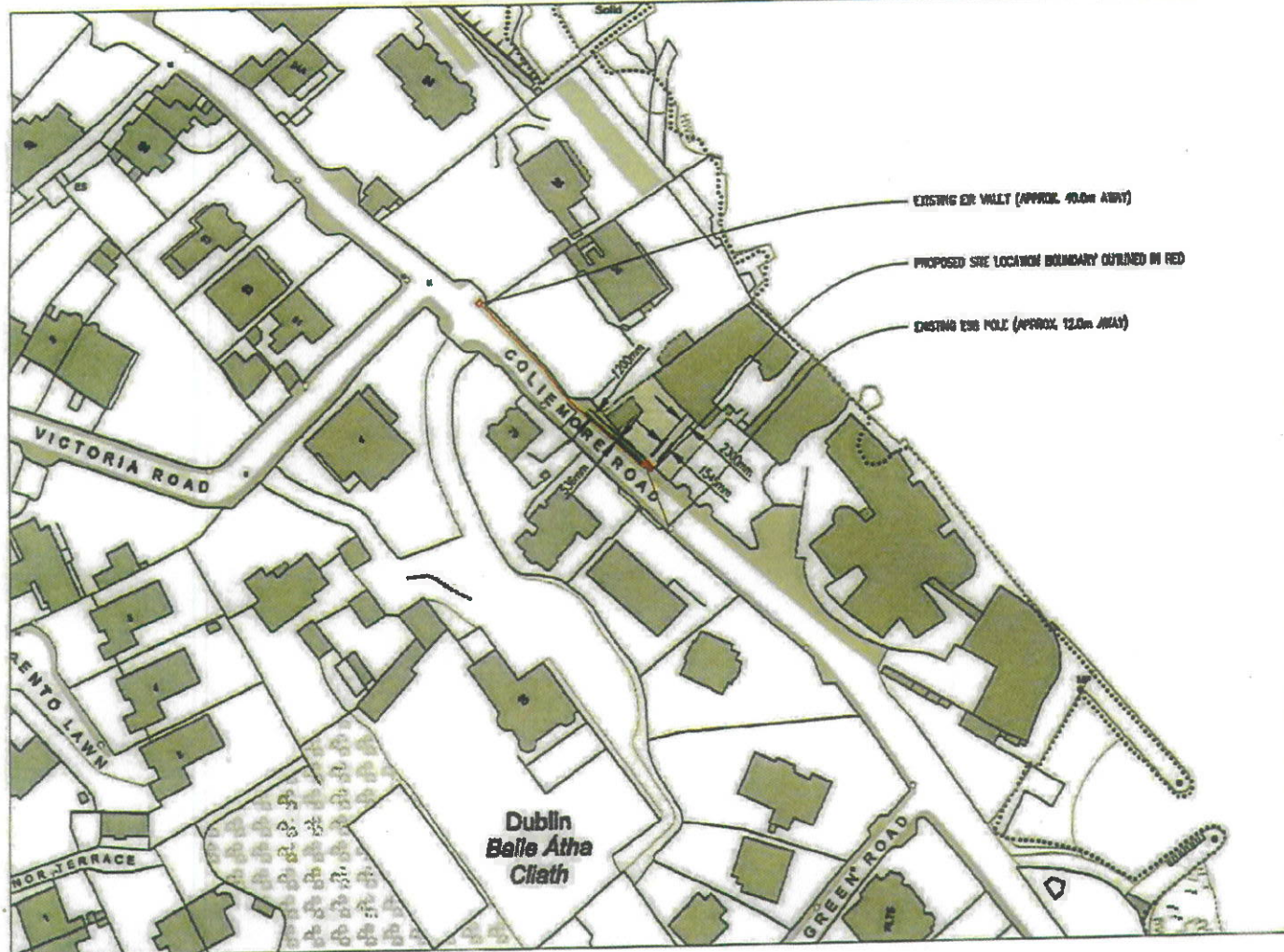
Site Address  
COLLEMORE ROAD,  
DUNREY  
CO. DUBLIN

Title  
PR SMART STREETPOLE  
EQUIPMENT DETAILS

Designed	Date: 8/10/2012
Drawn	Scale: AS SHOWN Rev. A
Dwg No. DN-2967-01-PD-05	



727198m E, 726845m N



726906m E, 726630m N

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OVERVIEW MAP  
1:1000

SITE COORDINATES			
Latitude	Longitude	UTM Zone	UTM Easting

No.	Revision	Date	By	Chk

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entrust@entrust-ireland.com

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**PHOENIX TOWER INTERNATIONAL**

**GLENLINE telecoms**

**SECTION 254**

Site No. DN-2967-01

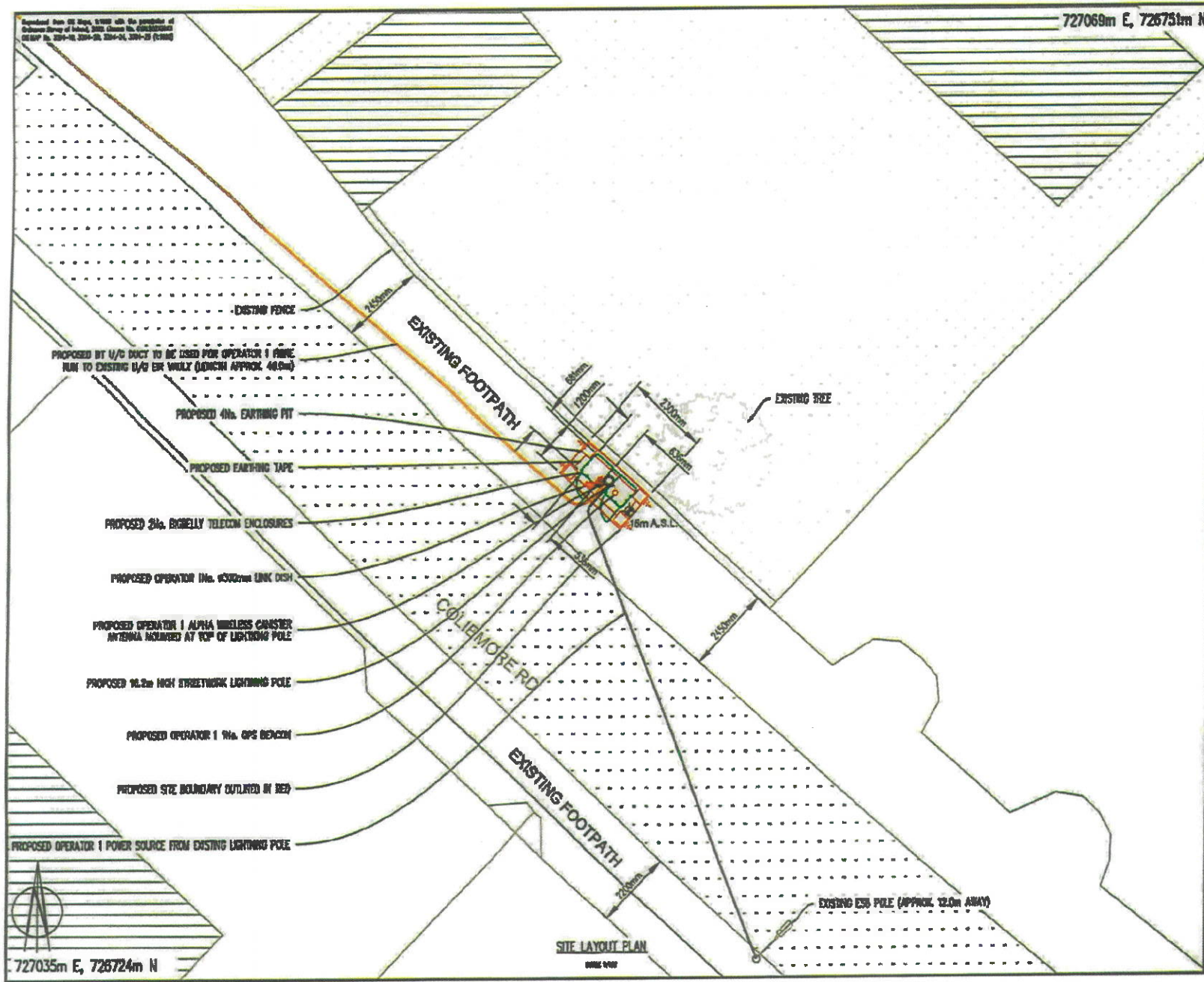
R.P. No. N/A

Site Address  
**COLIEMORE ROAD,  
DUXEY  
CO. DUBLIN**

Title  
**SITE LOCATION MAP  
1:1000 MAP**

Designed	Date 10/10/04
Drawn	Scale as shown (Rev. A)
Proj. No. DN-2967-01-PD-01	





727069m E, 726731m N

**SITE COORDINATES**

727035m E, 726724m N

**LEGEND**

U/O Pole

No.	Revision	Date	By	Out

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entrust ltd. Unit 15, Sheppard Industrial Centre, Brampton, ON, Canada, L6Y 4R9, 905-888-6611  
entrust@entrust-environmental.com

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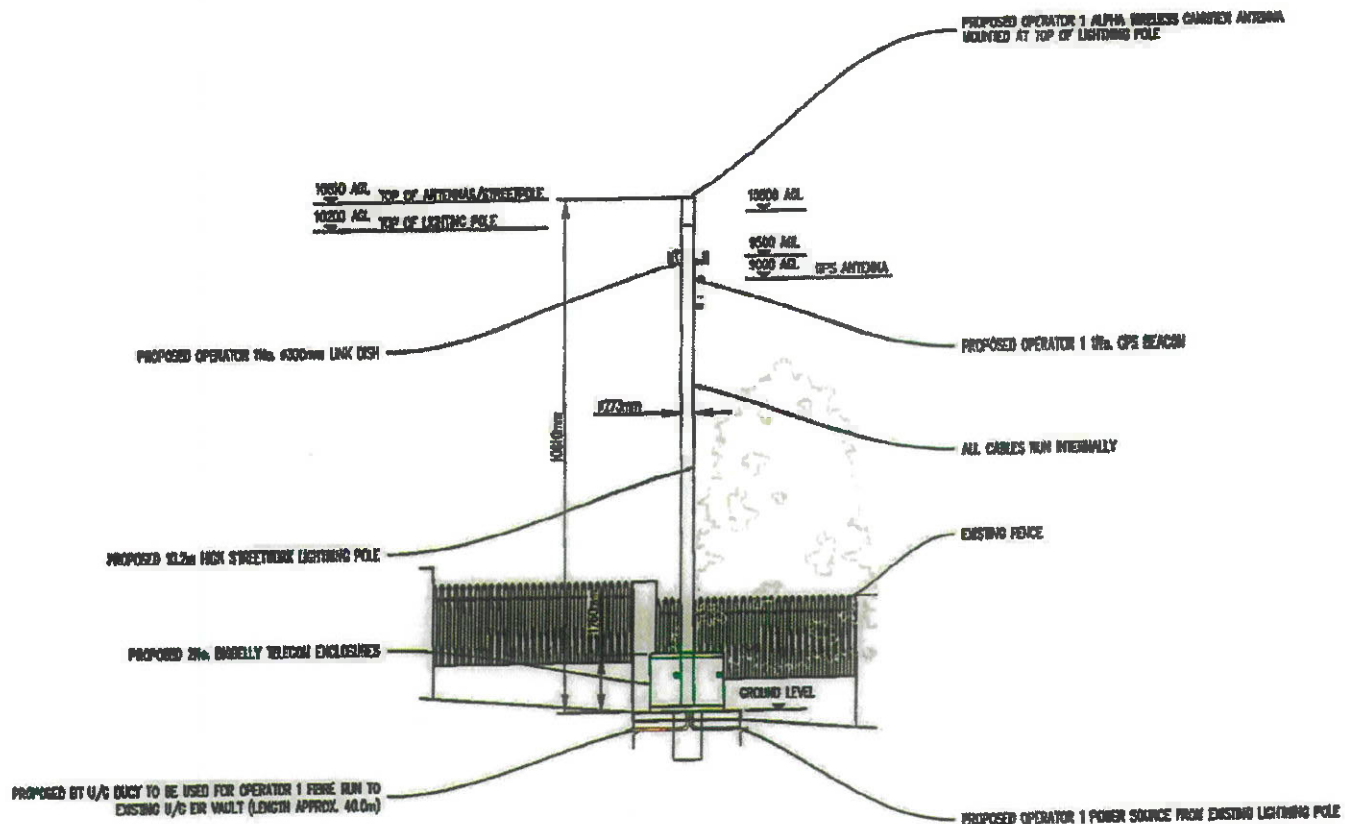
**PHOENIX TOWER INTERNATIONAL**

**GLENLINE telacoms**

**SECTION 25.4**

Site Code: DN-2967-01  
S.P. Ref: N/A  
Site Address: COLEMORE ROAD, DALKEY CO. DUBLIN  
Title: PT SMART STREETPOLE SITE LAYOUT PLAN  
Designed: [Redacted] Date: 1/16/2012  
Drawn: [Redacted] Scale: AS SHOWN (Rev. A)  
Proj. No. DN-2967-01-PD-02





**SOUTH-WEST ELEVATION**  
 2007 1/10

**SITE COORDINATES**

Latitude	Longitude	U.T.M. Zone	U.T.M. Easting	U.T.M. Northing

No.	Revision	Date	By	Chk
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Drawing prepared by: [Redacted]  
 ENTRUST LTD, Unit 10, Tollemore Estate, Tollemore, Co. Dublin, T91 3002, TEL: 01 242 5100  
 entrust@entrust-services.com

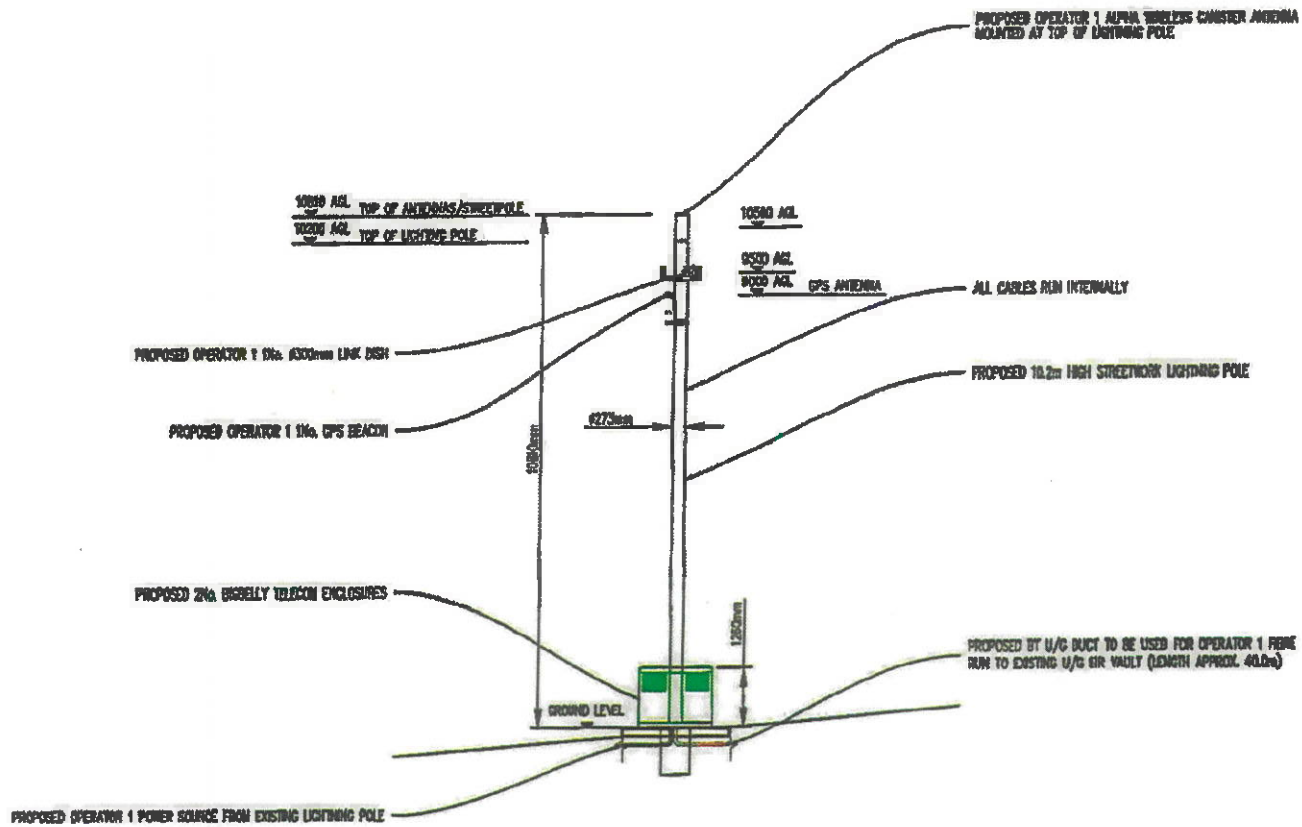
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**PHOENIX TOWER INTERNATIONAL**

**GLENLINE**  
 telecoms

**SECTION 254**

Site Code:	DN-2967-01
S.P. Ref:	N/A
Site Address:	COLINDRE ROAD, BALKEY CO. DUBLIN
Title:	PTI SMART STREETPOLE SOUTH-WEST ELEVATION
Designed:	Date: 12/16/2007
Drawn:	Scale: AS SHOWN Rev: A
Draw No.:	DN-2967-01-PD-03



NORTH-EAST ELEVATION

04/25/2012

SITE COORDINATES

LONGITUDE	OF 10 DEGREES	MINUTES	SECONDS	DECIMALS
LATITUDE	OF 53 DEGREES	MINUTES	SECONDS	DECIMALS

NO.	REVISION	DATE	BY	CHKD
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Developed prepared by  
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 www.entrustplanning.com

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SECTION 254

Site Code: DN-2967-01

S.P. Ref: N/A

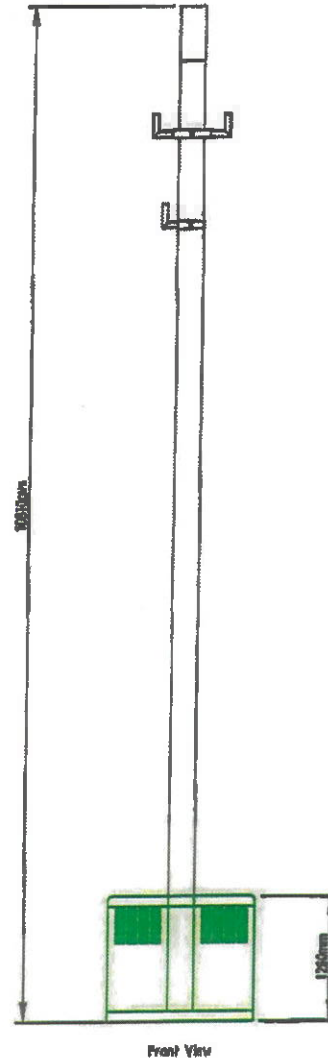
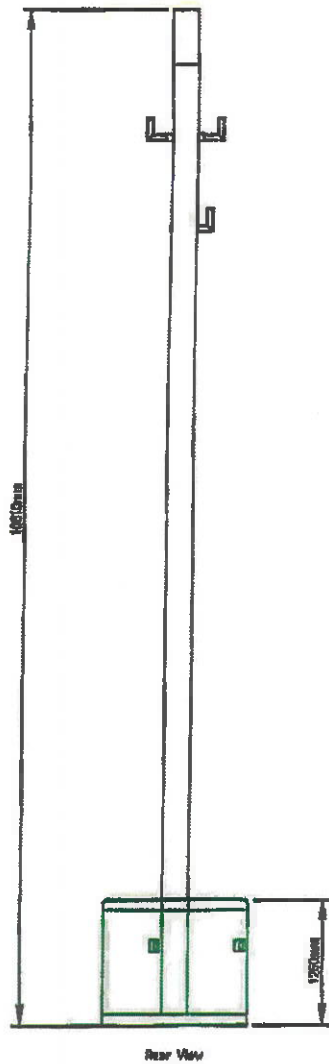
Site Address:  
 COLEMORE ROAD,  
 DALKEY  
 CO. DUBLIN

Title:  
 P11 SMART STREETPOLE  
 NORTH-EAST ELEVATION

Designed: [ ] Date: 14/04/2012

Drawn: [ ] Scale: AS SHOWN Rev: A  
 Draw No. DN-2967-01-PD-04





EQUIPMENT DETAILS : STREETWORK LIGHTING POLE & BIGBELLY TELECOM ENCLOSURES

2012 1/10

SITE COORDINATES

LATITUDE	53° 07' 22.00" N	LONGITUDE	10° 01' 04.00" W	FOUR FIGURE	2554
UTM EASTING	49 820 700	UTM NORTHING	57 400 000	UTM ZONE	29QUB

No.	Revision	Date	By	Chk
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Drawings prepared by  
**ENTRUST LTD.** Unit 15, Airport Business Centre, Drogheda,  
 Co. Galway, H91 2D8, Ireland (01 353 476  
 info@entrust-ireland.com

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SECTION 25.4

Site Code: DN-2967-01

S.P. Ref: N/A

Site Address  
**COLEMORE ROAD,  
 DALKEY  
 CO. DUBLIN**

Title  
**PI SMART STREETPOLE  
 EQUIPMENT DETAILS**

Designed: [Redacted] Date: 04/05/2012

Drawn: [Redacted] Scale: as shown Rev: A

Dwg. No.: DN-2967-01-PD-05

**Date: 12/04/2023**

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

**Re: Section 254 Application- Proposed Telecommunications Streetworks Solution**

**Date Received: 16.11.2022**

**Applicant: Emerald Tower Limited,  
of 1st Floor,  
30313 Lake Drive,  
City West,  
Dublin 22,**

**Site Name: PTI: DN\_2967 Dalkey**

**Location: The site is located adjacent to Coliemore Road.**

**dlr Application Reference: CTT.22.050-273264 - Coliemore Rd, Dalkey**

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 Coliemore Road, Dalkey, Co. Dublin.

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

Transportation Planning Section object to this application as it will greatly obstruct the footpath as 1.8m footpath width minimum is required.

The Conservation Division cannot support the issuing of a Section 254 license for a telecommunication pole and associated infrastructure at the proposed location as they consider it would be contrary to County Development Plan 2022-2028, Specific Local Objective 130.





Road Maintenance have recommended refusal as the proposed structure is located along the main pedestrian route. The back wall is often used to guide a partially sighted or blind person and thus this location should be kept clear. Also, the width outside the proposed structure is 1.250m. This clearance width is deemed to be inadequate along this busy tourist route and a route to school, especially as this will be reduced further when the cabinet doors are open.

Please find accompanying memo from Transportation Planning, Road Maintenance and The Conservation Division which detail the reasons for refusal and additional.

Yours faithfully,



**Margaret O'Carroll,**  
**Clerical Officer**  
**Roads Maintenance**

