

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

**Date:** 16<sup>th</sup> January 2023  
**Re:** Section 254 Application- Proposed Telecommunications Streetworks Solution  
**Applicant:** Cignal Infrastructure Ltd., Suite 309, Q House, 76 Furze Road, Sandyford Industrial Estate, Dublin 18.  
**Site Name:** Laughanstown  
**Location:** Lehaunstown, south of the Laus Stop, Laughanstown, Co. Dublin

Dear Sir/Madam,

On behalf of our client, Cignal Infrastructure Ltd. ("Cignal") please find attached application under Section 254 (1) (g) subsection 5 (A) of the Planning and Development Act 2000, which provides for the installation of communications infrastructure under licence from the Authority. We have included plans and other information concerning the requirement, position, design and capacity of the structure as outlined in Section 254 (3). We are happy to provide additional information on request.

### **Background**

The applicant, Cignal is a company of Cellnex, which is a European Telecommunications infrastructure provider. Cignal are a registered Infrastructure Provider for the Communications Industry with over 1800 sites around Ireland supporting mobile and broadband communications. Cignal provide Tower, Mast, Roof Top and Streetworks Solutions for the expanding requirements of the Licenced Operators including EIR, Vodafone and Three.

Cignal is authorised by ComReg to provide Electronic Communications Networks and Services, which allows them to apply for a licence under section 254(1) of the Planning and Development Act, 2000 for the establishment of over ground electronic communications

infrastructure and any associated physical infrastructure. Please see attached a Certificate of Authorisation for your information.

### **The Requirement**

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

### **The Proposal**

With reference to the attached plans you will note that it is proposed to provide a 20m high Smart Streetpole Solution in the specified location. See below a photograph of a similar Smart Streetpole and cabinet installed in Drummartin Road in July 2021. This was installed under a Section 254 Licence granted by DLR Co Co.



*Fig 1. Existing Smart Streetpole Solution as erected in Drummartin Road, Kilmacud, D14*

The street pole has an approx. diameter of 406mm and will be galvanised and painted in finish up to 11.5m in height. Above the 11.5m height, an antenna, approx. diameter of 460mm, will be mounted to a finishing height of up to 18m. Above the antenna will be 2 sets of 3No., approx. 1m active antennas finishing height of up to 20m.

The pole would be accompanied by an Operator Cabinet specifically located in a position agreeable to the local authority engineers. (Refer to detailed drawings attached). The antenna and structure are designed to blend in with the streetscape, are Irish made and will provide instant coverage.



Fig 2. Aerial View Site Location

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

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

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

Yours Sincerely,

**Chartered Engineer**



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## **PLANNING STATEMENT**

to support s.254 licence application for

### **TELECOMMUNICATIONS INFRASTRUCTURE**

at

**LEHAUNSTOWN LANE, LAUGHANSTOWN, CO. DUBLIN**

Client: Signal Infrastructure Ltd.

16<sup>th</sup> January 2023

## 1.0 INTRODUCTION

David Mulcahy Planning Consultants Ltd have been instructed by **Signal Infrastructure Ltd**<sup>1</sup> to prepare a planning statement to support a Section 254 licence application for a telecommunication structure at Lehaunstown Lane, Laughanstown, Co. Dublin.

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

This report should be read in conjunction with the drawings prepared by **Jason Redmond Associates, Consulting Engineers** who are the agents for this application. All correspondence should be sent to Jason Redmond Associates<sup>2</sup>.

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

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

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

## 2.0 LOCATION AND DESCRIPTION

### 2.1 Location

The site is located on the east side of Lehaunstown Lane, Laughanstown, Co. Dublin. Please refer to the site location map submitted with the application.

### 2.2 Description

The site currently consists of a an overgrown grass verge.



**Fig No.1** Photograph of subject site (source Google Streetview August 2022).



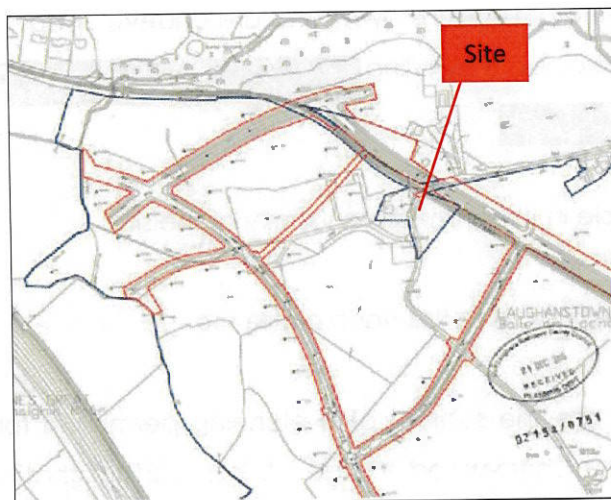
dwelling have the necessary telecommunication infrastructure in place to serve them.



**Fig No.2a** Approximate location of site relative to permitted housing development (source: Cherrywoodvillage.ie)

Ref.DZ15A/0758 (as extended)

The lands to the east of the site are the subject of a permission granted in 2016 for an SDZ application for development on lands (site area c.25.65HA) involving Roads and infrastructure (phase 1) as approved under the Cherrywood SDZ Planning Scheme (2014) to form part of public road network providing access and services for the future development of the adjoining SDZ lands.



**Fig. No.2b** Approximate location of site relative to permitted housing development (source: Cherrywoodvillage.ie).



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## **3.0 PROPOSED DEVELOPMENT**

### **3.1 Description**

The proposal consists of a multi-operator capable solution consisting of a 20m Alpha 4.0 podium pole, with a 6.5m alpha antenna (model AW3954) with 2 sets of 3No., 1m active antennas (model AAU5613, total of 6 active antennas) at the top of the pole at azimuths TBD°, along with ancillary cabinetry (1.25m wide x 1.65m high x 1.05m deep).

This proposal is for hosting Eir but will also facilitate hosting another mobile operator on the proposed solution without any additional amendments. i.e. the proposed pole and cabinet will facilitate the co location of two mobile operators. Refer to drawings and CGI images prepared by Jason Redmond Associates, Consulting Engineers for further details.

### **3.2 Technical Justification**

#### **3.2.1 Objective of Search Ring Area**

The search ring, or area within which a telecommunications installation is required in order to meet the search ring objectives, is an area of c. 1,000 metres in diameter. The site is required in order to improve network coverage in the area. It has been identified by radio engineers that an installation within the search ring will bring required coverage to the coverage black spot, subject to a site-specific assessment and radio clearance - see diagram of search ring below.

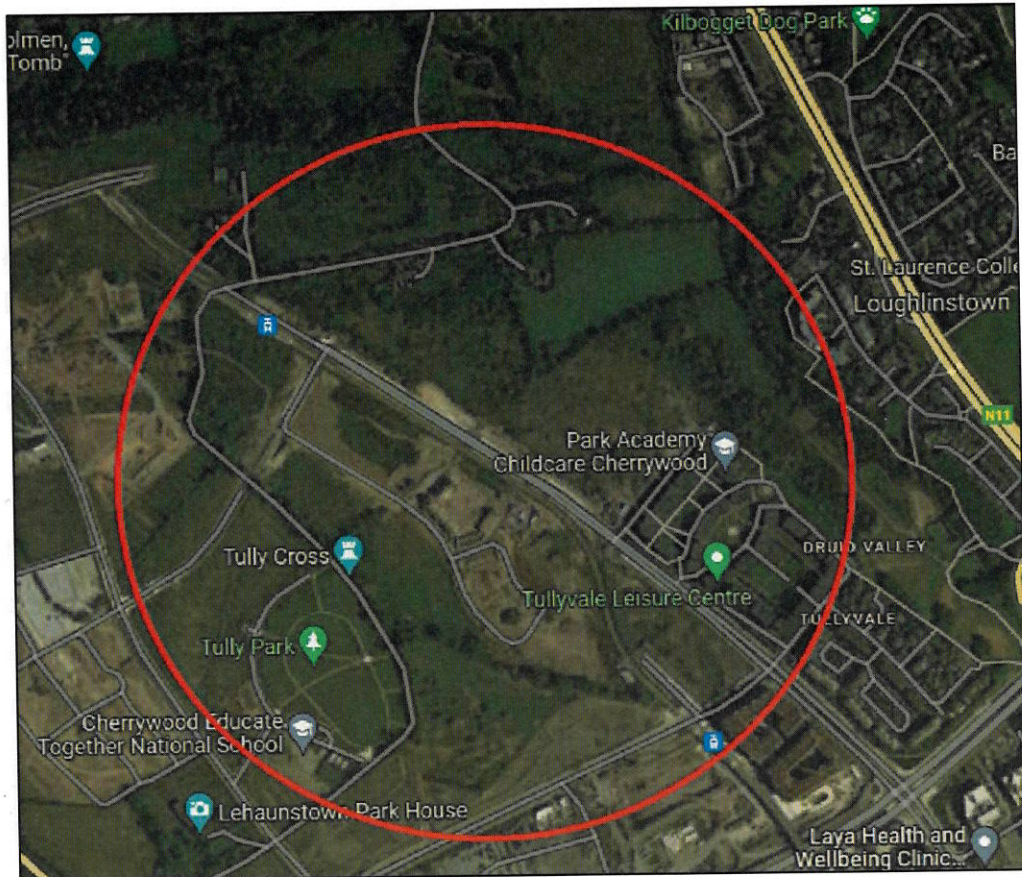


Fig No.3 Search Ring for subject site.

### 3.2.2 Reason why location was chosen:

The location at Lehaunstown Lane, Laughanstown was chosen because of the following:

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

Eir are upgrading the network in Dublin to provide customers with good quality voice and high-speed data services. As part of Eir Ltd licensing

requirements and the continuing rollout of their 3G and 4G network, Eir requires an infill site at Loughanstown, Co. Dublin.

Eir's current deep indoor coverage in this area specifically around Barrington Road, Loughanstown Lower , Lehaunstown , Domville Dr , Loughanstown Luas Stop and Grand Parade are all areas that will be experience an improvement in the quality of service and capacity if this infill progresses and a Mobile base station deployment at the proposed location would greatly support Eir customers in the area.

### **3.2.3 Coverage Map**

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

Figure 4 below demonstrates the existing indoor around the site.

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

Figure 6 shows the comparison between the existing (red) coverage and the proposed coverage (blue).

It is respectfully submitted that the coverage maps below clearly demonstrate the significance of the proposed installation with respect of the telecommunications network.

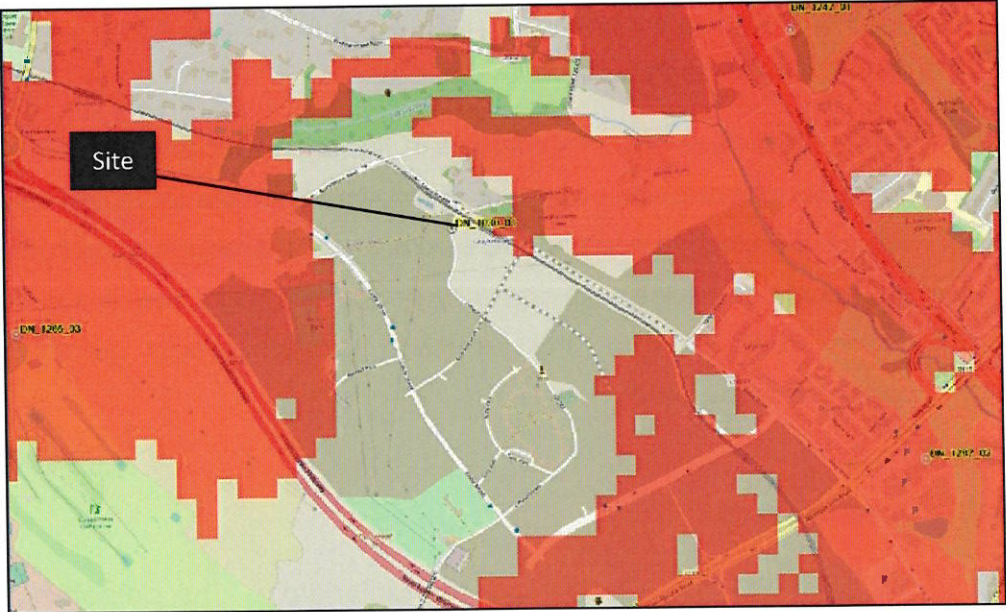


Figure 4: Existing Indoor coverage footprint in the area without Cignal site.

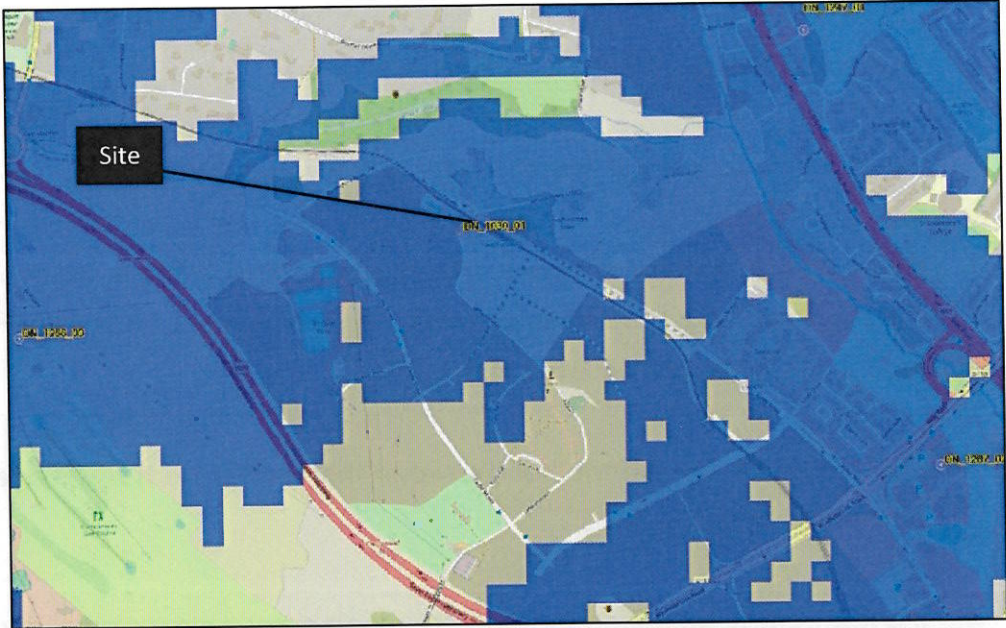
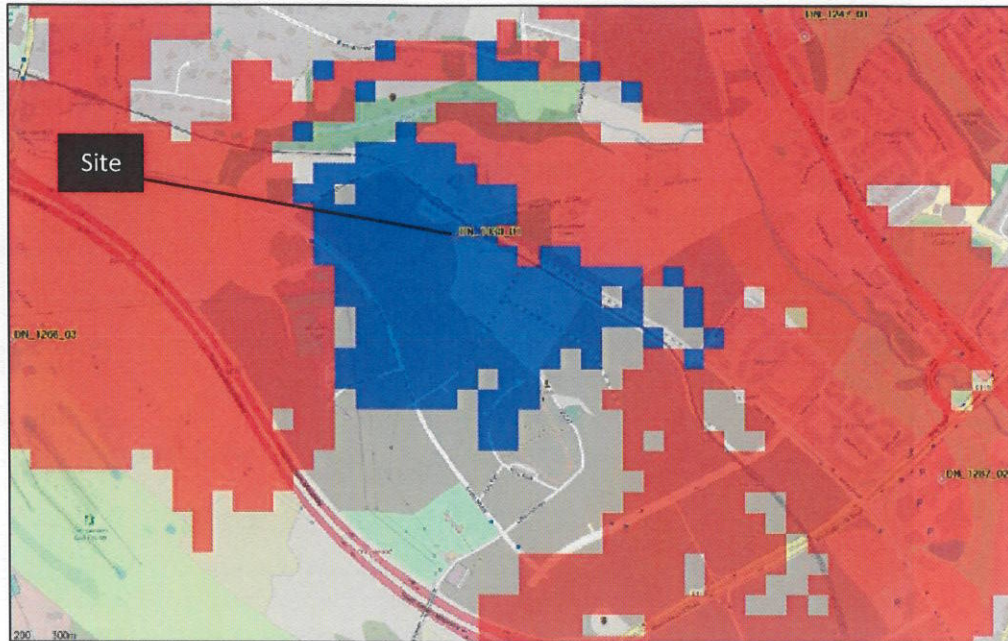


Figure 5: Predicted indoor coverage (blue) with new Cignal Site.



**Figure 6:** Comparison existing indoor coverage (blue) and proposed coverage with new Signal Site.

### 3.2.4 Comreg Map/Policy

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

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

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



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

### 3.2.5 Alternative sites

Please refer to the above Comreg Map under figure 7 above, which sets out the other relevant Infrastructure in the subject general area of Leathurstown, Co. Dublin. It must be noted that all of the sites identified are situated outside the required search ring, which has a diameter of c.1000 metres.

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

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

Site:	Name of Site (Comreg):	Approx. Distance from Site:	Details/Discounted Reason(s):
<b>A</b>	METEOR DN_1266 THREE_DU0871 VODAFONE DN291	1.11km	Site is significantly outside of the required search ring, therefore there is no benefit in adding equipment at this location towards the end of achieving current required search ring objectives. Eir is already positioned at this site therefore equipment at this location would not address the service needs of the subject search ring.
<b>B</b>	METEOR DN_1247 THREE_DU0208 VODAFONE DN176	995m	Site is significantly outside of the required search ring, therefore there is no benefit in adding equipment at this location towards the end of achieving current required search ring objectives. Eir is already positioned at this site therefore equipment at this location would not address the service needs of the subject search ring.
<b>C</b>	METEOR DN_1287 THREE_DU0125 VODAFONE DN323	1.3km	Site is significantly outside of the required search ring, therefore there is no benefit in adding equipment at this location towards the end of achieving current required search ring objectives. Eir is already positioned at this site therefore equipment at this location would not address the service needs of the subject search ring.

D	METEOR DN_3864 THREE_DU1072 VODAFONE DN287	1.2km	Site is significantly outside of the required search ring, therefore there is no benefit in adding equipment at this location towards the end of achieving current required search ring objectives. Eir is already positioned at this site therefore equipment at this location would not address the service needs of the subject search ring.
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## 4.0 APPLICANT: BACKGROUND

### 4.1 Introduction

The applicant, Cignal Infrastructure Ltd is a company of Cellnex, which is a European Telecommunications infrastructure provider, which specifically facilitates co-location to the communications sector in Ireland and Europe. Cignal was purchased by Cellnex in September 2019. Cignal Infrastructure Ltd remains the legal entity or trading name for the organisation in Ireland. The organisation has significant commercial relationships with each mobile network operator in the State namely Three, Vodafone and Meteor/eir in addition to radio, broadband and emergency communication service providers. Whilst managing their existing portfolio of 300 former Coillte sites, in addition to over 250 new sites., Cellnex has recently completed the purchase of an additional 1150 sites from CK Hutchinson in Ireland. This brings the total portfolio in Ireland to **c.1800 sites nationwide**. The applicant plans to add new developments to support the ongoing infrastructural requirements of the telecommunications industry and to facilitate the provision of broadband in current **“black spot” areas** and to also facilitate higher data transmission speeds in urban areas through various initiatives. It is submitted that the intervention of private sector firms such as Cignal Infrastructure Ltd. (and its parent company Cellnex), in the



roll-out of telecommunications infrastructure, is a significant and fundamental pillar in the Governments telecommunications policy and its future plans.

## 5.0 PLANNING CONTEXT

### 5.1 Taskforce: Backdrop to Process

The Section 254 Telecommunications Licence Process has evolved as a direct outcome of the Governments Programme for Government, which gave a commitment to establish a Mobile Phone and Broadband Task Force to identify immediate solutions to broadband/mobile phone coverage deficits and to investigate how better services could be provided to consumers. The Taskforce made a number of key recommendations and set out clear actions, which have evolved with reference to the Implementation Report, inter alia.

Chapter 2, Planning and Licencing, of the Taskforce Report recommended that: *'Provisions relating to planning exemptions for telecommunications infrastructure should be amended to facilitate its smoother deployment and the removal of barriers to investment'*. [author's emphasis]

The Task Force also recommended the following:

*'That a review of the relevant statutory Planning Guidelines should be undertaken, in conjunction with telecoms industry representatives and other relevant stakeholders, with the aim of evaluating and updating key aspects of the Guidelines to provide clarity and consistency in their interpretation and implementation'.*

## 5.2 Distinction between Section 254 and Class 31

As a direct result of this Government Task Force Report and addendum Implementation Report, two crucial yet mutually exclusive instruments of Irish Planning Law were enacted by resolution of the Oireachtas in order to facilitate the Government's aim; *'To identify immediate solutions to broadband/mobile phone coverage deficits and to investigate how better services could be provided to consumers'*. These two legislative instruments were also supported under European Law by the European Union (Reduction of Cost of Deploying High-Speed Public Communications Networks) Regulations 2016.

Putting it simply, the key differentiating element of the Section 254 legislation is that it refers to **Public Roads** whilst the Class 31 exemptions refer to Private Lands and associated 'Exemptions'.

Section 254 requires the applicant to acquire a Licence for the construction of such Telecommunications Infrastructure adjunct to Public Roads. This licence application must demonstrate how the proposal conforms to the proper planning and sustainable development of the area. Under Section 254, an Appeal of a decision to An Bord Pleanála is provided for. There are no height stipulations provided for therein, however Cignal is committed to the highest standards of proper planning and sustainable development and aims to achieve highest possible environmental assimilation standards. One such example of this aim is portrayed in the pursuit of slim line design prototypes, which have evolved since the enactment of the legislation, such as the Alpha 2 model (inter alia), which has combined highly technical specifications with a slim line aesthetically attractive construct with credit afforded to the Cignal Design Team in conjunction with JRA (Jason Redmond Associates).

### 5.3 Spirit of the Legislation

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

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

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

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

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

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

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

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

## **5.5 Licence History & Precedent**

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

There have been no previous Section 254 Licence Applications by the applicant in the subject local area.

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

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

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

With regard to the principle of development and the associated acceptance of the proposed modernised type of telecommunications pole, under ABP PL 305114-19 the inspector referred, with regard to the principle of development, "*It is agreed that modern technology has provided for design standards that are more amenable to coming within the scope for a License application under Section 254*". This appeal was granted by the Board subject to conditions and it pertained to a similar description; 15 metre Alpha 2.0 pole and cabinet, in height and general dimensions.

We also refer the Council to a recent decision by An Bord Pleanála (ref. LC93.309598) dated 28th July 2021 concerning a proposed for a 15m high

streetpole solution to address identified mobile and mobile broadband coverage blackspots at the Junction of St. John's Hill and The Folly, Waterford (Reg. Ref. 19/523).

The An Bord Pleanála Inspector noted that:

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

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

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

The above Section 254 Licence Applications have similar characteristics to the subject area in terms of receiving environment.

## **5.6 Street Works in Northern Ireland and the UK, US.**

It is very important to convey that this type of Telecommunications solution is extremely commonplace in Northern Ireland, the UK, Europe and in the US.

Furthermore, 'The Greenbook', 'Guidance on the Potential Location of Overground Telecommunications Infrastructure on Public Roads' (April 2015),

published by the Dept of DCCAIE (see [www.dccae.ie](http://www.dccae.ie)) demonstrates various examples of such structures similar to the structure proposed herewith.

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

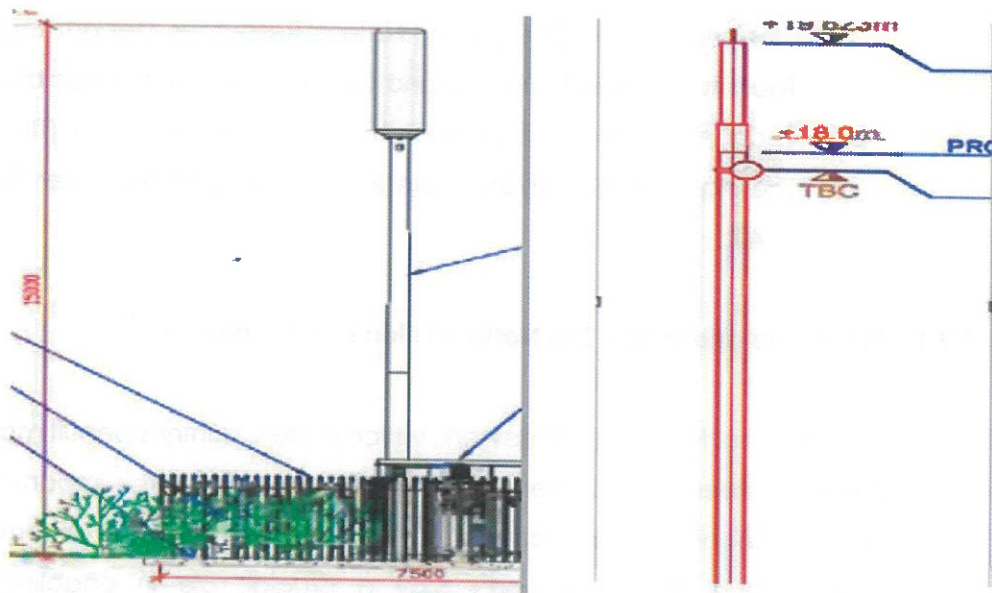
In Section 5.4 Consideration of Suitability of Locations, the Green Book refers to the use of standalone poles as the preferred option in urban settings where there is a wide verge or similar.

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

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

In general, the height of telecommunications infrastructure is determined by the network requirements. According to EIR, an overall height of 20m is required at Lehaunstown Lane, Laughanstown in order to provide the required coverage and to clear local obstacles that would cause network interference.

We note Appendix A of the Green Book, which offers examples of acceptable roadside infrastructure, particularly examples three and four, both of which are structures of 15m and over.



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

For these reasons we suggest that the proposed development is in line with the National and EU digital agenda and the Development Plan and as such should be permitted as a critical addition to the local service provision.

## 5.7 Proper Planning and Sustainable Development Considerations

This section sets out the Planning Considerations relevant to the subject licence application. Signal Infrastructure Ltd. has given due regard to the following policy documents in selecting the subject site.

### National Telecommunications Policy

- Planning Guidelines for Telecommunications Antennae and Support Structures' (1996).
- Circular Letter PL 07/12 issued by the Department of the Environment and Local Government.
- The 'Green Book': Guidance on the Potential Location of Overground Telecommunications Infrastructure on Public Roads (April 2015), Published by The Dept of DCCAE (Product of Collaboration with Department of

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

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

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

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

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

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

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

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

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



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

Section 6.4: The Region's Economic Engines and their Sectoral Opportunities:  
In alignment with the Growth Strategy for the Region in Chapter 3, and in conjunction with the Settlement Strategy expressed in Chapter 4, it is an aim of the RSES that there is a convergence between where people live and work and that settlements improve the quality of life of their people.

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

#### Section 8.6 Communications Network and Digital Infrastructure

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

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

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

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

**Regional Policy Objective - RPO 8.25**

Local authorities shall:

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

**Regional Policy Objective - RPO 8.26**

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

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

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

#### 12.9.8 Telecommunications

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

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

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

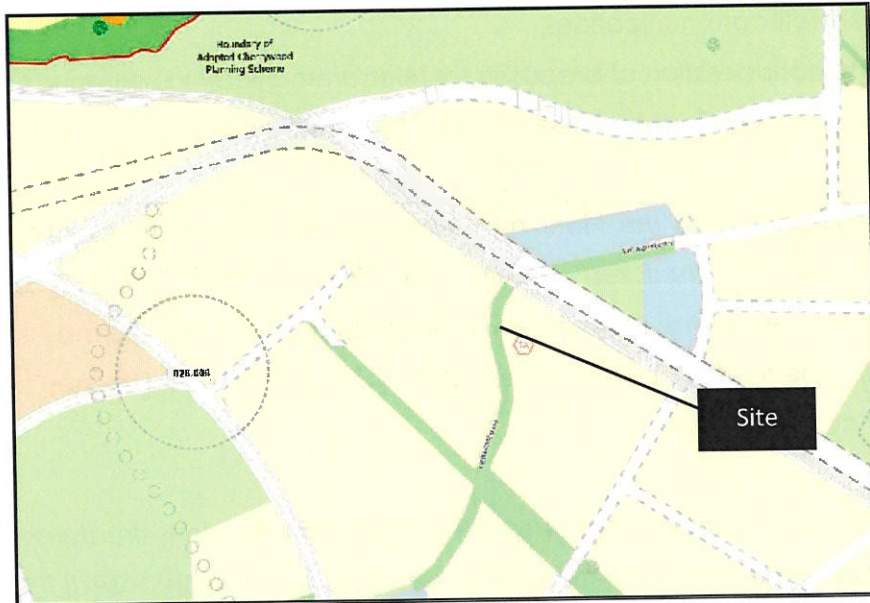
*To what degree the proposal will impact on the amenities of occupiers of nearby properties, or the amenities of the area - e.g. visual impacts of masts and associated equipment cabinets, security fencing treatment etc. - and the potential for mitigating visual impacts including low and mid - level landscape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

*Any impacts on rights-of-way and walking.*

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

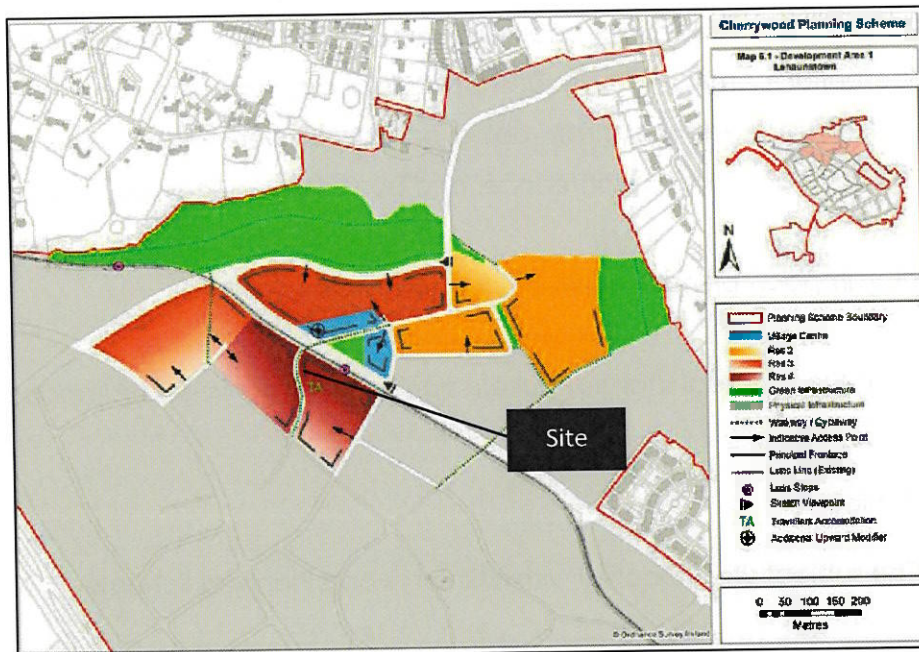
#### Zoning

*The subject site is located within Cherrywood Planning Scheme.*



**Fig No.10** Extract from DLR Development Plan 2022-28 zoning map showing site within Cherrywood Planning Scheme.

The site is shown at the **edge of a residential area** in Cherrywood Planning Scheme as amended in 2021.



**Fig No.11** Approved Amendments to Cherrywood Planning Scheme as amended in 2021.

**Site Designations (Scenic Routes, Landscape Sensitivity etc.)**

The site has no specific amenity designation. There is no protected scenic route proximate to the site. It is not within an SAC/SPA.

It is highlighted that that the Council can be comforted by section S.254 (4) of the Planning and Development Act 2000 as amended which states that *"A licence may be granted under this section by the planning authority for such period and upon such conditions as the authority may specify, including conditions in relation to location and design, and where in the opinion of the planning authority by reason of the increase or alteration of traffic on the road or of the widening of the road or of any improvement of or relating to the road, the appliance, apparatus or structure causes an obstruction or becomes dangerous, the authority may by notice in writing withdraw the licence and require the licensee to remove the appliance, apparatus or structure at his or her own expense"* – emphasis added.

## **6.0 VISUAL IMPACT ASSESSMENT**

Please refer to the CGI images prepared by Jason Redmond Associates, Consulting Engineers submitted with the application showing before and after images of the proposed development.

For the purpose of this study the criteria as set out in the current EPA Guidelines on Information to be contained in Environmental Impact Assessment Reports (2022) are used in the assessment of the likely impacts. The criteria for rating the significance of impacts are outlined below:

## Criteria for significance of effects under EPA Guidelines

EPA Rating	
<i>Imperceptible</i>	<i>An impact capable of measurement but without significant consequences</i>
<i>Not Significant</i>	<i>An effect which causes noticeable changes in the character of the environment without significant consequences</i>
<i>Slight</i>	<i>An impact which causes noticeable changes in the character of the environment without affecting its sensitivities</i>
<i>Moderate</i>	<i>An impact that alters the character of the environment in a manner that is consistent with the existing and emerging baseline trends</i>
<i>Significant</i>	<i>An impact which, by its character, magnitude, duration or intensity alters a sensitive aspect of the environment</i>
<i>Very Significant</i>	<i>An effect which, by its character, magnitude, duration or intensity significantly alters most of a sensitive aspect of the environment</i>
<i>Profound</i>	<i>An impact which obliterates sensitive characteristics</i>

A total of **7 no. Visual Reference Points** have been identified within a 182m radius of the site.

VRP 4 is taken at a distance of 34m from the site. The pole and cabinet are visible from this location. Given the established context provided by the receiving environment which comprises lamp posts and street signage, along with the slender nature of the structure, and the neutral sky grey colour, the visual impact is considered to be slight to moderate. It will read as part of the typical street furniture and will not be an incongruous insertion into the streetscape.

VRPs 1, 2, 3 & 5 are taken at distances of 96m, 70m, 47m and 52m respectively of the site. The pole is visible from these locations. Given the established context

provided by the receiving environment which comprises lamp posts and street signage, along with the slender nature of the structure, and the neutral sky grey colour, the visual impact is considered to be not significant to slight. It will read as part of the typical street furniture and will not be an incongruous insertion into the streetscape.

The streetpole solution is not visible from VRPs 6 or 7.

### **VIA Conclusion**

It is concluded that while the proposed 20 metre pole will be visible from close-up locations, which is to be expected, it will not be an incongruous insertion into the streetscape. It is submitted that the proposed pole will be of neutral sky grey, which will reflect the skyline and therefore the proposed pole will be well assimilated with regards to its colour/texture. It is not considered that such visual sighting of same would be detrimental to the visual amenities of the area, the community amenities or of the public realm at this location.

Established trees, lighting poles and the nature of the side will have the effect of absorbing the proposed structure from many of the viewpoints.

The proposed pole structure and cabinet, which are proposed for this spatial context is a more stream-lined and sleek version of the structures, which were initially rolled out under the Section 254 Licence process. The proposed structure/equipment is testament to the objective of the Cellnex Company, Cignal, which has been to strive to carefully select appropriate sites, which meet coverage objectives, but which also sensitively address the streetscape wherein such structures are located. It is respectfully submitted that the proposed structure, is presented as a utility structure in this streetscape.

Please note the inspector's comment under ABP reference PL.61.306440, which was an appeal against a decision of Galway City Council to refuse a similar

Alpha 2.0 pole structure. The Board overturned the decision of the planning authority in this instance and the ABP inspector, whilst recommending a grant be issued, referred the following in relation to design and visual impacts:

*'I would consider that the structure itself is nondescript in character and design and is not dissimilar in scale or design of a lamp standard or traffic light pole. I would consider that the structure is of a design and scale that would not be out of character or be a visually obtrusive or an incongruous element in a suburban area such as this'.*

It is respectfully submitted that the proposal, in a similar suburban context, will be assimilated into the established streetscape and skyline at this location and within the backdrop of the receiving environment and is entirely in accordance with the proper planning and sustainable development of the area.

## **7.0 APPROPRIATE ASSESSMENT SCREENING**

### **7.1 Natura 2000 Provisions**

Having regard to the nature and limited scale of the proposed development and nature of the receiving environment together with the distance from the nearest European site, no Appropriate Assessment issues arise and it is not considered that the proposed development would be likely to have a significant effect individually or in combination with other plans or projects on a European site.



## 8.0 ICNIRP COMPLIANCE

### 8.1 Health and Safety legislation and Guidelines

The proposed development will be built in accordance with current Health and Safety legislation and Guidelines, which is ultra vires to the planning process. Comreg is the appropriate authority with responsibility for same. The proposed equipment and installation are designed to be in full compliance with the limits set by the Guidelines of the International Commission on Non-Ionising Radiation Protection.

## 9.0 CONCLUSION

It is respectfully submitted that the proposed street work solution accords with pattern and character of the public realm in this area of Lehaunstown Lane, Laughanstown, Co. Dublin.

The principle of the proposed 20m streetpole structure has been accepted by numerous planning authorities and An Bord Pleanála, since the enactment of the legislation.

It is respectfully submitted that policy cited under the **Dún Laoghaire-Rathdown County Development Plan, 2022-2028**, particularly with regard to colocation, was clearly applied to the site selection process. All other locations i.e. existing telecommunication sites have been evaluated and discounted for various reasons set out above. The majority of the established sites assessed were too far from the search ring, to satisfy its technical requirements. The Cellnex Team also considered 'Alternatives' and various locations were ruled out for genuine reasons.

Furthermore, the **Dún Laoghaire-Rathdown County Development Plan, 2022-2028** clearly recognises the importance of the development of a high-quality telecommunications network.

The proposed 20 metre streetpole solution will provide for optimum coverage as required in an area where there is a noted dearth in coverage. Additionally, given the recent Covid 19 crisis, the newly acquired practices of wholesale 'Working from Home' have placed increasing demands on the network as noted by Government in recent Circulars and associated actions. It is also widely accepted that 'Working from Home' practices will become the new norm for a significant time period into the future. Therefore, the immediate urgency of this type of telecommunications infrastructure to address coverage gaps in the network, in addition to increased demand, has never been so crucial to the ongoing economic and sustainable development of the Country.

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

On a site-specific basis, the proposed location will provide an appropriate setting for the proposed pole and cabinet where it will appear as normal utility infrastructure.

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

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

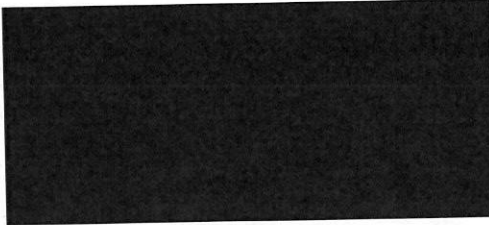
The planning authority is respectfully requested to consider the necessity for this infrastructure, which the market would not require if there was not a demand for same. The planning authority is also requested to consider the meticulous site selection process undertaken, which has to satisfy the criteria of the planning authority in addition to the technical/radio requirements of the identified search ring. Finally, the planning authority is also requested to consider the suitability of this type of spatial context for this infrastructure generally. i.e. arterial transport route/ proximate to nearby junction.

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

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

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

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



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



Marsh Ireland Brokers Ltd  
Marsh House  
25-28 Adelaide Road  
Dublin 2  
D02 RY98  
Tel: 01 604 8100  
www.marsh.ie

To Whom It May Concern

9<sup>th</sup> of March 2022

Dear Sir/Madam,

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

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

**Business Description**

Provides telecommunications infrastructure solutions

**PUBLIC LIABILITY**

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

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

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

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Marsh



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cancellation provisions and may also be subject to warranties. Limits shown may have been reduced by paid claims.

We express no view and assume no liability with respect to the solvency or future ability to pay off any of the insurance companies which have issued the insurance(s).

Where a copy of this letter has been provided to a third party, we assume no obligation to advise that third party of any developments regarding your insurance(s) subsequent to the date hereof. Additionally this letter is given on the condition that we are not assuming any liability to any third party who receives a copy of this letter, based upon the placement of your insurance(s) and/or the statements made herein.

This letter shall be governed by and shall be construed in accordance with Irish law.

Yours sincerely,

[Redacted signature block]

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

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

## Radio Emissions Statement

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

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

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

Directors

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

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

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

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

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

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

**Internal Documentation References:**

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

**Statement Prepared By:** [REDACTED]

**Date:** 12/07/17





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

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

**To whom it may concern**

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

**Authorised Person: Signal Infrastructure Ltd**

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

An Authorised Person may:

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

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

**Commission for Communications Regulation**  
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Bloc DEF, Cúirt na Mainistreach, Ionad Irish Life, Sraid Na Mainistreach Iocht, Baile Atha Cliath 1  
Telephone +353 1 804 9600 Fax +353 1 804 9665 Email [info@comreg.ie](mailto:info@comreg.ie) Web [www.comreg.ie](http://www.comreg.ie)



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

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

**Issued on behalf of the Commission for Communications Regulation by**

**Name:**



**Title/Position:**

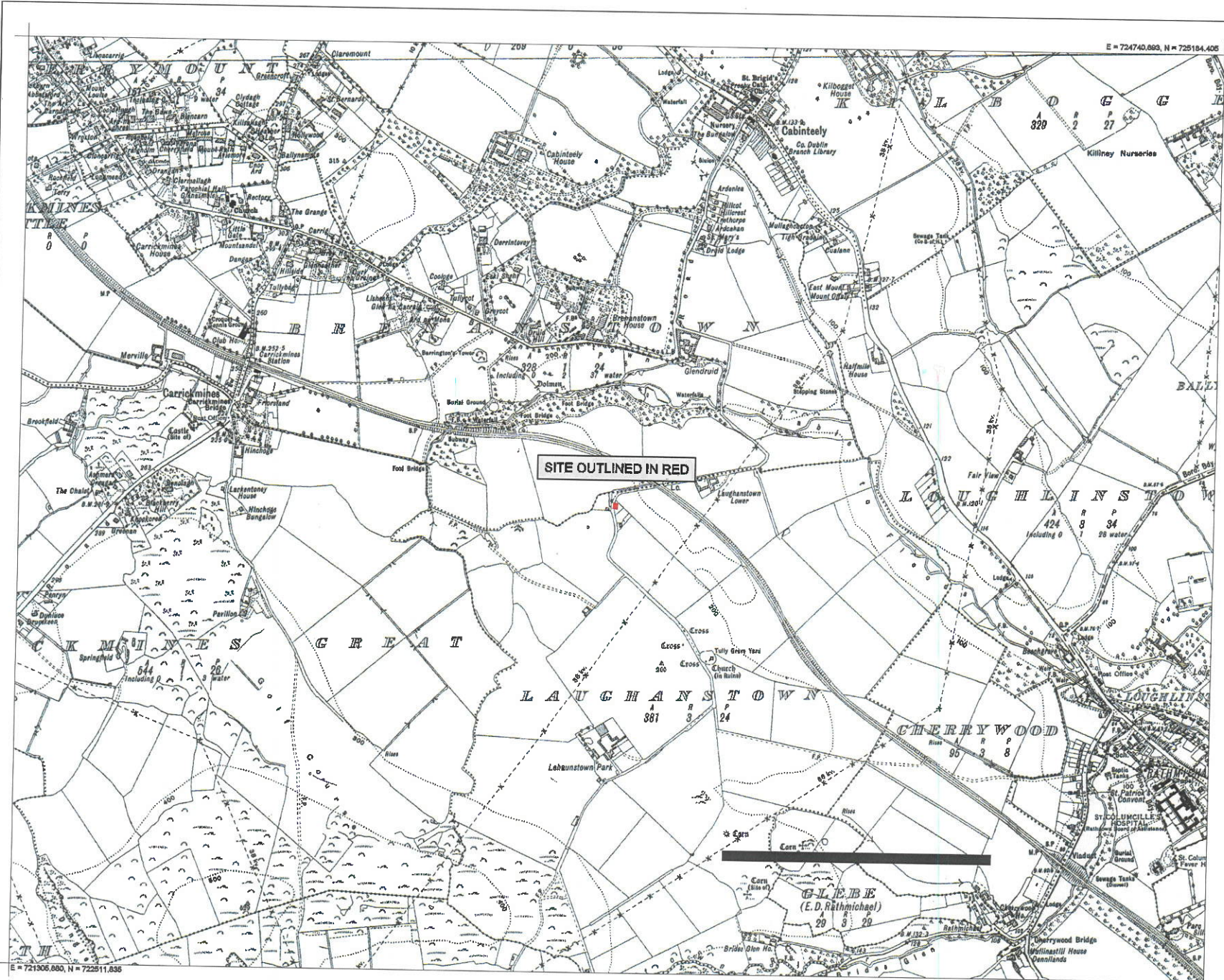
**Analyst – Market Framework Division**

**Date:**

**3 March 2016**

**Commission for Communications Regulation**  
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E = 724740.693, N = 725184.406

E = 721306.600, N = 722511.636

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**Author:**  
JRM/JRM  
**Project / Street:**  
Ordnance Survey Index (OSI)  
**Date Sheet / Reference:**  
RWD03  
Revision Date =  
Survey Date =  
Landed Date = 31-Dec-1972  
RWD04  
Revision Date =  
Survey Date = 31-Dec-1987  
Landed Date = 31-Dec-1987  
RWD05  
Revision Date = 31-Dec-1987  
Survey Date = 31-Dec-1987  
Landed Date = 31-Dec-1989  
RWD06  
Revision Date = 31-Dec-1987  
Survey Date = 31-Dec-1987  
Landed Date = 31-Dec-1989  
**File Format:**  
Vector Image File Format (VIF)  
**File Name:**  
R:\RWD0222.VIF

**City Grid / Area of Interest (AOI):**  
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L12J13W 725000 1874 725001 1874  
L12J14W 725000 1874 725001 1875  
**Projection / Spatial Reference:**  
BNG/ETRS89\_2770000\_Meters  
**Centre Point Coordinates:**  
X,Y = 725000 1874 725000 1875  
**Date / Revision Date:**  
01-Dec-2022  
**Project Number:**  
L3  
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No.	Revision	Date	By	Clid	

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3D Remote Sensing Business Park, Slieve Road,  
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D18 YV50, IRELAND.



Jason Redmond and Associates Consulting Engineers  
3 Lansdown Court, Portlaoine, Co. Laois, N32 RH28  
Phone: +353 (0) 37 8662335  
Website: [www.jra.ie](http://www.jra.ie) Email: [info@jra.ie](mailto:info@jra.ie)

## PLANNING

Signal site ID **CIG-03811**

Operator site ID **DN 1030**

Site Name  
**LAUGHANSTOWN**

Site Address  
**PUBLIC GRASS VERGE, LEHAUNSTOWN,  
LEHAUNSTOWN,  
CO. DUBLIN**

Title  
**CELLNEX SMART STREETPOLE  
SITE LOCATION MAP**

Designed	Date	08.12.2022
Drawn	Scale	1:1000
Dwg No.	Rev.	A
Dwg No. <b>DN_1030-100</b>		

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**SITE LOCATION:**

- **GPS COORDINATES:**  
N 53°15'2.54" W 6°9'23.27"  
LAT=53.250706, LON= -6.156464
- **ITM:**  
E = 723023.533, N = 723846.390

SITE OUTLINED IN RED

**20m Alpha 4.0 STREETPOLE**

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A	REVISION FOR PLANNING	DATE	BY	CHKD
No.	Revision	Date	By	Chkd

**DELMEC**

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

**cellnex**  
*driving telecom connectivity*

Signal Infrastructure Ltd.  
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**JRA**  
Consulting Engineers

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Phone: +353 (0) 17 686313  
Website: www.jra.ie Email: info@jra.ie

**PLANNING**

Signal site ID **CIG-03811**

Operator site ID **DN\_1030**

Site Name  
**LAUGHANSTOWN**

Site Address  
**PUBLIC GRASS VERGE, LEHAUNSTOWN,  
LEHAUNSTOWN,  
CO. DUBLIN**

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

Designed	Date	05.12.2022
Drawn	Scale	1:250
Dwg No.	DN_1030-101	Rev. A

DATE: 05.12.2022 10:00:00 AM

E = 723183,254, N = 723872,268

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**Description:**  
Digital Landscape Model (DLM)  
**Publisher / Source:**  
Ordnance Survey Ireland (OSI)  
**Data Source / Reference:**  
PRISM2  
**File Format:**  
Autodesk AutoCAD (DWG, RVT)  
**File Name:**  
v\_55304222\_1.dwg

**City Extent / Area of Interest (AOI):**  
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LUR(L)M= 723314.8814,723833.1252  
ULX(L)E= 723231.8814,723833.1252  
LUR(L)E= 723314.8814,723833.1252

**Projection / Spatial Reference:**  
Projection: BSW27E11\_A114\_Devonshire\_Mercator

**Centre Point Coordinates:**  
X,Y= 723283.1814,723848.1252

**Reference Index:**  
Map Series / Map Sheet  
1:2,500 / 3458-D

**Date Expiration Date:**  
Date= 03-03-2022

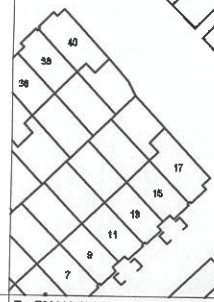
**Source Data Reference:**  
OSMS Reference V1.158.116

**Product Version:**  
Version: 1.0

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E = 722863,484, N = 723723,874

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Rep. of Ireland.



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Phone +353 (0) 87 4681139  
Website [www.jra.ie](http://www.jra.ie) Email: [info@jra.ie](mailto:info@jra.ie)

## PLANNING

Signal site ID: CIG-03611

Operator site ID: DN\_1030

Site Name: LAUGHANSTOWN

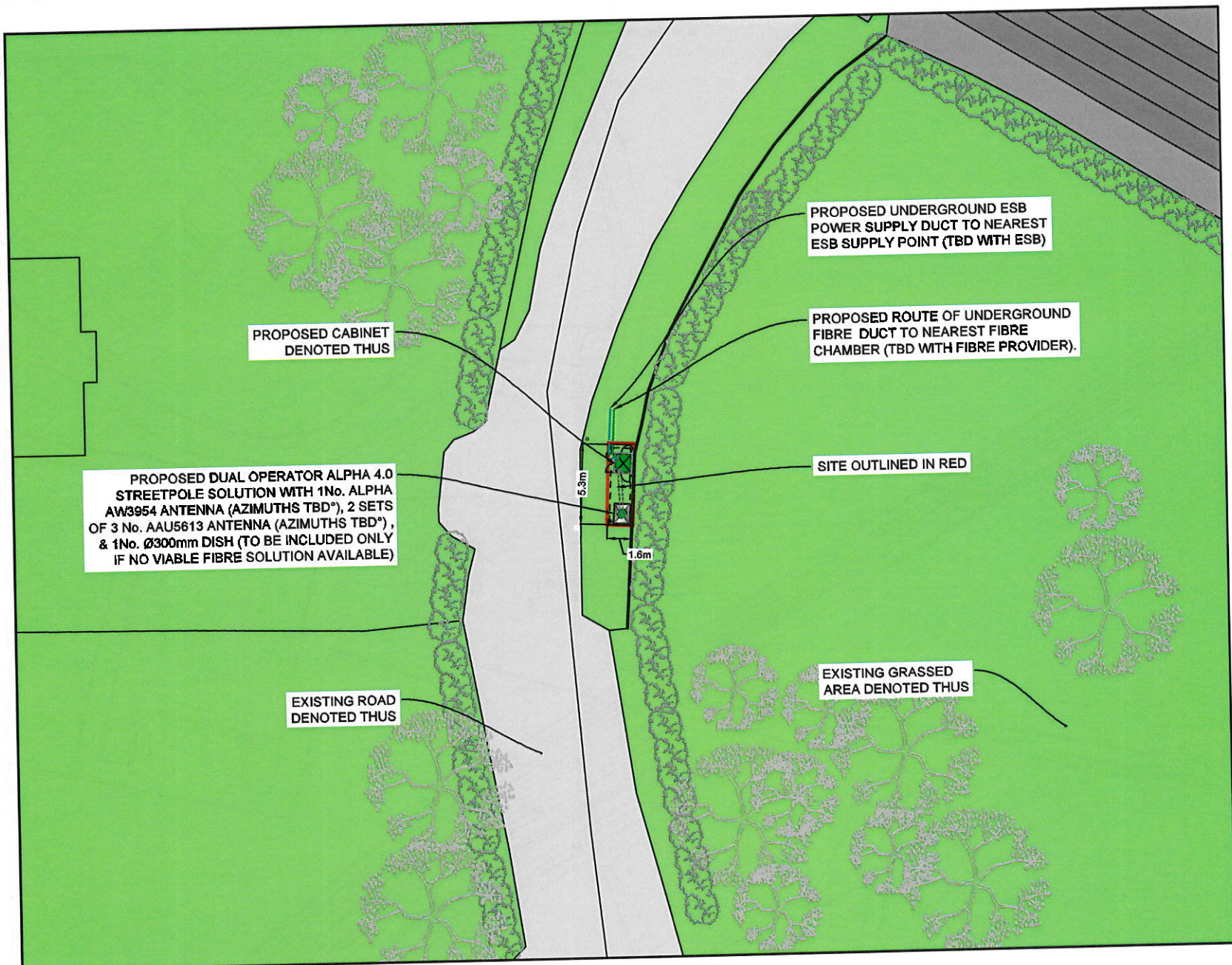
Site Address: PUBLIC GRASS VERGE, LEHAUNSTOWN,  
LEHAUNSTOWN,  
CO. DUBLIN

Title: CELLNEX SMART STREETPOLE  
SITE LOCATION PLAN

Designed: Date: 05.12.2021

Drawn: Scale: 1:100 Rev: A

Dwg No. DN\_1030-102  
LOCATION: © 2022 DELMEC. ALL RIGHTS RESERVED. DELMEC, THE DELMEC LOGO, AND ALL OTHER TRADEMARKS ARE THE PROPERTY OF DELMEC. ALL OTHER TRADEMARKS ARE THE PROPERTY OF THEIR RESPECTIVE OWNERS.



**SITE LAYOUT**  
SCALE 1:250

**20m Alpha 4.0 STREETPOLE**

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

**NOT FOR CONSTRUCTION**

**LEGEND**

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



A	ISSUED FOR PLANNING	10/2022		
No.	Revision	Date	By	Clad

**JELMEC**

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**JRA**  
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Website: www.jra.ie Email: info@jra.ie

**PLANNING**

Signal site ID **CIG-03811**

Operator site ID **DN\_1030**

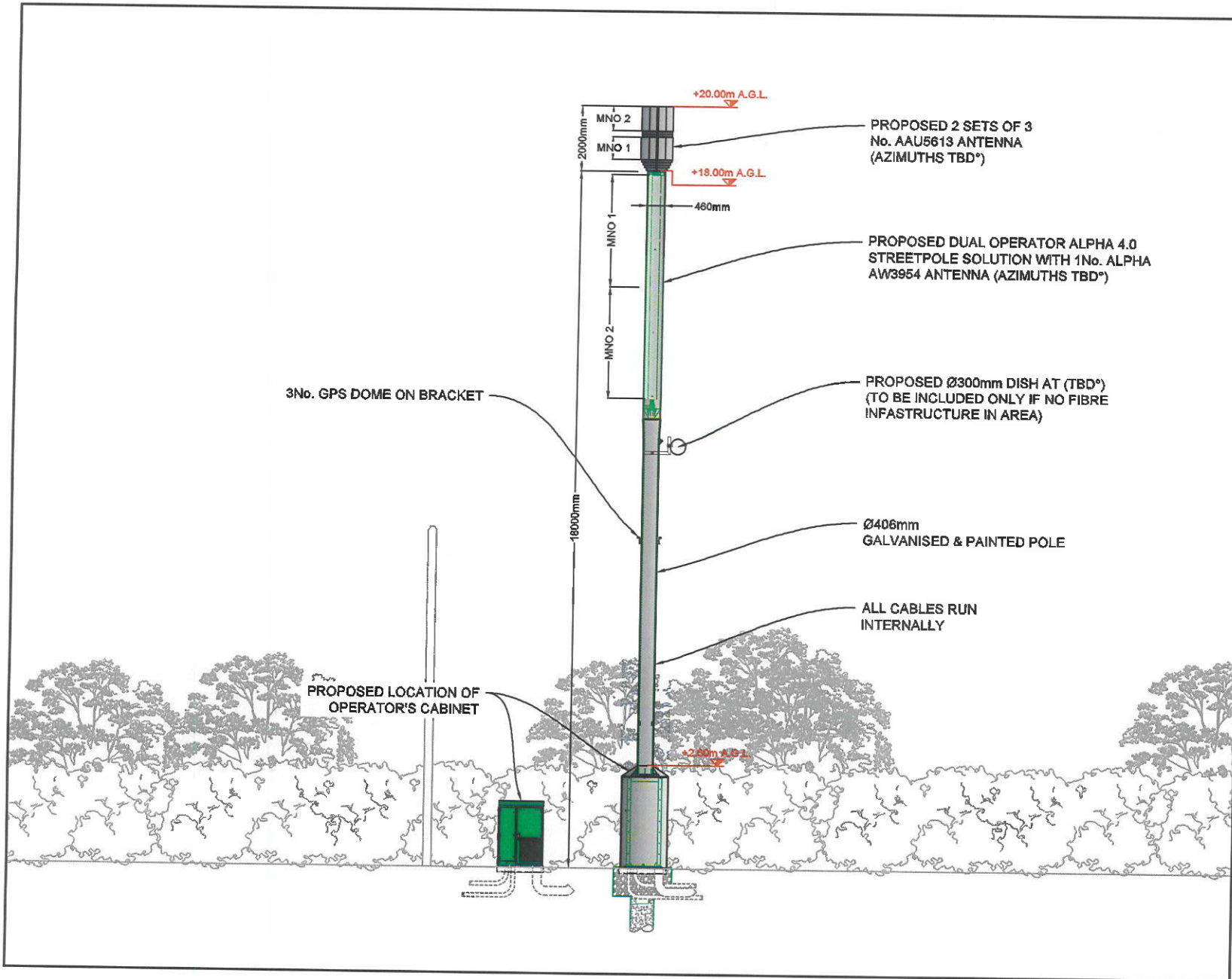
Site Name  
**LAUGHANSTOWN**

Site Address  
**PUBLIC GRASS VERGE, LEHAUNSTOWN,  
LEHAUNSTOWN,  
CO. DUBLIN**

Title  
**CELLNEX SMART STREETPOLE  
SITE LAYOUT PLAN**

Designed	Date 05.11.2022
Drawn	Scale 1:250 Rev. A
Dwg No. <b>DN_1030-103</b>	

DWG LOCATIONS



**ELEVATION**  
SCALE 1:100

**20m Alpha 4.0 STREETPOLE**

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No.	Revision	Date	By	Chd
A	ISSUED FOR PLANNING	14/02/22		

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**PLANNING**

Signal site ID **CIG-03811**

Operator site ID **DN\_1030**

Site Name  
**LAUGHANSTOWN**

Site Address  
**PUBLIC GRASS VERGE, LEHAUNSTOWN,  
LEHAUNSTOWN,  
CO. DUBLIN**

Title  
**CELLNEX SMART STREETPOLE  
ELEVATION**

Designed  Date 05.12.2022  
Drawn  Scale 1:100 Rev. A

Dwg No. **DN\_1030-103A**



## 20m Alpha 4.0 STREETPOLE

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 PROCEEDS.

**NOT FOR CONSTRUCTION**

No.	Revision	Date	By	Clkd
A	ISSUED FOR PLANNING	16/10/22		

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**PLANNING**

Signal site ID **CIG-03811**

Operator site ID **DN\_1030**

Site Name  
**LAUGHANSTOWN**

Site Address  
**PUBLIC GRASS VERGE, LEHAUNSTOWN,  
 LEHAUNSTOWN,  
 CO. DUBLIN**

Title  
**CELLNEX SMART STREETPOLE  
 SCHEMATIC ELEVATION**

Designed  Date 06.12.2022

Drawn  Scale N/A Rev. **A**

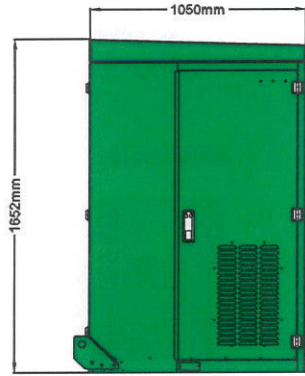
Dwg No. **DN\_1030-104**

DWG LOCATION

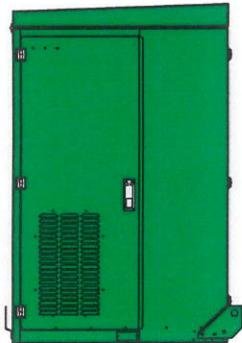




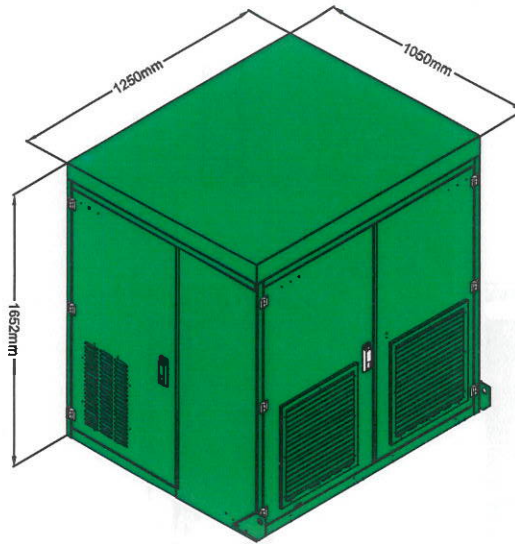
FRONT VIEW



R/H SIDE VIEW



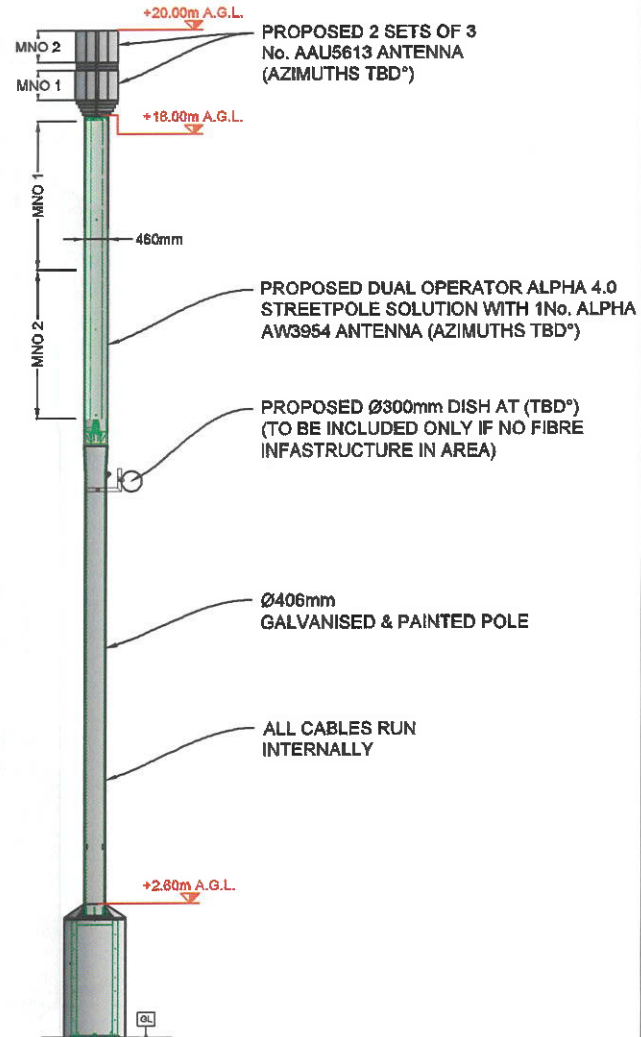
L/H SIDE VIEW



ISO. VIEW

**TYPICAL DUAL  
OPERATOR CABINET**

SCALE 1:25



**20m Alpha 4.0 STREETPOLE**

THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL PRELIMINARY AND FINAL TECHNICAL DRAWINGS. PLEASE CONSULT WITH THE DESIGNER TO BE SURE YOU HAVE A COMPLETE SET OF INFORMATION BEFORE OR AT ANY POINT IN THE PROJECT.

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**NOT FOR CONSTRUCTION**

A	ISSUED FOR PLANNING	1/1/2021		
No.	Revision	Date	By	Cltd

**DELMEC**

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Signal Infrastructure Ltd.  
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D18 YV50, (IRELAND).

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**PLANNING**

Signal site ID: **CIG-03811**

Operator site ID: **DN\_1030**

Site Name: **LAUGHANSTOWN**

Site Address: **PUBLIC GRASS VERGE, LEHAUNSTOWN,  
LEHAUNSTOWN,  
CO. DUBLIN**

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

Designed		Date	15.12.2021
Drawn		Scale	AS
Dwg No.	<b>DN_1030-105</b>	Rev.	<b>A</b>



20m Alpha 4.0 STREETPOLE

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NOT FOR CONSTRUCTION

## VISUAL REFERENCE POINTS

DWG NO.	LOCATION	COORDINATES (ITM)	DISTANCE	BEARING	VISIBILITY
1	VRP 1	723026.6766, 723748.6280	96M	180°	Top of pole visible.
2	VRP 2	723030.2383, 723775.9335	70M	176°	Top of pole visible.
3	VRP 3	723023.7172, 723798.6495	47M	182°	Pole visible.
4	VRP 4	723027.7535, 723879.4669	34M	6°	Pole and cabinet visible.
5	VRP 5	723049.7163, 723890.8570	52M	30°	Pole visible.
6	VRP 6	723121.1269, 723905.0695	113M	59°	Solution not visible.
7	VRP 7	723192.5930, 723917.1198	182M	162°	Solution not visible.

A	INITIAL ISSUE	09/12/2022		
No.	Revision	Date	By	Clid

**DELMEC**

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**PLANNING**

Cignel site ID **CIG-03811**

Operator site ID **DN\_1030**

Site Name  
**LAUGHANSTOWN**

Site Address  
**PUBLIC GRASS VERGE, LEHAUNSTOWN,  
LEHAUNSTOWN,  
CO.DUBLIN**

Title  
**CELLNEX SMART STREETPOLE  
VRP INFORMATION**

Designed **09/12/2022**

Drawn **Scale 1:1** Rev. **A**

Dwg No. **DN\_1030-VRP INFORMATION**

LOCATION: **20m Alpha 4.0 STREETPOLE**



## 20m Alpha 4.0 STREETPOLE

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A	INITIAL ISSUE	09/12/22		
No.	Revision	Date	By	Clk

### DELMEC

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## PLANNING

Signal site ID: **CIG-03811**

Operator site ID: **DN\_1030**

Site Name: **LAUGHANSTOWN**

Site Address: **PUBLIC GRASS VERGE, LEHAUNSTOWN,  
LEHAUNSTOWN,  
CO.DUBLIN**

Title: **CELLNEX SMART STREETPOLE  
VRP MAP**

Designed: [ ] Date: 09/12/2022  
Drawn: [ ] Scale: 1:1 Rev: A

Dwg No. **DN\_1030-VRP MAP**  
DATE: [ ] LOCATION: [ ]



VRP1 - WITHOUT SOLUTION IN PLACE



VRP1 - WITH SOLUTION IN PLACE

20m Alpha 4.0 STREETPOLE

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DESIGN & DRAWING: JIRA CONSULTING ENGINEERS. PROJECT NO: JIRA/2022/001. DATE: 08.12.2022. PROJECT: [REDACTED]

NOT FOR CONSTRUCTION

A	INITIAL ISSUE	08.12.2022	[REDACTED]	[REDACTED]
No.	Revision	Date	By	Clcd

**DELMEC**

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**PLANNING**

Signal site ID: CIG-03811

Operator site ID: DN\_1030

Site Name: LAUGHANSTOWN

Site Address: PUBLIC GRASS VERGE, LEHAUNSTOWN, LEHAUNSTOWN, CO.DUBLIN

Title: CELLNEX SMART STREETPOLE VRP 1

Designed: [REDACTED] Date: 08.12.2022  
Drawn: [REDACTED] Scale: 1:1 Rev: A

Dwg No. DN\_1030-VRP 1  
DWG LOCATION: [REDACTED]



VRP2 - WITHOUT SOLUTION IN PLACE



VRP2 - WITH SOLUTION IN PLACE

## 20m Alpha 4,0 STREETPOLE

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CONSTRUCTION TO BE SHOWN UNLESS OTHERWISE SPECIFIED BY THE  
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NOT FOR CONSTRUCTION

No.	Revision	Date	By	Chd
A	INITIAL ISSUE	08/12/22		

### DELMEC

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**PLANNING**

Signal site ID **CIG-03811**

Operator site ID **DN\_1030**

Site Name  
**LAUGHANSTOWN**

Site Address  
**PUBLIC GRASS VERGE, LEHAUNSTOWN,  
 LEHAUNSTOWN,  
 CO.DUBLIN**

Title  
**CELLNEX SMART STREETPOLE  
 VRP 2**

Designed  Date 08/12/2022

Drawn  Scale 1:1 Rev. A

Dwg No. **DN\_1030-VRP 2**

DATE: 08/12/2022



VRP3 - WITHOUT SOLUTION IN PLACE



VRP3 - WITH SOLUTION IN PLACE

## 20m Alpha 4.0 STREETPOLE

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DESIGNER'S NAME: JRA CONSULTING ENGINEERS  
 PROJECT NO.:

NOT FOR CONSTRUCTION

No.	Revision	Date	By	Clad

### DELMEC

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### cellnex

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## PLANNING

Signal site ID: CIG-03811

Operator site ID: DN\_1030

Site Name: LAUGHANSTOWN

Site Address: PUBLIC GRASS VERGE, LEHAUNSTOWN,  
 LEHAUNSTOWN,  
 CO.DUBLIN

Title: CELLNEX SMART STREETPOLE  
 VRP 3

Designed: [ ] Date: 03/12/2022  
 Drawn: [ ] Scale: 1:1 Rev: A

Dwg No. DN\_1030-VRP 3

DATE: 03/12/2022



VRP4 - WITHOUT SOLUTION IN PLACE



VRP4 - WITH SOLUTION IN PLACE

20m Alpha 4.0 STREETPOLE

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A	INITIAL ISSUE	09/12/22			
No.	Revision	Date	By	Ctd	

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**PLANNING**

Signal site ID: CIG-03811

Operator site ID: DN\_1030

Site Name: LAUGHANSTOWN

Site Address: PUBLIC GRASS VERGE, LEHAUNSTOWN,  
LEHAUNSTOWN,  
CO.DUBLIN

Title: CELLNEX SMART STREETPOLE  
VRP 4

Designed: [Redacted] Date: 09/12/2022

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

Dwg No. DN\_1030-VRP 4

LOCATION: [Redacted]





VRP5 - WITHOUT SOLUTION IN PLACE



VRP5 - WITH SOLUTION IN PLACE

## 20m Alpha 4.0 STREETPOLE

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NOT FOR CONSTRUCTION

No.	Revision	Date	By	Clad
A	INITIAL ISSUE	08/12/22		

### DELMEC

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### JRA

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Website: www.jra.ie | Email: info@jra.ie

## PLANNING

Signal site ID **CIG-03811**

Operator site ID **DN\_1030**

Site Name  
**LAUGHANSTOWN**

Site Address  
**PUBLIC GRASS VERGE, LEHAUNSTOWN,  
LEHAUNSTOWN,  
CO.DUBLIN**

Title  
**CELLNEX SMART STREETPOLE  
VRP 5**

Designed **[ ]** Date **08/12/2022**

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

Dwg No. **DN\_1030-VRP 5**

OPERATOR: [ ]



VRP6 - SOLUTION NOT VISIBLE

## 20m Alpha 4.0 STREETPOLE

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NOT FOR CONSTRUCTION

A	INITIAL ISSUE	08/12/22			
No.	Revision	Date	By	Chk	

**DELMEC**

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Website: www.jra.ie Email: info@jra.ie

**PLANNING**

Signal site ID **CIG-03811**

Operator site ID **DN\_1030**

Site Name  
**LAUGHANSTOWN**

Site Address  
**PUBLIC GRASS VERGE, LEHAUNSTOWN,  
LEHAUNSTOWN,  
CO.DUBLIN**

Title  
**CELLNEX SMART STREETPOLE  
VRP 6**

Designed **[Redacted]** Date 08/12/2022

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

Dwg No. **DN\_1030-VRP 6**

DATE LOCATION



VRP7 - SOLUTION NOT VISIBLE

## 20m Alpha 4.0 STREETPOLE

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NOT FOR CONSTRUCTION

No.	Revision	Date	By	Cltd
A	INITIAL ISSUE	09/12/2022		

**DELMEC**

10 Barrowside Business Park, Steady Road,  
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Signal Infrastructure Ltd.  
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**JRA**  
 Consulting engineers

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 5 Limerick Court, Portlambert, Co. Louth, R22 N92H  
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**PLANNING**

Signal site ID **CIG-03811**

Operator site ID **DN\_1030**

Site Name  
**LAUGHANSTOWN**

Site Address  
**PUBLIC GRASS VERGE, LEHAUNSTOWN,  
 LEHAUNSTOWN,  
 CO.DUBLIN**

Title  
**CELLNEX SMART STREETPOLE  
 VRP 7**

Designed **[Redacted]** Date 09/12/2022

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

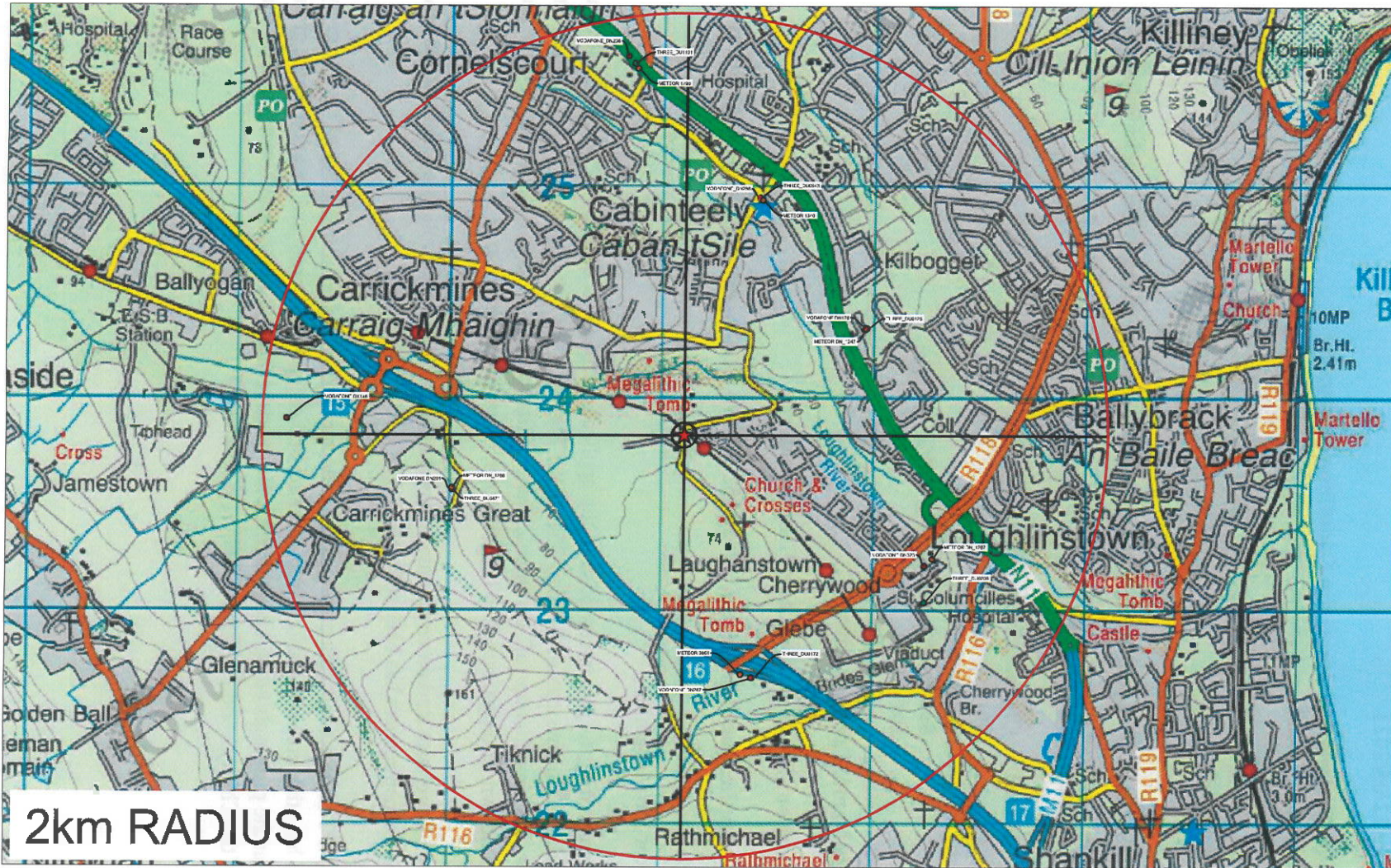
Dwg No. **DN\_1030-VRP 7**

DATE: 09/12/2022  
 LOCATION: FROM EXISTING THE BEST AVAILABLE MAPS AND PHOTOGRAPHS TO LOCATE THE PROPOSED SITE AND SETBACKS



**LEGEND:**

Search Ring Radius	
Radius Area (2km)	
Proposed Site SR- 1341	
Existing Vodafone site shown thus	
Existing EIR site shown thus	
Existing H3Gi site shown thus	



2km RADIUS

**LOCATION MAP**  
SCALE 1:20,000



A	ISSUED FOR PLANNING	1/1/2022		
No.	Revision	Date	By	Clk

**DELMEC**

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**PLANNING**

Signal site ID **CIG\_03811**

Operator site ID **DN\_1030**

Site Name  
**LAUGHANSTOWN**

Site Address  
**PUBLIC GRASS VERGE, LEHAUNSTOWN,  
LEHAUNSTOWN,  
CO. DUBLIN**

Title  
**CELLNEX SMART STREETPOLE  
COMREG MAP**

Designed		Date	09.11.2022
Drawn		Scale	1:20,000
		Rev.	B

Dwg No. **DN\_1030-107**

**Date: 12/05/2023**

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

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

**Date Received: 16.01.2023**

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

**Site Name: Laughanstown**

**Location: Lehaunstown Lane, Laughanstown.**

**dlr Application Reference: CTT.23.052-277778 - Lehaunstown Lane, Laughanstown**

Dear Sir/Madam,

I am writing to you in response to the application made on behalf of Signal Infrastructure Ltd. under the provisions of Section 254 of the Planning and Development Act, 2000 (as amended) for the installation of communications infrastructure under licence from Dun Laoghaire Rathdown County Council at Lehaunstown Lane, Laughanstown.

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

DAPT have serious concerns regarding the appropriateness and suitability of the site proposed to host this communications infrastructure and object to the proposed location on the grounds that the proposals are not considered to be in accordance with the requirements and objectives of the Cherrywood Planning Scheme (as amended)

Transportation Planning also recommend refusal as they believe the telecommunication infrastructure would be a traffic hazard.

Please find accompanying memo from Transportation Planning and the Development Agency Project Team which detail the reasons for refusal and additional.

Yours faithfully,

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