

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

Our Ref: [REDACTED]

09/04/2024

By Email Only

APPLICATION FOR SECTION 254 LICENSE

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

INSTALLATION AT SALLYNOGGIN ROAD, WOODPARK, CO. DUBLIN

Dear Sir/Madam,

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

This License Application comprises:

- Cover Letter & Planning Statement (this document);
- 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, transfer of previous application fee 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-1968-01-PD-01	1:1000
2	Site Layout Plan	DN-1968-01-PD-02	1:100
3	South-East Elevation Plan	DN-1968-01-PD-03	1:100
4	North-West Elevation Plan	DN-1968-01-PD-04	1:100
5	Equipment Details	DN-1968-01-PD-05	1:50

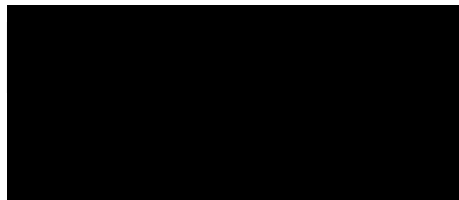
We write in connection with a proposal for a Section 254 License to install a 'Streetworks Pole' for the co-location of two separate operators equipment within the same pole, in order to provide high speed broadband and data services to the local community by two operators from a single pole, thus obviating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

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

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

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

Yours faithfully



For and on behalf of:
Emerald Tower Limited

Tel: [REDACTED]

Email: [REDACTED]

**WIRELESS BROADBAND & DATA
COMMUNICATIONS
STREETWORKS POLE**

**INSTALLATION AT
SALLYNOGGIN ROAD,
WOODPARK,
CO. DUBLIN**

**PLANNING STATEMENT
INCORPORATING ENVIRONMENTAL CONSIDERATIONS**

**Prepared by
Entrust Limited**

April 2024

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-Rathdown County Council (**the Local Authority**) for; the installation of an 18m dual operator pole, associated equipment, together with ground-based equipment cabinets and all associated site development works for wireless data and broadband services (**the Proposed Development**).
- 1.2. The Proposed Development will be installed on the Sallynoggin Road, Woodpark, Co. Dublin (**the Site**).

2. Background

Applicant

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

Operator

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

Pre- Application Consultation

- 2.5. There was correspondence between [REDACTED] (Emerald Tower Limited- Applicant) and Thomas Featherstone (DLR Council) via email in May/ June 2023.
- 2.6. [REDACTED] engaged with Thomas in order to query the prospect of a telecommunications structure at the proposed site location.
- 2.7. Thomas responded via email on the 18th of July, with the below comments on the proposed location of the street works structure.
- Traffic – no issue with either site being used provided there is no impact to the existing pedestrian crossing. **The site is located approx. 41m east of the pedestrian crossing at the junction of Sallynoggin Road and Rochestown Avenue. The site will not impact road users.**
 - Public Lighting – **no issue with either site being used.**
 - Active Travel –The location may work, but this cannot be confirmed until the part 8 for the scheme is completed. If there are any changes post consultation it may conflict. The Part 8 is due for decision in September. Please see attached a drawing which may assist in finding suitable locations. **After review of the Part 8 that was decided by DLR in October 2023- Rochestown Travel Scheme. It has been confirmed that this site will not impact this route and it is located approx. 40m east of Rochestown Avenue on the Sallynoggin Road, meaning it is sited away from the Part 8. Please see below that clearly indicates that the Sallynoggin Road is not impacted.**



- Planning – NTA bus networks require the green area below for a bus shelter, but any area around the rectangle below is free. There may be a 2m clear-way requirement around the plinth to allow for work space. **The site is located approx. 2m from this boundary, therefore compliant with DLRs concerns.**



Resubmission

- 2.8. This is a resubmission of application Ref. CTT.23.064-307151, having received initial feedback from the Council's Parks Department and Roads Department, it was advised to relocate the proposed development away from the existing tree on the northern/eastern side of the grass verge and further away from the bus station.
- 2.9. In this regard revised proposal is to relocate the proposed development approx. 9m west of the original location, as submitted under CTT.23.064-307151, and as per the location proposed during the discussions held with the Council. In addition to the change in location the applicant has agreed to colour the pole and cabinets in colour RAL7043 as requested by the Council.
- 2.10. No further changes were requested in terms of height or number of cabinets.
- 2.11. The changes as referenced above were discussed and agreed with the Council in a meeting held with Paul Featherstone (Roads) and Paul Conlon (Parks) with [REDACTED] (Agent), on Monday 26th February 2024.
- 2.12. On this basis the proposed location of development has been amended in accordance with the advice given by the Council to achieve the optimum location for this type of development here. It is hoped that the Council accepts this resubmission and permission is granted for same.

3. Proposed Development

Site Location

- 3.1. This site is located along the Sallynoggin Road approx. 980m east of Sallynoggin and south of Dublin City Centre. The site is located on a grass verge that is elevated off the ground to the south of a bus stop on the Sallynoggin Road. There are residential dwellings approx. 23m away to the west and a large Soccer Pitch located to the north. There are trees bound to the north east of the site approx. 10m in height and more trees along the Sallynoggin Road to the west. There are also vertical infrastructure items including traffic lights, bus signs and street lights located close to the proposed site location, which will screen the proposal into the baseline character of the area.
- 3.2. As noted in the previous section, the subject location has been amended and moved further westwards on this grassed away further away from the bus stop and away from

existing tree located here in order to avoid interference with existing road infrastructure here, in accordance with the advice of the Council.



Figure 1 Site Location



Figure 2: Aerial of Site Location

Site Ownership

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

Design

3.4. The proposal is to install a new 'Streetworks Pole' with Eir's antennas to be encased inside the top of the pole, with space for a second operator's antennas below the eir antennas, a cabinet for Eir Mobile and provision for a second cabinet for a subsequent operator to be co-located onto this installation in future. The equipment dimensions are as follows:

Streetworks Pole		Cabinets (1 & 2)	
Height	18m	Height	1) 1.9m
Diameter or Width	406mm (Diameter)	Length	1) 1.3m
		Depth	1) 0.8m
Area	0.13m ²	Area	1) 1.04m ²
Volume	2.33m ³	Volume	1) 1.768m ³
Colour	RAL7043*	Colour	RAL7043

Total Streetworks Pole & Cabinets			
Area	2.69m ²	Volume	6.682m ³
Footpath Width 2.9m, Cabinet Doors Open 2.9m, Cabinet Doors Closed 2.9m No Change			

Dishes (2)	300mm (Diameter)	Antennas (encased inside pole)	4m H x 406mm (Diameter)
Colour	RAL7043	Colour	RAL7043

*RAL7043 colour as requested by the Council during meeting with applicant's agent on 26th February 2024.

3.5. Great care and attention have been given to the design of the Proposed Development.

- It is proposed that the structure will be coloured in RAL7043 as requested and will assimilate with the typical sky colour in Ireland and surrounding street infrastructure, however, it is possible for the proposed development to be painted in any colour including a dark fir green or black finish which could be requested by way of a conditional License;
- Slimline, slender and un-fussy design to minimise any negative visual impacts;
- Pole design to blend in with existing street infrastructure such as street lighting, road signs poles and traffic lights poles;
- Sited on a grass verge here so therefore will not affect the existing 2.9m wide footpath nor affecting the bus stop east of the proposal.
- Sited in relatively close proximity to traffic lights, road signs and streetlights therefore blending into the existing character along the street scene.

3.6. As part of eir Mobile's continued network improvement programme, there is now an urgent requirement in this area to provide new and improved high speed data and broadband services, for the operator to improve overall network coverage. The site following the proposed installation will be capable of accommodating new, more advanced technologies for two separate operators within the surrounding area. The proposed pole, at an overall height of 18m is the absolute minimum available to support two operators equipment that will allow all these criteria to be met and to achieve antenna 'line of sight' above the surrounding landscape topography, built form and vegetation (surrounding high trees).

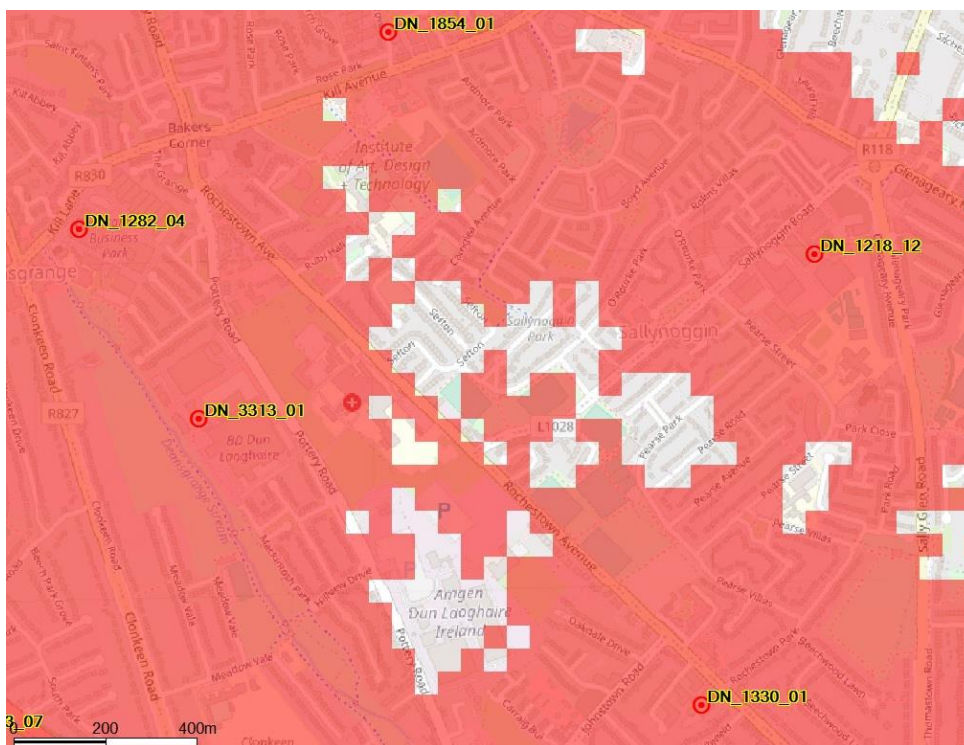
- 3.7. Consideration has been given to technical, engineering, environmental, health and safety and land use planning viability in the siting and design of the proposed telecommunication's installation. The height of the structure has been driven by the requirement to achieve the desired level of coverage to the wider area. The proposed location, in our view, would provide the optimum location to site this equipment achieving the desired area and level of coverage, whilst minimising the number of telecommunications installations and minimising visual impact.
- 3.8. In light of the applicant's efforts to design the best solution for this particular site so as to minimise the impact of the development on the environment, it is considered that the appearance of the proposed structure would not seriously impact upon the visual or residential amenity of the area, nor would it form an obtrusive feature within the surrounding area. The proposal strikes a good balance between environmental impact and operational considerations. The proposed height, colour and design represent the best compromise between the visual impact of the proposal on the surrounding area and meeting the technical requirements for the Site. Taking all matters into account, it is considered that this proposal which is to provide new and improved high speed broadband and data services, initially for eir Mobile and a second operator on a single structure as opposed to having eventually two separate structures in this area, would not be discordant within the local environment.

4. Technical Justification

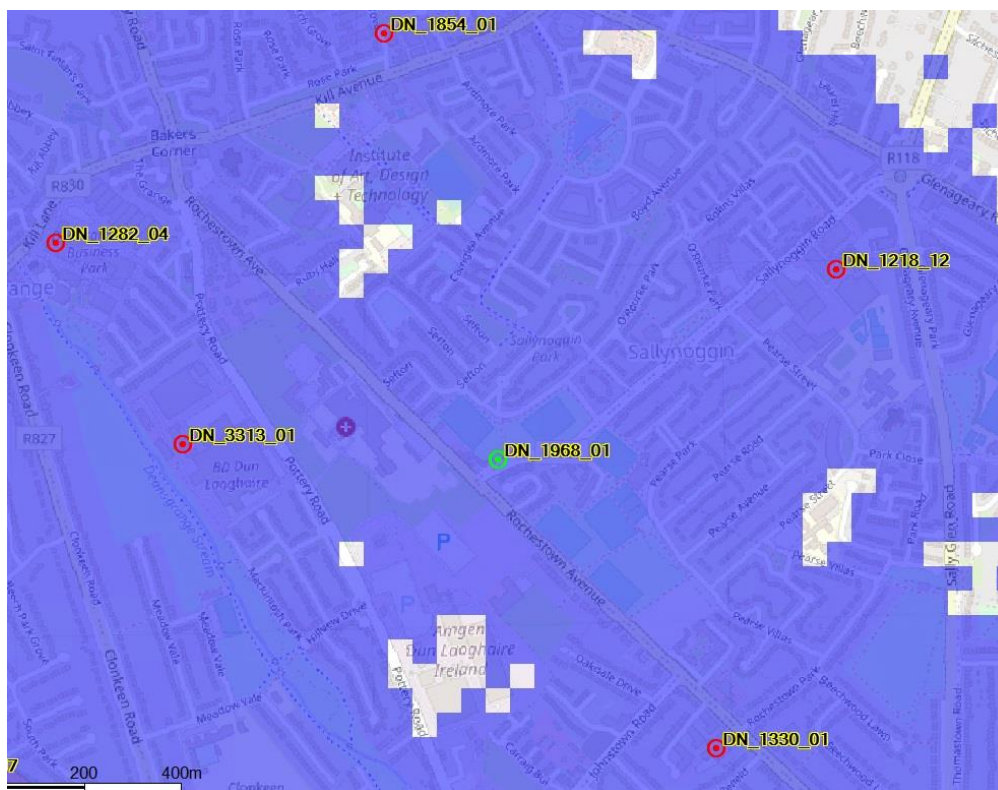
- 4.1. *Eir has stated that As part of Eir Ltd licensing requirements and the continuing rollout of their 3G, 4G networks, Eir requires a site in this area of Rochestown, Co Dublin. The current site density in the area for Eir does not provide adequate indoor service or capacity for high speed mobile broadband in some locations. Eir's current coverage in this area specifically around the Rochestown Avenue and National Rehabilitation Hospital, Amgen, Sefton Housing Estate, Sallynoggin Park , Pearse Drive, Pearse Gardens and Pearce Park 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 and greatly improve overall network capacity to improve broadband speeds for users.*
- 4.2. Eir Search Ring DN_1968



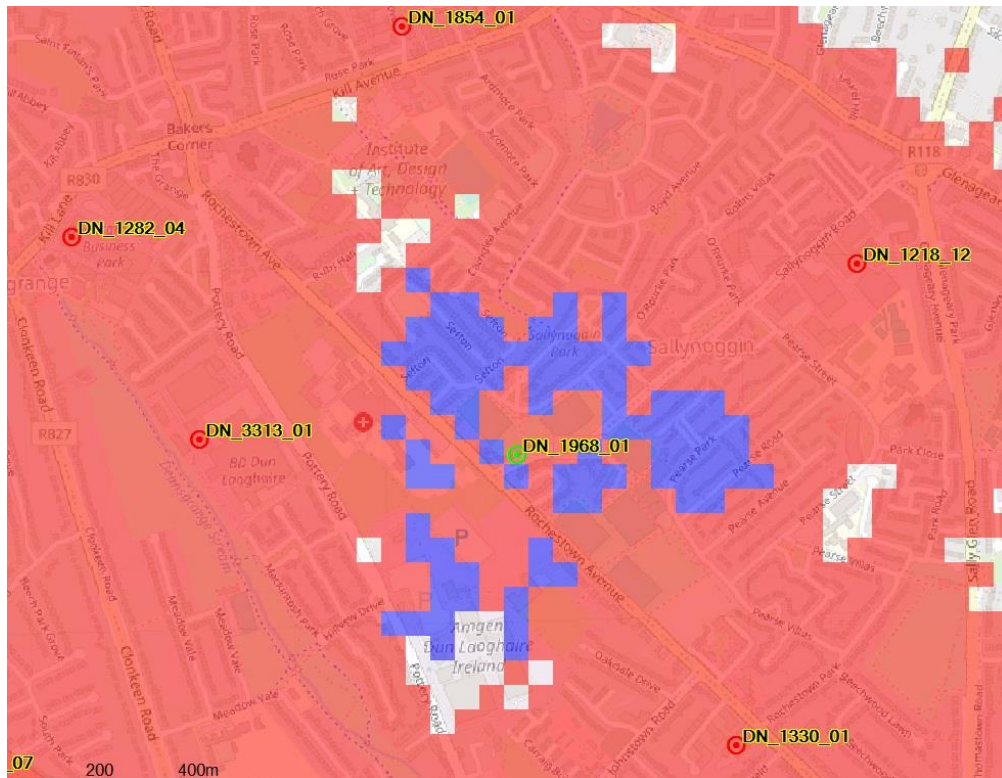
4.3. Existing Indoor Coverage without DN_1968



4.4. Predicted New Indoor Coverage with DN_1968



4.5. Existing and Predicted Indoor Coverage with DN_1968



5. Site Selection Process and Discounted Options

- 5.1. Eir will always co-locate on an existing telecommunications structure as a first choice if a suitable existing structure exists, as it has done on many hundreds of its sites in its radio network to date and which it has already done here at the nearest existing 3 out of 4 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 residential area currently suffer from a severe lack of high-speed wireless broadband and data services. Eir would not be looking to provide the much-needed coverage here if it could do so by its two existing two 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 two operators to share the same pole.
- 5.3. To avoid any confusion as to why a new telecommunications installation is required here which is a central point in this application, all the mobile operators namely Three, Eir and Vodafone have an obligation to provide 100% coverage throughout the country, including at this location. The nearest existing sites are too far away for the newer technologies to work including 4G and 5G technologies and to a large extent 3G, due to the required data speeds for applications like social media, internet browsing and downloading, the technology range which depends on the number of users at any one time can be only several hundred metres. What is required is a balance between planning requirements and

people's entitlements to modern communications facilities which affects their quality of life, which is classed by the government as an essential public service like water and electricity so these services are required in all areas. Unlike the earlier 2G technology in the late 1990's which had a range of up to 10KM and not several hundred metres for 4G and 5G technologies, so back then masts could be located miles away from their coverage target area, but that is not the case nowadays, so it is respectfully requested that the Council show's flexibility for the newer technologies with regards to siting, whilst protecting amenity, which is what the applicant considers it has done very successfully here as there are no resulting significant environmental impacts resulting from the proposed development as is demonstrated in this planning statement.

5.4. The siting of the Proposed Development was decided upon after firstly analysing the requirements to provide new and improved broadband coverage here as explained above. 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 4.1 and 4.2 of this document. These sites must be at relatively high points to ensure the antennas can transmit and receive over the proposed cell area. Sites also must have the following characteristics, they must be environmentally suitable i.e. where any inevitable and associated impacts are within acceptable parameters;

- Within search ring to meet wireless broadband coverage objectives;
- Be capable of being developed; sufficient space for pole and cabinets, avoiding underground utilities and free of overhead obstructions like cables;
- Sufficient pavement space for wheelchair access and buggys/prams;
- Minimise any impacts on the residential amenity of the area;
- 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	Musgrave Marketplace, Sallynoggin Road, Dun Laoghaire-Sallynoggin East County Dublin,	E: 324270 N: 226906	This site is located east from the proposed site location approx. 808m away. Three, Eir and Vodafone are all co-locating here on a rooftop. This site is currently serving Glenageary Rd Upper. The site is too far outside the search ring to reach the target coverage area. The signal is blocked by built form and therefore does not meet Eirs coverage objective.
2	Rochestown Lodge Hotel & Spa, Rochestown Avenue, Cabinteely-Granitefield DED County Dublin,	E: 324025 N: 225923	This site is located south from the proposed site location approx. 751m away. Three, Eir and Vodafone are all co-locating here on a rooftop. This site is currently serving Johnstown Road, Granite Field and Johnstown Park. The site is too far outside the search ring to reach the target coverage area. The signal is blocked by built form and therefore does not meet Eirs coverage objective.
3	Carraig Buí, Kill of the Grange, Cabinteely-Pottery DED 1986, Dún Laoghaire, Dún Laoghaire-	E: 323497 N: 226003	This site is located south from the proposed site location approx. 504m away. Vodafone is located here on a rooftop. This site is currently providing Vodafone coverage to Pottery Road. The site is too far outside the search ring to reach the target coverage area. The signal is blocked by built form and therefore does not meet Eirs coverage objective.

	Rathdown, County Dublin,		
4	The Physique Consultants, Pottery Road, Kill of the Grange, Cabinteely- Pottery, County Dublin,	E: 322930 N: 226546	This site is located north west from the proposed site location approx. 630m away. Eir is locating here on a rooftop. This site is currently serving Pottery Road. The site is too far outside the search ring to reach the target coverage area. The signal is blocked by built form and therefore does not meet Eirs coverage objective.

- 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 of Rochestown, specifically around Rochestown Avenue and National Rehabilitation Hospital, Amgen, Sefton Housing Estate, Sallynoggin Park, Pearse Drive, Pearse Gardens and Pearce Park hence why Eir requires a site here.

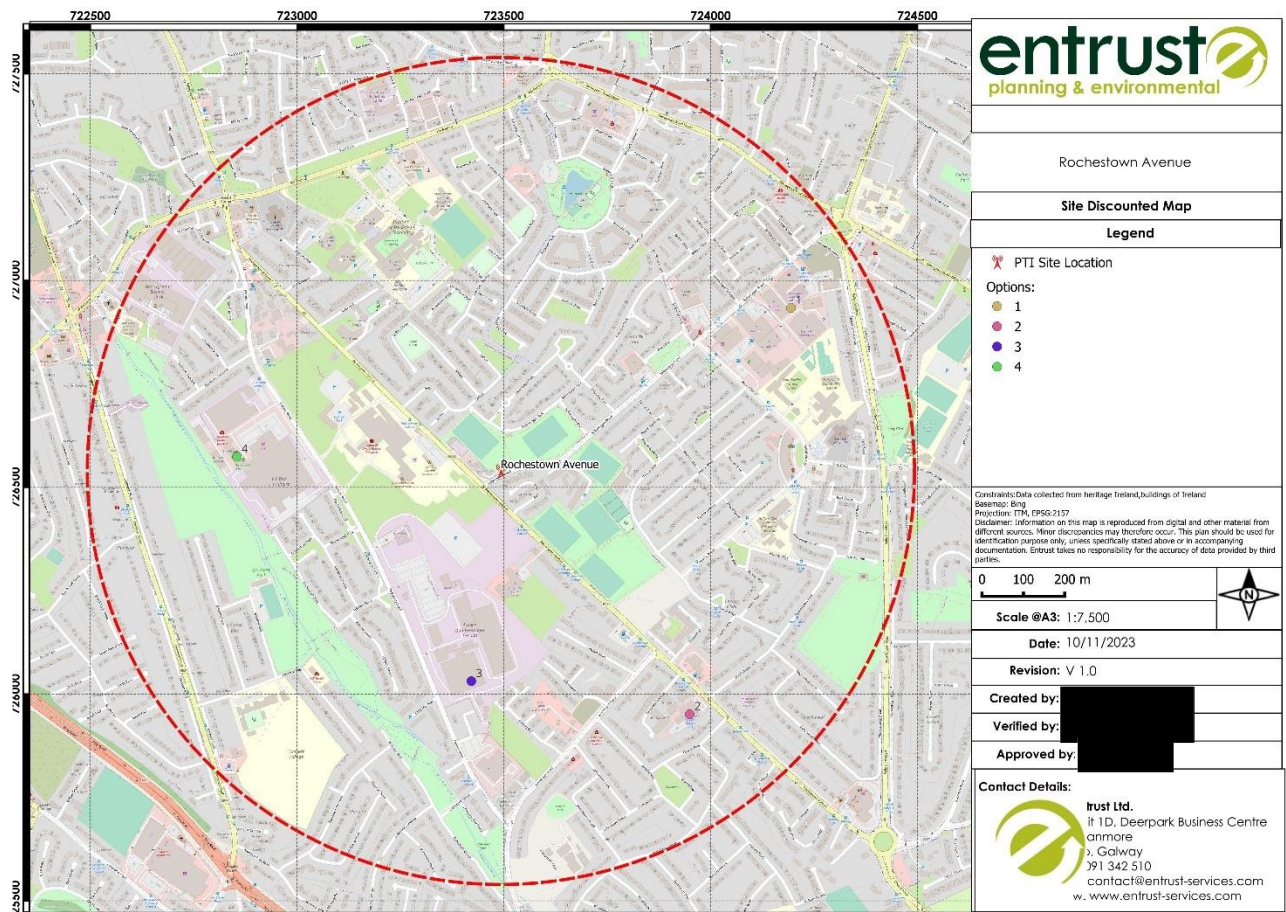


Figure 2. ComReg Site Finder depicting existing telecommunications sites in the area.

6. Environmental Considerations

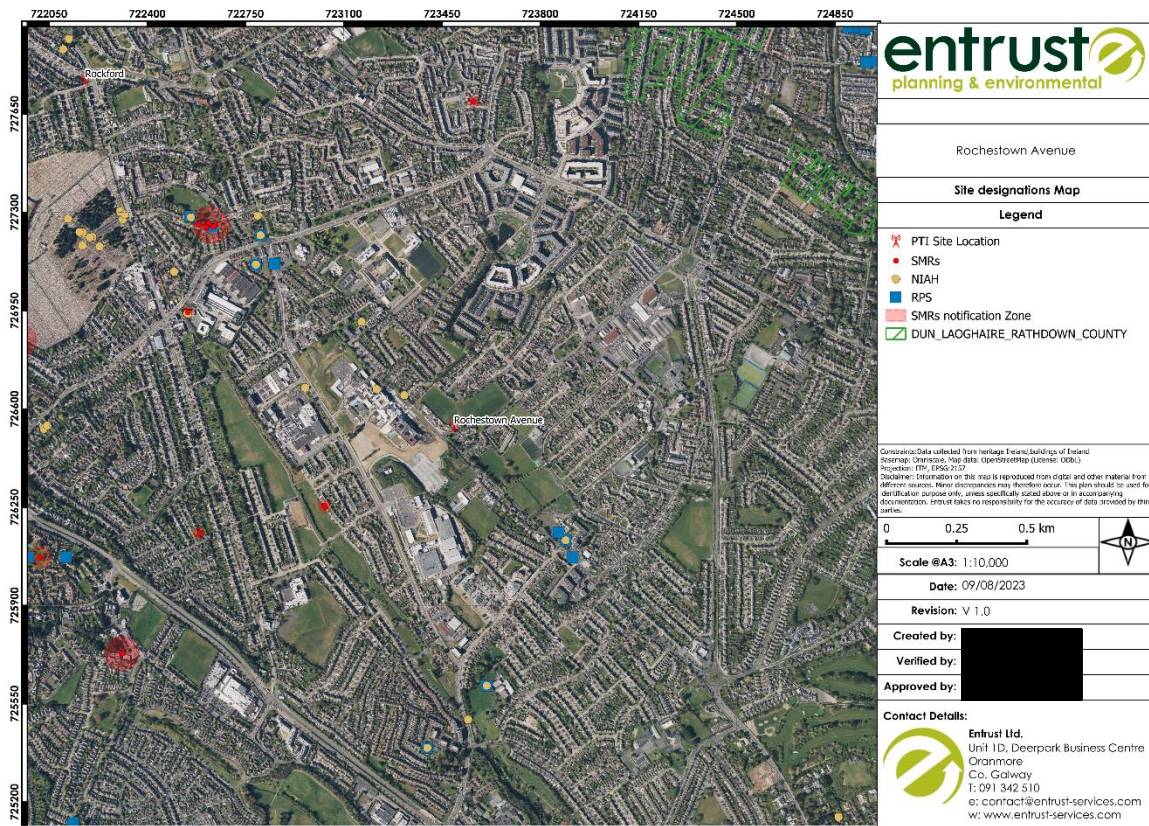


Figure 3: Environmental Designations Map

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 landscape or ecological sensitive designated areas that will not be impacted by the proposal.
- 6.2. The closest heritage asset to the proposal is a protected structure located on Rochestown Avenue approx. 470m south of the proposal. There are a large volume of built form and vegetation that separates the proposal with this protected structure which in turn provides screening and therefore will not have a visual impact on the protected structure.

Health

- 6.3. 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

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

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

Table 2: Visual Sensitivity

- 6.5. 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.
- 6.6. 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.
- 6.7. Levels of magnitude of change - high, medium to high, medium, medium to low and low - are applied in order that the judgement used in the process of appraisal is made clear. The criteria used to determine magnitude of change differ for the effects on landscape receptors and visual receptors, as well as the cumulative effects on both.

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

Table 3: Magnitude of Change

- 6.8. 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.
- 6.9. 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 →	High	Medium-High	Medium	Medium-Low	Low	Negligible
Visual Sensitivity ↓						

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

- 6.10. 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.
- 6.11. 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.
- 6.12. 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 – Rochestown Avenue south of the site
 - VP2 – Sallynoggin Park north of the site
 - VP3 – National Rehabilitation Hospital north west of the site
 - VP4 – Rochestown Avenue north of the site.
- 6.13. 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).
- 6.14. 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 – Rochestown Avenue south of the site E: 723543 N: 726423 Distance to Proposal: 127m
Existing Character	This viewpoint (VP) is taken along Rochestown Avenue, approx. 127m south of the proposed location of the development. This image shows the extent of the road network here, bound to the west by a stone wall and to the east by mature trees approx. 10m in height. The surrounding area consists of existing built-up suburb, in the distance some housing estates and commercial buildings are visible. There is also vertical infrastructure visible here including light poles and overhead electricity lines, towards the background of this VP there are traffic lights and road signs visible.
Receptor Type and Sensitivity	The typical receptor at this location would be road users such as pedestrians, motorists, and cyclists. The sensitivity is therefore medium.
Nature of Change	From this viewpoint, the proposal is partially visible, the top of the pole is minorly visible only if one is looking for it as it is screened by the existing trees and built form towards the back of the viewpoint. The colour of the pole assimilates into the colour of the sky. Given the colour of the pole and the vertical elements in this viewpoint the pole sits very well into the host environment and does not alter the existing view.
Magnitude of Change	In relation to the view at this VP, the magnitude of change is considered to be low as the proposed development is predicted to have a minor loss or alteration to one or more key landscape elements/ features/ characteristics such that post development the change/loss would be discernible, but the landscape character would be similar to the baseline.
Summary of Visual Assessment	Sensitivity: Medium (Road Users)
	Magnitude: Negligible
	Level of effect: Negligible
Significant effect?	No

Viewpoint 2	VP2 – Sallynoggin Park north of the site E: 723501 N: 726623 Distance to Proposal: 84m
Existing Character	This viewpoint (VP) is taken in Sallynoggin Park, approx. 127m north of the site. This VP is taken by on a large green area in this park. This VP extends out and shows the extent of the park. There is also a row of semi mature trees in the background of this viewpoint. Further to this, is the Sallynoggin road which is host to street lights and bus stops. There is also built form and electricity poles with overhead cables visible here towards the background of this VP
Receptor Type and Sensitivity	Primary receptors at this location would be residential dwellings along with road users such as motorists, pedestrians and cyclists and recreational users of the park. The sensitivity is therefore high.
Nature of Change	Due to the proximity of this viewpoint to the site, the proposal will be visible from this viewpoint. However the row of trees towards the background of this viewpoint provide screening to absorb the proposal into the character of the area. During the autumn season the trees will be in full bloom therefore providing more screening and the cabinets will full absorb into the area due to similarities in colour to the leaves. The nature of change is considered to be low as the proposed development will not have any negative impact upon the landscape.
Magnitude of Change	In relation to the view at this VP, the magnitude of change is considered to be medium as the proposed development is predicted to have some loss or alteration to one or more key landscape elements/features/characteristics such that post development the

	change/loss would be discernible, but the landscape character would be similar to the baseline.
Summary of Visual Assessment	Sensitivity: Medium (Road users)
	Magnitude: Medium
	Level of effect: Moderate
Significant effect?	No

Viewpoint 3	VP3 – National Rehabilitation Hospital north west of the site E: 723331 N: 726590 Distance to Proposal: 169m
Existing Character	This view is located on the grounds of the National Rehabilitation Hospital approx. 169m north west of the site. Specifically, this viewpoint is taken within a car park. There are a vast number of streetlights throughout this viewpoint. There are mature trees in the background of this viewpoint towards the site location. To the west there are electricity poles with overhead cables present.
Receptor Type and Sensitivity	Primary receptors at this location would be users of the National Rehabilitation Hospital and road users such as motorists, pedestrians and cyclists. The sensitivity is therefore high.
Nature of Change	From this VP, the proposed development will be visible from this direction. However, it sits well in the host environment due to the large number of vertical infrastructure which provides screening for the proposal. The proposal is only visible if one is looking for it, furthermore it does not break the skyline and the colour of the proposal sits well against the background of the sky. This viewpoint confirms that the location has the capacity to accommodate the proposal without it resulting in any significant impacts
Magnitude of Change	In relation to the view at this VP, the magnitude of change is considered to be low as the proposed development is predicted to have a minor loss or alteration to one or more key landscape elements/ features/ characteristics such that post development the change/loss would be discernible, but the landscape character would be similar to the baseline.
Summary of Visual Assessment	Sensitivity: Medium (Residential Dwellings)
	Magnitude: Negligible
	Level of effect: Negligible
Significant effect?	No

Viewpoint 4	VP4 – Rochestown Avenue north of the site. E: 723275 N: 726661 Distance to Proposal: 294m
Existing Character	This viewpoint is taken along Rochestown Avenue located approximately 294m from the proposal to the north of the site. The main feature of this is the 2-lane road network, Rochestown Avenue. There are semi mature trees visible here in the foreground and background of this viewpoint approx. 12m in height. Further to this there are a number of vertical infrastructure items present here including, streetlights north of the car park for the National Rehabilitation Hospital and telephone poles with overhead cables lining Rochestown Avenue.
Receptor Type and Sensitivity	Primary receptors at this location would be road users such as motorists, pedestrians, and cyclists. The sensitivity is therefore medium.

Nature of Change	The proposed development will not be visible from the perspective of this viewpoint, due to the sheer volume of vertical infrastructure and mature trees at this viewpoint that are screening the proposal and assimilates it into the baseline characteristics of this viewpoint.
Magnitude of Change	In relation to the view at this VP, the magnitude of change is considered to be low as the proposed development is predicted to have a minor loss or alteration to one or more key landscape elements/ features/ characteristics such that post development the change/loss would be discernible, but the landscape character would be similar to the baseline.
Summary of Visual Assessment	Sensitivity: Medium (Road Users)
	Magnitude: Negligible
	Level of effect: Negligible
Significant effect?	No

7. Relevant Planning Policy and Guidance

National Planning Framework (NPF)

- 7.1. Under the NPF, one of the 10 goals or national strategic outcomes is to create a strong economy that can foster enterprise and innovation and attract talent and investment. It states that delivering this outcome will require the coordination of growth and place making with investment in world class infrastructure including digital connectivity, which this application supports. It also supports a second goal regarding international connectivity.
- 7.2. 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 Spatial & Economic Strategy for Eastern and Midlands Regional Assembly (RSES) 2019-2031

- 7.6. The RSES establishes the high-level objectives to grow the economy and sustainable development for the eastern and midlands regions, which includes Dublin. The strategy acknowledges the importance of broadband as an essential service alongside water and transport for good quality living and is mentioned for prioritising investment in placemaking. The document lays out these priorities in its regional policy objectives (RPOs).
- 7.7. The Regions dispersed settlement pattern and its peripheral location in Europe makes it particularly dependent on efficient communications - good rail, road, sea, air and telecommunications links are of the utmost importance. The RSES seeks to enhance communications and technology across the Region.
- 7.8. RPO 4.2 seeks to ensure that all necessary infrastructure is provided alongside all residential and employment areas including, the provision of broadband services. This policy also outlines the need to safeguard adequate service capacity is available to match demand within the receiving environment. It is evident that the proposed nature of works, for provision of a streetworks pole for telecommunication, fall subject to this objective as it is intended to provide needed broadband capacity.
- 7.9. The strategy continues further to highlight the essential nature of broadband for modern living, stating that good connectivity is vital to continued growth and enhancing communities set out in RPO 8.25.
- 7.10 **Analysis:** this proposal is in accordance with the high level objectives set out for priority development in the eastern and midlands region, namely the priority roll out of broadband services and telecoms connectivity. Broadband services are now considered as a necessary infrastructure to be provided in proximity to all residential and employment lands, including provisions to ensuring such services have capacity available to match demand. In this regard the proposal seeks to ensure capacity is available to service Dublin currently and into the future as the city continues to consolidate its population with the existing built up urban areas like Rocehstown.

Dun Laoghaire-Rathdown County Development Plan 2022-2028 (CDP)

Telecommunications (Section 10.6.1)

- 7.7. 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.
- 7.8. 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)

- 7.9. 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

- 7.10. The site is zoned, to preserve and provide for open space with ancillary active recreational amenities, however as per The Dun Laoghaire-Rathdown County Development Plan 2022-2028, Public Services- are Open to Consideration at this location.
- 7.11. **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 section 3.5 and 3.6, the proposed design of the structure was discussed where it was confirmed that the pole can be painted in any colour that the Planning Authority may prefer however a galvanised colour is proposed to match existing streetlights and to blend in with the typical sky colour. It is also intentionally sited close to semi-mature and mature trees for maximum screening purposes and is an acceptable distance from any surrounding dwellings in the area to protect residential amenity. Moreover, the site location sits in relative proximity to Sallynoggin College of Further Education and the Rehabilitation Centre, both of which are major community services in the area, both of which rely on good quality internet and broadband services to carry out daily tasks, as such the proposed development will have additional knock on benefits for residents, those employed and those visiting the area. This proposal is in conjunction with all Council objectives to deliver necessary infrastructure it is considered that the proposal in the subject location along the Sallynoggin Road shows planning balance wherein it will not have undue negative impacts on the area but will undoubtedly provide many benefits for those living and working here.

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

- 7.12. 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.
- 7.13. 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.'*
- 7.14. 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.'*
- 7.15. 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.
- 7.16. In regard to co-location and sharing, section 4.5 states that 'Sharing of installations (antennae support structures) will normally reduce the visual impact on the landscape' and 'All applicants will be encouraged to share and will have to satisfy the authority that they have made a reasonable effort to share'. It is confirmed that Emerald Tower Limited actively encourages the sharing of all infrastructure in its portfolio which is the case for this proposal also.

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

- 7.17. 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.
- 7.18. 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.
- 7.19. 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 here in this document, it is considered that this proposed telecommunications pole is the optimum solution in terms of providing the required technology coverage, minimising any adverse impacts on local amenity and the surrounding townscape. The site is considered to be appropriately located as it is not located within any sensitive landscape designation, with the closest being sited approx. 400m away from the proposal on Rochestown Avenue. The site location of the proposed development benefits from the presence of mature and semi-mature trees as well as streetlights along Sallynoggin Road and is located where it will have the least possible impact on residential amenity. It is considered that the proposal is at the minimum height possible for the co-location of two separate operators on the same pole to be able to 'see' above the surrounding trees, 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. This means that the proposed development will not be seen as the dominating structure in the area and will not have a negative impact upon the streetscape or character of the surrounding area.
- 8.2. The height proposed at 18m is the lowest possible height for two operators to be co-located on the same pole to provide the required technology coverage by having 'line of sight' above the immediate built form and vegetation.
- 8.3. Moreover, the applicant has pro-actively engaged with the Council to achieve the best solution and to carefully locate the proposed development without causing harm to the receiving environment. In this regard, the proposed location subject of this application has been relocated on the advice given by the Council and colour of equipment have been amended in line with requests by the Council, thus it is hoped that this is considered in the assessment of this application and that permission be granted. Any further changes might be made to the application by way of condition.
- 8.4. 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.
- 8.5. The applicant has addressed the areas of concern raised by the area planner, namely the potential for conflict with the proposed road improvement scheme. It is noted that the route and extent of road works have been agreed by the Council and that the proposed development is suitably distance away from these works, having no impact that would undermine the delivery of improvements here. Nor would it have any other impact on the future location of a bus station here, thus should be granted permission to support continued investment in public infrastructure including ICT services here.
- 8.6. Taking into consideration the immediate context of this proposal, being situated in a predominantly residential area, adjacent the rehabilitation hospital and near Sallynoggin College of Further Education the provision of improved internet coverage here will have measurable knock on benefits not only for those resident here but also for those working and continuing education within the community. In this respect the proposed

development is in accordance with Council objectives and sustainable development but will have numerous additional benefits to support high quality neighbourhood development.

- 8.7. 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.
- 8.8. 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.
- 8.9. 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.

Telecommunications Development Photomontage Report

Report Date: 26/10/2023

Project: DN1969 Rochestown Avenue

Surveyed by:

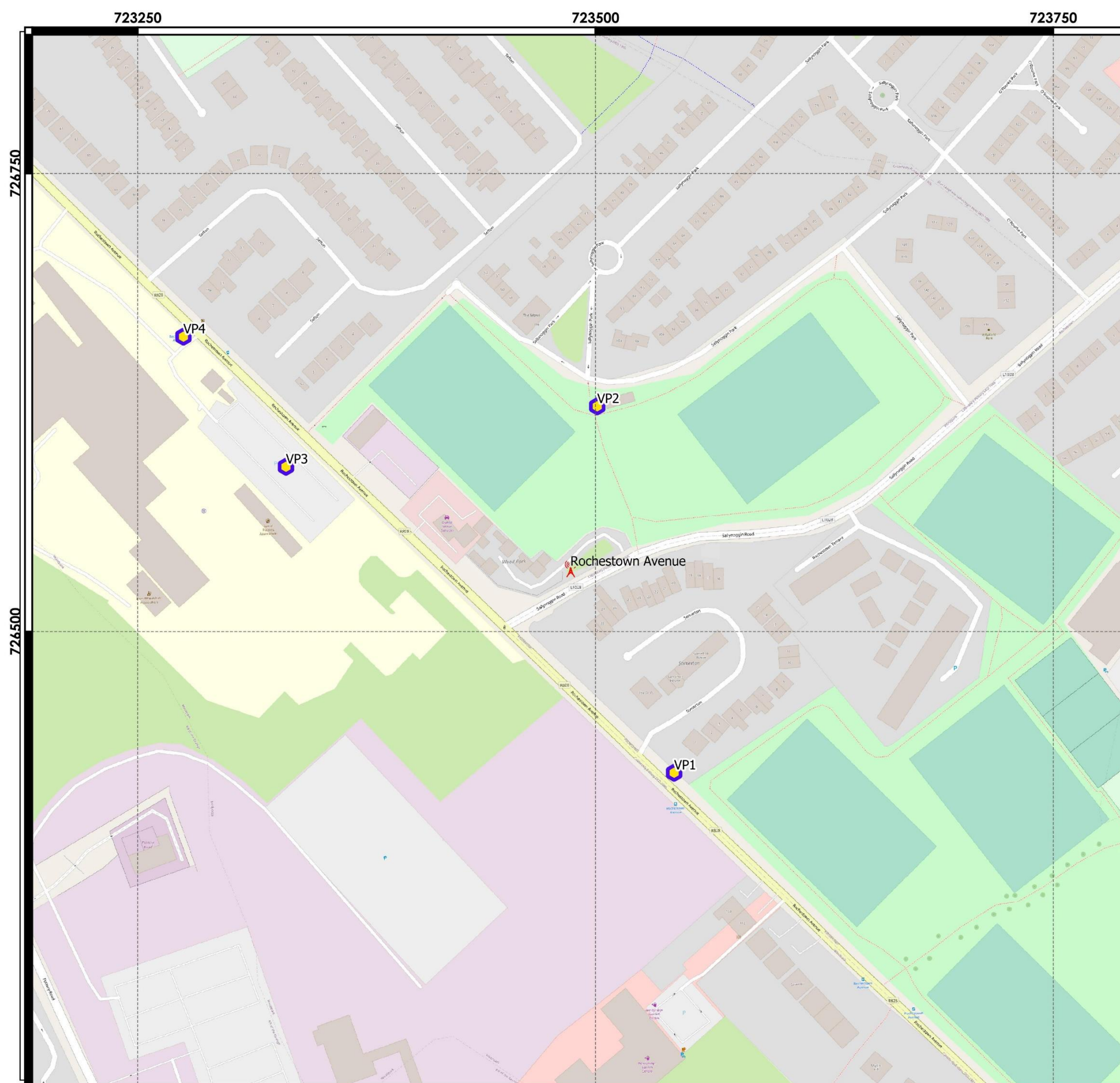
Created by


Approved by:

Client:

Provided by:









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Rochestown Avenue

Viewpoints Map

Legend


 PTI Site Location

 Viewpoints

Constraints: Data collected from heritage Ireland, buildings of Ireland
Basemap: Bing
Projection: ITM, EPSG:2157
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050100 m

Scale @A3: 1:2,000




Date: 04/04/2024

Revision: V 1.0

Created by: [Redacted]

Verified by: [Redacted]

Approved by: [Redacted]








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View Point Name		Existing View of Viewpoint 1				
Site ID	Viewpoint No.	Easting	Northing	Elevation (AOD)m	Direction-Degrees(N)	Distance (m)
DN1969	VP1	723543	726423	56.2	31.05310084061	127
Viewing Distance: 300mm			Height above ground: 1.5m			
Page size: A3			Camera & Lens: Canon 6D - 50mm Focal Length			
<div><div>entrust</div><div>planning & environmental</div></div>					Provided by: www.entrust-services.com Unit 1D, Deerpark Business Centre, Oranmore, Co. Galway, H91 X599	Surveyed by: <div></div> Created by: <div></div> Approved by: <div></div>



View Point Name		Proposed View of Viewpoint 1						Provided by:		Surveyed by: 	
Site ID	Viewpoint No.	Easting	Northing	Elevation (AOD)m	Direction-Degrees(N)	Distance (m)		www.entrust-services.com			
DN1969	VP1	723543	726423	56.2	31.05310084061	127				Created by: 	
Viewing Distance: 300mm			Height above ground: 1.5m								
Page size: A3			Camera & Lens: Canon 6D - 50mm Focal Length							Approved by: 	




View Point Name		Existing View of Viewpoint 2				
Site ID	Viewpoint No.	Easting	Northing	Elevation (AOD)m	Direction-Degrees(N)	Distance (m)
DN1969	VP2	723501	726623	52.6	165.372348663803	84
Viewing Distance: 300mm			Height above ground: 1.5m			
Page size: A3			Camera & Lens: Canon 6D - 50mm Focal Length			



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Unit 1D, Deerpark Business Centre, Oranmore, Co. Galway, H91 X599	Created by: ██████████
	Approved by: ██████████



View Point Name		Proposed View of Viewpoint 2				
Site ID	Viewpoint No.	Easting	Northing	Elevation (AOD)m	Direction-Degrees(N)	Distance (m)
DN1969	VP2	723501	726623	52.6	165.372348663803	84
Viewing Distance: 300mm			Height above ground: 1.5m			
Page size: A3			Camera & Lens: Canon 6D - 50mm Focal Length			



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Approved by:



View Point Name		Existing View of Viewpoint 3				
Site ID	Viewpoint No.	Easting	Northing	Elevation (AOD)m	Direction-Degrees(N)	Distance (m)
DN1969	VP3	723331	726590	55.0	114.527796548183	169
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 (partially visible)				
Site ID	Viewpoint No.	Easting	Northing	Elevation (AOD)m	Direction-Degrees(N)	Distance (m)
DN1969	VP3	723331	726590	55.0	114.527796548183	169
Viewing Distance: 300mm			Height above ground: 1.5m			
Page size: A3			Camera & Lens: Canon 6D - 50mm Focal Length			



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	Approved by:



View Point Name		Existing View of Viewpoint 4				
Site ID	Viewpoint No.	Easting	Northing	Elevation (AOD)m	Direction-Degrees(N)	Distance (m)
DN1969	VP4	723275	726661	55.8	127.398523550294	294
Viewing Distance: 300mm			Height above ground: 1.5m			
Page size: A3			Camera & Lens: Canon 6D - 50mm Focal Length			



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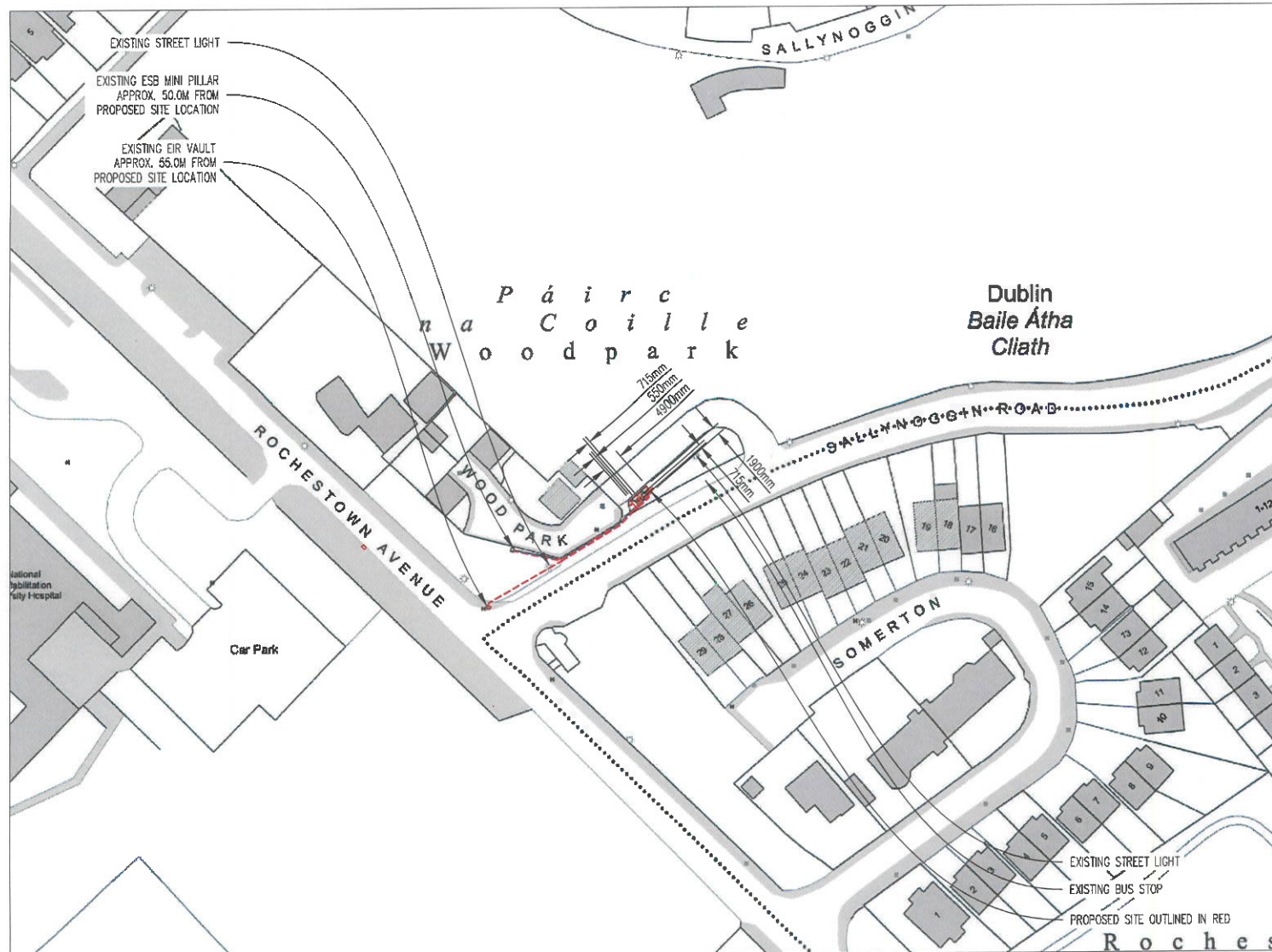
View Point Name		Proposed View of Viewpoint 4 (not visible)				
Site ID	Viewpoint No.	Easting	Northing	Elevation (AOD)m	Direction-Degrees(N)	Distance (m)
DN1969	VP4	723275	726661	55.8	127.398523550294	294
Viewing Distance: 300mm			Height above ground: 1.5m			
Page size: A3			Camera & Lens: Canon 6D - 50mm Focal Length			

END OF REPORT

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		Approved by: 



723635m E, 726646m N



723342m E, 726429m N

OVERVIEW MAP

SCALE 1:1000

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MAP No. 3383-25 (1:1000), 3633-25 (1:1000)

SITE COORDINATES

LATITUDE:	53° 16' 28.080" N	IG EASTING:	323562	ITM EASTING:	725485
LONGITUDE:	06° 08' 54.580" W	IG NORTHING:	228506	ITM NORTHING:	726534

A	SITE LOCATION CHANGE	08.04.24		
~	LICENSE DRAWINGS	18.10.23		
No.	Revision	Date	By	Ckd

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Drawings prepared by
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is highlighted in red.

**PHOENIX TOWER
INTERNATIONAL**

**GLENLINE
telecoms**

SECTION 254

Site Code, _____

S.P. Ref: _____ N/A

Site Address
ROCHESTOWN AVENUE,
DUN LAOGHAIRE,
CO. DUBLIN
IRELAND

Title
SITE LOCATION MAP
1:1000 MAP

Designed		Date	08-04-2023
Drawn		Scale	AS SHOWN
Dwg No.		Rev.	A

723505m E, 726549m N

SITE COORDINATES

LATITUDE:	53° 16' 28.000" N	10 EASTING:	333562	10M EASTING:	723486
LONGITUDE:	00° 06' 54.500" W	40 NORTHING:	228506	10M NORTHING:	726534

LEGEND

A	SITE LOCATION CHANGE	08.04.24
-	LICENCE DRAWINGS	18.10.23
No.	Revision	Date By Ckd



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is highlighted in red.



SECTION 254

Site Code:	
S.P. Ref:	N/A
Site Address	ROCHESTOWN AVENUE, DUN LAOGHAIRE, CO. DUBLIN IRELAND
Title	PTI SMART STREETPOLE SITE LAYOUT PLAN
Designed	Date 08-04-2023
Drawn	Scale AS SHOWN Rev. A
Dwg No.	

PROPOSED LOCATION OF FUTURE
OPERATOR 2 OUTDOOR CABINET

PROPOSED 18.0m HIGH ALPHA
STREETPOLE SOLUTION WITH 3No.
4.1m LONG ALPHA AW3940-E-C
ANTENNA (AZIMUTHS TBC)

PROPOSED LOCATION OF
OPERATOR 1 OUTDOOR CABINET

EXISTING KERB

PROPOSED EARTHING TAPE

PROPOSED 2No. EARTHING PIT

PROPOSED FUTURE OPERATOR 2
ROUTE OF UNDERGROUND FIBRE
DUCT TO NEAREST EIR FIBRE
CHAMBER (TBC WITH EIR)
LENGTH APPROX. 60.0m

PROPOSED FUTURE OPERATOR 2
UNDERGROUND ESB POWER
SUPPLY DUCT TO NEAREST ESB
SUPPLY POINT AS IDENTIFIED BY
ESB (LENGTH APPROX. 55.0m)

PROPOSED OPERATOR 1
UNDERGROUND ESB POWER
SUPPLY DUCT TO NEAREST ESB
SUPPLY POINT AS IDENTIFIED BY
ESB (LENGTH APPROX. 50.0m)

SITE LAYOUT PLAN SCALE 1:100

723471m E, 726521m N



EXISTING FOOTPATH

SALLYNOGGIN RD

WOOD PARK

EXISTING MANHOLE

EXISTING STREET
LIGHT POLE

PROPOSED SITE OUTLINED IN RED

PROPOSED FEEDER DUCT

PROPOSED 2No. #300mm LINK
DISHES (AZIMUTH TBC)

EXISTING BUS STOP

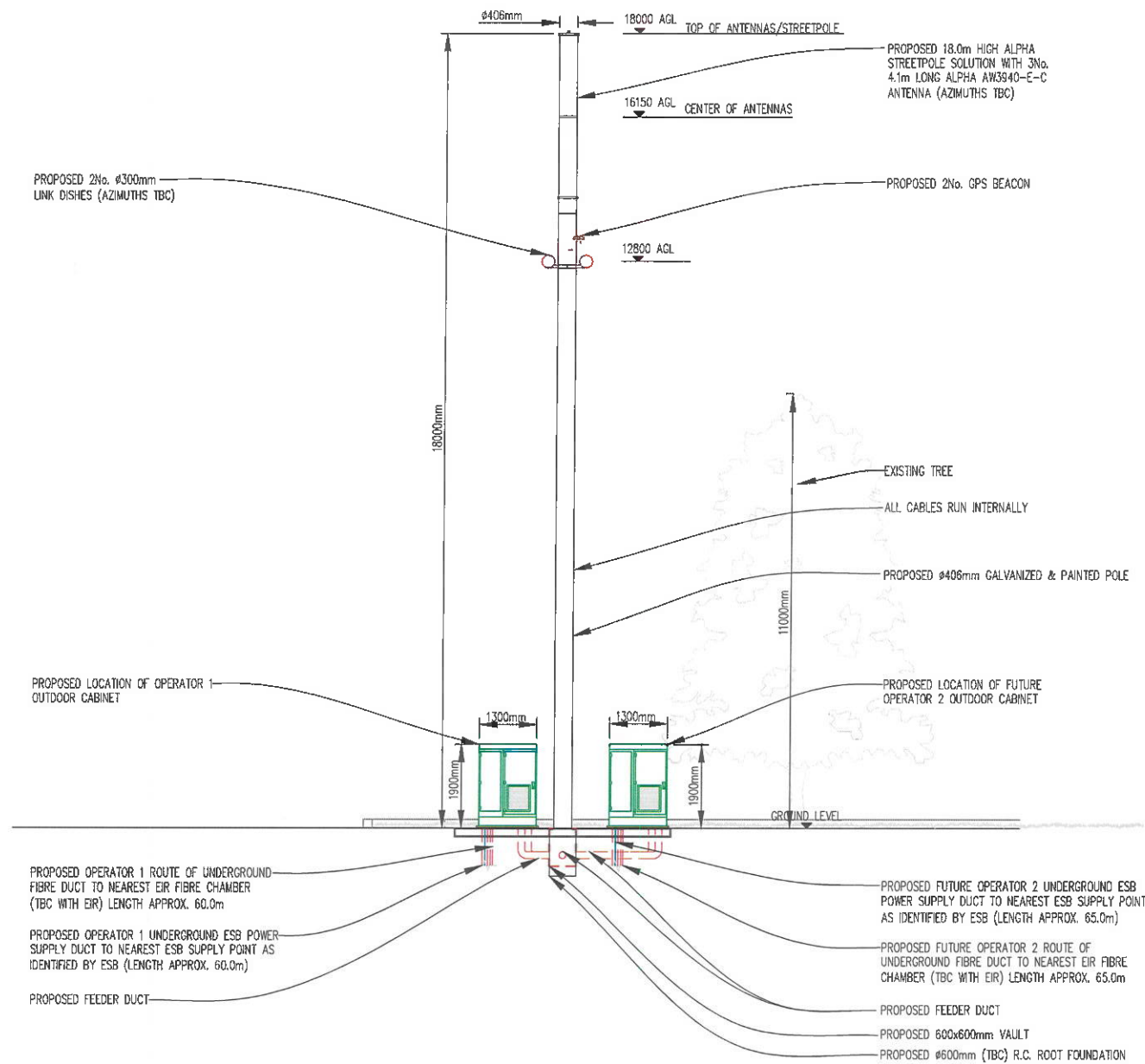
PROPOSED 2No. GPS BEACON

PROPOSED FEEDER DUCT

PROPOSED 600x600mm VAULT

PROPOSED FEEDER DUCT

PROPOSED OPERATOR 1 ROUTE
OF UNDERGROUND FIBRE DUCT
TO NEAREST EIR FIBRE CHAMBER
(TBC WITH EIR)
LENGTH APPROX. 55.0m



SOUTH-EAST ELEVATION
SCALE 1:100

SITE COORDINATES					
LATITUDE:	53° 18' 28.080" N	10 EASTING:	303562	17M EASTING:	723488
LONGITUDE:	08° 08' 54.560" W	10 NORTHING:	228508	17M NORTHING:	728534

A	SITE LOCATION CHANGE	08.04.24		
-	LICENSE DRAWINGS	18.10.23		
No.	Revision	Date	By	Ckd

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Drawings prepared by: [Redacted]
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Co. Galway, H91 1M99, TEL: +353 (0) 91 342 510
contact@entrust-services.com

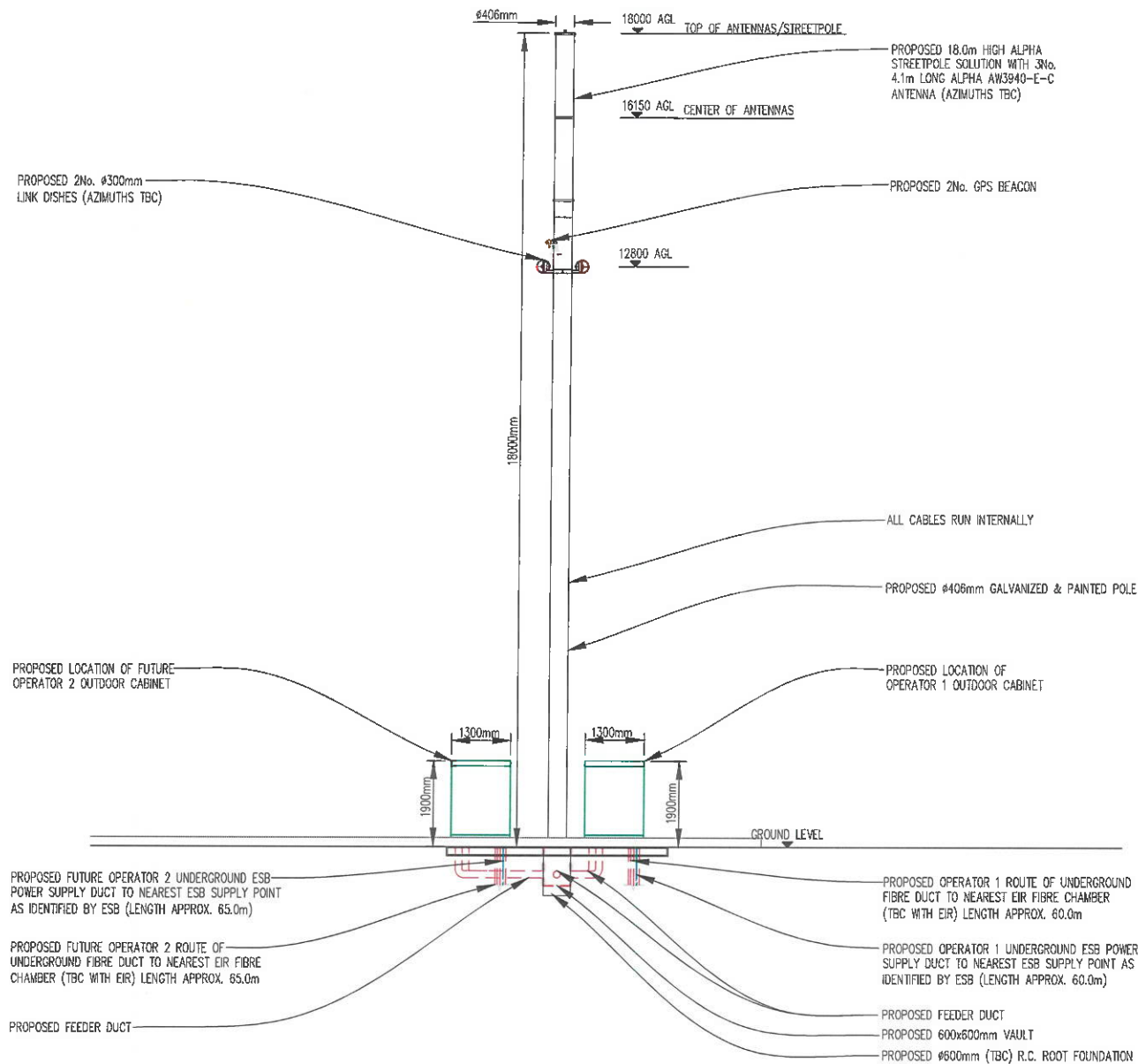
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PHOENIX TOWER
INTERNATIONAL

GLENLINE
telecoms

SECTION 254

Site Code:	
S.P. Ref:	N/A
Site Address	ROCHESTOWN AVENUE, DUN LAOGHAIRE, CO. DUBLIN IRELAND
Title	PTI SMART STREETPOLE SOUTH-EAST ELEVATION
Designed	Date 08-04-2023
Drawn	Scale AS 310W Rev. A
Dwg No.	



NORTH-WEST ELEVATION
SCALE 1:100

SITE COORDINATES

LATITUDE	53° 16' 26.000" N	15 EASTING	525562	15M EASTING	723495
LONGITUDE	00° 06' 54.560" W	10 NORTHING	225505	10M NORTHING	725534

A	SITE LOCATION CHANGE	08.04.24			
-	LICENSE DRAWINGS	18.10.23			
No.	Revision	Date	By	Clk	

entrust
planning & environmental

Drawings prepared by
ENTRUST LTD, Unit 10, Deep Park Business Centre, Oranmore,
Co. Galway, H91 X599, TEL: +353 (0) 91 342 510
contact@entrust-services.com

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PHOENIX TOWER
INTERNATIONAL

GLENLINE
telecoms

SECTION 254

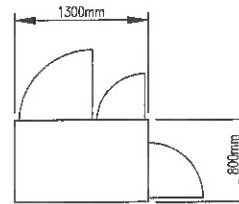
Site Code: [REDACTED]

S.P. Ref: [REDACTED] N/A

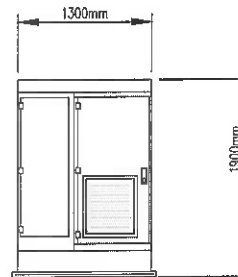
Site Address
ROCHESTOWN AVENUE,
DUN LAOGHAIRE,
CO. DUBLIN
IRELAND

Title
PTI SMART STREETPOLE
NORTH-WEST ELEVATION

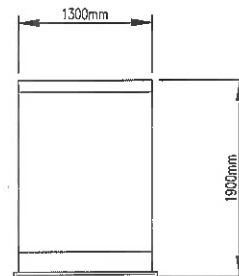
Designed	Date 08-04-2023
Drawn	Scale AS SHOWN Rev. A
Dwg No.	



Top View



Front View



Back View

EQUIPMENT DETAILS
SCALE 1:50

SITE COORDINATES

LATITUDE:	53° 16' 28.080" N	IS EASTING:	322502	ITM EASTING:	723488
LONGITUDE:	08° 08' 54.560" W	IS NORTHING:	226306	ITM NORTHING:	729534

A	SITE LOCATION CHANGE	08.04.24		
--	LICENSE DRAWINGS	15.10.23		
No.	Revision	Date	By	Ckd

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planning & environmental

Drawings prepared by
ENTRUST LTD, Unit 1D, Deepport Business Centre, Dranmore,
Co. Galway, H91 X990, TEL: +353 (0) 91 342 510
contact@entrust-services.com

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PHOENIX TOWER
INTERNATIONAL

GLENLINE
telecoms

SECTION 254

Site Code: [REDACTED]

S.P. Ref: N/A

Site Address
ROCHESTOWN AVENUE,
DUN LAOGHAIRE,
CO. DUBLIN
IRELAND

Title
PTI SMART STREETPOLE
EQUIPMENT DETAILS

Designed		Date	08-04-2023
Drawn		Scale AS SHOWN	Rev. A
Dwg No.			



2022 Bianconi Avenue
Citywest Business Campus
Dublin 24 D24 HX03
[Redacted]
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

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

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

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

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

Internal Documentation References:

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

Statement Prepared By: [REDACTED] eir Group Head of Environment, Health and Safety

Date: 12/07/17

Date: 07/06/2024

Client Code: [REDACTED]

To Whom It May Concern,

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

Business Description: Owning, leasing and management of wireless infrastructure

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

Policy Type:	Combined Liability
Name of Primary Insurer:	Chubb Insurance Co.
Primary Policy Number:	[REDACTED]
Cover Period:	23 rd April 2024 to 22 nd April 2025 both days inclusive
Name of Policyholder:	Emerald Tower Limited and/or Phoenix Ireland HoldCo Limited and/or Phoenix Tower Ireland Limited
Insured Business Description:	Owning, leasing and management of wireless infrastructure
Name of Excess Insurer:	Convex Insurance UK Ltd
Policy Number:	[REDACTED]
Policy Period:	23 rd April 2024 to 22 nd April 2025 both days inclusive

. 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.

Directors:

**Total Limit of
Indemnity:**

- Public/Products Liability: €6,500,000
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, Website: www.olearyinsurances.ie.

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Directors:

Extension:

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

Dublin City Council
Dun Laoghaire Rathdown County Council
Fingal County Council
South Dublin County Council
Limerick City Council
Limerick County Council
Galway City Council
Galway County Council
Waterford City and County Council
Meath County Council
Cork City Council
Cork County Council
Louth County Council
Monaghan County Council
Longford County Council
Kerry County Council
Carlow County Council
Cavan County Council
Clare County Council
Donegal County Council
Kildare County Council
Kilkenny County Council
Kilkenny City Council
Laois County Council
Leitrim County Council
Mayo County Council
Offaly County Council
Roscommon County Council
Sligo County Council
Tipperary County Council
Wexford County Council
Wicklow County Council
Westmeath County Council

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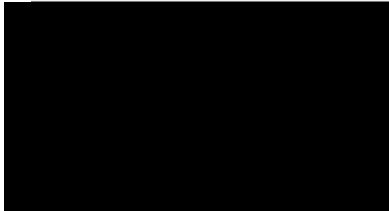
Telephone calls are recorded for training quality and verification purposes.

Directors

Subject to policy terms, conditions and exclusions.

Trusting this is the information you require.

Yours sincerely,



Commercial Account Director

Email [REDACTED]

Tel [REDACTED]

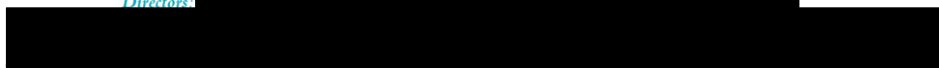
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*Lough Mahon House, Blackrock, Cork, T12 C43C, **Tel:** 021 4536800, **Fax:** 021 4536801, **Email:** info@oli.ie, **Website:** www.olearyinsurances.ie.*

Telephone calls are recorded for training quality and verification purposes.

Directors:



Date: 25/05/2022

To whom it may concern,

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

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

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

Yours faithfully

[Redacted Signature]
Senior Operations Manager, Ireland

Phone: [Redacted]

Email: [Redacted]

Licence Number: CRM 320717

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

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

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

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

Emerald Tower Limited. ("the Licensee")

a Licence to place and maintain 2 Telecommunications Cabinet
measuring externally for cabinet no.1 at 1.976m³ (1.30mL × 0.80mW × 1.90mH),
measuring externally for cabinet no.2 at 1.976m³ (1.30mL × 0.80mW × 1.90mH),
and a pole area 0.129m² (height 18m)

subject to a minimum footpath clearance of 1.8m and the General Licence Conditions
pertaining to the issue of this licence (see reverse) at the
grass verge that is elevated off the ground adjacent to bus stop 3248 on Sallynoggin Road.

Underwriter: Chubb Insurance Co. (primary), Convex Insurance UK Ltd (excess)

Public Liability Insurance: Policy no [REDACTED] (primary) [REDACTED] (Excess), Expiry
Date: 23.04.2025

Date of grant of licence: 11/07/2024

Expiry date of licence: 10/07/2029

James Phelan

Senior Engineer

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



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

1. *Plans and Particulars* - The telecommunications street pole and associated operator cabinet shall be installed and completed in its entirety fully in accordance with the plans, particulars and specifications lodged with this Section 254 licence application, save as may be required by the other conditions set out in this licence, and the height and other dimensions as specified in those particulars shall not be exceeded.
2. *Duration of Licence* - The duration of this agreement is for five years only. The agreement shall expire five years from the date of the grant of the licence. Within three months of the expiry date, the pole and cabinet shall be removed by the Licensee and the area reinstated to the satisfaction of the Council at the Licensee's expense and as specified in other conditions.
3. *Withdrawal of License* - Under section 254(4) of the Planning and Development Act 2000, the Council has the right to withdraw this licence and require the Licensee to remove the appliance, apparatus or structure at the Licensee's own expense where in the opinion of the Council by reason of the increase or alteration of traffic on the road or of the widening of the road or of any improvement of or relating to the road, the appliance, apparatus or structure causes an obstruction or becomes dangerous. In the event of a withdrawal of a licence under section 254(4) of the Planning and Development Act 2000, all reinstatement works shall comply with the "Guidelines for Managing Openings in Public Roads" unless specifically stated otherwise and in accordance with the requirements of the Council.
4. *Notice issued by Council* - Any notice issued by the Council to the Licensee to withdraw this Licence under section 254(4) of the Planning and Development Act 2000 or otherwise shall be in writing and shall be delivered by hand or sent by pre-paid ordinary post to the Licensee's registered office at 1st Floor, Marketing Suite Building, Lake Drive, Citywest Business Campus, Dublin D24 YXW2. Any such notices shall be deemed to have been delivered to the Licensee on the date of delivery of the notice if the notice is delivered by hand or the date following the date of posting of the notice, if the notice is sent by ordinary pre-paid post.
5. *Obsolescence* - In the event of obsolescence of the installed infrastructure (telecommunications street pole, antenna and operator cabinet) or withdrawal or expiry of the license without renewal, the telecommunications street pole, antenna and associated operator cabinet shall be removed from the site and the site reinstated at the expense of the Licensee in accordance with the requirements of the Council. The Licensee shall reinstate and where appropriate repair any damage to the public area, with all works to the satisfaction of the Council at the Licensee's expense. All reinstatement works shall comply with the "Guidelines for Managing Openings in Public Roads" unless specifically stated otherwise and in accordance with the requirements of the Council.
6. *No additional dishes, antennae or other equipment* - No additional dishes, antennae or other equipment other than that demonstrated on the plans, particulars and specifications lodged with this Section 254 licence application, shall be attached to the telecommunications street pole and antenna unless agreed in writing between the Council and the Licensee.
7. *Installation and Drainage* - The installation of the telecommunication street pole and associated operator cabinets shall not impair the operation of the existing land and roadside drainage and the Licensee shall not interfere with roadside drainage without the prior written agreement of the Council.



8. *Road Opening License*: No works are to be carried on/in a public road until the Licensee is in receipt of a Road Opening License issued by the Council (Section 13(10)(b) of the Roads Act (1993)), providing all documentation is correctly submitted.
9. *Footpath and Cyclists* - The Licensee shall ensure that the telecommunications street pole and cabinet shall not obstruct pedestrians, cyclists and will not to create a road safety hazard. The specific location is to be prior agreed with the Council.
10. *Maintenance* - Access to the licence area for maintenance purposes by any statutory undertakers shall be available at all times.
11. *Change of Ownership* - The Licensee shall notify the Council in writing of any change of ownership, transfer to a new operator or any subsequent agreements to the sharing of the telecommunications street pole and associated operator cabinets.
12. *Legislation* - This licence is for the telecommunications street pole, antenna and cabinet and nothing in this licence shall be construed as negating the Licensee's statutory obligations or requirements under any other enactments or regulations, including planning legislation, building legislation and The Roads Act 1993.
13. *Payment of fee* - The granting of the licence is subject to payment of the appropriate fee and adherence to the requirements and does not automatically guarantee the renewal in subsequent years.
14. *Sub-letting* - This Licence is personal to the Licensee and may not be assigned or sub-let.
15. *Breach* - Any breach of the terms of the Licence will lead to the licence being revoked.
16. *Change in use* - A change in use of the licenced area will require the submission of a new licence application.
17. *Maintenance during license* - The Licensee shall maintain the area used for the cabinet and pole, and the cabinet and pole in an acceptable condition so as not to constitute a nuisance e.g. free from graffiti.
18. *Insurance* - Prior to the erection of any equipment under this licence, the Licensee shall provide evidence to the Council of public liability insurance to a minimum level of 7 million euro which indemnifies the Council for third party claim arising from the installation of the equipment. The Licensee must provide evidence of such insurance cover remaining in place for each year of the Licence. Failure to provide such annual updates of insurance cover to the Council will give grounds to the Council to withdraw this Licence from the Licensee.
19. If accidental damage is caused to the cabinet and pole or associated network, the Council will not be responsible for any claims made against it by the licensee or their customers.
20. The cabinet and pole shall be suitably anchored and of robust and stable construction to prevent movement in adverse wind conditions or when repair works etc are being carried out on the adjacent footpath.



21. The Licensee shall supply to the Council a contact name and number that is available at all times, including outside normal working hours so that any reports of damage to the structure can be passed to the licensee and rectified without delay.
22. Any works which require the use of a mobile crane or hoist will require the applicant to submit an application for a mobile crane and hoist licence prior to the commencement of the development. This is covered under a surface permit application. Any scaffolding requirements are also covered under a surface permit license.

