

Cork County Council
Planning Department
County Hall
Carrigrohane Road
Cork
T12 R2NC

Our Ref: PTI: CK_2950 Carrignafof Avenue

27/08/2022

APPLICATION FOR SECTION 254 LICENSE

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

INSTALLATION AT CARRIGNAFOY AVENUE / EAST HILL, CARRIGNAFOY, CO. CORK (E: 580754, N: 567125, ITM).

Dear Sir/Madam,

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

This License Application comprises:

- Cover Letter & Planning Statement (this document);
- Section 254 Drawings (see table below)
- Application Form;
- Comreg Authorisation (see section 2.3 of this document)
- Photomontages Report;
- Letter from Applicant confirming Safety Statement is in place;
- Confirmation of Public Liability and Employers Liability Insurance of €13 million each;
- Eir ICNIRP Declaration;
- License Fee in the sum of €125.00, cheque enclosed.

Schedule of Drawings

No.	Title	Drawing No.	Scale
1	Overview Map	CK-2950-01-PD-01	1:1000
2	Site Layout Plan	CK-2950-01-PD-02	1:100
3	North-East Elevation Plan	CK-2950-01-PD-03	1:100
4	South-West Elevation Plan	CK-2950-01-PD-04	1:100
5	Equipment Details	CK-2950-01-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



IGNATIUS LO, MPLAN

For and on behalf of:

Emerald Tower Limited

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**WIRELESS BROADBAND & DATA
COMMUNICATIONS
STREETWORKS POLE**

**INSTALLATION AT
CARRIGNAFOY AVENUE / EAST HILL
CARRIGNAFOY
CO. CORK**

**PLANNING STATEMENT
INCORPORATING ENVIRONMENTAL CONSIDERATIONS**

**Prepared by
Entrust Limited**

September 2022

1. Introduction

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

Operator

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

3. Proposed Development

Site Location

- 3.1. The site is located on a grass verge adjacent to the roundabout at the junction of Carrignafoy Ave and East Hill Road. The site is located adjacent to a park with a number of semi-mature and mature trees. There are also a lot of urban vertical infrastructure items in the area, such as road signs, signage, streetlights, and electricity/telegraph poles with overhead cables. The site is located approx. 24m south of St. Colmans Cemetery. Cobh GAA Club and Carrignafoy Community Centre are approx. 300m west of the site. The Cobh Fort is approx. 480m south of the site. There is tree screening immediately surrounding the site location from all directions making it the optimum location in the provided search ring provided by Eir Mobile within section 4.2 of this report in terms of protecting residential amenity and minimising visual impact locally. The location is also considered to be an acceptable distance from any dwellings in order to protect residential amenity locally.



Figure 1 Site Location



Figure 2 Aerial Photograph of Site

Site Ownership

3.2. The site is located on land owned by Cork County Council.

Design

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

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

Total Streetworks Pole & Cabinets			
Area	2.69m ²	Volume	6.682m ³
Footpath Width 1.8m, Cabinet Doors Open 1.8m, Cabinet Doors Closed 1.8m			

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

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

- It is proposed that the structure will be coloured in a galvanised (CL 3093W) finish and will assimilate with the typical sky colour in Ireland and surrounding street infrastructure, however, it is possible for the proposed development to be painted in any colour including a dark fir green or black finish which could be requested by way of a conditional License;
- Slimline, slender and un-fussy design to minimise any negative visual impacts;
- Pole design to blend in with existing street infrastructure such as street lighting, road signs poles and traffic lights poles;
- Sited in relatively close proximity to existing trees along Carrignafoy Avenue for maximum screening purposes along the streetscene;

3.5. 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, particularly along Carrignafoy Avenue near to the site.

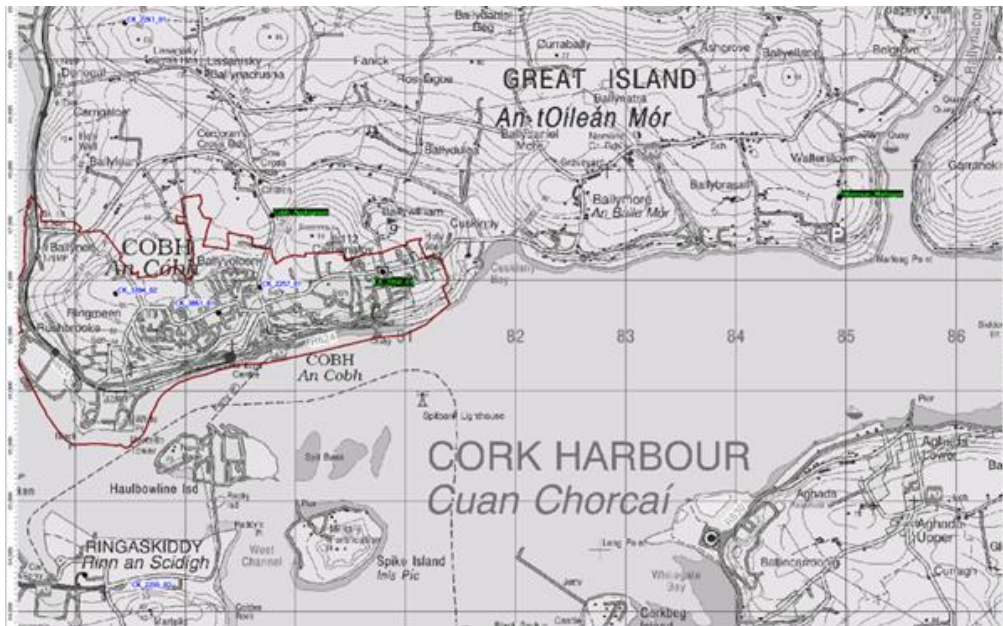
3.6. Consideration has been given to technical, engineering, environmental, health and safety and land use planning viability in the siting and design of the proposed telecommunication's installation. The height of the structure has been driven by the requirement to achieve the desired level of coverage 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.

3.7. 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.

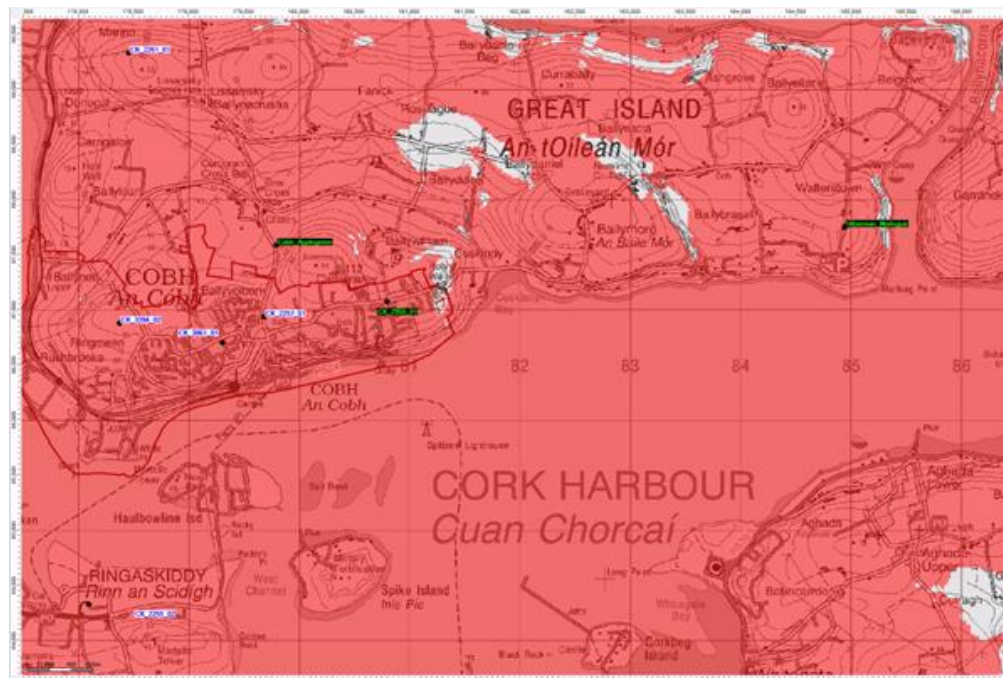
4. Technical Justification

4.1. Eir has stated that "As part of Eir Ltd licensing requirements and the continuing rollout of their 3G, 4G and 5G networks, Eir require a site indicated by the circle in the map in 4.2 below (around label CK_2950_01 on below map) which is a very confined search ring. The current sites in the area for Eir do not provide adequate service for good indoor highspeed mobile broadband or Voice. Eir's current indoor coverage in this area is patchy and users experience may miss calls or feel a poor quality of service when indoors. A mobile base station deployment at the proposed location would greatly support Eir customers, and in the area".

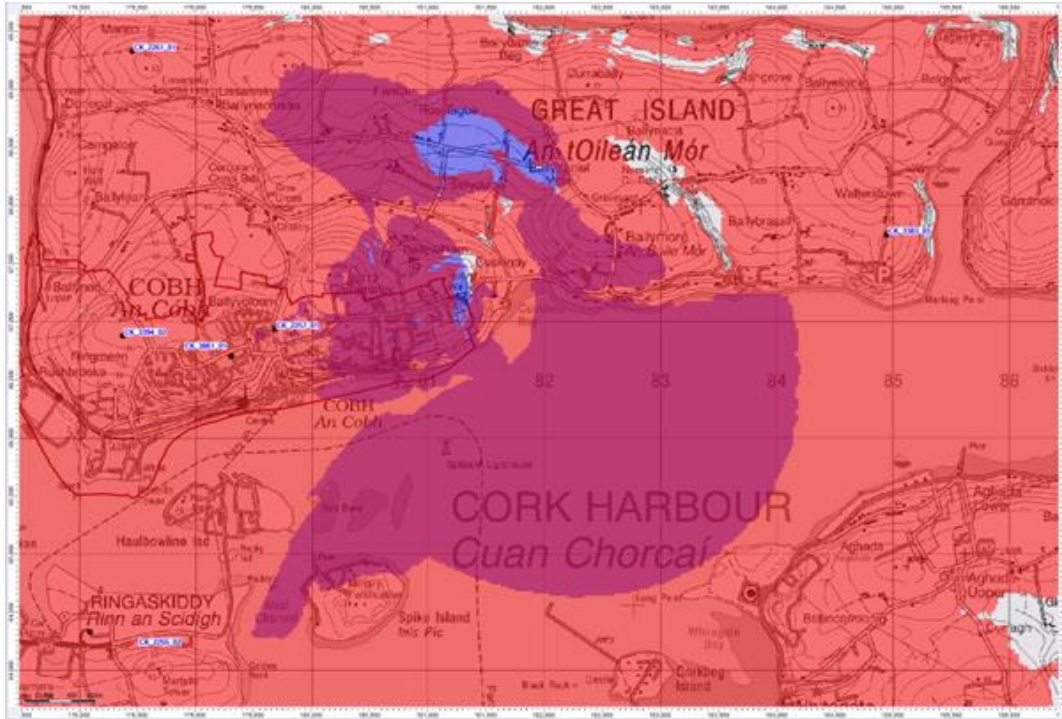
4.2. Eir Search Area CK_2950



4.3. Existing Indoor Coverage without CK_2950



4.4. Predicted New Indoor Coverage with CK_2950



5. Site Selection Process and Discounted Options

- 5.1. Eir will always co-locate on an existing telecommunications structure as a first choice if a suitable existing structure exists, as it has done on many hundreds of its sites in its radio network to date and which it has already done here at the nearest existing 2 out of 2 telecommunications structures as shown below in table 1.
- 5.2. There are no suitable existing structures in this search area to locate Eir's equipment and the local community in this densely populated area currently suffer from a severe lack of high-speed wireless broadband and data services. Eir would not be looking to provide the much-needed coverage here if it could do so by its two existing structures. Due to the sheer amount of intervening vegetation and built form as well as the increasing capacity issues on its network as a result of increasing demand here in this densely populated area for data services, means Eir cannot meet its wireless broadband and data objectives here without having a new structure which is proposed as a last resort in accordance with the sequencing approach to finding a site in accordance with the 1996 Government Guidelines. The location has been selected on the basis that it is the optimum location in this search area and the only option which is a last resort. The height is the lowest height possible to 'see' over surrounding high trees and built form in the area for 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;
 - Optimum location to protect residential amenity;
 - Be capable of being developed; sufficient space for pole and cabinets, avoiding underground utilities and free of overhead obstructions like cables;
 - Sufficient pavement space for wheelchair access and buggys/prams;

- Available power and fibre connections nearby.

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

No.	Site Location	Location	Reason
1	Orilia Terrace, Kilgarvan, Cobh, Co. Cork	E: 179680 N: 66935	This site is significantly outside the search ring. Eir is already co-located on this site with Three Ireland, Vodafone, and Imagine Communications Ireland Ltd so it would not meet Eir's coverage objective here.
2	Ballyvoloon, Cobh, Co. Cork	E: 179304 N: 66691	This site is significantly outside the search ring. Eir is already located on this site, so it would not meet Eir's coverage objective here.

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

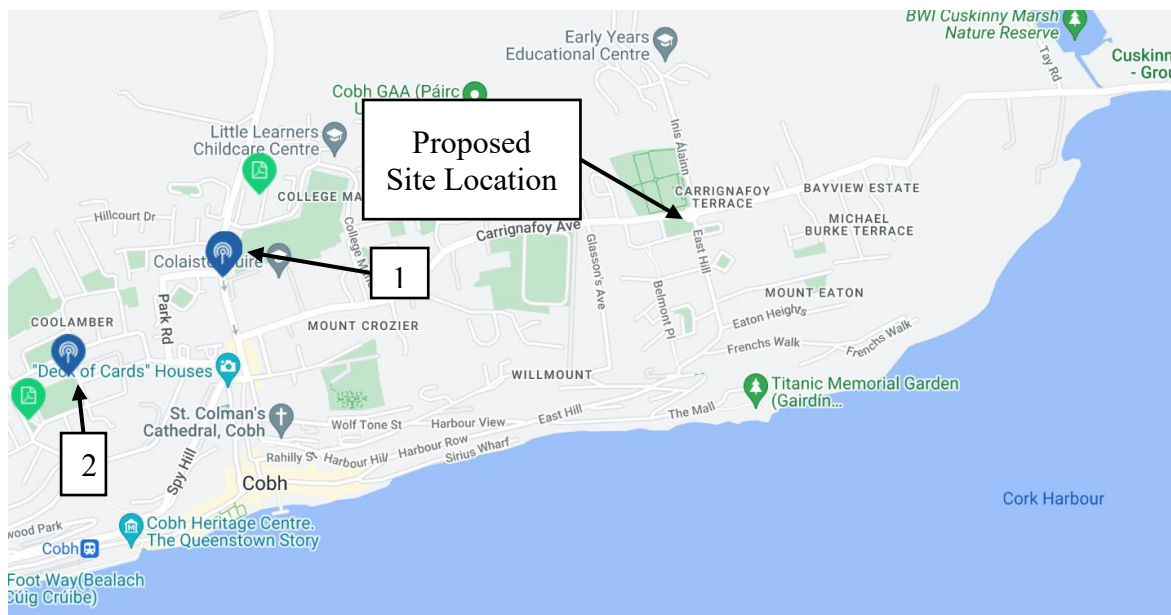


Figure 3 ComReg Site Finder depicting existing telecommunications sites in the area.

6. Environmental Considerations



Figure 4: Environmental Designations Map

Heritage, Ecology and Landscape

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

Health

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

Visual Assessment

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

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

Table 2: Visual Sensitivity

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

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

Table 3: Magnitude of Change

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

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

Table 5: Illustrative Matrix of Effects

- 6.9. Where the visual effect has been classified as Major or Major/Moderate significant effects may occur. Effects identified as moderate or less are not considered to be significant. As with many aspects of visual assessment, significance of effect also needs to be quantified with respect to the scale over which it is felt. An effect may be locally significant, or significant with respect to a small number of receptors, but not significant when judged in a wider context.
- 6.10. Any effect may be described as temporary or permanent, direct or indirect, positive or negative and cumulative and these various types of effect described below have a bearing on the acceptability or otherwise of any impact. Visual effects can be described as temporary or permanent and reversible or irreversible. Due to the long-term nature of telecommunications structures, they are generally regarded as a long-term reversible addition to the landscape preserving the choice for future generations whether or not to retain what might be regarded as the landscape fabric of today.
- 6.11. It is possible to identify a number of sensitive receptors within the study area, which should then be further investigated through field visits and the production of photomontages and wirelines. The most important viewpoints (VPs) are identified as being points whereby the Proposed Development is likely to show the greatest amount of visibility or impact on the largest number of users and as such these warranted further investigation.

These VP's are:

- VP1 – Carrignafoy Avenue west of the site
- VP2 – Inis Alainn north of the site
- VP3 – Carrignafoy Avenue east of the site
- VP4 – Mount Eaton south of the site

- 6.12. The photomontages attached will illustrate the views from locations where the proposed communications mast would be theoretically visible. This in turn has informed the locations of the final viewpoints. The viewpoints were selected where theoretical points of visibility intersected public roads, residential areas, cultural heritage assets and public rights of way (PROWs).

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

Table 6: Viewpoints Analysis

Viewpoint 1	VP1 – Carrignafoy Avenue west of the site E: 580612 N: 567131 Distance to Proposal: 143.3m
Existing Character	This viewpoint (VP) is taken along Carrignafoy Avenue, approx. 143.3m south of the site. In the foreground are residential dwellings and in the background are multiple mature and semi-mature trees, landscaping, and infrastructure items such as street lighting and cabinets.
Receptor Type and Sensitivity	The typical receptor at this location would be residential dwellings, along with road users such as pedestrians, motorists, and cyclists. The sensitivity is therefore high.
Nature of Change	From this viewpoint, the proposal is partially visible, as it appears to be mainly screened by existing trees in the background of the photograph. The proposal does not come remotely close to dominating the view as the trees provide much screening and the existing streetlights and other utility poles along Carrignafoy Avenue allow the proposal to be absorbed into the environment, meaning that the proposal will not cause a significant negative impact upon the streetscape.
Magnitude of Change	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: High (Residential Dwelling, Road users) Magnitude: Low Level of effect: Moderate-Low
Significant effect?	No

Viewpoint 2	VP2 – Inis Alainn north of the site E: 580760 N: 567179 Distance to Proposal: 53.2m
Existing Character	This viewpoint (VP) is taken along Inis Alainn approx. 53.2m north of the site. The area is dominated by housing, vegetation, signage, electricity poles with overhead cables and streetlights.
Receptor Type and Sensitivity	The typical receptor at this location would be residential dwellings, along with road users such as pedestrians, motorists, and cyclists. The sensitivity is therefore high.
Nature of Change	The proposed development will be visible from the perspective of this viewpoint given the very close proximity of the viewpoint to the site. While the entire structure is visible, and as it is shown in its fullest form and worst case, it does not significantly impact upon the streetscape as the proposed development will be able to assimilate into its location by the presence of existing streetlights and electricity poles which are of similar height to the proposal, and have the effect of absorbing it to a good degree so that it does not appear as a dominating or isolated structure. It is important to note that the search ring for this proposal is confined to a very small geographical area as shown in section 4.2, and it is considered that the optimum location has been chosen to protect residential amenity so that it is not in direct view of any dwelling locally and has the benefit of

	a roundabout on one side (NE) and a large green space adjacent to it (SW).
Magnitude of Change	In relation to the view at this exact VP, the magnitude of change is considered to be medium as the proposal results in a partial loss or alteration to one or more key landscape elements/features/characteristics such that post development the landscape character area would be partially changed.
Summary of Visual Assessment	Sensitivity: High (Residential Dwelling, Road users)
	Magnitude: Medium
	Level of effect: Moderate / Low
Significant effect?	No

Viewpoint 3	VP3 – Carrignafoy Avenue east of the site E: 580824 N: 567161 Distance to Proposal: 77.2m
Existing Character	This view is located at Carrignafoy Avenue, approx. 77.2m east of the site. In the foreground are the boundary walls of residential dwellings and in the background are multiple mature and semi-mature trees, landscaping, and infrastructure items such as street lighting and cabinets.
Receptor Type and Sensitivity	Primary receptors at this location would be residential dwellings along with road users such as motorists, pedestrians, and cyclists. The sensitivity is therefore high.
Nature of Change	From this VP, the proposed development will be mainly in view from this direction. It would be partially obscured by the presence of semi-mature trees, a residential boundary wall and the presence of existing street light poles and other utility poles of similar design and height which help to absorb the proposal quite successfully.
Magnitude of Change	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: High (Residential Dwelling, Road users)
	Magnitude: Low-Medium
	Level of effect: Moderate-Low
Significant effect?	No

Viewpoint 4	VP4 – Mount Eaton south of the site E: 580786 N: 567058 Distance to Proposal: 74.7m
Existing Character	This viewpoint is located at the junction of Bracken Court/The Fairways, approximately 74.7m south of the site. There are semi-mature and mature trees present along Carrignafoy Avenue and streetlight poles are dotted along the roadside.
Receptor Type and Sensitivity	Primary receptors at this location would be the adjacent residential dwellings along with road users such as motorists, pedestrians, and cyclists. The sensitivity is therefore high.
Nature of Change	The proposed development will be partially visible by approximately its upper half, from the perspective of this viewpoint given the close proximity to the proposal. However, the proposal is considered to fit in comfortably to its host environment here as it is absorbed and assimilated into its location by the presence of existing street lighting poles together with tree screening which helps to ensure the proposal is not seen as a dominating or isolated structure and instead is viewed at the same or similar height as the existing street lighting poles in view. This viewpoint confirms that the

	location has the capacity to accommodate the proposal without it resulting in any significant impacts.
Magnitude of Change	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: High (Residential Dwelling, Road users)
	Magnitude: Low-Medium
	Level of effect: Moderate-Low
Significant effect?	No

7. Relevant Planning Policy and Guidance

National Planning Framework (NPF)

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

Regional Spatial and Economic Strategy (RSES) for the Southern Region of Ireland

Digital Connectivity, Infrastructure and Smart Cities and Region (Section 1)

Digital Connectivity (Section 6.2)

- 7.6. Enhanced quality and provision of digital and mobile telecommunications infrastructure is critical for the revitalisation of cities, towns, villages, and rural areas. Developments in information and communications technology (ICT) continues to fundamentally change how our society and economy functions.
- 7.7. The relational proximity of all locations will improve with advances in technology. Regions need to embrace innovative solutions in the pursuit of prosperity, environmental protection and reduce locational disadvantage. To optimise the opportunities from smart technology, access to high-speed, high capacity digital and communications infrastructure is required across the Region. This is fundamental to ensure parity for all locations in the Region

National Broadband Plan (NBP) (Section 6.2.3)

- 7.8. The NBP is funded by the Government and part co-funded through the European Regional Development Fund under the Southern and Eastern Regional Operational Programme 2014-20 which is managed by the Southern Regional Assembly. The targets of the NBP include:
- 70Mbps - 100Mbps available to at least 50% of the population with a majority having access to 100Mbps;
 - At least 40Mbps, and in many cases much faster speeds, to at least a further 20% of the population and potentially as much as 35% around smaller towns and villages;
 - A minimum of 30Mbps available to all, no matter how rural and remote.
- 7.9. The NBP involves a combination of commercial investment by the telecommunications sector and State intervention to provide high-speed broadband to the unserved parts of the country where the market has failed due to factors such as low population density.
- 7.10. **Analysis:** The proposal ensures the continuing investment in new and improved broadband in this area for the socio-economic benefit of the local community and for the wider economic competitiveness of County Cork. Furthermore, the proposal continues to work towards the achievement of the targets set out in the National Broadband Plan.

Cork County Development Plan 2022-2028 (CDP)

Connectivity (Section 8.10)

- 7.11. The plan recognises and supports digital and transport connectivity for interaction between the County's Employment Network and the Region's Economic Drivers including Cities and Metropolitan Areas, Economic Corridors and other Key Towns and Networks, especially those with close cross boundary interactions.
- 7.12. Objective EC: 8-5 - Prioritise infrastructure delivery across the County to enhance connectivity (multi-modal transport and digital) with the wider southern region as supported in Chapter 12 Transport and Mobility and Chapter 13 Energy and Telecommunications

Communications and Digital Connectivity (Section 13.18)

- 7.13. Access to high quality digital and mobile telecommunications infrastructure is critical to the social and economic wellbeing of communities and can support the revitalisation of towns, villages, and rural areas. Developments in digital, information and communications technology continue to fundamentally change how our society and economy functions. The relational proximity of all locations will improve with advances in technology. To optimise the opportunities from smart technology, access to high-speed, high capacity digital and communications infrastructure needs to improve across the Count.
- 7.14. The Council recognises the provision of a modern, efficient communications system and digital connectivity is essential for the economic development of the region and supports the development of the new Smart Region and Smart Technology initiatives that are coming on stream in urban and rural areas. Enhanced digital connectivity and the roll out of smart technologies can improve quality of life by offering new choices in services, education, employment, entertainment, communications, mobility etc.
- 7.15. While the importance of telecommunications infrastructure is acknowledged, it is equally as important that the landscape, both urban and rural, are considered and protected from any significant impact caused by such infrastructure. Visual impact should be minimal in the landscape and therefore, telecommunications infrastructure will be subject to a Visual Impact Assessment. Environmental, heritage and ecological impacts of any such infrastructure will also be assessed in accordance with standard Council policies and procedures.
- 7.16. Objective ET 13 – 28: Information and Communications Technology:
- Facilitate the delivery of a high-capacity ICT infrastructure and high-speed broadband network and digital broadcasting throughout the County in accordance with the Guidance on Environmental Screening / Appropriate Assessment of Works in relation to the Deployment of Telecommunications Infrastructure (2020).
 - Support the roll out of the National Broadband Plan throughout the County in conjunction with relevant statutory agencies and in accordance with the above Guidance document.
 - Support the role of Smart City / Smart Region initiatives and the role of smart technologies to urban and rural areas.
- 7.17. The Cork Region would benefit significantly from a new telecommunications cable system connection as currently the majority of international connectivity ex Ireland is routed via Dublin leading to additional costs being incurred to access international connectivity.

Data Centres

- 7.18. Data centres are central to the digital economy and are facilities that house computers, storage devices, telecommunication systems, cooling systems and power backups used by organisations for the storage, management, and dissemination of its data. Data centres need resilient power and fibre connectivity, and it is acknowledged that data centres may generate a significant demand for renewable energy. Therefore, they need to be located in areas where they have a safe, secure supply of energy with excellent connections to the grid. Ireland has become a leading European destination for data centres. The National Planning Framework and the Southern Regional Assembly have acknowledged the important role of data centres and support the development of these facilities in the country. They contribute to job creation and generate significant added economic benefit by providing a range of services to other firms that undertake production, research and

development, marketing, sales, service, and support activities in locations with no physical/geographic connection to the data centre.

Archaeology and Large-Scale Development

- 7.19. The County Council requires that a proposed development whose area is half hectare or more, whose length is 1km or more, including large scale infrastructure schemes such as electricity, sewerage, telecommunications, water supply, flood relief and proposed roadwork's (both realignment and new roads) require an archaeological assessment. It is recommended that the assessment includes appropriate archaeological investigations such as licensed metal detection, geophysical survey and archaeological testing, as appropriate. It is recommended that the assessment is carried out, following pre planning consultation with the County Archaeologist, by an appropriately experienced archaeologist to guide the design and layout of the proposed scheme/development, safeguarding the archaeological heritage in line with Development Management Guidelines.

Utilities and Infrastructure (U)

- 7.20. In this Plan lands zoned for utilities and infrastructure uses are largely for operational requirements such as drainage, sanitation, emergency services, electricity, gas, telecommunications, and traffic management and maintenance purposes. New roads, walkways and cycleways are also included on zoning maps under this heading, and it should be noted that such lines are indicative only and are subject to agreement with landowners and other considerations as appropriate.
- 7.21. Operational requirements of utilities and infrastructure operators such as drainage, sanitation, emergency services, electricity, gas, telecommunications, and traffic management. New roads, walkways and cycleways.

Zoning

- 7.22. The site which forms part of the local road infrastructure is not zoned.
- 7.23. **Analysis:** The Cork County Development Plan 2022-2028 (CDP) underlines that telecommunications infrastructure is a key requirement within County Cork. 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 Objective EC: 8-5 and Objective ET: 13-28, which demonstrates that Cork County Council, working with other stakeholders, will support measures to improve transport and telecommunications networks into and around Cork County and region

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

- 7.24. 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.
- 7.25. 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.'*

- 7.26. 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.'*
- 7.27. 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.
- 7.28. 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

- 7.29. 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.
- 7.30. 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.
- 7.31. The Section 254 licensing process emerged from this taskforce to help deliver broadband infrastructure more quickly by removing barriers to its deployment. It differs from the Planning and Development Regulations 2001 (as amended), Schedule 2, Class 31 Telecommunications, in that Section 254 licensing relates solely to public roads and not to other property under the Regulations. Section 254 requires high standards of design and adherence to the proper planning and sustainable development of the area which this proposal full complies with as is set out within this document.

8. Conclusions

- 8.1. Taking into consideration all the relevant factors set out herein this document, it is considered that this proposed telecommunications pole is the optimum solution in terms of providing the required technology coverage, minimising any adverse impacts on local amenity and the surrounding townscape. The site is considered to be appropriately located as it is not located within any sensitive landscape designation. There are multiple semi-mature and mature trees which are similar in height along Carrignafoy Avenue. In addition, there are also streetlights and signage which will allow the proposed development to be absorbed comfortably by its host environment as it is similar in design to existing roads vertical infrastructure. There is tree screening immediately surrounding the site location making it the optimum location in the provided search ring provided by Eir

Mobile within section 4.2 of this report in terms of protecting residential amenity and minimising visual impact locally. The location is also considered to be an acceptable distance from any dwellings in order to protect residential amenity locally.

- 8.2. The height proposed at 18m is the best 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. Given the existing landscape and the existing streetlights in the immediate surrounding area, residential amenity will be protected despite the proposed 18m development.
- 8.3. It has been shown in section 6 of the document, that there are *No Significant Environmental Impacts* predicted as a result of the Proposed Development. The attached photomontage report demonstrates that there will not be any significant visual impacts as a result of this proposal, however, that there are *Significant Benefits* to be provided by the Proposed Development for the local community by having access to the most up to date wireless broadband and data services, to be provided by a national mobile broadband operator on a slender structure, and making provision for another operator, thus obviating the need for up to two separate structures in the same area and the environmental damage it would cause, which it is considered should be considered carefully in determining the planning 'balance' by the Planning Authority.
- 8.4. Broadband is now considered an essential public service like water and electricity and the applicant urges the Planning Authority to assess the planning balance carefully here in terms of the public benefits associated with the proposal as opposed to the limited dis-benefits (limited visual impact) which are considered to be far outweighed in accordance with national and local policy.
- 8.5. As has been demonstrated in section 7 of this document, this proposal is in full accordance with the aforementioned policies and guidance, including the 1996 Government Guidelines and Development Plan, with regards to the sequential approach to locating telecommunications equipment and which actively encourages co-location, to prevent the proliferation of masts, which this application proposes.
- 8.6. Therefore, in the absence of any significant harm to the site and its surrounds and in view of supporting policy at national and local level in favour of this proposal, the applicant therefore respectfully asks the Local Authority to grant a license for this proposal.