

An
Bord
Pleanála

AN BORD PLEANÁLA	
LDG-	<u>078076-25</u>
ABP-	
19 FEB 2025	
Fee: €	<u>220.00</u> Type: <u>card.</u>
Time:	<u>14.06</u> By: <u>hand</u>

Planning Appeal Form

Your details

1. Appellant's details (person making the appeal)

Your full details:

(a) Name

Alex Reid - Independent Site Management

(b) Address

77 Camden Street Dublin 2, Ireland. D02 XE80

Agent's details

2. Agent's details (if applicable)

If an agent is acting for you, please **also** provide their details below. If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

Click or tap here to enter text.

(b) Agent's address

Click or tap here to enter text.

Postal address for letters

3. During the appeal we will post information and items to you **or** to your agent. For this appeal, who should we write to? (Please tick ✓ one box only.)

You (the appellant) at the address in Part 1

☒

The agent at the address in Part 2

☐

Details about the proposed development

4. Please provide details about the planning authority decision you wish to appeal. If you want, you can include a copy of the planning authority's decision as the appeal details.

(a) Planning authority

(for example: Ballytown City Council)

Dublin City Council

(b) Planning authority register reference number

(for example: 18/0123)

0024/25

(c) Location of proposed development

(for example: 1 Main Street, Baile Fearainn, Co Ballytown)

80-82 Philipsburgh Avenue, Fairview, Dublin 3, D03H3F1

Appeal details

5. Please describe the grounds of your appeal (planning reasons and arguments). You can type or write them in the space below or you can attach them separately.

Attached separately

Supporting material

6. If you wish you can include supporting materials with your appeal.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

Acknowledgement from planning authority (third party appeals)

7. If you are making a third party appeal, you **must** include the acknowledgment document that the planning authority gave to you to confirm you made a submission to it.

Fee

8. You **must** make sure that the correct fee is included with your appeal. You can find out the correct fee to include in our Fees and Charges Guide on our website.

Oral hearing request

9. If you wish to request the Board to hold an oral hearing on your appeal, please tick the “yes, I wish to request an oral hearing” box below.

Please note you will have to pay an **additional non-refundable fee** of €50. You can find information on how to make this request on our website or by contacting us.

If you do not wish to request an oral hearing, please tick the “No, I do not wish to request an oral hearing” box.

Yes, I wish to request an oral hearing

☐

No, I do not wish to request an oral hearing

☒

NALA has awarded this document its Plain English Mark

Last updated: April 2019.



An Bord Pleanála
64 Marlborough Street,
Dublin 1,
D01 V902

19 February 2025

Dublin City Council Ref: 0024/25

PLANNING APPEAL: EXISTING TEMPORARY TELECOMMUNICATIONS STRUCTURE COMPRISED OF A 15M TRANSPORTABLE MONOPOLE STRUCTURE SECURED BY 4 ANCHOR BOLTS TO 4 NO. 2M X 2M X 1M REMOVABLE CONCRETE BALLAST BLOCKS; & ALL ASSOCIATED ANTENNAS, DISHES AND ANCILLARY GROUND-BASED EQUIPMENT CABINETS. SITUATED WITHIN THE CONSTRUCTION SITE HOARDING ON A SECTION OF LAND AT 80-82 PHILIPSBURGH AVENUE, FAIRVIEW, DUBLIN 3, D03H3F1.

Dear Sir/Madam,

Please find attached an application for a planning appeal submitted on behalf of the applicant, namely, Independent Site Management, 77 Camden Street Dublin 2, Ireland. D02 XE80

The Application comprises:

- ✓ 1 no. copy of Application Form.
- ✓ 1 no. copy of Grounds for appeal document.
- ✓ 1 no. copy of Letter of Consent from the Landowner.
- ✓ 1 no. copy of Technical Justification by Eircom (T/A Eir), Three Ireland and Vodafone.
- ✓ 1 no. copy of Letters of support by Eircom (T/A Eir), Three Ireland and Vodafone.
- ✓ 1 no. copy of the Section 5 application submitted to Dublin City Council including, planning statement, historic photos, plans and drawings in schedule below.

SCHEDULE OF DRAWINGS

No.	Title	Drawing No.	Scale
1	Site Photos & Location Map	ISM – 6004 – 01 - REV B	1:20000
2	Record Place Map	ISM – 6004 – 02 - REV B	1:10560
3	Site Location Map	ISM – 6004 – 03 - REV B	1:2500
4	Site Location Map	ISM – 6004 – 04 - REV B	1:1000
5	Site Location Map	ISM – 6004 – 05 - REV B	1:500
6	Existing Site Layout Plan	ISM – 6004 – 06 - REV B	1:200
7	Proposed Site Layout Plan	ISM – 6004 – 07 - REV B	1:200
8	North Site Elevation	ISM – 6004 – 08 - REV B	1:200
9	West Site Elevation	ISM – 6004 – 09 - REV B	1:200
10	South Site Elevation	ISM – 6004 – 10 - REV B	1:200
11	East Site Elevation	ISM – 6004 – 11 - REV B	1:200
12	Cabinet Details	ISM – 6004 – 12 - REV B	1:20

Yours Faithfully,



Alex Reid
 Independent Site Management Limited
 ✉: alex@ismireland.com
 ☎ : +353 (0)1 905 8800



An Bord Pleanála
64 Marlborough St,
Rotunda,
Dublin 1,
D01 V902

19 February 2025

RE: Appeal to An Bord Pleanála Decision Order Number: P2282

Application Number: 0024/25
Registration Date: 17-Jan-2025
Decision Order Number: P2282
Fairview, Dublin 3

Application Type: Section 5
Decision Date: 11-Feb-2025
Location: 80-82 Philipsburgh Avenue,

Proposal EXPP: Existing temporary telecommunications structure comprised of a 15m transportable monopole structure secured by 4 anchor bolts to 4 No. 2m x 2m x 1m removable concrete ballast blocks; & all associated antennas, dishes and ancillary ground-based equipment cabinets. Situated within the construction site hoarding on a section of land at 80 82 Philipsburgh Avenue, Fairview, Dublin 3, D03H3F1.

Applicant Details: Independent Site Management Limited

Dear Sir/Madam,

Respectfully, Independent Site Management Limited (hereinafter referred to as "ISM") wishes to appeal to An Bord Pleanála, Dublin City Council's refusal to consider the above referred temporary telecommunication structure as exempted development under Planning and Development Regulations 2001 (as amended) Schedule 2, Part 1, Exempted Development - General, Class 16, the subject of our Section 5 application.

We kindly request that An Bord Pleanála exercise its statutory powers and return with an order granting the temporary telecommunication structure as exempted development under the aforementioned Planning and Development Regulations 2001 (as amended) Schedule 2, Part 1, Exempted Development - General, Class 16.

ISM attests that Dublin City Council has erred in its refusal to consider the temporary telecommunications structure under Planning and Development Regulations 2001 (as amended) Schedule 2, Part 1, Exempted Development - General, Class 16 for the following reasons:

1. Our application thoroughly and demonstrably, utilising standard technical data (e.g. coverage plots) and supporting documentation, established that without the temporary telecommunications structure the area would be devoid of cellular signal from all 3 mobile telecommunication networks. Cellular signal is an absolute necessary requirement to contact emergency services. It is an error to not consider the critical Health & Safety component of a development site, that in the event of fire or personal injury that the development team has the ability to contact the required emergency services. Additionally, the Council has ignored that it is also a key component for the area and fills a critical telecommunication infrastructure need to the residents living and working within a 300-500m radius of the development site.
2. Our application demonstrated the established history of the property which has maintained cellular telecommunication infrastructure for the area for the past 20 years.
3. Our application demonstrated that the presence of the temporary telecommunication structure is not inconsistent with other temporary measures required for development such as tower cranes, site hoarding, site offices etc
4. Our application addressed that under the Council's own development plan and the Urban building Height Guidelines (2018) that planning applicants are required to address the retention of telecommunication channels (section 3.2 and Objective 5), and the temporary telecommunication structure should have formed part of the conditions of approval for the development.
5. We would also like to point out that the decision addresses another class of exemption (Class 31 (g)) where there was no cause to do so. ISM did not apply for exemption under Class 31 (g) in its Section 5 application and deems those



points relating to Class 31 (g) with the decision as immaterial and irrelevant, noting that it seems to have been used as reasoning to arrive at the Council's decision.

In conclusion, we categorically maintain that the temporary telecommunications structure is exempted under Planning and Development Regulations 2001 (as amended) Schedule 2, Part 1, Exempted Development - General, Class 16. Our Section 5 application adequately demonstrated to the Council, and by extension An Bord Pleanála, that it is genuinely needed in connection with the development on the site, and that it serves a specific purpose tied to the operations of the site. Our Section 5 application provided clear evidence of this need—supported by the planning history, technical justification, expert opinions, and the scale and nature of the development—and that the temporary telecommunication structure should be exempted under Class 16 as part of the ongoing development process.

Yours Faithfully,



Alex Reid
Independent Site Management Limited
✉: alex@ismireland.com
☎: +353 (0)1 905 8800





FATHER SCULLY HOUSE
GARDINER STREET MIDDLE
DUBLIN 1 D01 YY26
PHONE: 01 4438842
EMAIL: info@cabhru.ie
www.cabhru.ie

Dublin City Council
Planning and Property Development
Department Civic Offices
Wood Quay
Dublin 8

17th February 2025

To whom it may concern

We, Cabhrú Housing Association, give consent to Independent Site Management Limited, to appeal Dublin City Council's planning decision reference 0024/25 with regards to the temporary telecommunications mast located at 80 – 82 Philipsburgh Avenue, Fairview, Dublin 3, D03 H3F1.

For and on behalf of
Cabhrú Housing Association

A handwritten signature in black ink that reads "Patrick A. Doherty".

(SIGNED)

Patrick Doherty
(PRINT NAME)

Operations Manager
(State Role in Company)

Yours sincerely

Pat Doherty

Operations Manager

pat.doherty@cabhru.ie

Mobile: +353 (0) 86 102 5653

Office: +353 (0) 1 443 8842

Website: www.cabhru.ie

Cabhrú is the business name of Cabhrú Housing Association, a Charitable company limited by guarantee and exempt from displaying the word "limited" or "CLG" in its name. Registered in Dublin Ireland.

Directors: Daniel O'Connor, Yan Barry, Rachel Markey, Liam Meagher, Dearbhla Kelly, Brendan Kenny, Anand Kumar Panday, Nigel Bolger, Padraig McMahon and Liam Boyce.

Company Secretary: Dearbhla Kelly.

Registered Office: Fr. Scully House, Gardiner St. Middle, D01 YY26. Company No.23302. Charity No. 20008543/CHY5549



17 February 2025

**RE: Planning appeal for the temporary telecommunications installation at
80 - 82 Philipsburgh Avenue, Fairview, Dublin 3 D02 H3F1**

To whom it may concern,

Vodafone understand that ISM intend to appeal the Dublin City Councils decision in retention of a temporary telecommunication installation at 80 Philipsburgh Avenue, Fairview, Dublin 3, D02 H3F1.

Vodafone support the appeal application for this site.

Loss of this temporary installation will severely impact Vodafone's coverage in the area.

In line with Dublin City Council Telecommunications guidelines and strategies, Vodafone prefer to site share on structures and buildings subject to them providing sufficient antenna height and rigidity for effective radio signal propagation, thereby eliminating the need for an independent site.

I trust that this letter is of assistance in this appeal application, but please feel free to contact me should you require any more information or clarification.

Yours sincerely

Hanél Gallogly
Property Manager
Vodafone Ireland Ltd
hanel.gallogly@vodafone.com

Vodafone Ireland LTD

MountainView, Leopardstown, Dublin, D18 XN97, Ireland
T - +353 (0)1 203 7777 W - www.vodafone.ie

Registered Office: MountainView, Leopardstown, Dublin, D18 XN97. Registered in Ireland No. 326967.
Directors: Amanda Nelson (CEO), Brice Evin (FR) and Liam O'Brien



Vodafone ID:	DN478
Site Name:	Fairview Temp Mast
Site Address:	Fairview Fitness, 80 – 82 Philipsburgh Avenue, Marino, Dublin 3.
Co-ordinates: WGS 84	53.36652, -6.23919
Technologies:	2G/4G/5G
Radio Planner:	Colm Pattison.
Date:	13/02/2025

Radio Engineering Site Justification:

Vodafone Ireland would like to continue to provide quality mobile voice and data services to the Fairview and Marino areas. DN478 Fairview Temp mast currently supplies 5G coverage to the residents and businesses in the area. It also provides contiguous coverage for pedestrian and vehicular traffic transiting through Fairview and Marino.



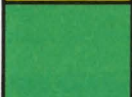

The closest Vodafone sites at DN730 C&T Supermarket, DN712 Smyths Fairview, and DN866 Richmond Road are not 5G capable and would not be able to compensate for the withdrawal of services if DN478 Fairview Temp mast was removed.

The following coverage plots clearly show the coverage gap that would result if DN478 Fairview Temp mast was removed. This gap would cause severe service disruption for the residents and businesses in the area and would also have an impact on the pedestrian and vehicular traffic transiting through Fairview and Marino.

Figure 1: 2100MHz 5G coverage levels from existing sites in the Fairview/Marino area.

Figure 2: 2100MHz 5G coverage levels from existing sites in the Fairview/Marino area but without DN478 Fairview Temp.

Coverage Legend

Colour	Coverage	Description
	Very Good	Strong signal with maximum data speeds
	Good	Strong signal with good data speeds
	Fair	Fast and reliable data speeds may be attained, but marginal data with drop-outs possible at weaker signal levels
	Fringe	Weak signal level, poor data speeds and dropouts possible

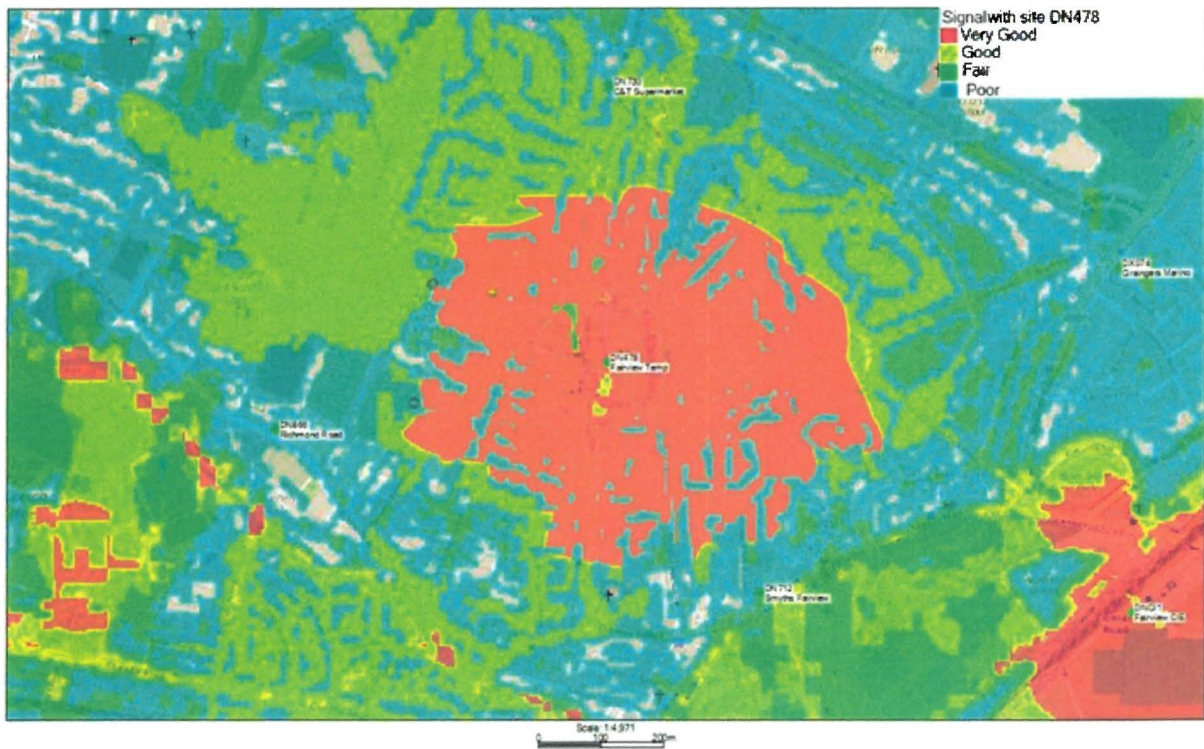


Figure 1: 2100MHz 5G Existing coverage levels from sites in the Fairview/Marino area including DN478 Fairview Temp Mast.



Figure 2: 2100MHz 5G Coverage levels from existing sites in the Fairview/Marino area but without DN478 Fairview Temp Mast.



Three Ireland (Hutchison) Limited.
Registered Office:
28/29 Sir John Rogerson's Quay,
Dublin 2, Ireland.

17/02/2025

RE: Planning appeal of temporary telecommunications installation at 80 - 82 Phibsborough Avenue, Fairview, Dublin 3. D02H3F1

To whom it may concern,

Three Ireland understand that Independent Site Management Limited intend to submit a planning appeal for the retention of a temporary telecommunications installation at 80 - 82 Phibsborough Avenue, Fairview, Dublin 3. Three support this appeal as the temporary structure provides needed mobile and wireless broadband coverage to the Dublin area.

Loss of this temporary installation will severely impact Three Irelands coverage in the area.

In line with Dublin Council Telecommunications guidelines and strategies, Three prefer to site share on structures subject to them providing sufficient antenna height and rigidity for effective radio signal propagation, thereby eliminating the need for an independent site. The rollout of mobile wireless broadband services by Three requires a greater number of telecommunications sites in order to meet licence obligations for coverage. This site provides coverage to our customers living, visiting, and travelling in the area. Failure to retain this installation therefore could have a negative impact on network subscribers.

I trust that this letter is of assistance in this appeal application, but please feel free to contact me should you require any more information or clarification.

Yours Sincerely

Seamus O' Connor
seamus.oconnor@three.ie

RF Technical Justification Report

For the temporary mast at

Site ID: DU1791

Site Name: CYMCLC Temp

Address: 80 – 82 Philipsburgh Avenue,
Fairview,
Dublin 3

Prepared by:

Keith Gray – Radio Engineer, Three Ireland

Date: 18/02/2025



Index

1.0 Introduction	P.3
2.0 Network Planning and Performance	P.3
3.0 Coverage Requirements at CYMCLC Temp	P.5
4.0 Service Coverage Plots / Predictions	P.6
5.0 Technical Conclusion	P.8

1.0 Introduction

This section provides a technical justification for the temporary mast at 80 - 82 Philipsburgh Avenue, Fairview, Dublin 3. The installation is required to provide 2G/3G/4G/5G service provision in Fairview and enhance coverage in the surrounding area. The installation forms part of an integrated telecommunications network system which has been meticulously planned out to provide best possible network performance within the limitations encountered in this rural environment. The current uptake of devices has put additional pressures on the network meaning existing base stations are undergoing significant upgrades in technology to meet this demand and so are critical in maintaining current and future service provision. The retention of this base station will continue to have a positive impact on Three's network provision in the wider area. This site is required to continue to provide mobile voice and data coverage in Fairview and surrounding wider area and to improve voice and broadband access to local residents & business users.

2.0 Network Planning and Performance

The site selection process at the network planning stages is central to creating an overall network that is efficient and meets customer expectation but also meets the regulatory systems within which the network is operating. Aside from the land-use planning and property procurement, addressed in other sections of the report, there are many external factors that affect network performance. Performance can be affected by various issues such as the technology of the devices used, the local environment the signals need to travel through, the fundamental physics behind wireless transmission and more. Some of these cannot be avoided and measures must be taken to try to minimise these negative effects. The following will briefly elaborate on some of these issues in order to understand the limitations on site choice for radio planners.

2.1 Physical Obstructions

Wireless signals can have trouble penetrating solid objects which can be any numbers of things such as hills, buildings, single walls or even people. The more obstructions you have between the transmitter and receiver, the more chance there is that the signal strength will be affected so sites are chosen with as clear a line of site to the next base station as possible.

2.2 Network Range & Distance between Devices

The further apart the networked devices that are trying to communicate with each other are, the more the signal strength drops. This is due to the way that wireless signals propagate covering a wider area as they travel further and because of this, as the signal spreads more, the weaker it becomes, in general, if the distance is doubled the signal becomes 8 times weaker and so on.

2.3 Wireless Network Interference

Wireless Networking is becoming more and more common and therefore more wireless transmissions are being sent through the air. Signals operating at similar frequencies can cause interference with each other and have a significantly negative effect on the performance of the network. This means that more widely used frequency bands can be severely affected by the overcrowding of wireless signals to a point where a device will not operate at an acceptable level. Other wireless technologies can cause identical interference such as mobile phones and microwave ovens that operate within the same ranges.

2.4 Signal Sharing

Wireless Networks allow more than 1 device (Smart phone, Tablet etc.) to communicate with a base station at any one time. This sharing of connection means that the more customers accessing the network, the more devices the base station has to try and communicate with instantaneously. The point of access has to delegate its resources to each subscriber individually per the amount of transmitting radios it operates on.

2.5 Network Usage- Bandwidth / Data Speeds

With the widespread take-up of Smart Phones and other 4G internet ready mobile devices a more common problem is network usage. The more people utilising the network bandwidth, the less bandwidth there is to share between them. As bandwidth requirements increase with for example when accessing video streaming and other bandwidth intensive applications existing base station technologies need to be upgraded in or to maintain performance. The proposed 3G services provided on 900Mhz band and 4G services delivered on the 800Mhz band give a larger cell coverage area compared to older 3G on 2100Mhz band and provide better building penetration / indoor coverage. The 4G services provide data speeds far in excess of 3G services (up to 10 times faster) and can outperform fixed line broadband services in a lot of cases and especially in rural areas.

2.6 Local Environment Characteristics

Particular to indoor networks or coverage, wall construction properties can be one of the biggest inhibitors of wireless signals. Construction materials used in building and offices have different levels of effect; concrete is a usual suspect in badly performing indoor network coverage. Basically the thicker the walls, the less success the signal will have penetrating through it whilst maintaining a high strength.

3.0 Coverage Requirements at CYMCLC Temp and environs





The main driver for the retention of the site is to continue the service provided in Fairview and wider area. This site will continue to provide voice and high-speed data services to the areas surrounding Fairview. By not retaining this site, a coverage blackspot, particularly 4G, for users in the areas will remain.

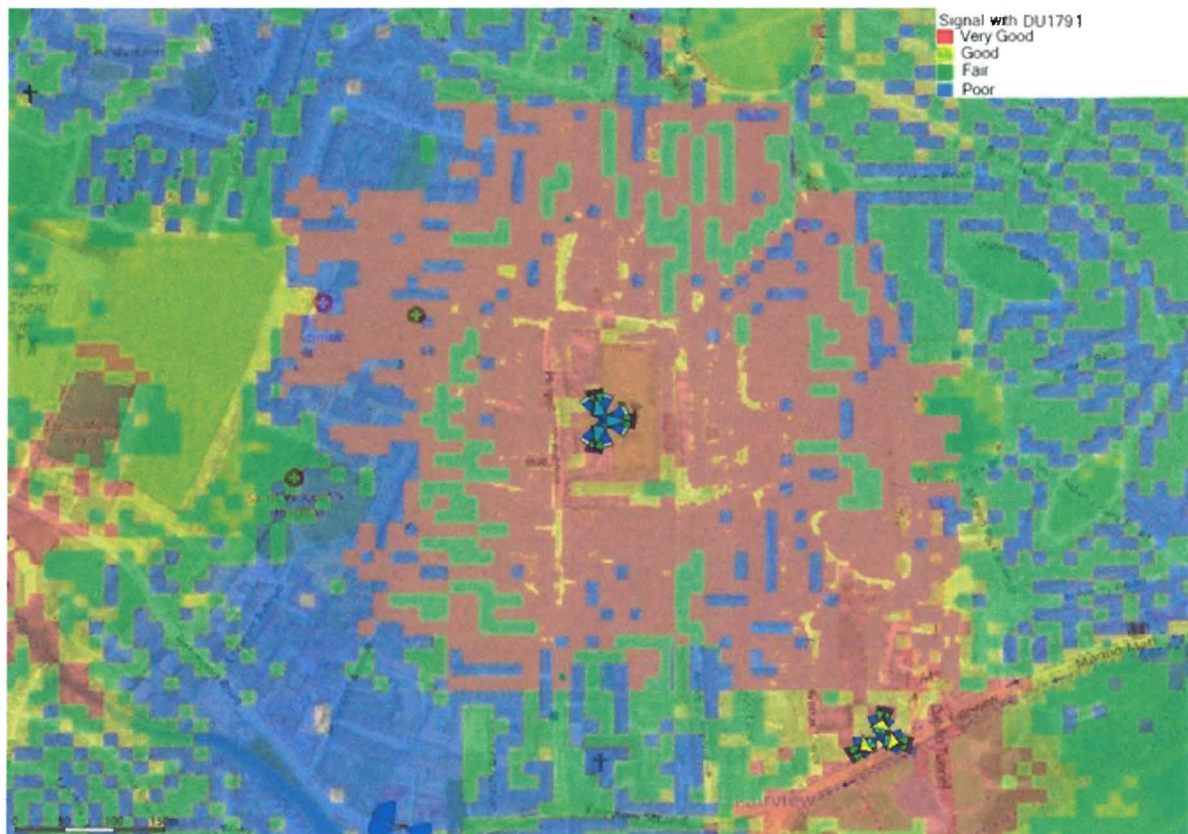
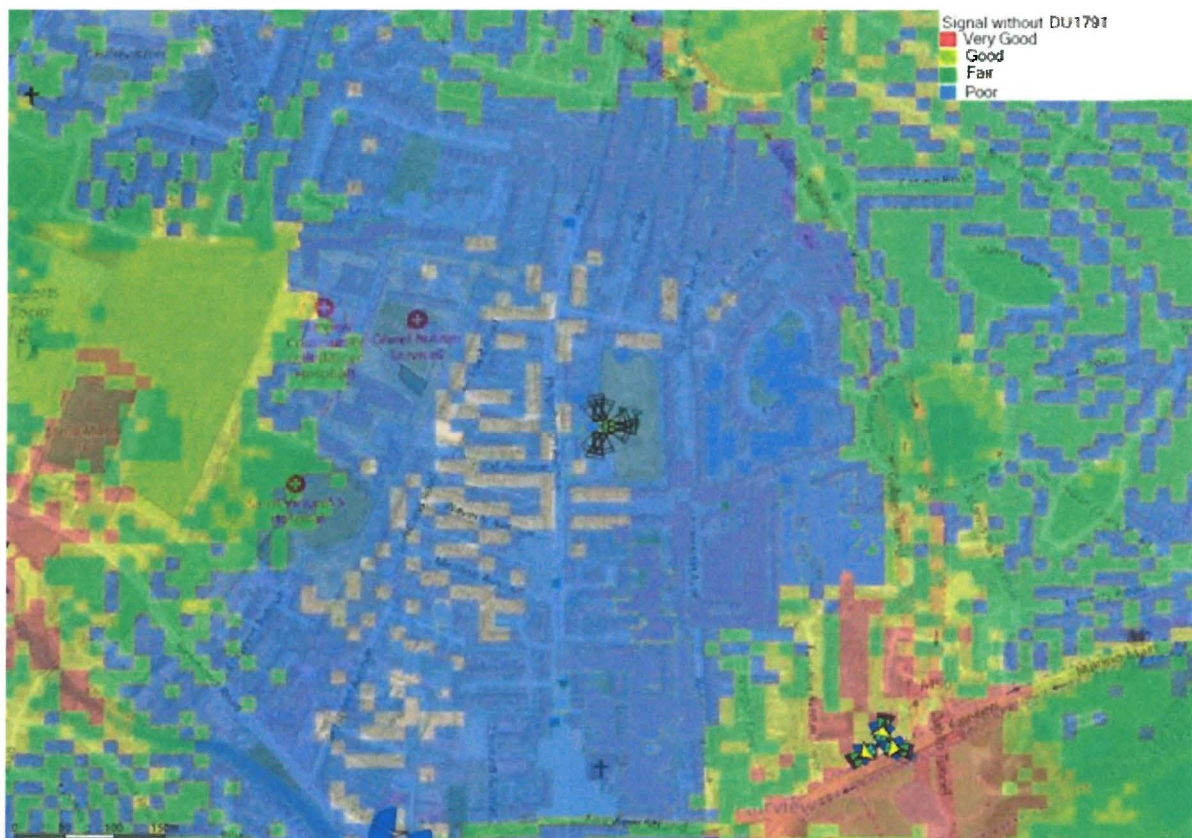
3.1 Restrictions on Locating on Existing Telecoms Structures

Three Ireland has a policy to co-locate into existing telecommunications structure where possible, that are located within the target area. Following compressive search of the target search area, no existing base station options were identified that could be shared or upgraded to provide the necessary coverage required.

4.0 Service Coverage Plots / Predictions

The coverage maps on the following page illustrate the service coverage from the existing installation at 80 - 82 Philipsburgh Avenue.

4G LTE: Coverage by Signal Level (DL)		
	Excellent Signal Level (dBm)	≥ -70
	Very Good Signal Level (dBm)	≥ -80
	Good Signal Level (dBm)	≥ -90
	Fair Signal Level (dBm)	≥ -105

EXISTING 4G INDOOR COVERAGE WITH TEMPORARY MAST**REDUCED 4G INDOOR COVERAGE WITHOUT TEMPORARY MAST**

5.0 Technical Conclusion

The evidence provided within this Technical Justification demonstrates the technical need for the temporary mast at 80 - 82 Philipsburgh Avenue, Temp to provide high quality 2G/3G/4G/5G network coverage and deliver good customer experience in Fairview and surrounding wider area.

The existing temporary installation forms part of an established telecommunications network system that Three operates in the area and has been carefully chosen to ensure performance levels are maintained. The site is considered the best possible solution to meet both the existing and future demands of its customers in this area. Failure to retain this installation in its current location as can be seen in the plots provided has a negative impact on Three's network by leaving customers around Fairview without sufficient coverage.



2 Heuston South
Quarter
St. John's Road West
Dublin 8 D08 Y42NT
+353 1 671 4444
eir.ie

Mr Alex Reid
Independent Site Management Limited
77 Camden Street Lower,
Dublin 2,
D02 XE80

19th February 2025

RE: Independent Site Management Limited, support for temporary telecommunications support structure located at: 80 - 82 Philipsburgh Avenue. Our Ref: DN_1081

Dear Alex,

eir Mobile (formerly Meteor Mobile Communications) support the temporary telecommunications support structure located at **80 - 82 Philipsburgh Avenue**. eir Mobile have relocated their equipment from the building onto this new temporary structure to ensure continuous mobile and wireless broadband coverage to the surrounding area. This is a highly built up residential and commercial area with a high density population. Due to the lack of options in the area eir worked with Independent Site Management Limited, and the other mobile Operators, to locate a suitable location within the grounds of 80 - 82 Philipsburgh Avenue for a solution during the construction phase. As such the temporary structure was deemed necessary to service the immediate need of eir's customers. Independent Site Management Limited plan to lodge a planning application to install the telecommunications equipment on the roof of the new building once constructed.

The operation of mobile and wireless broadband services by eir Mobile, as a wholly owned subsidiary of eir plc., requires eir Mobile to ensure telecommunications sites are maintained in order to meet licence obligations for coverage. In line with the Government & Dublin City Council's Telecommunications guidelines and policies, eir Mobile prefer to site share on existing structures subject to them providing sufficient antenna height and rigidity for effective radio signal propagation, thereby eliminating the need for an independent site. This temporary site will allow eir to continue to provide coverage to our customers living, visiting and travelling in the area. It will also enable eir to enhance the services for eir Mobile customers as part of the commitment to facilitate all communities' access to excellent telecommunication services.

Yours sincerely

By Email

Sarah Waddell BSc SCS
Site Acquisition & PR Manager
Meteor Mobile Communications Limited t/a eir Mobile
E: sarah.waddell@eir.ie

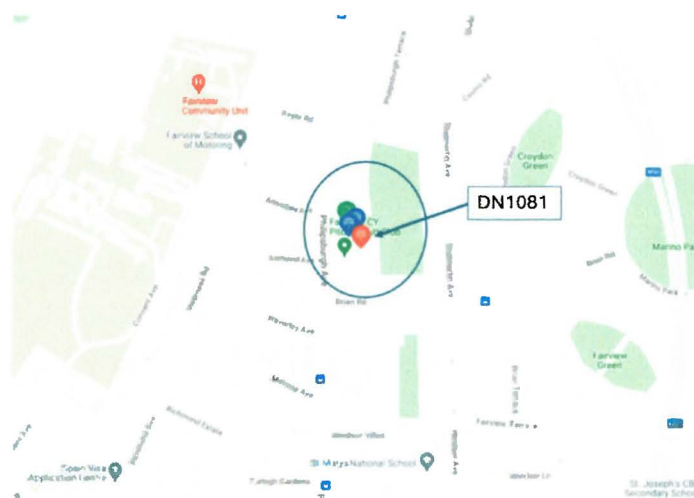
An Bord Pleanála
64 Marlborough Street,
Dublin 1,
D01 V902

19 February 2025

RE: Eircom Limited (t/a Eir) Planning appeal for existing telecommunications structure comprised of a tower and associated antennas, dishes with ancillary ground based equipment cabinets and fencing on a section of land at 80 - 82 Philipsburgh Avenue, Fairview, Dublin 3, D03 H3F1.

1 Justification for retention of structure:

Eir requests that the current temp mast remain in place at 80 – 82 Philipsburgh Avenue. Eir's current coverage in this area specifically around the Philipsburgh Avenue/Terrace, Annadale Road/Terrace, Lomond Avenue, Croydon Park, Biran Road/Terrace, Shelmartin Avenue, Windsor Avenue, Melrose Avenue and surrounding areas would experience significant reduced quality of service and capacity if the If the enforcement notice for the temporary structure was upheld. This it would result in poor indoor service and reduced capacity for high-speed mobile broadband in and around the area. Supports for the temporary mast would greatly support Eir customers in the area whilst planning for the permanent rooftop site on the new building is applied for.



Above: Figure 1: Eir current site DN1081 - 80 – 82 Philipsburgh Avenue.

2 Discounted Structures:

Eir is committed to maintaining and operating only necessary infrastructure. Prior to erecting any new infrastructure, it assesses existing mast infrastructure and high buildings for co-location opportunities. Set out below is the list of options considered and discounted.

- I. CT Superstore and Market, Philipsburgh Ave Marino, Dublin 3: Vodafone transmit from a chimney mounted solution. There is no space for Eir and Three to install and due to the height of the property being only 7 metres. Therefore cellular signal would not be able to reach the lower part of Philipsburgh Avenue or be a suitable replacement for the Temporary Telecommunications Structure which incorporates all 3 Network Operators.
- II. Richmond Builder's Providers & DIY, 148 Richmond Road, Dublin Three and Eir currently transmit from a mast on the property. The mast is due to be demolished, and the property redeveloped into 183 No. Build-to-Rent apartments called the Richmond Road SHD An Bord Pleanála reference ABP-317136-23.
- III. Charthouse Business Park, Dublin 3 currently transmits Vodafone from a mast on the property. The mast is only capable of homing 1 network provider and is approximately 12m in height. This site would not be able to meet the coverage area currently being facilitated by the Temporary Telecommunications Structure.
- IV. Meagher's Pub, Dublin 3: Eir and Three transmit from rooftops installations. But due to the height of these property being only 7 metres, Eir's and Three's coverage are only marginally boosted and there is no room for a Vodafone installation.
- V. Tesco Express: The structure is already utilised by Eir, Three and Vodafone yet this location fails to satisfy the local coverage requirements.



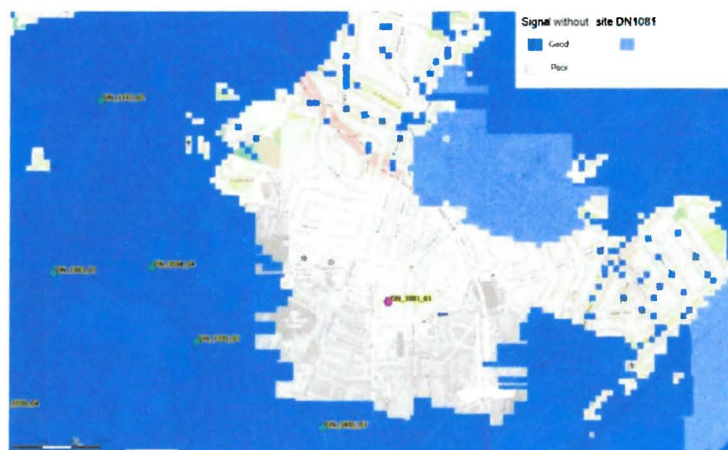


Figure 2: Comreg Site viewer - Locations of proximate telecommunications structures.

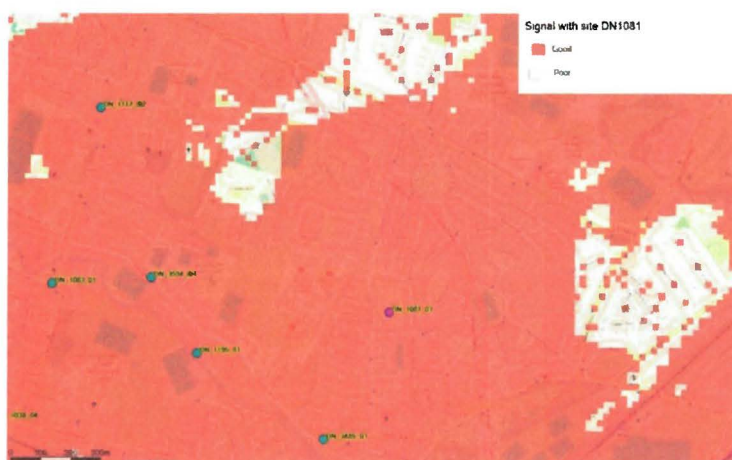
Conclusion - none of the existing telecommunications in the vicinity can facilitate Eir's technical objectives for the area.

3 Outdoor Coverage Map:

Set out below is a map showing Eir's current 4G coverage (**Figure 3**) plots provided by Eir below indicate the deficit in coverage and the improvement with the planning retention of the mast.



Above: Figure 3: Coverage Map - Eir coverage if the mast is decommissioned at DN1081 - 80 – 82 Philipsburgh Avenue.



Above: Figure 4: Eir Coverage plots with the mast at DN1081 - 80 – 82 Philipsburgh Avenue.

5 Conclusion:

Eir's current coverage in this area specifically around the Philipsburgh Avenue/Terrace, Annadale Road/Terrace, Lomond Avenue, Croydon Park, Biran Road/Terrace, Shelmartin Avenue, Windsor Avenue, Melrose Avenue and surrounding areas will be greatly affected with the decommissioning of the mast. The temporary mast enables Eir

to fulfil its licensing obligations and commercial commitments to serve its customers with quality and extensive wireless coverage, speed and capacity.

With the above in mind, we respectfully request that the temporary mast remains in position during the construction phase of the new development.

Yours sincerely,



Alex Reid

Independent Site Management Limited

✉: alex@ismireland.com

☎: +353 (0)1 905 8800

DECLARATION ON DEVELOPMENT & EXEMPTED DEVELOPMENT

SECTION 5 APPLICATION FORM



Comhairle Cathrach
Bhaile Átha Cliath
Dublin City Council

NAME OF APPLICANT: Independent Site Management

ADDRESS OF APPLICANT: 77 Camden Street Dublin 2, Ireland. D02 XE80

EMAIL ADDRESS: alex@ismireland.com

TELEPHONE NO. Day: 01 905 8800 Mobile: 087 720 6990

NAME OF AGENT AND AGENT'S ADDRESS: _____

TELEPHONE NO. Day: _____ Mobile: _____

ADDRESS FOR CORRESPONDENCE (if different from above)

LOCATION OF SUBJECT SITE: _____

80-82 Philipsburgh Avenue, Fairview, Dublin 3. D03 H3F1

Is this a Protected Structure or within the curtilage of a Protected Structure?

Yes ☐

No ☒

**Please provide details of works (where applicable) or proposed development.
(Note: only works listed and described under this section will be assessed under this
Section 5 application). Use additional sheets if required.**

Section 5 Application Existing Temporary Telecommunications Structure comprised of a 15m transportable monopole structure secured by 4 anchor bolts to 4No. 2m x 2m x 1m removable concrete ballast blocks; & all associated antennas, dishes and ancillary ground-based equipment cabinets. Situated within the construction site hoarding on a section of land at 80 - 82 Philipsburgh Avenue, Fairview, Dublin 3, D03 H3F1

List of plans, drawings etc. submitted with this application

Documents: Cover Letter + Historical Photos Document

Drawings: ISM - 6003 - 01, ISM - 6003 - 02, ISM - 6003 - 03

ISM - 6004 - 04, ISM - 6003 - 05, ISM - 6003 - 06

ISM - 6007 - 07, ISM - 6003 - 08, ISM - 6003 - 09

ISM - 6007 - 10, ISM - 6003 - 11, ISM - 6003 - 12

Please state Applicant's interest in this site: Leasee

If applicant is not owner of site, please provide name & address of owner:

Cabhrú Housing Association, Father Scully House, Gardiner Street Middle

Dublin 1, DO1 YY26

Are you aware of any enforcement proceedings connected to this site? *If so please supply details:*

Dublin City Council's correspondence dated 3rd of October 2024 to

Independent Site Management Limited, Ref E0843/24

Where there previous planning application/s on this site?

Yes ☒ No ☐

If so please supply details:

A search of the Planning Authority ePlan online planning records, via a map search in November 2024, revealed that the site location does hold relevant planning history in relation to the proposed development.

Redevelopment existing building Application Reference: 5176/22

Decision: Grant Permission

PERMISSION: The development proposes the demolition of the existing 2 storey building on site (approx. 1020.5 sq.m GFA), amendments to the quantum of existing car parking, removal of existing substation on Philipsburgh Avenue, and the construction of 48 no. new residential apartment units (48 no. 1 bed units) in 2 no. apartment building, consisting of 1 no. 2-4 storey building (Building A fronting Philipsburgh Avenue) and 1 no. 2-4 storey (Building B rear block). Building A provides 22 no. 1 bed apartment units and Building B provides 26 no. 1 bed apartment units. All units are intended to provide

housing for independent living for older residents (60 years plus). An office room (7.2 sq.m), communal room (34.2 sq.m) and Kitchenette/WC (10.5 sq.m) associated with the apartment units will be provided. The development also proposes approx. 372.8 sq.m of communal open space, balconies/ terraces associated with individual apartment units, associated secure bicycle parking, car parking (4 no of spaces) and bin storage, ESB Substation, hard and soft landscaping and all other associated site works and services above and below ground on an overall site area of approx 2681 sq.m Access to the development will be via the existing access point along Philipsburg Avenue, which will be upgraded to provide enhanced pedestrian/vehicular access. Access to adjacent pitch and putt club lands is maintained via the provision of vehicular/pedestrian gates in the southeast corner of the site. A Natura Impact Statement has been prepared and submitted with this Planning Application.

Application Reference: 3484/22

Decision: Application Declared Invalid

The development proposes the demolition of the existing 2 storey building on site (approx. 1020.5 sq.m GFA), amendments to the quantum of existing car parking, removal of existing substation on Philipsburgh Avenue, and the construction of 49 no. new residential apartment units (49 no. 1 bed units) in 2 no. apartment buildings, 1 no. 2-4 storey (Building A fronting Philipsburgh Avenue) and 1 no. 2-4 storey (Building B rear block). Building A provides 22 no. 1 bed apartment units and Building B provides 27 no. 1 bed apartment units. All units are intended to provide housing for an elderly population. The development also proposes approx. 410 sq.m of communal open space, balconies/terraces associated with individual apartment units, associated secure bicycle parking, car parking (4 no of spaces) and bin storage, ESB Substation, hard and soft landscaping and all other associated site works and services above and below ground on an overall site area of approx 2681 sq.m. Access to the development will be via the existing access point along Philipsburgh Avenue. Access to adjacent golf club lands is maintained via the provision of vehicular/pedestrian gates in the south east corner of the site. A Natura Impact Statement has been prepared and submitted with this Planning Application.

Application Reference: 3251/16

Decision: Grant Retention Permission

Retention of existing sessional preschool at part of ground floor level and retention of change of use of the existing established beauty clinic at the first floor to use as a preschool and afterschool.

Application Reference: 3200/16

Decision: Application Declared Invalid

Retention of existing sessional preschool at part of ground floor level and retention of change of use of the existing established beauty clinic at the first floor to use as a preschool and after school.

Application Reference: 4207/15

Decision: Refuse Retention Permission

Planning permission for retention of change of use of the existing established beauty clinic at the first floor to use as a crèche as an extension to the existing established crèche at the ground floor level at the former CYMS/LCS sports club premises.

Application Reference: 1380/06

Decision: Grant Retention Permission

Retention planning permission is sought by Fairview CYMC/LC for retention of 2 advertising signs and supporting framework, erected along the front boundary fence and close to the public footpath at No. 80 Philipsburgh Avenue, Fairview, Dublin 3.

Application Reference: 1063/06

Decision: Application Declared Invalid

Retention Planning Permission is sought by Fairview CYMC/LC, for retention of two advertisement signs and supporting framework erected along the boundary fence and close to the public footpath at No 80, Philipsburgh Avenue, Fairview, Dublin 3.

PLANNING HISTORY – AN BORD PLEANÁLA

Bord Pleanála Case reference: PL29N.316593

Decision: Grant Permission with Conditions

Demolition of the existing building and the construction of 2 apartment buildings with 48 residential units. A Natura Impact Statement has been prepared and submitted with this Planning Application.

Signed: _____ Date: _____

NOTES

Application shall be accompanied by 2 copies of site location map with site clearly outlined in red and a fee of €80.00. Please submit 2 copies of any additional plans/reports etc. you may wish to include as part of the application.

Application shall be forwarded to: Dublin City Council, Planning Registry
Section, Block 4, Floor 0, Civic Offices, Wood Quay, Dublin 8.
Contact Details: Phone: 01 222 2149 Fax: 01 222 2675

Section 5 Declaration for Protected Structures

Required Documents

1. *Application form* (The application form should be used to provide a numbered list of all the proposed works. Two copies of all supporting information should be submitted).
2. *Application fee* (€80)
3. 2 copies of the *site location map* (location clearly outlined in red).
4. A photographic record of the historic fabric to be affected/impacted upon by the proposed works and a general photo of the building. (notes can be added to these photos to explain the proposed works)
5. An outline explaining justification for and assessment of the impact of the proposed works on the protected structure.
6. A method statement outlining the proposed works to include a specification of the materials to be used.
7. Elevation, plan and detail drawings where appropriate.

The Department of Housing Local Government and Heritage Advice Series documents are recommended reading before submitting a Section 5 application for proposed works to a protected structure. These publications contain the best practice advice for conservation work and knowledge of best conservation practice must be clearly demonstrated in all applications. (See links below):

[A GUIDE TO THE REPAIR OF HISTORIC WINDOWS](#)

[A GUIDE TO THE REPAIR OF THATCHED ROOFS](#)

[A GUIDE TO THE CONSERVATION AND REPAIR OF MASONRY RUINS](#)

[A GUIDE TO THE REPAIR OF HISTORIC ROOFS](#)

[A GUIDE TO THE CONSERVATION OF PLACES OF WORSHIP](#)

[A GUIDE TO PAVING, THE CONSERVATION OF HISTORIC GROUND SURFACES](#)

[A GUIDE TO MAINTANCE, THE CARE OF OLDER BUILDINGS](#)

[A GUIDE TO THE REPAIR OF WROUGHT AND CAST IRONWORK](#)

[A GUIDE TO ENERGY EFFICIENCY IN TRADITIONAL BUILDINGS](#)

[A GUIDE TO DISASTER, PREVENTION AND PREPAREDNESS IN THE HISTORIC BUILT ENVIRONMENT](#)

[A GUIDE TO THE REPAIR OF HISTORIC BRICKWORK](#)

[A GUIDE TO ACCESS, IMPROVING THE ACCESSIBILITY OF HISTORIC BUILDINGS AND PLACES](#)

Dublin City Council
Planning and Property Development
Department Civic Offices
Wood Quay
Dublin 8.

RE: Application under Section 5 of the Planning & Development Acts 2000 (as amended)

Development Description: Temporary Telecommunications Structure comprised of:

- a 15m transportable monopole structure
- secured by 4 anchor bolts to 4No. 2m x 2m x 1m removable concrete ballast blocks; &
- all associated antennas, dishes and ancillary ground-based equipment cabinets.

Situated within the construction site hoarding on a section of land at 80 - 82 Philipsburgh Avenue, Fairview, Dublin 3, D03 H3F1. (hereinafter the "Temporary Telecommunications Structure").

Dear Sir/Madam,

Please find attached Section 5 Application form and enclosed drawings and photographs detailing the extent of the Temporary Telecommunications Structure for your review.

This Application is being submitted by Independent Site Management Limited (hereinafter the "ISM"), with its registered address at 77 Camden Street Dublin 2, Ireland. D02 XE80 in cooperation and on behalf of Vodafone Ireland Limited (tenancy originating 2002), Three (Hutchison) Ireland Limited (tenancy originating 2003) and Eircom Limited (T/A Eir) (tenancy originating 2002) [hereinafter the "Statutory Undertakers" as defined within the Planning and Development Act 2000 (as amended)]

1. SECTION 5 DECLARATION

In accordance with Section 5 of the Planning and Development Act 2000 (as amended), ISM requests a declaration from Dublin City Council (the "Planning Authority") that the above referred Temporary Telecommunications Structure is 'exempted development' in accordance with The Planning and Development Regulations 2001 (as amended) Schedule 2, Part 1, Exempted Development - General, Class 16.

CLASS 16

The erection, construction or placing on land on, in, over or under which, or on land adjoining which, development consisting of works (other than mining) is being or is about to be, carried out pursuant to a permission under the Act or as exempted development, of structures, works, plant or machinery needed temporarily in connection with that development during the period in which it is being carried out.

The Temporary Telecommunications Structure is a critical requirement (*needed temporarily in connection with that development*) in order comply with the a number of provisions within Acts of the Oireachtas and/or Statutory Instruments and/or Regulations made under such Acts and/or Statutory Instruments including but not limited to the Health and Welfare at Work Act, 1989 to 2005; and most importantly Health and Welfare at Work (Construction) Regulations, 2001 to 2006.

The supporting documents/information enclosed demonstrate that without the Temporary Telecommunications Structure, the area within >300m radius from the development site will be devoid of the ability to use a handheld cellular device to contact fire and ambulance services, as well as utilise other voice or data services that are required for day-to-day communication and broadband functions. (see below diagram).



The supporting documents/information also validate that there are not any suitable alternative sites that could or can address the critical requirement of cellular coverage in the given area (>300m radius).

The Temporary Telecommunications Structure will sit alongside other temporary structures, works, plant or machinery such as tower cranes, site offices, and/or electrical substations, and will not be anything that is incoherent or inconsistent with other temporary measures required to develop or redevelop a building site.

Additionally, it should be noted as part of the Council's consideration of this Section 5 application, the oversight by the Planning Authority ¹ from its own Development Plan 2022-2028, Volume 2, Appendix 3, Table 4, Objective 5 (Public Safety and Functional Impacts) in its evaluation of the proposal and subsequent granting of permission (Planning Ref: 5176/22) for the demolition and redevelopment of 80-82 Philipsburgh Avenue. Chapter 15 of the Dublin City Development Plan 2022-2028 sets out the standards and criteria to be considered in the development management process so that development proposals can be assessed both in terms of how they contribute to the achievement of the core strategy and related policies and objectives. In this regard, Dublin City Council's stated objective in the Development Plan 2022-2028 is set out in 9.5.11 therein (see full wording in Planning Definitions / Regulations/ Objectives below). As mandated by Volume 2, Appendix 3, Table 4, Objective 5 (Public Safety and Functional Impacts) an appendix of Chapter 15, all applications must be accompanied by an assessment on potential interference with aviation, navigation and telecommunications. Any specific assessment in accordance with both Object 5 and additionally, section 3.2 of the Building Height Guidelines (2018) with respect to the proposed development works at 80-82 Philipsburgh Avenue, would have highlighted the requirement that the proposal must allow for the retention of important telecommunication channels ². The Temporary Telecommunications Structure is categorically such an allowance.

¹ not subsequently addressed by An Bord Pleanála (ABP-316593-23)

² **Please note:** Plan Ref: WEB2214/24 Further Information Request item 5. *The applicant is requested to clarify that there is no impact on local telecommunications as due to the development* No such request was made of the Applicant in Planning Ref: 5176/22.



The Temporary Telecommunications Structure is providing the Applicant/developer with the means to be in compliance with both the Health and Welfare at Work (Construction) Regulations, 2001 to 2006 and with the related policies and objectives within the Dublin City Development Plan 2022-2028 regarding telecommunications infrastructure and is critical requirement to the construction site as well as the local area.



2. BACKGROUND / HISTORY



80 - 82 Philipsburgh Avenue, Fairview, Dublin 3, D03 H3F1 coinciding with its various uses and iterations as a commercial building, has provided roof top space for up to 5 No. duly licensed wireless telecommunication operators at any given time since December 2002. Over the subsequent years, the number of licensed wireless network operators in Ireland has reduced significantly, leaving only 3 cellular network operators and a handful of fixed or LTE wireless broadband network operators. Since 2010, 80 - 82 Philipsburgh Avenue, Fairview, Dublin 3, D03 H3F1 has only provided roof top space to the 3 cellular networks operated and maintained by Vodafone Ireland Limited (tenancy originating 2002), Three (Hutchison) Ireland Limited (tenancy originating 2003) and Eircom Limited (T/A Eir) (tenancy originating 2002).

Planning Ref: 5176/22 - In November 2022 Cabhrú Housing Association, applied to Dublin City Council for Planning Permission proposing the demolition of the existing 2 storey building on site (approx. 1020.5 sq.m GFA), amendments to the quantum of existing car parking, removal of existing substation on Philipsburgh Avenue, and the construction of 48 no. new residential apartment units (48 no. 1 bed units) in 2 no. apartment building, consisting of 1 no. 2-4 storey building (Building A fronting Philipsburgh Avenue) and 1 no. 2-4 storey (Building B rear block). Building A provides 22 no. 1 bed apartment units and Building B provides 26 no. 1 bed apartment units. All units are intended to provide housing for independent living for older residents (60 years plus). An office room (7.2 sq.m), communal room (34.2 sq.m) and Kitchenette/WC (10.5 sq.m) associated with the apartment units will be provided. The development also proposes approx. 372.8 sq.m of communal open space, balconies/ terraces associated with individual apartment units, associated secure bicycle parking, car parking (4 no of spaces) and bin storage, ESB Substation, hard and soft landscaping and all other associated site works and services above and below ground on an overall site area of approx 2681 sq.m Access to the development will be via the existing access point along Philipsburg Avenue, which will be upgraded to provide enhanced pedestrian/vehicular access. Access to adjacent pitch and putt club lands is maintained via the provision of vehicular/pedestrian gates in the southeast corner of the site. A Natura Impact Statement has been prepared and submitted with this Planning Application.



Pursuant to its functions under the Planning & Development Acts 2000 (as amended), Dublin City Council, being the Planning Authority for the City of Dublin, by order dated 06-Apr-2023, decided to Grant of Permission for the development described above, subject to a number of conditions.

ABP-316593-23 – The aforementioned Grant of Permission was subsequently appealed to An Bord Pleanála. 21st of December 2023 An Bord Pleanála granted permission for the development subject to a number of conditions

14 August 2024 – The Temporary Telecommunications Structure and equipment, as detailed in the drawings provided, was installed by ISM on behalf of Vodafone Ireland Limited, Three (Hutchison) Ireland Limited and Eircom Limited (T/A Eir) (the Statutory Undertakers) in advance of the ongoing demolition works currently underway.

File Ref: E0843/24 Dublin City Council issued a Section 154 Enforcement Notice in relation to the Temporary Telecommunications Structure and equipment.

3. PLANNING DEFINITIONS/ REGULATIONS / OBJECTIVES

Relevant Definitions - As defined within the Planning and Development Act 2000 (as amended) and/or Planning and Development Regulations 2001 (as amended) Dublin Development Plan 2022-2088

“Development”

Section 3, (1) - In this Act, “development” means, except where the context otherwise requires, the carrying out of any works on, in, over or under land or the making of any material change in the use of any structure or other land.

“Works”

Section 2, (1) – “works includes any act or operation of construction, excavation, demolition, extension, alteration, repair or renewal and, in relation to a protected structure or proposed protected structure, includes any act or operation involving the application or removal of plaster, paint, wallpaper, tiles or other material to or from the surfaces of the interior or exterior of a structure.

“Statutory Undertaker”

means a person, for the time being, authorised by or under any enactment or instrument under an enactment to—

- (a) construct or operate a railway, canal, inland navigation, dock, harbour or airport,
- (b) (b) provide, or carry out works for the provision of, gas, electricity or telecommunications services, or
- (c) (c) provide services connected with, or carry out works for the
- (d) purposes of the carrying on of the activities of, any public undertaking;

“Structure”

Section 2, (1) – “structure” means any building, structure, excavation, or other thing constructed or made on, in or under any land, or any part of a structure so defined, and

- (a) where the context so admits, includes the land on, in or under which the structure is situate, and
- (b) in relation to a protected structure or proposed protected structure, includes—
 - (i) the interior of the structure,
 - (ii) the land lying within the curtilage of the structure,
 - (iii) (iii) any other structures lying within that curtilage and their interiors,
 and



- (iv) (iv) all fixtures and features which form part of the interior or exterior of any structure or structures referred to in subparagraph (i) or (iii);

“Exempted Development”

Section 2, (1) – “exempted development” has the meaning specified in section 4

Section 4

- (a) development consisting of the use of any land for the purpose of agriculture and development consisting of the use for that purpose of any building occupied together with land so used;
- (b) development by the council of a county in its functional area, exclusive of any borough or urban district;
- (c) development by the corporation of a county or other borough in that borough;
- (d) development by the council of an urban district in that district;
- (e) development consisting of the carrying out by the corporation of a county or other borough or the council of a county or an urban district of any works required for the construction of a new road or the maintenance or improvement of a road;
- (f) development carried out on behalf of, or jointly or in partnership with, a local authority that is a planning authority pursuant to a contract entered into by the local authority Pt.I S.4 concerned, whether in its capacity as a planning authority or in any other capacity;
- (g) development consisting of the carrying out by any local authority or statutory undertaker of any works for the purpose of inspecting, repairing, renewing, altering or removing any sewers, mains, pipes, cables, overhead wires, or other apparatus, including the excavation of any street or other land for that purpose;
- (h) development consisting of the carrying out of works for the maintenance, improvement or other alteration of any structure, being works which affect only the interior of the structure or which do not materially affect the external appearance of the structure so as to render the appearance inconsistent with the character of the structure or of neighbouring structures;
- (i) development consisting of the thinning, felling and replanting of trees, forests and woodlands, the construction, maintenance and improvement of non-public roads serving forests and woodlands and works ancillary to that development, not including the replacement of broadleaf high forest by conifer species;



- (j) development consisting of the use of any structure or other land within the curtilage of a house for any purpose incidental to the enjoyment of the house as such;
- (k) development consisting of the use of land for the purposes of a casual trading area (within the meaning of the Casual Trading Act, 1995);
- (l) development consisting of the carrying out of any of the works referred to in the Land Reclamation Act, 1949, not being works comprised in the fencing or enclosure of land which has been open to or used by the public within the ten years preceding the date on which the works are commenced.

The Planning and Development Regulations 2001 (as amended) Schedule 2, Part 1, Exempted Development -General, Class 16.

Column 1 Description of Development	Column 2 Conditions and Limitations
<p>CLASS 16</p> <p>The erection, construction or placing on land on, in, over or under which, or on land adjoining which, development consisting of works (other than mining) is being or is about to be, carried out pursuant to a permission under the Act or as exempted development, of structures, works, plant or machinery needed temporarily in connection with that development during the period in which it is being carried out.</p>	<p>Such structures, works, plant or machinery shall be removed at the expiration of the period and the land shall be reinstated save to such extent as may be authorised or required by a permission under the Act.</p>

Digital Connectivity Infrastructure The rapidly evolving digital connectivity sector is a key enabler of numerous economic, social and educational activities. The sector covers access to broadband, digital fibre services and wireless connectivity such as Wi-Fi, satellites and wired technologies. High quality digital connectivity infrastructure, both fixed and wireless, is essential to supporting Dublin's technology and digital service sectors and plays a central role in supporting the delivery of city services and the Internet of Things. The demand for super connectivity and the importance of secure and reliable communications networks will increase over the coming years as we enter a new era of 5G connectivity. The transition to 5G use will require local authorities to play a greater role in supporting the rollout of digital connectivity infrastructure and telecoms networks and it will be essential to ensure the future-proofing of public realm and capital investment projects across the City to cater for digital connectivity infrastructure.

Sustainable Environmental Infrastructure and Flood Risk | Chapter 9 295

The City Council will also be required to take a more proactive role in facilitating the deployment of telecoms infrastructure and equipment (including small cells) in compliance with the European Electronic Communication Code³ (EECC) and Broadband Cost Reduction Directive⁴ . This will involve opening up its assets such as ducting, buildings, street furniture and columns.

4. SITE LOCATION AND DEVELOPMENT DESCRIPTION

This Section 5 application for the Temporary Telecommunication Structure is submitted in response to Dublin City Council's correspondence dated 3rd of October 2024 to Independent Site Management Limited, Ref E0843/24 enforcement notice, declaring the Temporary Telecommunication Structure is unauthorised development.

The critical requirement for the Temporary Telecommunication Structure is vital to maintain coverage and services to this part of Dublin City during the period of construction of an independent living housing development for older residents (60 years plus), Dublin City Planning Reference 5176/22.

There has been telecommunications infrastructure located on the roof of the old, now demolished building since 2002 so the operator's networks have been designed and have evolved around the presence of telecommunications equipment at this location and as such this location is designated as a Priority 1 location by the operators. Failure to maintain this installation will have an immediate and dramatic impact on Eircom (T/A Eir), Three Ireland and Vodafone Ireland networks and their customers.

The intention is to seek planning permission for a permanent installation on the roof of the completed development, currently under construction (subject to securing planning consent). The telecommunications equipment that is currently located on the Temporary Telecommunication Structure would then be moved to the roof of the completed building to maintain coverage levels in the area thus alleviating the requirement for a Temporary Telecommunication Structure at this location.

5. TECHNICAL JUSTIFICATION FOR TEMPORARY STRUCTURE AND OTHER AND DISCOUNTED STRUCTURES

5.1 TECHNICAL JUSTIFICATION

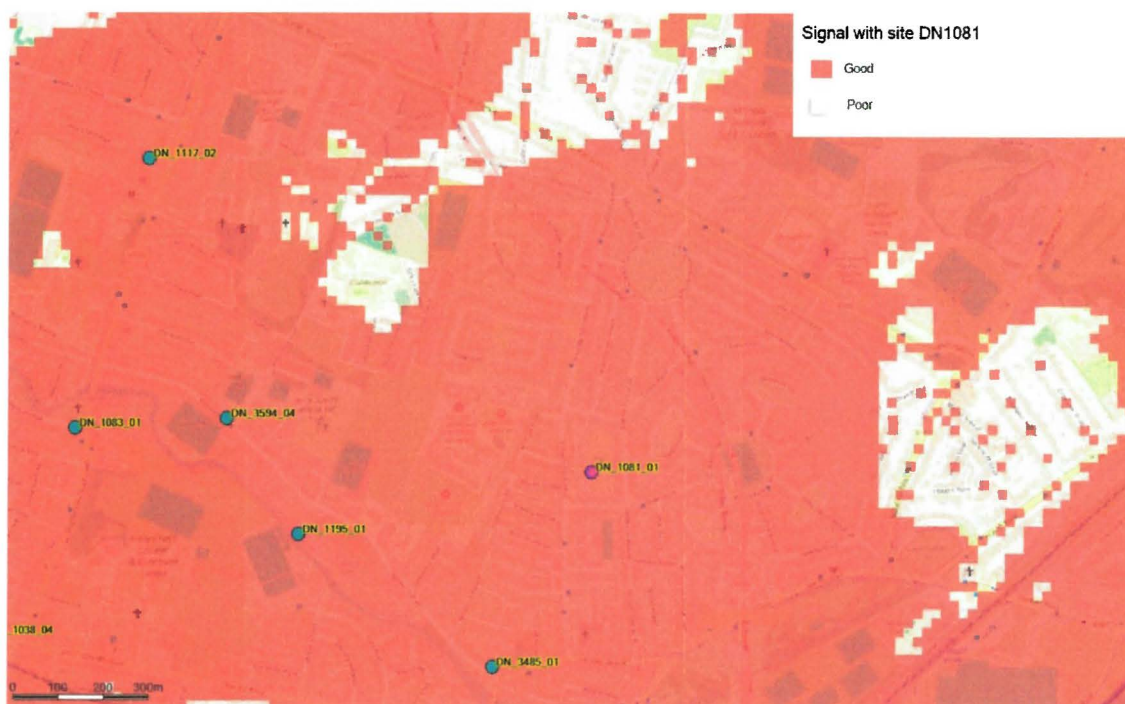


The Temporary Telecommunication Structure is required to retain the mobile voice and data coverage to the busy surrounding residential dwellings and retail and commercial developments which would have been lost due to the redevelopment of the 80–82 Philipsburgh Avenue.

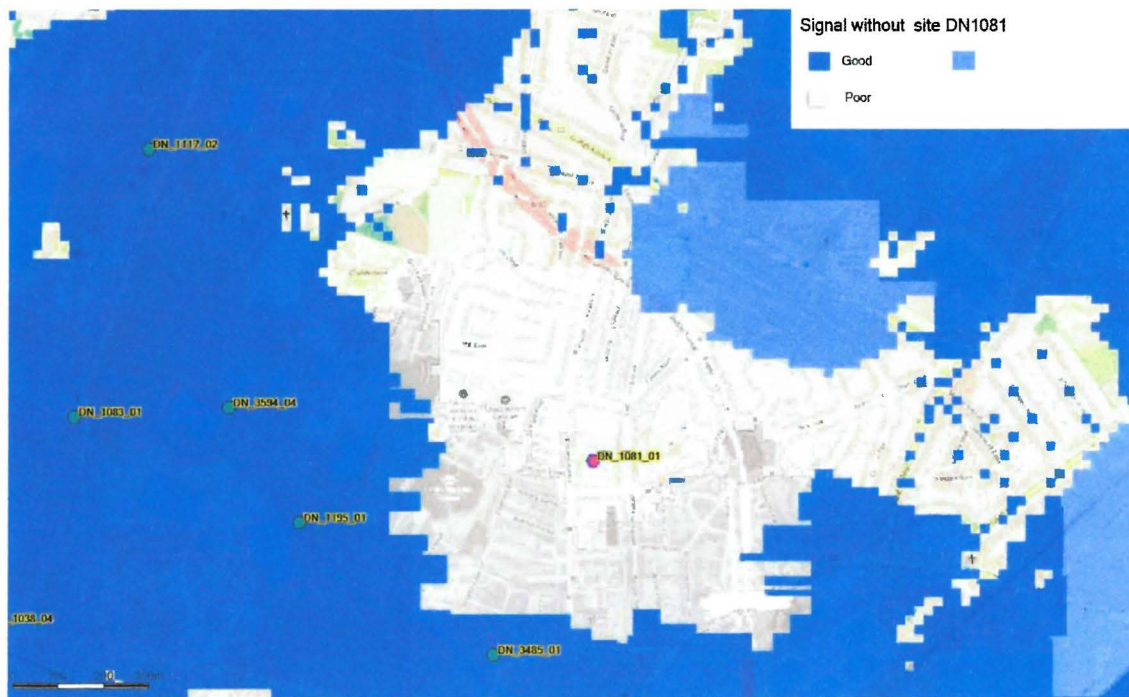
The loss of the Temporary Telecommunication Structure would mean that coverage in the area would be lost and affect the ability for people to make emergency 999 calls. This would be most noticeable in the immediate vicinity of the temporary telecommunication structure such as Philipsburgh Avenue/Terrace, Annadale Road/Terrace, Lomond Avenue, Croydon Park, Biran Road/Terrace, Shelmartin Avenue, Windsor Avenue, Melrose Avenue and surrounding areas.

The Coverage plots below supplied by the radio engineering from Eircom (T/A Eir), Three Ireland and Vodafone Ireland, indicating the extent of the coverage degradation with and without the Temporary Telecommunication Structure.

EIRCOM (T/A EIR) COVERAGE PLOTS

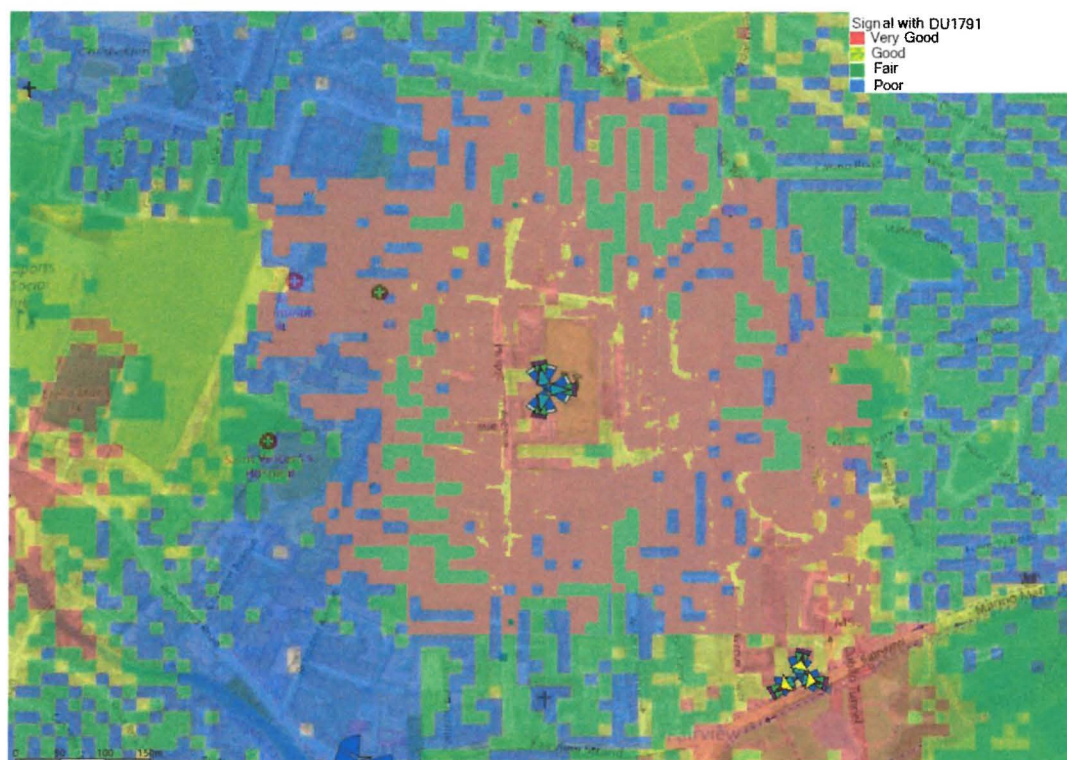


Above: Figure 1: Eir Coverage Levels with the Temporary Telecommunication Structure
DN1081: 80 – 82 Philipsburgh Avenue.

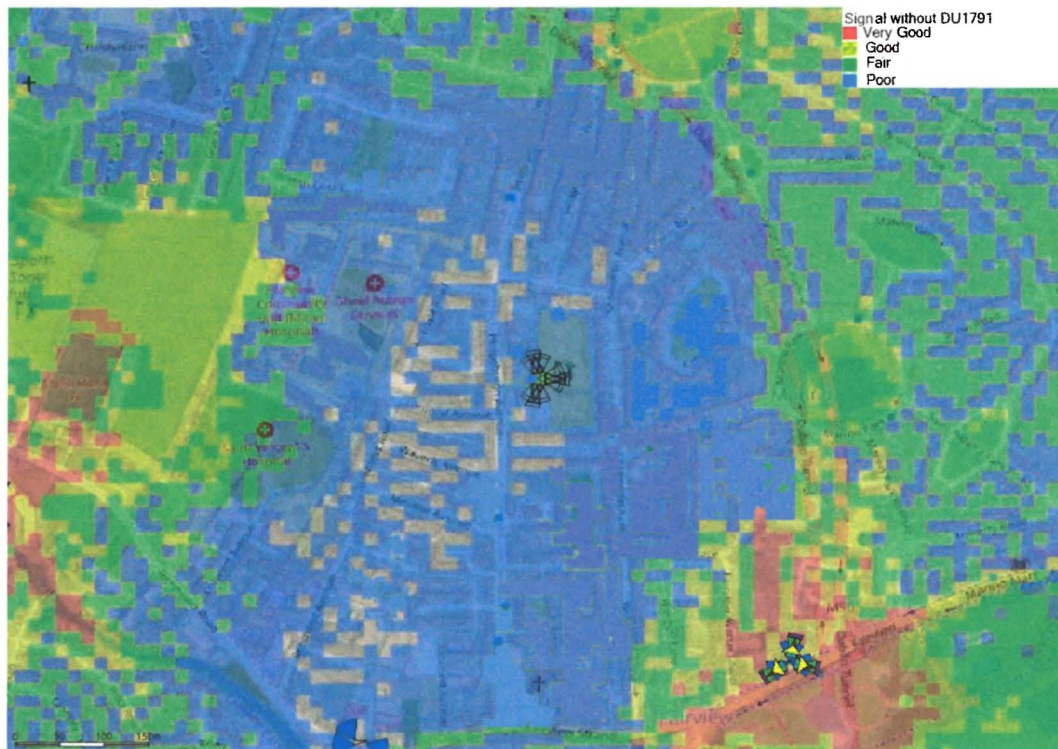


Above: Figure 2: Eir Coverage Levels without the Temporary Telecommunication Structure DN1081: 80 – 82 Philipsburgh Avenue.

THREE IRELAND COVERAGE PLOTS

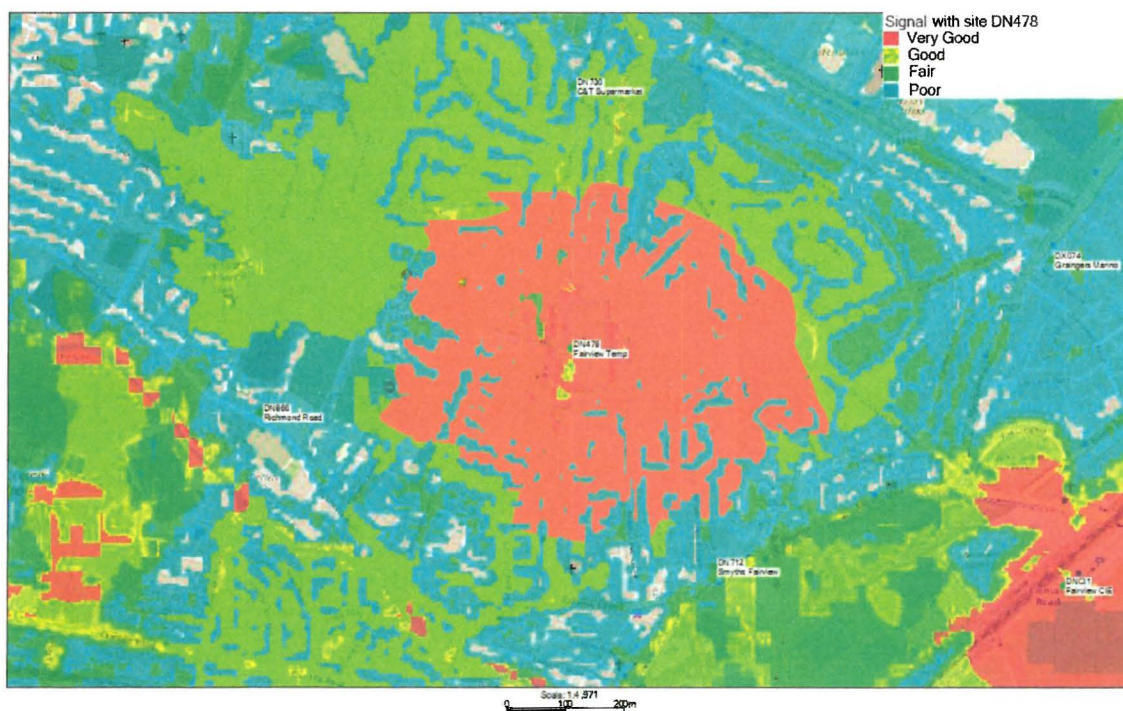


Above: Figure 3: Three Coverage Levels with the Temporary Telecommunication Structure DU1791: 80 – 82 Philipsburgh Avenue.



Above: Figure 4: Three Coverage Levels without the Temporary Telecommunication Structure DU1791: 80 – 82 Philipsburgh Avenue.

VODAFONE IRELAND COVERAGE PLOTS



Above: Figure 5: Vodafone Coverage Levels with the Temporary Telecommunication Structure DU478: 80 – 82 Philipsburgh Avenue.



Above: Figure 6: Vodafone Coverage Levels without the Temporary Telecommunication Structure DU478: 80 – 82 Philipsburgh Avenue.

5.2 DISCOUNTED STRUCTURES

A technical evaluation was carried out by the operators prior to the erection of the Temporary Telecommunication Structure, this included existing mast infrastructure, high buildings and co-location opportunities. Set out below is the list of options considered and discounted structures. See Figure 7 for locations.

- I. CT Superstore and Market, Philipsburgh Ave Marino, Dublin 3: Vodafone transmit from a chimney mounted solution. There is no space for Eir and Three to install and due to the height of the property being only 7 metres. Therefore cellular signal would not be able to reach the lower part of Philipsburgh Avenue or be a suitable replacement for the Temporary Telecommunications Structure which incorporates all 3 Network Operators.
- II. Richmond Builder's Providers & DIY, 148 Richmond Road, Dublin Three and Eir currently transmit from a mast on the property. The mast is due to be demolished, and the property redeveloped into 183 No. Build-to-Rent apartments called the Richmond Road SHD An Bord Pleanála reference ABP-317136-23.

- III. Charthouse Business Park, Dublin 3 currently transmits Vodafone from a mast on the property. The mast is only capable of homing 1 network provider and is approximately 12m in height. This site would not be able to meet the coverage area currently being facilitated by the Temporary Telecommunications Structure.
- IV. Meagher's Pub, Dublin 3: Eir and Three transmit from rooftops installations. But due to the height of these property being only 7 metres, Eir's and Three's coverage are only marginally boosted and there is no room for a Vodafone installation.
- V. Tesco Express: The structure is already utilised by Eir, Three and Vodafone yet this location fails to satisfy the local coverage requirements.

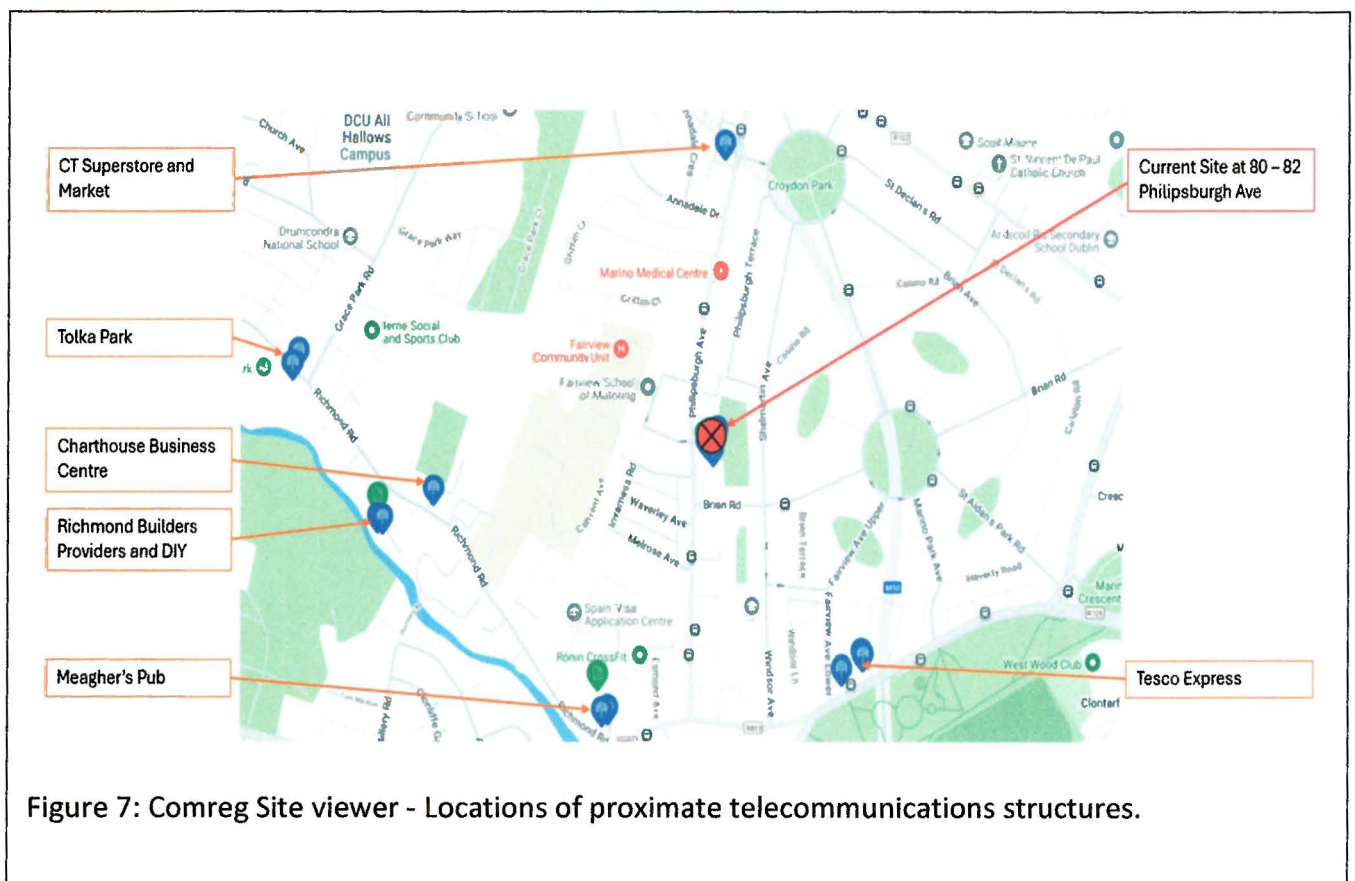


Figure 7: Comreg Site viewer - Locations of proximate telecommunications structures.

Conclusion - none of the existing / discounted telecommunications infrastructure in the vicinity can facilitate the operators coverage and technical objectives for the area.

6. COMPLIANCE WITH NATIONAL GUIDELINES AND COUNTY DEVELOPMENT PLAN POLICIES

6.1 THE REPORT OF THE MOBILE PHONE AND BROADBAND TASKFORCE

The purpose of the taskforce report is to deliver the National Broadband Plan in the shortest time possible and to reduce Ireland's urban-rural divide. This taskforce report details exponential growth in data usage and demand in recent years:

- over the last 10 years there has been an 800% increase in broadband subscriptions from 212,000 to 1.7 million
- 4 million of us are now using the 3G and 4G mobile network
- Mobile data usage has increased by a massive 500% over the last five years.

The 40 actions contained within the taskforce report require the cooperation 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. The taskforce report acknowledges the importance of private investment in the provision of increased and improved communications services; *'Delivering better mobile coverage to consumers means locating more masts in the most suitable locations from an engineering perspective'*. It continues *'the constant rapid evolution in telecommunications technology requires planning and licensing processes to keep pace with consumer demand and the growth in new and emerging technologies (e.g. 5G)'*.

While the development, which is the subject of this Section 5, is only proposed to be retained for a temporary period, it is considered to be in accordance with the Report of the Mobile Phone and Broadband Taskforce which seeks to ensure consistent and reliable services to keep pace with consumer demand and emerging technologies.

6.2 TELECOMMUNICATIONS ANTENNA AND SUPPORT STRUCTURES - GUIDELINES FOR PLANNING AUTHORITIES (1996) AND CIRCULAR PL07/12

The Guidelines state that consideration must be given to the technical requirements of telecommunications networks. With regards to location, the Guidelines 1996 state that '*... location will be substantially influenced by radio engineering factors*'. The Guidelines state that Councils should have an understanding that the location and design of structures is influenced by technical requirements and the operator will have limited scope in terms of changing same. As outlined above, there has been a telecommunications presence at this location for over 20 years. As demonstrated in chapter 5 herein, Technical Justification and Discounted Structures, existing alternative sites in the wider area have all been discounted in terms of their suitability to maintain coverage to the specified area in and around around 80–82 Philipsburgh Avenue.

The location of the Temporary Telecommunication Structure is vital to ensure continued services to the residential, educational and commercial premises in the area. It is the applicants' intention to secure a permanent location for their equipment on the roof of the redevelopment in the future.

Section 4.3 of the guidelines address the potential visual impact of telecommunications infrastructure and state that '*in the vicinity of larger towns and in city suburbs operators should endeavour to locate in industrial estates or on industrially zoned land*'. The Temporary Telecommunication Structure will have limited visual impact as the subject location is a working construction site complete with equipment, cranes etc. (see figure 8 below)

In accordance with Section 4.6 of the Guidelines, 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). Regular measurements of emission levels are required to comply with the International Radiation Associations Guidelines. Health concerns are not considered a planning issue as demonstrated in An Bord Pleanála's Inspectors Report for (Kildare County Council reg. ref: 07/1027); 'A number of applicants and observers to the appeal had raised concerns in respect of the proposed impact the development would have on health. Health concerns are not considered a planning issue and the issue pertaining to radiation emissions is a matter for ComReg to monitor.' (Kildare County Council reg. ref. 07/1027).

The proposed installation will be within the limits as set out by ComReg and ICNIRP limits, with supporting documentation provided as part of this application. It is therefore fully compliant with the relevant Health & Safety legislation applicable to this type of development.



Figure 8: Photomontage alongside tower crane

It is the policy of Dublin City Development Plan to *"support and facilitate the delivery of a high-capacity ICT infrastructure, broadband networks, and digital broadcasting in the city, having regard to the government's guidelines: Telecommunications Antenna and Support Structures-Guidelines for Planning Authorities, 1996 (DEHLG), and Circular Letter PLO 07 /12 (including any updated/superseding documents) and where it can be demonstrated that development will not have significant adverse effects on the environment."*

Compliance with the Planning Guidelines for Telecommunications Antennae and Support Structures (DECLG, Circular Letter PL07/12) is addressed above in accordance with the requirements of the City Plan. The Temporary Telecommunications Structure accommodates all three operators which avoids an unnecessary proliferation of masts at this location.

7. SUMMARY AND CONCLUSION

The intention is to seek full planning permission for a permanent installation on the roof of the completed development currently under construction, thus alleviating the requirement for a Temporary Telecommunication Structure at this location.

If the Council decrees that the Temporary Telecommunications Structure, the subject of this section 5 application, is not exempted development under The Planning and Development Regulations 2001 (as amended) Schedule 2, Part 1, Exempted Development - General, Class 16. it will have a significant negative impact on the ability to carry out the building works related to Planning Ref: 5176/22 safely and productively and the ability for people to make emergency service calls (fire / Police / Ambulance) in the areas of Philipsburgh Avenue/Terrace, Annadale Road/Terrace, Lomond Avenue, Croydon Park, Biran Road/Terrace, Shelmartin Avenue, Windsor Avenue, Melrose Avenue and surrounding areas for all 3 network operators, Eircom (T/A Eir), Three (Hutchison) Ireland and Vodafone Ireland. We also conclude that it would countermand the planning mandates and key objectives set out in Dublin City Councils Development 2022-2028.

We look forward to receiving the Council's decision in due course. Please feel free to contact me should you require any additional information that would assist the Council in making a decision on this application.

Yours Faithfully,



Alex Reid
Independent Site Management Limited
✉: alex@ismireland.com
☎: +353 (0)1 905 8800



HISTORICAL PHOTOS OF TELECOMMUNICATION EQUIPMENT AT 80 - 82 PHILIPSBURGH AVENUE

Below are photos taken on the 21st of February 2003 at the subject site 80 - 82 Philipsburgh Avenue showing telecommunication infrastructure for Meteor (Now Eircom T/A Eir), O2 Ireland, Three Ireland and Vodafone Ireland. In addition also below, photos showing equipment taken in on the 4th of May 2022 and a Google Image from 2024.

The operators have built their network in this area around this location for over 20 years and as such the site is of critical importance.

The temporary telecommunication structure now in place at 80–82 Philipsburgh Avenue is crucial for ensuring continued wireless communication and internet connectivity in and around this historic telecommunication site. This site acts as key infrastructure for Eircom (T/A Eir), Three Ireland and Vodafone Ireland, providing the necessary coverage and capacity to meet the growing demand for mobile data, voice services and emergency services.

HISTORICAL PHOTOS TAKEN IN 2003



Figure 1: Image showing date photos were taken 21st February 2003



Figure 2: Subject site at 80–82 Philipsburgh Avenue, Image taken in 2003 showing Meteor (Now Eircom T/A Eir), O2 Ireland, Three Ireland and Vodafone Ireland equipment.

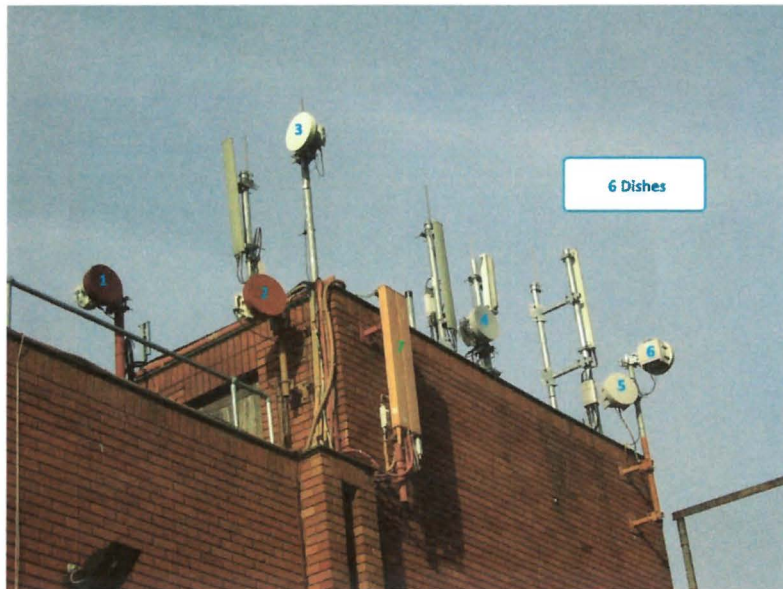


Figure 3: Subject site at 80–82 Philipsburgh Avenue, Image taken in 2003 showing Meteor (Now Eircom T/A Eir), O2 Ireland, Three Ireland and Vodafone Ireland equipment.



Figure 4: Subject site at 80–82 Philipsburgh Avenue, Image taken in 2003 showing Meteor (Now Eircom T/A Eir) equipment.



Figure 5: Subject site at 80-82 Philipsburgh Avenue, Image taken in 2003 showing Three Ireland and Vodafone Ireland equipment.

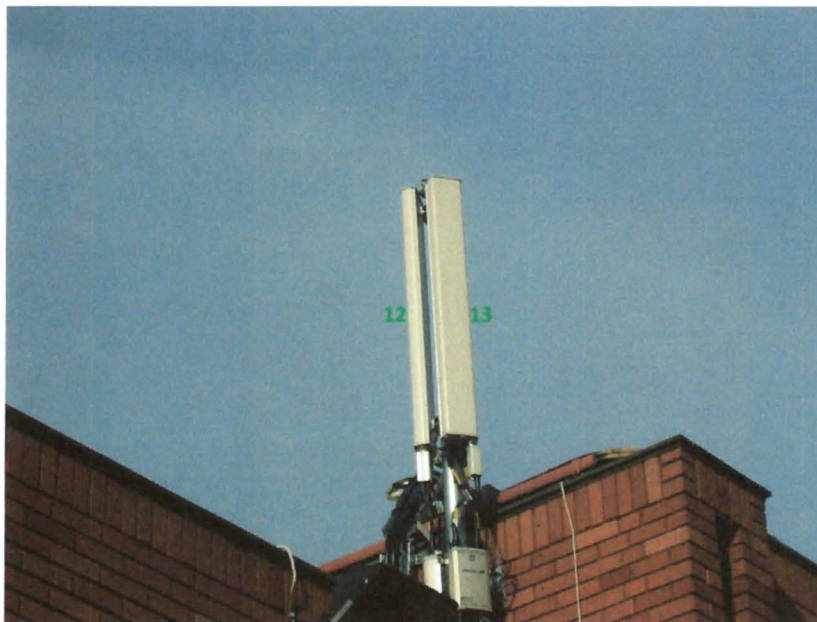


Figure 6: Subject site at 80-82 Philipsburgh Avenue, Image taken in 2003 showing Vodafone Ireland equipment.



Figure 7: Subject site at 80–82 Philipsburgh Avenue, Image taken in 2003 showing O2 Ireland, Three Ireland equipment.

HISTORICAL PHOTOS TAKEN IN 2022

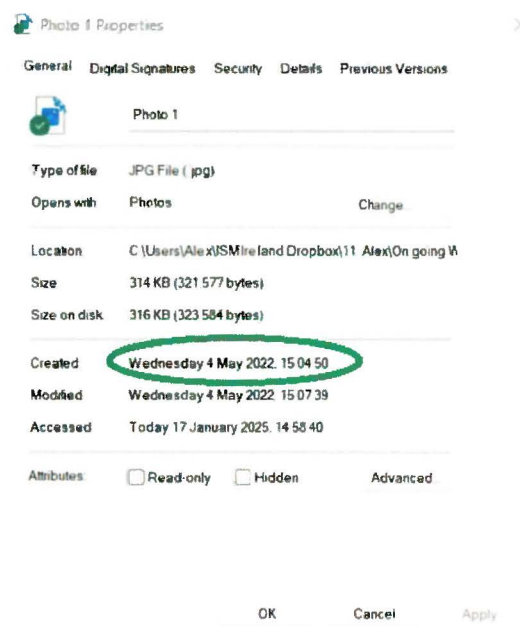


Figure 8: Image showing date photos were taken 4th May 2022



Figure 9: Subject site at 80–82 Philipsburgh Avenue, Image taken in 2003 showing Eircom T/A Eir, Three Ireland and Vodafone Ireland equipment.



Figure 10: Subject site at 80–82 Philipsburgh Avenue, Image taken in 2003 showing Eircom T/A Eir equipment.

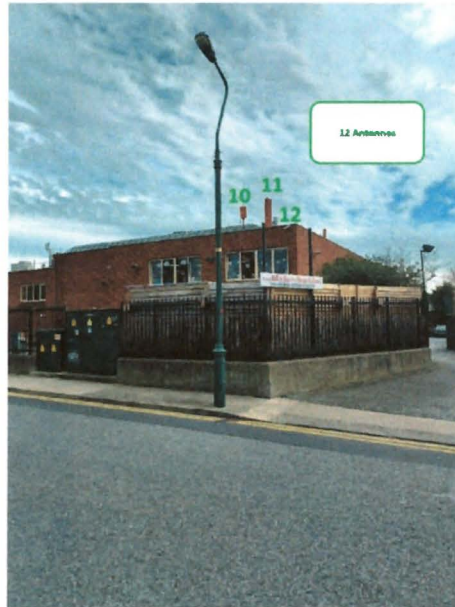


Figure 11: Subject site at 80–82 Philipsburgh Avenue, Image taken in 2003 showing Eircom T/A Eir equipment.

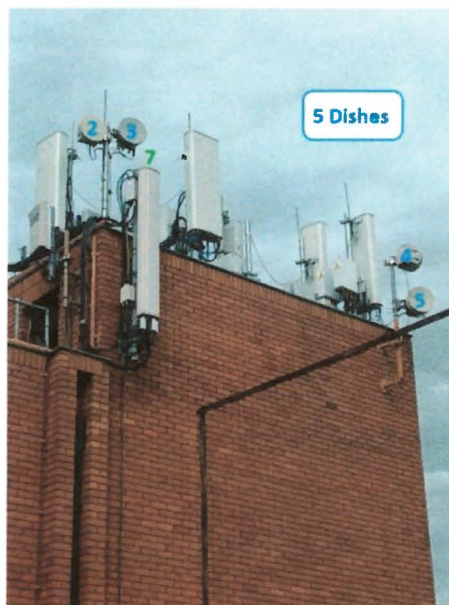


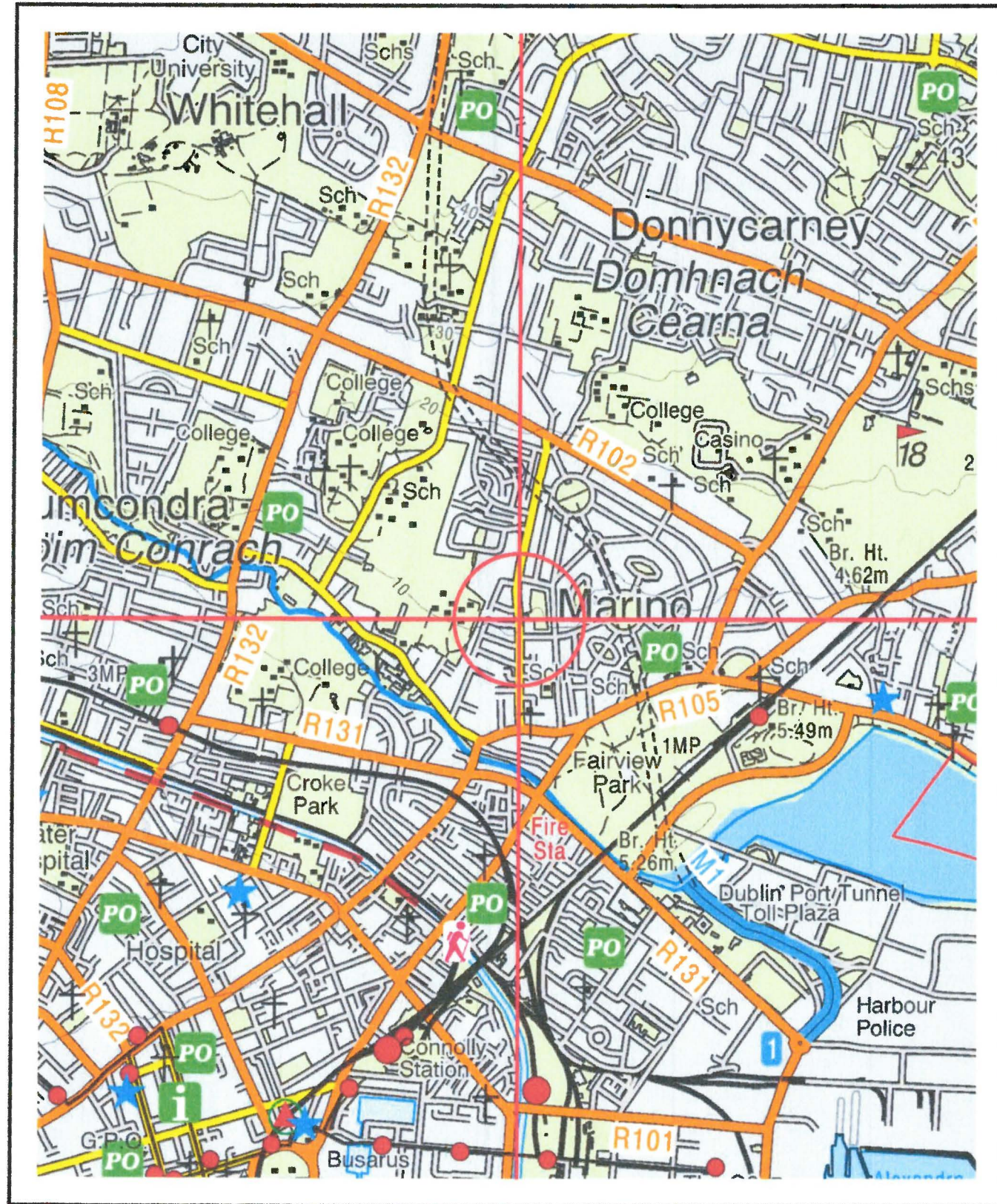
Figure 12: Subject site at 80–82 Philipsburgh Avenue, Image taken in 2022 showing Eircom T/A Eir, Three Ireland and Vodafone Ireland equipment.

HISTORICAL IMAGE FROM 2024



Figure 15: Subject site at 80–82 Philipsburgh Avenue before demolition showing Eircom T/A Eir, Three Ireland and Vodafone Ireland equipment. Image taken in 2024 Source Google Maps.

END REPORT:



OS LOCATION MAP
SCALE 1:20000



Site Coordinates			
EASTING:	317,260	LATITUDE:	53.366528° N
NORTHING:	236,567	LONGITUDE:	8.230104° W
Site Entrance Coordinates			
EASTING:	317,223	LATITUDE:	53.366446° N
NORTHING:	236,557	LONGITUDE:	8.230757° W



Fig 1. Deviation



Fig 2. Aerial View

SITE PHOTOGRAPHS

AN BORD PLEANÁLA

19 FEB 2025

LTP DATED _____ FROM App

LDG-
ABP- **321921-25**

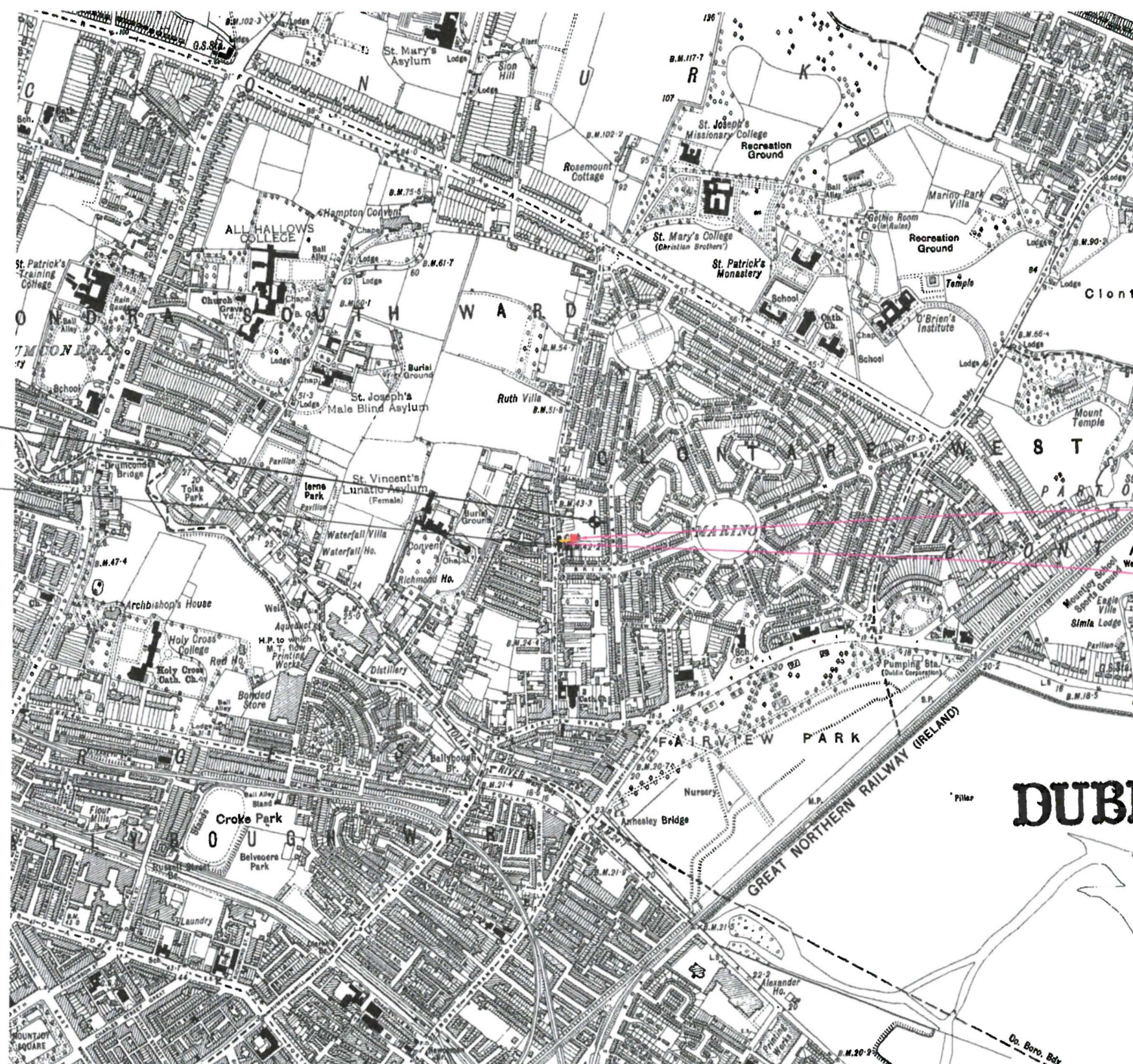


Independent Site Management
77 Camden Street Lower,
Dublin, D02 XE80
www.ismireland.com

Site Name
CYMCA TEMP MAST,
80 - 82 Phillipsburgh Avenue,
Fairview,
Dublin 3,
D03 H3F1

Title
**PHOTOGRAPHS
AND LOCATION MAP**

Designed	ISM	Drawn	JTD	Date	17.09.24	Scale	AS SHOWN
Reg. No.	ISM - 6003 - 01					Rev.	A



GROUND LEVEL = 11m
ABOVE SEA LEVEL (A.S.L.)

MAIN ROAD

PROPOSED SITE OUTLINE
HIGHLIGHTED IN RED

PROPOSED ACCESS ROUTE

RECORD PLACE MAP
1:10560

AN BORD PLEANÁLA

19 FEB 2025

LTR DATED FROM App

LDG-
ABP- 321921-25

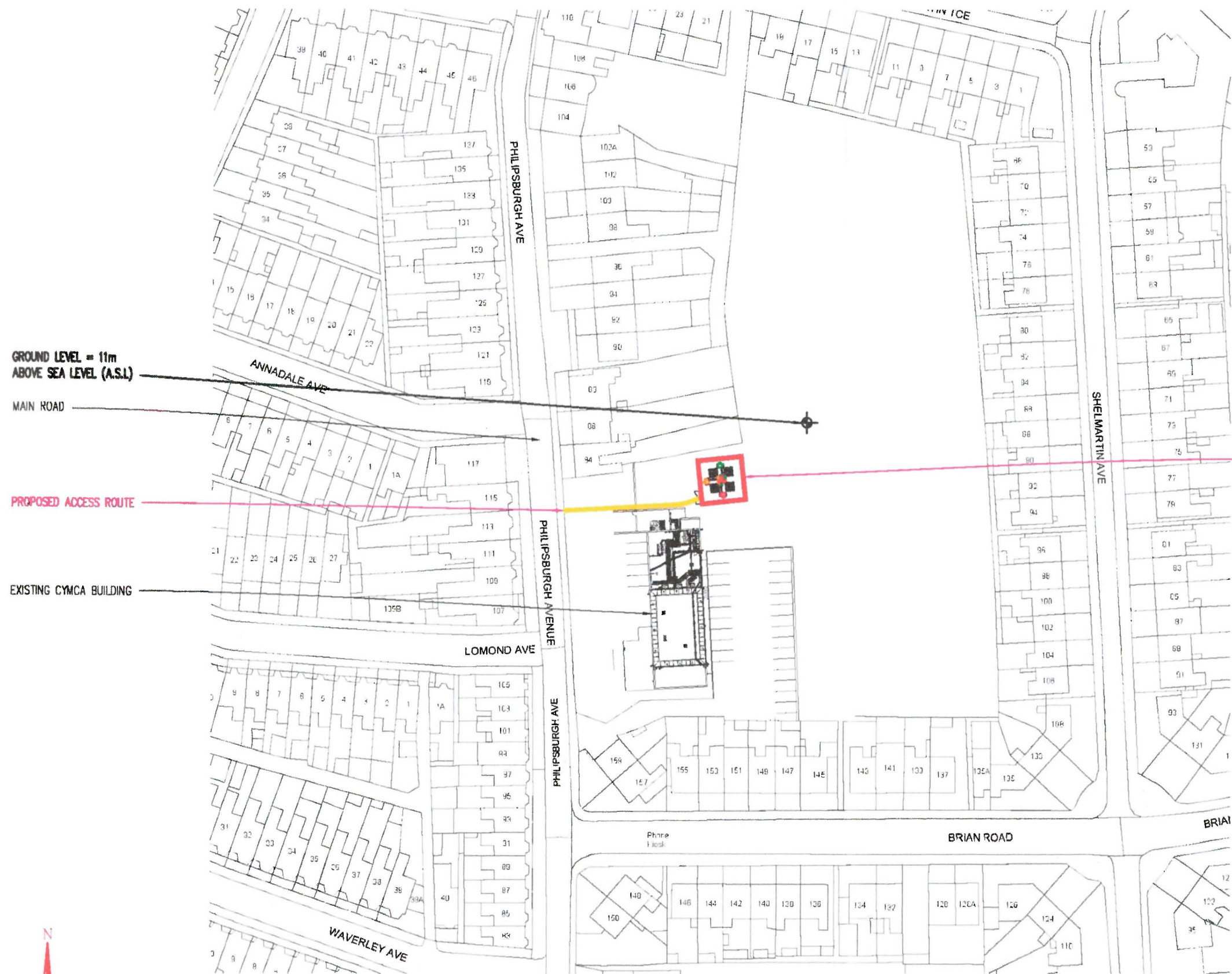
PLANNING CAD, FIRST ISSUE	17.09.24	JTD	ISM
No. Revision	Date	By	Clk



Site Name
CYMCA TEMP MAST,
80 - 82 Philipsburgh Avenue,
Fairview,
Dublin 3,
D03 H3F1

Title
RECORD PLACE MAP
SCALE 1:10560

Designed ISM	Drawn JTD	Date 17.09.24	Scale AS SHOWN
Dwg. No. ISM - 6003 - 02	Rev. A		



SITE LOCATION MAP
1:1000

AN BORD PLEANÁLA

19 FEB 2025

LTR DATED _____ FROM *App*

LDG-
ABP- **321921-25**

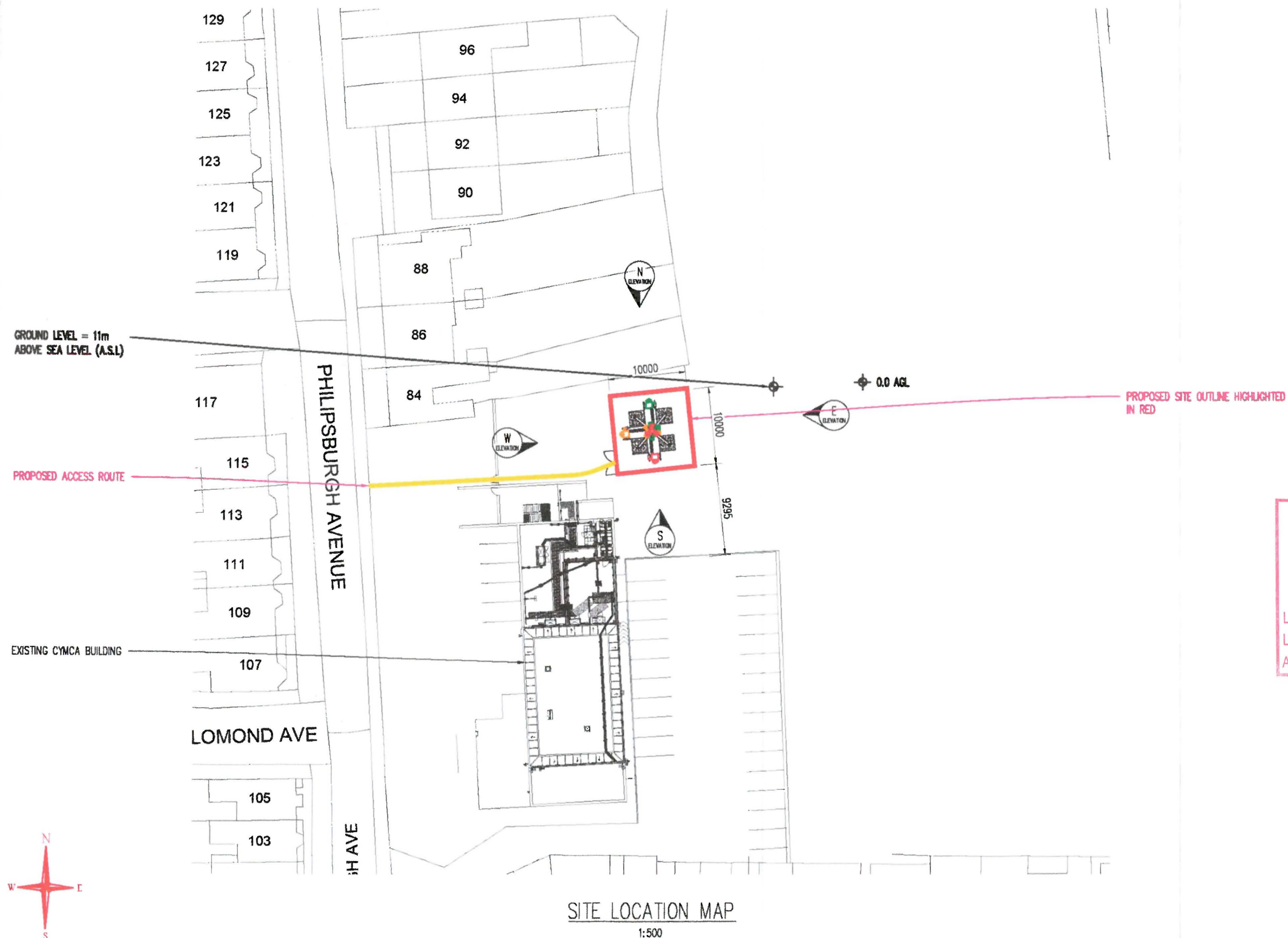
PLANNING QAD, FIRST ISSUE	17.09.24	JTD	ISM
No. Revision	Date	By	Chd

ISM Independent Site Management
77 Camden Street Lower,
Dublin, D02 XE80
www.ismireland.com

Site Name CYMCA TEMP MAST,
80 - 82 Philipsburgh Avenue,
Fairview,
Dublin 3,
D03 H3F1

Site **SITE LOCATION MAP**
SCALE 1:1000

Designed ISM	Drawn JTD	Date 17.09.24	Scale AS SHOWN
Drawn No.	ISM - 6003 - 04	Rev.	A



AN BORD PLEANÁLA

19 FEB 2025

LTR DATED FROM 1977

LDG-
ABP- 321921-25

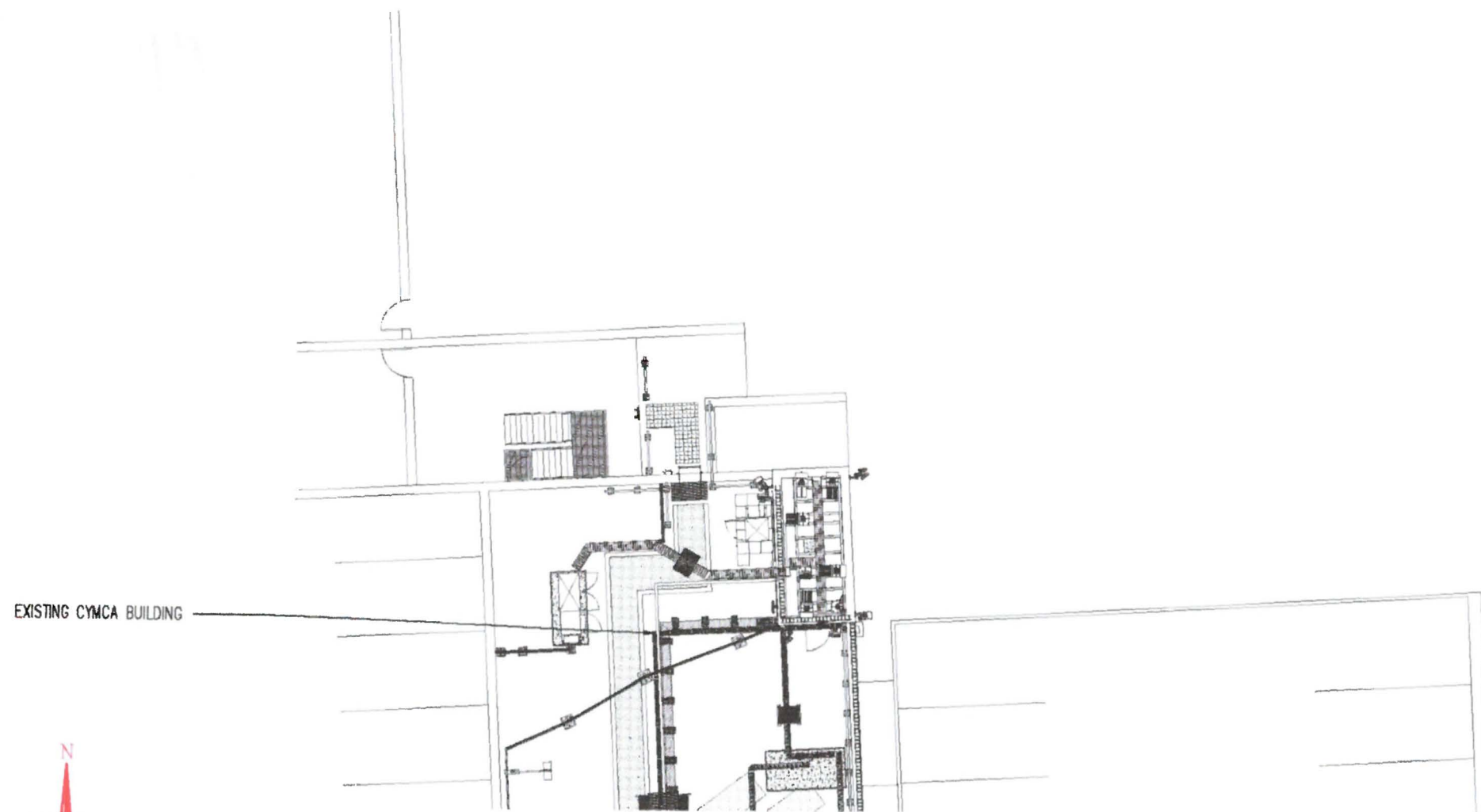
No.	Revision	Date	By	Old
1	PLANNING CAD, FIRST ISSUE	17.08.24	JTD	ISM

ISM Independent Site Management
77 Camden Street Lower,
Dublin, D02 XE80
www.ismireland.com

Site Name
CYMCA TEMP MAST,
80 - 82 Philippsburgh Avenue,
Fairview,
Dublin 3,
D03 H3F1

Title
SITE LOCATION MAP
SCALE 1:500

Designed	ISM	Drawn	JTD	Date	17.09.24	Scale	AS SHOWN
Drawn	No.	ISM - 6003 - 05	Rev.	A			



EXISTING LAYOUT PLAN

1:200

AN BORD PLEANÁLA

19 FEB 2025

LTR DATED _____ FROM *App*

LDG- _____

ABP- **321921-25**

No.	Revision	Date	By	Clk
-	PLANNING QAD, FIRST ISSUE	17.09.24	JTD	ISM



Site Name
CYMCA TEMP MAST,
80 - 82 Philipsburgh Avenue,
Fairview,
Dublin 3,
D03 H3F1

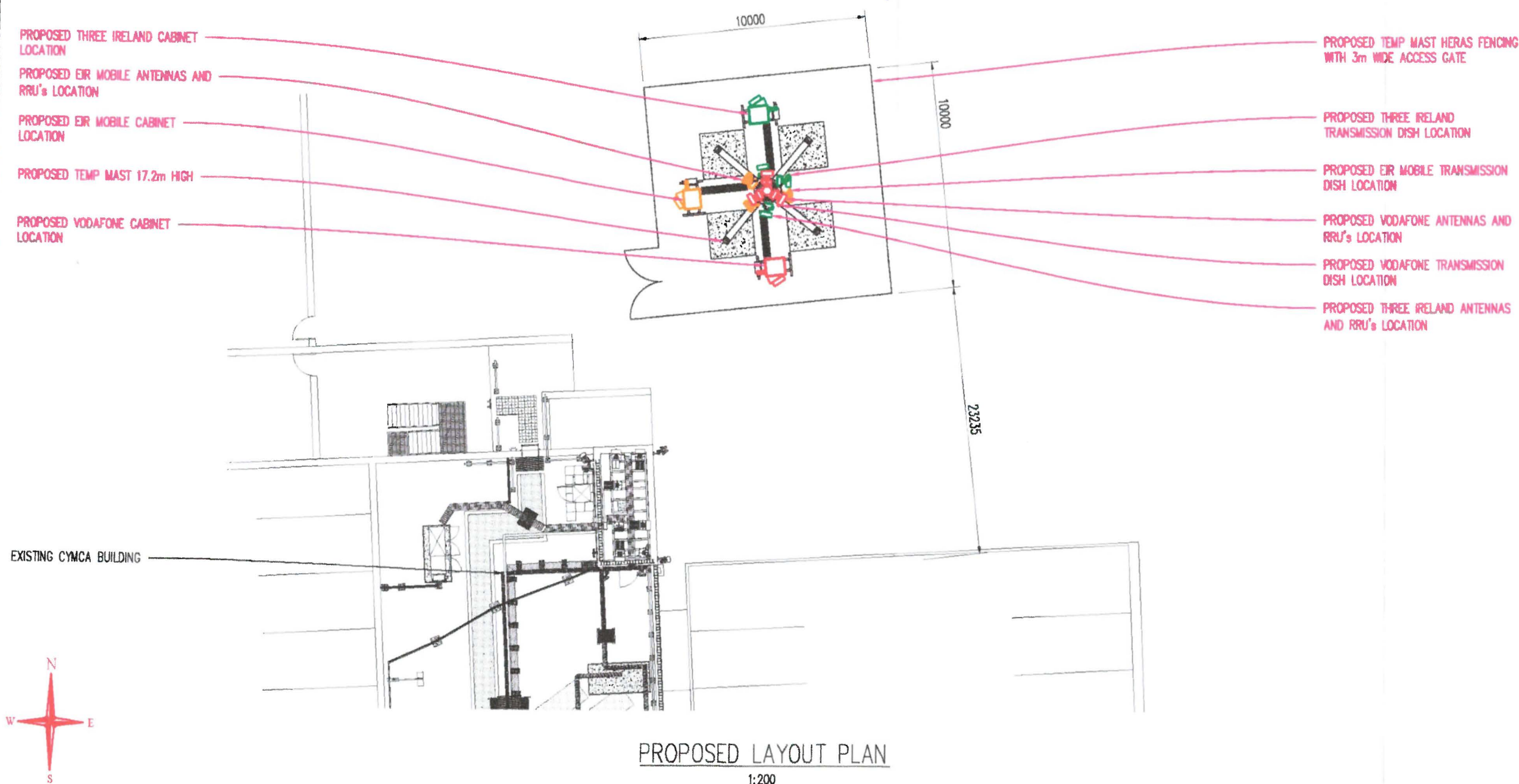
Title
EXISTING SITE LAYOUT PLAN
SCALE 1:200

Designed	ISM	Drawn	JTD	Date	17.09.24	Scale	AS SHOWN
Dep. No.	ISM - 6003 - 06					Rev.	A

AN BORD PLEANÁLA

19 FEB 2025

LTR DATED _____ FROM *Agg*
 LDG- _____
 ABF- **321921-25**



PLANNING CAD, FIRST ISSUE	17.09.24	JTD	ISM
No.	Revision	Date	By
 Independent Site Management 77 Camden Street Lower, Dublin, D02 XE80 www.ismireland.com			
Site Name CYMCA TEMP MAST, 80 - 82 Philippsburgh Avenue, Fairview, Dublin 3, D03 H3F1			
Title PROPOSED SITE LAYOUT PLAN SCALE 1:200			
Designed	ISM	Drawn	JTD
Date	17.09.24	Scale	AS SHOWN
Dep. No.	ISM - 6003 - 07	Rev.	A

PROPOSED VODAFONE ANTENNAS AND
RRU's LOCATION

PROPOSED VODAFONE TRANSMISSION
DISH LOCATION

PROPOSED THREE IRELAND
TRANSMISSION DISH LOCATION

PROPOSED EIR MOBILE TRANSMISSION
DISH LOCATION

PROPOSED EIR MOBILE ANTENNAS AND
RRU's LOCATION

PROPOSED THREE IRELAND ANTENNAS
AND RRU's LOCATION

PROPOSED TEMP MAST 17.2m HIGH

PROPOSED EIR MOBILE CABINET
LOCATION

PROPOSED THREE IRELAND CABINET
LOCATION

PROPOSED TEMP MAST HERAS FENCING
WITH 3m WIDE ACCESS GATE

17200 AGL TOP OF TEMP MAST

16400 AGL

14100 AGL

13200 AGL

EXISTING CYMCA BUILDING

8510 AGL

GROUND LEVEL

SITE ELEVATION (NORTH)

SCALE 1:200

AN BORD PLEANÁLA

19 FEB 2025

LTR DATED _____ FROM *Agg*
LDG- 321921-25
ABP-

PLANNING GAO, FIRST ISSUE	17.08.24	JTD	ISM
No.	Revision	Date	By

ISM Independent Site Management
77 Camden Street Lower,
Dublin, D02 XE80
www.ismireland.com

Site Name
CYMCA TEMP MAST,
80 - 82 Philipsburgh Avenue,
Fairview,
Dublin 3,
D03 H3F1

Title
NORTH ELEVATION
SCALE 1:200

Designed	ISM	Drawn	JTD	Date	17.09.24	Scale	AS SHOWN
Drawn	ISM	Rev.					A

PROPOSED VODAFONE ANTENNAS AND RRU's LOCATION

PROPOSED EIR MOBILE ANTENNAS AND RRU's LOCATION

PROPOSED THREE IRELAND ANTENNAS AND RRU's LOCATION

PROPOSED TEMP MAST 17.2m HIGH

PROPOSED VODAFONE CABINET LOCATION

PROPOSED EIR MOBILE CABINET LOCATION

PROPOSED THREE IRELAND CABINET LOCATION

PROPOSED TEMP MAST HERAS FENCING WITH 3m WIDE ACCESS GATE

17200 AGL TOP OF TEMP MAST

16400 AGL

14100 AGL

13200 AGL

GROUND LEVEL

SITE ELEVATION (WEST)
SCALE 1:200

AN BORD PLEANÁLA

19 FEB 2025

LTP DATED FROM App

LDG-
ABP- 321921-25

No.	Revision	Date	By	Chd
1	PLANNING GAO, FIRST ISSUE	17.08.24	JTD	ISM

ISM Independent Site Management
77 Camden Street Lower,
Dublin, D02 XE80
www.ismireland.com

Site Name
CYMCA TEMP MAST,
80 - 82 Philipsburgh Avenue,
Fairview,
Dublin 3,
D03 H3F1

Title
WEST ELEVATION
SCALE 1:200

Designed	ISM	Drawn	JTD	Date	17.08.24	Scale	AS SHOWN
Dep. No.	ISM - 6003 - 09				Rev.	A	

PROPOSED VODAFONE ANTENNAS AND
RRU'S LOCATION

PROPOSED THREE IRELAND
TRANSMISSION DISH LOCATION

PROPOSED VODAFONE TRANSMISSION
DISH LOCATION

PROPOSED EIR MOBILE TRANSMISSION
DISH LOCATION

PROPOSED EIR MOBILE ANTENNAS AND
RRU'S LOCATION

PROPOSED THREE IRELAND ANTENNAS
AND RRU'S LOCATION

PROPOSED TEMP MAST 17.2m HIGH

PROPOSED VODAFONE CABINET
LOCATION

PROPOSED EIR MOBILE CABINET
LOCATION

PROPOSED TEMP MAST HERAS FENCING
WITH 3m WIDE ACCESS GATE

GROUND LEVEL

17200 AGL TOP OF TEMP MAST

16400 AGL

14100 AGL

13200 AGL

SITE ELEVATION (SOUTH)

SCALE 1:200

AN BORD PLEANÁLA

19 FEB 2025

LTR DATED FROM *Agg*

LDG-

ABP- 321921-25

PLANNING QAD, FIRST ISSUE	17.08.24	JTD	ISM
No.	Revision	Date	By

ISM Independent Site Management
77 Camden Street Lower,
Dublin, D02 XE80
www.ismireland.com

Site Name CYMCA TEMP MAST,
80 - 82 Philipsburgh Avenue,
Fairview,
Dublin 3,
D03 H3F1

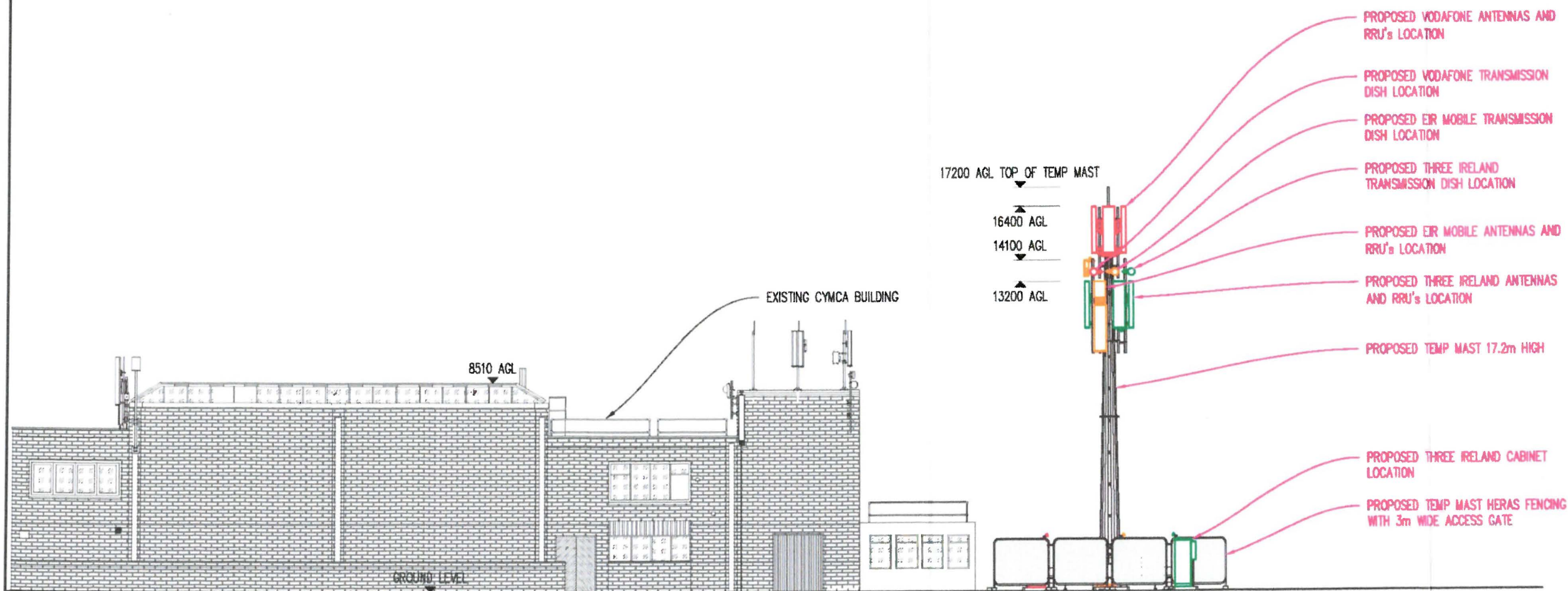
Title SOUTH ELEVATION
SCALE 1:200

Designed ISM	Drawn JTD	Date 17.08.24	Scale AS SHOWN
Dep. No. ISM - 6003 - 10	Rev. A		


AN BORD PLEANÁLA

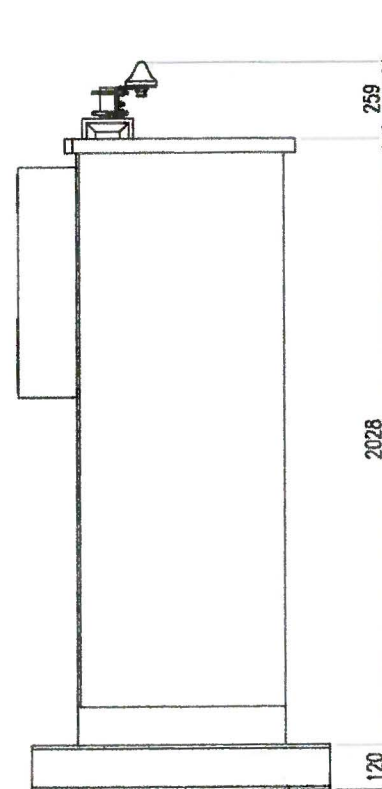
19 FEB 2025

LTR DATED _____ FROM *Agg*
LDG _____
ABP **321921-25**

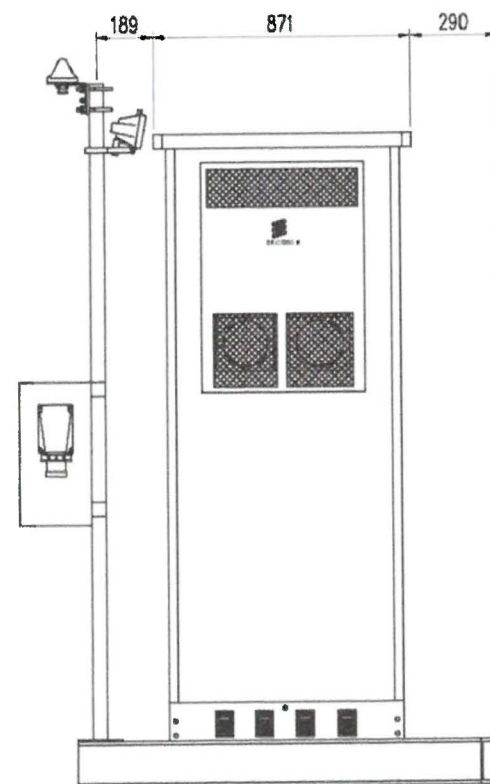


SITE ELEVATION (EAST)
SCALE 1:200

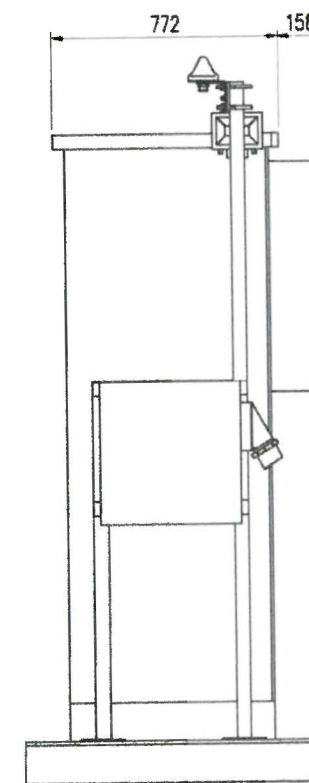
PLANNING CAD, FIRST ISSUE	17.08.24	JTD	ISM
No. Revision	Date	By	Clk
 Independent Site Management 77 Camden Street Lower, Dublin, D02 XE80 www.ismireland.com			
Site Name CYMCA TEMP MAST, 80 - 82 Philipsburgh Avenue, Fairview, Dublin 3, D03 H3F1			
Title EAST ELEVATION SCALE 1:200			
Designed ISM	Drawn JTD	Date 17.09.24	Scale AS SHOWN
Dep. No. ISM - 6003 - 11	Rev. A		



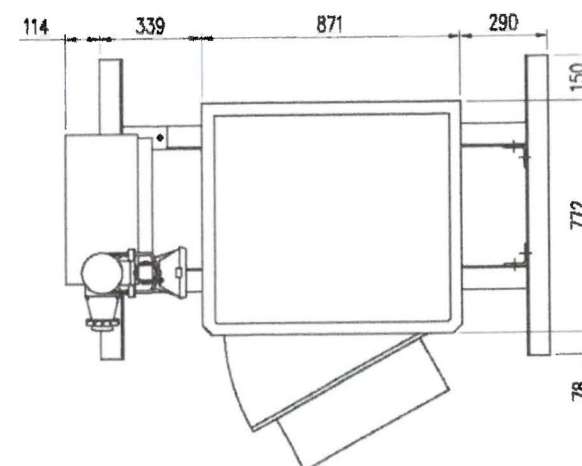
SIDE



FRONT



SIDE



TOP

TYPICAL CABINET DETAILS
SCALE 1:25

AN BORD PLEANÁLA

19 FEB 2025

LTP DATED _____ FROM *App*

LDG- _____

ABP- **321921 - 25**

No.	Revision	Date	By	Old
-----	----------	------	----	-----

ISM Independent Site Management
77 Camden Street Lower,
Dublin, D02 XE80
www.ismireland.com

Site Name CYMCA TEMP MAST,
80 - 82 Philipsburgh Avenue,
Fairview,
Dublin 3,
D03 H3F1

Title **CABINET DETAILS**
SCALE 1:20

Designed	ISM	Drawn	JTD	Date	17.09.24	Scale	AS SHOWN
Dep. No.	ISM - 6003 - 12					Rev.	A

