



An
Coimisiún
Pleanála

Inspector's Addendum Report

ABP-321251-24

Development	Erection of a 24m lattice telecommunications structure with all associated site works.
Location	Eir Exchange, Circular Road, Ballaghaderreen, Co. Roscommon.
Planning Authority	Roscommon County Council
Planning Authority Reg. Ref.	2460403
Applicant(s)	Towercom Limited
Type of Application	Permission
Planning Authority Decision	Grant
Type of Appeal	Third Party
Appellant(s)	Friends of the Irish Environment CLG
Date of Site Inspection	24 th March 2025
Inspector	Ian Boyle

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1.0 Introduction

- 1.1. This is an addendum report to the Inspector's report completed in respect of ABP-321251-24.
- 1.2. On the 27th March 2025, the Board decided to issue a Section 132 notice to the Applicant (Towercom Ltd.) requesting the following:
 - 1) Demonstration of engagement with ESB Telecoms in relation to utilising the existing telecommunications structure at the nearby ESB Compound in Ballaghaderreen and technical details as to why it is not possible to co-locate there.
 - 2) Technical details of why it is not possible to link the ESB mast to the Vodafone national fibre network planned at the Eir Exchange.
 - 3) An assessment of alternative sites in the area, including of existing high buildings or other suitable structures.
- 1.3. The Board received a response to this notice on 16th April 2025. The response circulated to the Planning Authority and Third Party Appellant (Friends of the Irish Environment CLG).
- 1.4. The Board subsequently received a response from the Third Party Appellant and Planning Authority within the statutory deadline.
- 1.5. This report considers the submissions made on foot of the request by the Board for further submissions.

2.0 Response of Relevant Parties to the Board's Decision

- 2.1. **The Applicant** made the following main points as part of their submission to the Board:

Response to (1) above:

- Vodafone has a good relationship with ESB Telecoms and is accommodated on several ESB sites and masts around the country.
- The ESB compound in Ballaghaderreen already has several agreements in place with other telecoms providers.

- A structural survey of the tower has not been undertaken. However, the compound is reaching full capacity with limited space for additional equipment.
- Even if the additional equipment required for the services were fixed to top section of the tower, it is not possible to provide the necessary ancillary equipment at ground level to secure Vodafone's operational requirements.
- At ground level, the ESB compound is approximately 10m by 7.5m. It is slightly wider at the northern boundary compared to the southern boundary. The area is full of ground equipment and there is no further capacity for new apparatus. [The compound layout is shown in Figure 1 of the submission.]
- This gives rise to maintenance and health and safety issues as the site is physically restricted in terms of accommodating a telecoms cabinet.
- Vodafone also requires a generator with a minimum 8-hour backup battery. Occasionally, a second generator is required, and the subject site would allow this to be accommodated.
- The ESB compound is unable to facilitate the installation of the equipment cabinet necessary for operational purposes.
- It is not feasible to expand the compound any further as it is surrounded by buildings, an access point to the site, and private gardens. [See aerial photograph in Figure 4 and the land registry map in Figure 5 of the submission, respectively.]

Response to (2) above:

- In theory, it is possible to link the ESB compound with the Vodafone national fibre network. However, this would require underground ducting and Council consent (see Figure 6 of submission).
- For services to be provided as part of a Base Station Controller / Hub Site, it is important to avoid breakdowns. It is therefore necessary to secure backup systems to ensure continuous operation can be maintained in case of failure of the primary system.

- The use of fibre also requires diverse fibre routes and different physical paths or routes for network connections. This is to avoid relying on a single point of failure.
- The appeal site (Eir Exchange) benefits from several different fibre routes. It therefore has multiple, independent fibre optic network paths between locations and services. This ensures 'network resilience' meaning that if one fibre path is disrupted (e.g., due to a cable cut), traffic can be rerouted through another, unaffected path, thus minimising downtime and service interruptions.
- To secure this diversity, the ESB compound would require two routes around the town from the Eir Exchange (see Figure 6 of the submission). This would require Council consent, is expensive, and would disrupt the town centre. Further complications arise in terms of land ownership and management of the fibre between Vodafone and the ESB.
- Therefore, the provision of the fibre network, although in theory is possible, would incur considerable time and cost, while the proposed development at the Eir Exchange site would be available in only a few weeks.

Response to (3) above:

- The reason for the tower is to secure additional height to provide links to the backhaul locations.
- The only building offering potential height for an installation is at the Aurivo Dairy and Ingredients facility southeast of the town.
- If the proposal was to provide a Base Transceiver Station providing coverage to a localised area only, and if the ESB tower was not available, then the Aurivo building might be an option. However, this would be subject to structural capacity, safe access and a separate power supply.
- The equipment required to ensure quality coverage and service is large and heavy with different types of antennas for different services and demands. Many instances have arisen where the structural capacity of the building has not been suitable.
- There are potential health & safety and fire risk issues with using this building.

- The purpose of the proposed development is to provide a Base Station Controller (BSC) / Hub site and the requirements for this type of facility are not particularly flexible as it comprises a large equipment cabin, needs space for a generator and unrestricted 24-hour access.

Conclusion:

- The appeal site offers several operational benefits, including 24hr / 365 day access, vehicular access, no complex H&S issues, fibre routes, minimum 8hr onsite battery backup, generator backup capability, and adequate space to accommodate an additional generator.
- The site would allow Vodafone to accommodate required equipment in the existing exchange building and through new connections to the proposed tower.
- The exchange building also has a battery room and recent storms and disruption to the electricity network have shown the importance for onsite battery backup.

3.0 Further Submissions

3.1. **The Appellant** (Friends of the Irish Environment CLG) raised the following main points in response to the Applicant's submission:

Response to (1):

- The Board has sought that the Applicant clearly demonstrate engagement with ESB confirming whether their compound is capable of serving an upgrade or whether the site can be modified to accommodate same.
- A response from ESB should have been provided as part the Applicant's submission to the Board. Towercom should have contacted them ESB, but this has not occurred.
- This raises the question if the ESB site is reaching full capacity, as contended by the Applicant, or if it might be a viable option to accommodate the proposed development.

- The Applicant has submitted nothing to the Board to confirm the technical inadequacy of existing sites and no evidence of engaging with ESB Telecoms has been provided.
- ESB would also have been under a legal duty to provide the relevant information to address the question raised by the Board.
- The Board is invited to draw their own conclusion as to why the question was not put to ESB Telecoms.
- The Appellant references other appeal cases to support this argument.

Response to (2):

- The Applicant has conceded that it is possible to link the ESB mast with the proposed Vodafone national fibre network from the Eir Exchange, but that the cost of this option is prohibitive.
- This is not sufficient justification, however, and no evidence has been submitted to quantify this cost.
- Any complications regarding land ownership and management of the fibre between Vodafone and ESB could be addressed via the EU Communications Code, or referred to ComReg, as necessary.

Response to (3):

- The Aurivo Dairy and Ingredients facility has been discounted due to steam emissions.
- However, there is another structure closer to the town centre, the Aurivo Animals Feeds Mill, which is also a tall building, and does not have steam emissions, but has not been considered as an option by the Applicant.
- There is no evidence of any engagement with Aurivo, or any other owners of potential alternative sites, as required by the Antennae Guidelines.
- The Roscommon CDP under Objective ITC 7.63 requires compliance with the Guidelines, including 'evidence' of alternatives discounted.

3.2. **The Planning Authority** responded by email to confirm they had no comments to make on the submission.

4.0 Assessment

The matters raised as a consequence of the Board's decision relate to:

- 1) A demonstrated engagement by the Applicant with ESB Telecoms regarding the potential utilisation of the ESB compound and technical details as to why it is not possible to co-locate here.
- 2) Provision of technical details of why it is not possible to link the ESB mast to the Vodafone national fibre network from the Eir Exchange.
- 3) An assessment of alternative sites, including existing high buildings or other suitable structures.

4.1. Engagement with ESB Telecoms

- 4.1.1. The Board requested the Applicant to 'demonstrate engagement' with ESB Telecoms in relation to utilising their existing telecommunications structure at the nearby ESB Compound and to provide technical details as to why it is not possible to co-locate equipment in this location, either at ground level or upon the existing structure.
- 4.1.2. The Applicant has provided a detailed response explaining why the ESB compound is not suitable and lacks the necessary space to accommodate the new Vodafone equipment. They state that the compound is reaching full capacity, and that the space is too limited to be housed either on the tower or at ground level. The Applicant supports their argument by referring to various maps and drawings. However, I note that the Board explicitly requested 'demonstration of engagement with ESB Telecoms' and this has not been provided as part of the Applicant's submission.
- 4.1.3. In their response, the Applicant does not provide any information demonstrating that they have engaged with the ESB or that they have held any discussions in relation to the ESB Compound as a potential option. There is no evidence that an attempt, of any type, has been made to contact the ESB about potentially making the compound available to accept new or upgraded telecoms equipment. While it may be the case that the current layout and physical arrangement of the compound does not currently lend itself to additional or upgraded telecoms equipment, this should be borne out in

consultation with the operator of the compound, and there is no evidence to suggest that this has occurred.

- 4.1.4. I consider that the proposed development would not be in accordance with Policy Objective ITC 7.65 of the Roscommon County Development Plan 2022-2028 ('CDP'), which is to encourage co-location of antennae on existing telecommunications structures.
- 4.1.5. I therefore conclude that it cannot be confirmed whether or not the ESB Compound has reached full capacity, as claimed by Towercom, and that the Applicant has failed to satisfy Item 1 of the Board's request for further information.

4.2. Potential to link the ESB mast to Eir Exchange

- 4.2.1. In their response, the Applicant provides a description of the technical difficulties which would be encountered as part of linking the ESB compound with the Vodafone national fibre network through the existing Eir exchange facility.
- 4.2.2. I note that it would be technically possible to connect the two facilities via underground ducting, but that this would require extensive and intrusive construction works, be subject to Council consent, and require certain landowner agreements to be obtained. The Applicant also states that there would be issues regarding future management of the fibre network between Vodafone and the ESB.
- 4.2.3. Having reviewed the response, it is clear that there would be complications associated with such an option. Whilst it may be theoretically possible, the routing of underground fibre routes would be circuitous, lengthy and convoluted. It would require the laying of fibre optic cables via two separate underground corridors through a busy network of streets.
- 4.2.4. The cables would emanate from the existing Eir Exchange and initially travel southwards onto Circular Road before splitting east and west and then heading northwards in the direction of the ESB compound via Station Road and the L1244, respectively. The cables would pass along Main Street before entering the compound and connecting to the ESB telecoms facility.

- 4.2.5. I note that Main Street is the main thoroughfare for Ballaghaderreen and is busy with traffic and pedestrians. This option would therefore lead to significant disruption of the town centre during the works phase and is not necessary, in my opinion, particularly where the siting all necessary telecoms equipment at the Eir compound has been confirmed by the Applicant as viable.
- 4.2.6. Furthermore, the existing Eir Exchange benefits from having several existing fibre routes and access points to multiple independent fibre optic networks. This infrastructure is available for use now and would be a far better option, in my view, than linking the ESB mast to the Eir Exchange in the manner described above.
- 4.2.7. I am therefore satisfied that the Applicant has addressed this issue, and the requested technical details have been provided.

4.3. Alternative Sites

- 4.3.1. In their response, the Applicant states that they had examined the Aurivo Dairy and Ingredients facility as a potential location to accommodate the proposed telecommunications equipment. The facility is the southeast of Ballaghaderreen town centre.
- 4.3.2. The Applicant states that this structure has the required height but that it has been discounted as a viable option for reasons to do with the structural rigidity of the building, safe access to the site, and the requirement for a separate power supply to serve the proposed telecoms mast. Concerns are also raised in relation to health & safety and fire risk due to the nature of industrial processes taking place on the site.
- 4.3.3. However, I note that there is a further structure which has not been considered by the Applicant and is situated nearer the town centre. This is the Aurivo Animals Feeds Mill. The building is on the western side of the L1244 across from the Aurivo Dairy and Ingredients facility.
- 4.3.4. Whilst it is not known how high this particular structure is, I note the mill building is relatively tall and, on face value, appears as they though it could potentially be a suitable location from which to accommodate new telecommunications infrastructure. There may be certain technical or practical reasons as to why the structure would not be able to serve such a purpose. However, this has not been explored by the

Applicant as part of their 'assessment of alternative sites' or discussed in their most recent submission to the Board.

- 4.3.5. The Applicant has not provided any information as to why this structure was discounted as a potential option, despite being requested by the Board to complete 'an assessment of alternatives sites in the area, including existing high buildings or other suitable structures'. This is also the requirement under the 'Guidelines for Planning Authorities on Telecommunications Antennae and Support Structures (1996)' where it is recommended that a sequential approach in finding a site should be undertaken.
- 4.3.6. The proposed development would, therefore, not be in accordance with the 1996 Guidelines as an adequate assessment of alternative sites in the area has not been undertaken, and it has not been demonstrated that the appeal site is the 'last resort' capable of accommodating the required telecoms equipment. The proposal would also be against Policy Objective ITC 7.63 of the CDP, in my opinion, which is 'to promote and facilitate the sustainable development of a high-quality ICT network throughout the county, in accordance with the requirements of the Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities, in order to achieve balanced social and economic development, whilst protecting the amenities of urban and rural areas'.
- 4.3.7. Therefore, and in conclusion, I consider that the Board's request for further information has not been met by the Applicant and that the proposed development should be refused permission for this reason.

5.0 Recommendation

- 5.1. I conclude that the Applicant has failed to adequately address the issues as raised by the Board and recommend that planning permission be refused for the proposed development.

6.0 Reasons and Considerations

- 6.1. Having regard to the 'Telecommunications Antennae and Support Structures Guidelines for Planning Authorities' issued by the Department of Housing, Planning and Local Government in 1996 (as updated by Circular Letter PL 07/12), the Roscommon County Development Plan 2022-2028, including Policy Objectives ITC 7.63 and ITC 7.65, the lack of demonstrated engagement with ESB Telecoms in relation to utilising the existing telecommunications structure at the nearby ESB Compound and of technical details as to why it is not possible to co-locate there, and in the absence of an adequate assessment of alternative sites in the area, including of a nearby high building, it is considered that the proposed development would seriously injure the amenities of the area, and of property in the vicinity. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.

Ian Boyle
Senior Planning Inspector

26th June 2025