Inspector's Addendum Report

PL-500394A-GY-25

Development	To remove an existing storage shed and erect an 18m high telecommunications monopole together with antennas, dishes and all associated equipment. This application supersedes a previous application planning reference 20/2011
Location	Eir Exchange, Clifden Road Gortyloughlin Moycullen Co. Galway
Planning Authority	Galway County Council
Planning Authority Reg. Ref.	2561345
Applicant(s)	Eircom Ltd (t/a eir)
Type of Application	Permission
Planning Authority Decision	Grant Permission + Conditions
Type of Appeal	Third Party Normal Planning Appeal
Appellant(s)	Friends of the Irish Environment CLG
Observer(s)	None

Date of Site Inspection	10th March 2026
Inspector	Patricia Byrne

1.0 Introduction

1.1. This is an addendum report to the Inspector's Report in respect of PL-500394-GY-25 (dated 20th April 2026).

1.2. On the 7th of May 2026 An Coimisiún Pleanála decided to defer consideration of this case and to issue a Section 132 notice as follows:

1. *Policy Objective ICT4 of the Galway County Council Development Plan 2022-2028 requires the co-location of antennae support structures and sites, where feasible, with operators required to submit documentary evidence as to the non-feasibility of this option in proposals for new structures. It is not apparent in the documentation provided that such in-depth and robust examination has been undertaken.*

   Please provide a detailed justification, including ComReg mapping data for the existing site and industry generated data for comparison with the alternative sites i.e. demonstrate that alternative locations/solutions have been examined and discounted as unsuitable for stated reasons.

2. *Circular PL07/12-Telecommunications Antennae & Support Structure Guidelines indicate that only as a last resort and if the alternatives are either unavailable or unsuitable, should free-standing masts be located in a residential area or beside schools. If such a location should become necessary, sites already developed for utilities should be considered and masts and antennae should be designed and adapted for the specific location.*

   Please advise the specific design features and/or adaptations proposed for this specific site.

3. *DM Standard 42 in relation to Telecommunications Masts as set out in Chapter 15 Development Management Standards of the Galway County Development Plan requires that all planning applications shall be required to furnish a statement of compliance with the International Radiation Protection Association (IRPA) Guidelines or the equivalent European Pre-Standard 50166-2 in the*

interest of health and safety. This requirement was not addressed in the documentation provided.

Please submit a Statement of Compliance.

1.3. The applicant responded within the prescribed period.

1.4. This report considers the submission made on foot of the request.

2.0 Applicants Response to the Commission's Decision to Request Further Information

2.1. The applicant makes the following points in the submission to the Commission:

Response to Item No. 1

- To secure enhanced 4G and 5G coverage it is necessary to locate as close as possible to the demand population. The Eir Exchange enables optimum coverage from a single location and secures the necessary height to capture coverage to the east (lower ground) and west (higher ground) being above the height of the existing built environment to prevent coverage blockage. The Eir Exchange site offers future opportunity for a haul back facility to be incorporated.
- Existing nearby telecommunications installations are located on a rooftop approximately 80m to southwest, at the junction of L-1313 Clifden Road. These are discounted for further co-location due to limited height and layout restrictions.
- Refers to an accompanying letter of support from Vodafone.
- The Eir Exchange is an established utilities location and the brownfield development avoids the need for alternative and additional development in the area with potential power and access limitations.
- The appeal site is a purpose-built telecommunications location with a history of such use. Provides operational benefits over the rooftop telecommunications site, detailed in previously submitted letter of support from Vodafone (dated December 2025).

- Many rooftop installations are unable to structurally accommodate new or upgraded equipment and can result in equipment being spread out and requiring long cable runs. This results in signal strength losses.
- Rooftops, especially parapet walls and/or adjoining buildings, can cause clipping of signal services, thereby reducing coverage.
- The current rooftop accommodates all three mobile network operators which can result in congestion of equipment. The Appellant is aware that rooftop equipment is clustered over different levels of the building at key points.
- Vodafone does not provide 5G services.
- Height of an installation correlates to coverage area. The 18m monopole is higher than the existing commercial rooftop. Fig. 2 and Fig. 3 are stated to indicate 12m and 18m heights for comparison purposes.
- ComReg Outdoor Mobile Coverage Maps for the Moycullen Area [Figures 4-9]. Response states that Fig. 4 and Fig. 5 demonstrate existing Eir 4G and 5G outdoor coverage in the immediate town centre as 'Very Good' with areas neighbouring the main town centre/crossroads dropping to 'Fair' and 'Fringe'.
- Fig. 6 and Fig. 7 indicate existing Three 4G and 5G outdoor coverage in the town/east of town centre as 'Very Good' with neighbouring areas to the west and southwest dropping to 'Fair' and 'Fringe'.
- Fig. 8 and Fig. 9 provide outdoor coverage map for Vodafone with both 4G and 5G indicating 'Fringe' and 'Fair' coverage to the south and west of the town centre despite the rooftop installation.
- The proposed installation would address these coverage gaps.
- Mapping of existing signal data from mobile network operators (MNO's) in the area provided by M2Catalyst, Crowd Site Intel (CSI) providing data analytics and visualisation platforms used by MNO's and tower companies worldwide. Figures 10-13 show existing Eir, Vodafone and Three, 4G and 5G Coverage for the period November to April 2026 with need for improved coverage.
- Fig. 14 Land Use Zoning map of Moycullen indicates new residential areas (Phase 1) to the south, west and southwest increasing demand for mobile coverage which could be addressed by the site.

- Sequential approach to site selection under the Telecommunications Guidelines 1996, refers to industrial locations. Such areas are located on the outskirts of Moycullen to the northeast and are at a greater distance to residential, mixed use and commercial areas of the town.
- The Eir Exchange site is considered to be the best available site to meet multi-operators requirements, and to ensure necessary coverage over a wider target area of Moycullen.

Response to Item No. 2

- The Eir Exchange is already developed for utilities and meets the sequential approach for locating telecommunications in a mixed-use town centre location as per the Telecommunications Guidelines.
- Fig. 15 and Fig. 16 demonstrate the established nature of the site
- An Omni antenna attached to the extant 12m wooden pole was in place in 2009/2010 and removed by October 2011.
- Extant planning permission for an 18m monopole under LPA Ref 20/2011.
- The current proposal supersedes the previously permitted scheme, with the revised location required due to ground complications. Increased separation between the monopole and housing to the rear of the site.
- A large tree in front of the storage shed was damaged in storms and removed making the current location available for construction.
- Wooden panel fencing will screen the widest part of the mast, ground level equipment, and cable management systems. Development area/compound is reduced in size from the previous proposal and natural screening will be retained as much as possible.
- The monopole and equipment can be painted dark brown to closer resemble the existing wooden pole or other neighbouring poles in the vicinity if required by the Commission.
- The design of the support structure is determined by numerous factors:
    - Monopoles preferred in town and village settings as per the Guidelines.

- Principle of telecommunications is acceptable on site, subject to visual impacts being acceptable.
- The 18m structure is taller than the 12m wooden pole previously used as a support structure but is kept to a minimum height/compound footprint.
- Multi-operator monopole can accommodate additional equipment facilitating changing technologies.
- Circular Letter PL01/2018 amended telecommunications exemptions allowing for taller structures and more equipment to assist the roll out of national broadband and to support enhanced mobile services. New (or replacement) support structures should be similarly designed to accommodate technological advancements. The 18m monopole, by comparison to the timber pole or rooftop location, allows for additional operators and equipment, facilitating increased co-location.
- Reduces proliferation of telecommunications structures by co-locating multi-operator infrastructure.

- Reference to photomontages provided with the application. Development would be mostly unnoticeable and intermittent in the surrounding area.
- A balanced planning approach to telecommunications development does not rule out free-standing sites in towns, villages or close to residential areas/schools on the sole basis of the location not being a last resort, particularly established utility sites.
- The Commission is requested to fully consider the merits of the proposal and to recognise the difficulties in providing telecommunications infrastructure within towns/close to residential areas where coverage is required.
- Reference to Telecommunications Guidelines with regard to visual impact and where views of a mast are intermittent and incidental and that local factors should be considered in determining the extent to which an object is noticeable or intrusive.

Response to Item No. 3

- ICNIRP Declaration letter from Vodafone Ireland Ltd. is provided in response.
- The Commission for Communications Regulations (ComReg) is the statutory body responsible for the regulation of radiation emissions.

Appendix A: **Letter of Support from Vodafone Ireland Ltd dated December 2025**

- Vodafone Ireland Limited is in the process of expanding and upgrading its network infrastructure. Increased demand requires upgrading capacity to existing sites and provision of new sites where there is a deficit in network coverage.
- Currently located on the roof of a mixed-use building, 80m to the southeast of the site. Vodafone intends to enter into an agreement with Towercom to co-locate on the new structure with Eir.
- The site offers resilience and operational benefits over the existing location (Stated as 24hr/7-day 365 access; No site-specific Health & Safety concerns; Minimum 8-hour battery backup; Generator backup capability; Space for 'height for hire' without requiring road closure/traffic management).
- Importance of large on-site battery backup complimented by generator in the event of power outage.
- Increased height allows antennae to be more prominent, resulting in increased coverage.
- Potential to develop the site as a Transmission Hub, subject to the Eir Exchange being connected to the Vodafone National fibre network for surrounding Vodafone sites. Provides future protection.
- Provides Vodafone with secure, purpose-built, co-located telecommunications installation; customer service improvements, and ongoing operational and maintenance benefits.
- Improves future capacity and enhances new 4G and 5G services to the area.

Appendix B: **ICNIRP Statement from Vodafone Ireland Ltd dated 29th May 2026**

- Confirmation that the equipment and installation are designed to be fully compliant with the EU Directive 2103/35/EU (updated 14th November 2024)

which outlines the minimum health and safety requirements on exposure to risk from electromagnetic fields. Guidelines used in the updated EU Directive are based on recommendations and guidelines from the International Commission on Non-Ionising Radiation (ICNIRP) 2020 Guidelines.

3.0 Response of the Appellant

3.1. The appellant provides a response to the First Party response, with the matters raised summarised and set out as follows:

- Response fails to address the last resort test, a requirement of the Galway County Development Plan due to the Plan's incorporation of the Antennae Guidelines.
- Proposal is driven by commercial interests, and the site location has been prejudged. The submission seeks to convince planning authorities and An Coimisiún Pleanála of a desire to address telecoms coverage gaps.
- Vodafone is operating without difficultly across the road from the proposed mast. Matters raised regarding unsuitability of the current site to justify relocating could be addressed by engaging with the owners.
- The existing location is compliant with the Antennae Guidelines, being the rooftop of a commercial premises.
- Commercially advantageous to relocate.
- Seeks to confuse by including Coverage Maps to highlight deficiencies.
- Moycullen is well served by existing antennae and the proposal to install a new mast is contrary to the Guidelines and the Development Plan, giving rise to visual impacts.
- The Commission is requested to uphold proper planning policy for telecoms provision in Moycullen.

4.0 Assessment

4.1. **<u>Introduction</u>:**

4.1.1. **P.A. Reg. Ref. 20/2011**

4.1.2. As set out in the earlier inspector's report, I referred to P.A. Reg. Ref. 20/2011 which relates to lands immediately adjacent the appeal site within the wider Eir Exchange compound. This application concerned the removal of an extant 12m timber telecommunications support structure and its replacement with an 18m high telecommunications structure. The application received a final grant of permission on the 12th of April 2021 and remained live as at the time of the first report being prepared.

4.1.3. By way of update, this permission does not appear to have been extended as evidenced by a search of the Galway County Council planning portal, and has subsequently expired.

4.1.4. As previously referenced, the extant 12m wooden telecommunications structure is not contained within the red line boundary of the appeal site (as was the case under P.A. Reg. Ref. 20/2011 where it was scheduled for removal as part of the permission). There are no proposals to remove this feature as part of the current application and no overall land holding map (outlined in blue) accompanies the application.

4.2. **Item No. 1**

4.2.1. Policy Objective ICT 4 Co-Location of Antennae as stated within the Galway County Development Plan 2022-2028, requires co-location of antennae support structures and sites, where feasible, with operators required to submit documentary evidence as to the non-feasibility of this option in proposals for new structures.

4.2.2. The response does not definitively confirm that no other opportunities are available to house the proposed development. As was raised in the initial assessment, the First Party previously referred to potential sites to the north, close to light industrial uses, and to woodlands as potential locations, noting that a mast would nonetheless be required if ultimately selected. The exact locations of these alternative sites is not provided, and I remain unsatisfied that in-depth and robust analysis has been demonstrated to disqualify such sites as unsuitable.

4.2.3. I refer in this regard to Section 4.3 of the Guidelines which states that *'only as a last resort should free-standing masts be located within or in the immediate surrounds of*

smaller towns or villages. If such location should become necessary, sites already developed for utilities should be considered and masts and antennae should be designed and adapted for the specific location. The support structure should be kept to the minimum height consistent with effective operation'.

4.2.4. I note again the accompanying letter of support from Vodafone Ireland Limited which formed part of the planning appeal. I note that the operator is currently expanding and upgrading its network infrastructure and it, together with other providers, occupies the rooftop of the commercial building in proximity to the southeast of the Eir Exchange site. The operator intends to enter an agreement to co-locate on the new support structure with the applicant, should permission be awarded.

4.2.5. While the stated intent to co-locate is noted, such arrangements exist at the current location. Additionally, I note that the arrangement to co-locate to the Eir Exchange does not appear to be contractually or legally binding and the response does not refer to an intent to decommission the existing rooftop installations. In this regard, the Commission is advised that the commercial building, whose roof top currently houses the telecommunications equipment, is not within the red line boundary of the application site.

4.2.6. I am of the opinion that the response to Item No. 1 does not fully resolve how the development is in compliance with Policy ICT 4 of the Galway County Council Development Plan 2022-2028.

4.3. **Item No. 2**

4.3.1. I refer to Policy Objective ICT3 Telecommunications Antennae and Support Structures of the Development Plan which requires the development of telecommunications throughout the county to be in compliance with the *Telecommunications Antennae and Support Structures, Guidelines for Planning Authorities, DECLG, 1996, except where they conflict with Circular Letter PI07/12.*

4.3.2. I refer again to the criteria of 'last resort' as referenced in the preceding section in response to Item No. 1, where *'only as a last resort should free-standing masts be located within or in the immediate surrounds of smaller towns or villages.* The Guidelines make a distinction with larger towns and city suburbs where operators should endeavour to locate in industrial estates/industrial zoned lands.

4.3.3. As established under the initial Inspector's report, Maigh Cuilinn is classified as a Small Growth Town within Volume 2 of the Development Plan – Settlement Strategy. I refer in this regard to the land use zoning map of Moycullen included in the response, and the contention that new residential development areas in the town are primarily to the south, west and northwest, further increasing the demand for enhanced mobile coverage for all operators.

4.3.4. I refer to existing levels of mobile coverage for the town using ComReg's Mobile Coverage Maps and note that for Vodafone, Eir and Three, the centre of Moycullen is identified as having 'Very Good' 4G coverage, while 5G coverage is classified as 'Very Good' for Eir and Three. Eir's coverage drops to 'Good' outside of the main town centre area for both 4G and 5G.

4.3.5. 5G Coverage for Vodafone is classified as 'Fringe' for the entire area.

4.3.6. As previously stated, potential sites to the north, close to light industrial uses, and to woodlands, referred to by the First Party have not been identified, and the response does not refer to the examinations which have occurred to determine feasibility, other than to indicate that sequentially, industrial lands on the outskirts of Moycullen are at a greater distance than the appeal site to residential, mixed-use and commercial areas of the town.

4.3.7. The focus of the response continues to centre on the location of extant telecommunications equipment at roof top level on the commercial building to the southeast of the Eir Exchange. Both the response of the First Party and letter of support from a third-party provider focus on the advantages in service provision of relocating to the appeal site over the current location. In this regard, reference is made to somewhat generic concerns regarding rooftop installations in general, but notes *that*

'we are aware that the rooftop equipment is clustered over different levels of the building at key points' and that *'Vodafone does not provide 5G Services'*.

4.3.8. Measures which could be pursued to enhance signal coverage from the roof top of this prominent three storey commercial structure have not been identified or definitively discounted.

4.3.9. In conclusion, while I am of the opinion that the principle of last resort does not constitute a blanket exclusion on the development of telecommunications masts within small towns and villages; in order to arrive at this position, it is evident that the proposer must firstly fully demonstrate that alternative locations/solutions have been examined and discounted. I do not conclude from the appeal or from the subsequent response of the First Party to the Section 132 notice, that all viable alternative locations/solutions have been examined and discounted in order to satisfactorily address the principle of last resort.

4.4. **Item No. 3**

4.4.1. I have reviewed the response to Item No. 3, and refer to the Declaration of Conformity with ICNIRP Exposure Guidelines (ICNIRP Declaration) dated 29th May 2026 from Vodafone Ireland Ltd. I am satisfied that the response addresses Item No. 3 of the Commission's request.

4.4.2. I note also that The Commission for Communications Regulations (ComReg) is the statutory body responsible for the regulation of radiation emissions.

5.0 Recommendation

5.1. I refer to the previous Inspector's Report and recommendation dated 20th April 2026. Having regard to the additional submission received, I conclude that the applicant has failed to adequately address the issues as raised by the Commission in relation to compliance of the development with Policy Objective ICT 4 of the Galway County Development Plan 2022-2028, and the requirements of the Telecommunications

Antennae and Support Structures- Guidelines for Planning Authorities July 1996, as updated by Circular Letter PL07/12 issued by the Department of the Environment, Community and Local Government on the 19th day of October 2012. I therefore recommend that development is refused.

6.0 Reasons and Considerations

Having regard to:

(a) the Guidelines relating to Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities issued by the Department of the Environment and Local Government in July 1996, and Circular Letter PL07/12 issued by the Department of the Environment, Community and Local Government on the 19th day of October 2012,

(b) the provisions of the Galway County Development Plan 2022-2028,

(c) Policy Objective ICT 3 Telecommunications Antennae and Support Structures,

(d) Policy Objective ICT 4 Co-location of Antennae,

(e) DM Standard 42 Telecommunications Masts,

(f) the location of the site within the Smaller Growth Town of Maigh Cuilinn (Moycullen) and proximate to residential properties and to Protected Structure RPS 711

(g) the absence of clear demonstration as to the unsuitability of alternative locations:

It is considered that the proposed development would fail to demonstrate compliance with the Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities 1996, as updated by Circular Letter PL07/12, and would be contrary to the provisions of Policy Objective ICT 3 of Volume 1 of the Galway County Development Plan 2022-2028 and would fail to demonstrate compliance with DM Standard 42 in relation to Telecommunications Masts as set out in Chapter 15

Development Management Standards of the Development Plan. The proposal does not satisfactorily demonstrate sufficient reasoned justification for the proposed development at this location and 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 me, directly or indirectly, following my professional assessment and recommendation set out in my report in an improper or inappropriate way.

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Patricia Byrne

Planning Inspector

4th November 2026.