



An
Coimisiún
Pleanála

Inspector's Report

PL-500419-LK-25

Development	24 metre telecommunications pole, equipment cabinet and associated site works
Location	Na Piarsaigh GAA Club, Elm Drive Caherdavin, County Limerick
Planning Authority	Limerick City and County Council
Planning Authority Reg. Ref.	2560652
Applicant(s)	APW UK WIP Limited t/a Icon Tower
Type of Application	Permission
Planning Authority Decision	Grant Permission
Type of Appeal	Third Party
Appellant(s)	Towercom Limited
Observer(s)	None
Date of Site Inspection	20 th March 2026
Inspector	Clare Clancy

Contents

1.0	Site Location and Description.....	3
2.0	Proposed Development.....	3
3.0	Planning Authority Decision	4
4.0	Planning History	6
5.0	Policy Context	6
5.1.	National and Regional Policy	6
5.2.	Regional Spatial & Economic Strategy for the Southern Region 2040	7
5.3.	Section 28 Guidelines	8
5.4.	Limerick Development Plan 2022-2028 (as varied)	9
6.0	EIA Screening	12
7.0	The Appeal.....	13
8.0	Assessment.....	18
8.1.	Principle of Development.....	18
8.2.	Justification for Development & Location.....	19
8.3.	Visual Impact	23
8.4.	Flood Risk – New Issue	25
9.0	AA Screening	27
10.0	Water Framework Directive.....	27
11.0	Recommendation	28
12.0	Reasons and Considerations	28
	Appendix 1: Form 1 EIA Pre-Screening.....	30

1.0 Site Location and Description

1.1. The appeal site is located in the southern corner of Na Piarsaigh GAA grounds which is located in the Caherdavin area approx. 2.86 km to the west of Limerick city centre, as the crow flies. The GAA grounds are bounded to the north and east by residential developments. Access to the site is from Elm drive off the Ennis road. Vehicular access to the GAA grounds is from Elm Drive to the south of the Ennis road. It also serves the adjoining housing developments to the east. There are agricultural lands adjoining the site to the south and the R527 is located to the west. The topography of the area is generally low-lying.

2.0 Proposed Development

2.1. Permission is sought to construct a 24 m telecommunications monopole with antennas, dishes and associated equipment attached, equipment cabinets at ground level, enclosed by securing fencing, and an extension to an existing access track.

2.2. The appeal site has a stated area of 0.041 ha and the application site boundary (red line) includes the proposed access track. The application site is located within the landholding identified by the blue line.

2.3. Access to the proposed telecommunications mast will be via an existing access route within the GAA grounds. It is proposed to provide an access track from the site with an approx. length of 115 m to link with the existing access route.

2.4. Documents lodged with the application include:

- A letter of consent from the landowner on which the application is made
- RF Technical Justification Report
- Cover letter – Charter House Infrastructure Consultants
- Photomontages of the proposed development

2.4.1. In response to a Further Information request, the following documents were submitted:

- A chart providing reasons as to why other existing sites are unable to support the proposed development

- RF Technical Justification Report

3.0 Planning Authority Decision

3.1. Decision

3.1.1. Following a request for further information (FI), by Order dated 07th October 2025, Limerick City and County Council decided to grant permission subject to 7 no. conditions. The conditions are generally standard and include for surface water management and the sites reinstatement when the structure is no longer required. The following conditions are of note:

- Condition 2 – Requires the mast to be made available for other service providers.
- Condition 6 – Requires the proposed access track to be constructed of permeable materials only.
- Condition 7 – To notify the Irish Aviation Authority and Coonagh Aerodrome of intention to commence crane operations at least 30 days prior to notification of erection in accordance with S.I. 215 of 2005 Irish Aviation Authority (Obstacles to Aircraft in Flight) Order.

3.2. Planning Authority Reports

First Report 19/08/2025

- The principle of the development was considered to be acceptable having regard to the zoning objective for the site 'Open Space' for which telecommunications mast are 'open for consideration'.
- The siting and design of the proposed development were considered acceptable.
- Some impact on visual amenities would arise however due to its setback from the public road, its location relative to existing flood lighting within the site, existing mature trees, no undue impact were considered to arise on adjoining residential properties.

- Noted the third party submission from Towercom which raised issues regarding the justification for the proposed structure, and that their existing telecommunications mast has potential for site sharing and co-location.
- FI was sought to determine all other available sites considered for the proposed development.
- It was concluded that Appropriate Assessment and an EIA screening determination were not required.

Second Report 07/11/2025

- The FI response noted 5 existing sites within the immediate area, 4 of which are within 1.0 km of the subject site and were ruled out due to being unable to cover the specific areas of Knock Hill and Amharc Abhann residential estates.
- The existing Eir Exchange site is not suitable. It is unable to cover the specific target area as the structure is not optimally positioned to provide coverage to Knock Hill and Amharc Abhann which are located to the northwest of the GAA club.
- No suitable sites were available in the immediate vicinity, the proposal was considered to be acceptable subject to a condition included requiring the permitted mast to be made available for other third party licensed mobile operators.
- The proposed development would not unduly impact on future development in regard to visual amenities as adjoining lands zoned to the south and southwest are zoned for open space and recreation.

3.3. Other Technical Reports

- Mid West National Road Design Office – No objection.

3.4. Prescribed Bodies

- Irish Aviation Authority – No objection subject to condition to 30 days notification to the IAA and Connagh Aerodrome regarding crane assembly and operation.

- Transport Infrastructure Ireland – No objection subject to regard to the provisions of official policy for development proposals impacting national roads as per the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities.

3.5. **Third Party Observations**

One Third Party observation was received from Towercom. The issues raised are similar to those raised in the grounds of appeal.

4.0 **Planning History**

Appeal Site – Most Recent

- P.A. Ref. 22/347 – Permission granted to widen existing entrance.
- P.A. Ref. 22/1084 – Permission granted for alterations to existing club house.
- P.A. Ref. 22/522 – Permission granted for 4 no. flood lights.
- P.A. Ref. 24/61123 – Permission granted for gym.

5.0 **Policy Context**

5.1. **National and Regional Policy**

Climate Action Plan (CAP) 2025

- CAP 2025 to be read in conjunction with CAP 2024, the relevant part being Section 11.2.4.
- Section 10.1.8: Digital Transformation. The CAP supports the national digital transformation framework and recognises the importance of this transformation to achieve Ireland's climate targets.
- The transition towards green and digital societies is highlighted throughout the CAP 2025, as an overarching aim to achieve decarbonisation and net zero commitments.

- Section 15 of the Climate and Low Carbon Development Act 2015 as amended (the Climate Act), obliges the Board to make all decisions in a manner that is consistent with the current CAP.

Harnessing Digital. The Digital Ireland Framework.

- Section 2.1: Enable the physical telecommunication infrastructure and services delivering digital connectivity in line with the National Broadband plan.

National Planning Framework 'Project Ireland 2040'

- First Revision (April 2025)
- National Policy Objective 31: Support and facilitate delivery of the National Broadband Plan as a means of developing further opportunities for enterprise, employment, education, innovation, and skills development for those who live and work in rural areas.
- National Policy Objective 62: In co-operation with relevant Departments in Northern Ireland, develop a stable, innovative and secure digital communications and services infrastructure on an all-island basis.

National Development Plan 2021-2030

- The government recognises that access to quality high speed broadband is essential for today's economy and society.

National Broadband Plan 2020

- The National Broadband Plan (NBP) is the Government's initiative to improve digital connectivity by delivering high speed broadband services to all premises in Ireland, through investment by commercial enterprises coupled with intervention by the State in those parts of the country where private companies have no plans to invest.

5.2. Regional Spatial & Economic Strategy for the Southern Region 2040

- Section 4.7: Guiding principles for enterprise include the availability of different types of infrastructure including telecommunications.

- Section 6.2: Telecommunications infrastructure is essential to ensure digital connectivity.

5.3. **Section 28 Guidelines**

Telecommunication Antennae and Support Structures: Guidelines for Planning Authorities 1996

These guidelines were published in 1996 and provide general guidance on planning issues so that the environmental impact is minimised, and a consistent approach is adopted by the various planning authorities.

Circular Letter PL 03/2018

This Circular provides a revision to Chapter 2 of the Development Contribution, Guidelines for Planning Authorities, 2013 and specifically states that the waiver provided in the Development Contribution, Guidelines for Planning Authorities, 2013 should apply not only to the provision of broadband services but also to mobile services.

Circular Letter PL07/12

Circular Letter PL 07/12, dated 19th October 2012, sets out to revise Sections 2.2 to 2.7 of the Guidelines. The Circular was issued in the context of the rollout of the next generation of broadband (4G). It sets out elements of the 1996 Guidelines that required being revised. Broadly these are:

- Cease attaching time limiting conditions to telecommunications masts, except in exceptional circumstances;
- Avoid inclusion in development plans of minimum separation distances between masts and schools and houses;
- Omit conditions on planning permission requiring security in the form of a bond/cash deposit;
- Register or database of approved structures;
- Reiterates advice not to include monitoring arrangements on health and safety or to determine planning applications on health grounds; and

The circular also states that future development contribution schemes to include waivers for broadband infrastructure provision.

The Planning System and Flood Risk Management Guidelines, Guidelines for Planning Authorities (November 2009)

The purpose of the Guidelines is to provide planning authorities with detailed procedural and technical guidance needed to properly assess flood risk at development level, and to ensure all planning decisions comply with national policy of avoiding or managing flood risk. The Guidelines set out how flood risk must be assessed and integrated into planning decisions, and ensure that planning authorities follow the risk-based sequential approach.

5.4. Limerick Development Plan 2022-2028 (as varied)

5.4.1. Chapter 6 Environment, Heritage, Landscape and Green Infrastructure

- **Objective EH O1 Designated Sites and Habitats Directive**

It is an objective of the Council to ensure that projects/plans likely to have significant effects on European Sites (either individually or in combination with other plans or projects) are subject to an appropriate assessment and will not be permitted under the Plan unless they comply with Article 6 of the Habitats Directive.

- **Policy EH P8 Landscape Character Areas**

It is a policy of the Council to promote the distinctiveness and where necessary safeguard the sensitivity of Limerick's landscape types, through the landscape characterisation process in accordance with the Draft Guidelines for Landscape and Landscape Assessment (2000) as issued by the Department of Environment and Local Government, in accordance with the European Landscape Convention (Florence Convention) and with A National Landscape Strategy for Ireland – 2015- 2025. The Council shall implement any relevant recommendations contained in the Department of Arts, Heritage and the Gaeltacht's National Landscape Strategy for Ireland, 2015 – 2025.

- Map 6.1 Landscape Character Assessment – Indicates that the site is located in an area designated 'Caherdavin'.

5.4.2. Chapter 8: Infrastructure

- **Policy IN P1 Strategic Infrastructure**

It is a policy of the council to:

- a) Secure investment in the necessary infrastructure (including digital technology, ICT, telecommunications networks, water services, surface water management, waste management, energy networks), which will allow Limerick to grow and realise its full potential.
- b) Fulfil Limerick's ambition as a contemporary City and County in which to live, work, invest and visit, with supporting infrastructure, whilst complying with the relevant EU Directives and national legislation, including the protection of the environment.

Section 8.4.2 Telecommunications Support Structures, Antennae and Domestic Satellite Dishes:

- The Council recognises the importance of high-quality telecommunication infrastructure as a prerequisite for a modern society and economy. While the advantages of a high-quality ICT infrastructure is acknowledged, these must be balanced with the need to safeguard both the urban and rural landscape, which can be significantly impacted due to the physical nature of telecommunication structures. Visual impact should be kept to a minimum, with detailed consideration of design, siting and the scope for utilising landscaping measures effectively. In considering planning applications, regard shall be had to Telecommunications Antennae and Support Structures, Guidelines for Planning Authorities, DECLG, 1996, Circular Letter PI07/12 and the Planning and Development Regulations 2001 (as amended). These guidelines and regulations encourage the sharing or clustering of sites, as reflected in this chapter.
- **Objective IN O5 Telecommunication Support**

It is an objective of the Council to:

- a) Promote shared telecommunications infrastructure in all new developments to facilitate multiple network providers.
- b) Work closely with the telecommunications industry during the development and deployment phase of telecommunications infrastructure to carefully manage Limerick's road networks and minimise future road infrastructure works.

c) Require co-location of antennae support structures and sites where feasible. Operators shall be required to submit documentary evidence as to the non-feasibility of this option in planning applications for new structures.

e) Require best practice in both siting and design in relation to the erection of communication antennae and support infrastructure, in the interests of visual amenity and the protection of sensitive landscapes. There is a presumption against the location of antennae support structures where they would have a serious negative impact on the visual amenity of sensitive sites and locations.

f) Require the de-commissioning of a telecommunications structure and its removal off-site at the operator's expense when it is no longer required.

h) Ensure orderly telecommunications development in accordance with requirements of the Telecommunications Antennae and Support Structures, Guidelines for Planning Authorities, DECLG, 1996, except where they conflict with Circular Letter PL07/12 which takes precedence and any subsequent guidelines.

Chapter 9 Climate Action, Flood Risk and Transition to Low Carbon Economy

- *Section 9.3 Flooding, Flood Risk Management and Water Management*

The Section 28 Planning Guidelines The Planning System and Flood Risk Management (DHPLG/OPW, 2009) and associated Technical Appendices and Circulars, are the basis of the Council's policy in relation to development and flood risk management. It plays a key part in informing zoning decisions and decisions on individual planning applications, where flood risk is identified as a factor. The guidelines ensure that the key principles of flood risk management and sustainable planning are adopted. The sequential approach to managing flood risk within the planning system is one of the first aspects to consider and where uncertainty exists, the precautionary approach is taken.

Objective CAF O20 Flood Risk Assessments

It is an objective of the Council to require a Site-Specific Flood Risk Assessment (FRA) for all planning applications in Flood Zones A and B and consider all sources of flooding (for example coastal/tidal, fluvial, pluvial or groundwater), where deemed necessary. The detail of these Site-Specific FRAs (or commensurate assessments of flood risk for minor developments) will depend on the level of risk and scale of

development. The FRA will be prepared taking into account the requirements laid out in the SFRA, and in particular in the Plan Making Justification Tests as appropriate to the particular development site. A detailed Site-Specific FRA should quantify the risks, the effects of selected mitigation and the management of any residual risks. The assessments shall consider and provide information on the implications of climate change with regard to flood risk in relevant locations.

Chapter 12 Land Use Zoning Strategy

- Land Use Zoning

Zoning – Open Space and Recreation

Objective: To protect, provide for and improve open space, active and passive recreational amenities.

Purpose: To provide for active and passive recreational resources including parks, sports and leisure facilities and amenities including greenways and blueways. The Council will not normally permit development that would result in a loss of open space.

5.5. **Natural Heritage Designations**

- SPA: 004077 - River Shannon and River Fergus Estuaries SPA – approx. 1.16 km to the south.
- pNHA: 002048 - Fergus Estuary And Inner Shannon, North Shore – approx. 1.16 km to the south.
- SAC: 002165 - Lower River Shannon SAC – approx. 1.16 km to the south.

6.0 **EIA Screening**

- 6.1. The proposed development is not a class for the purposes of EIA as per the classes of development set out in Schedule 5 of the Planning and Development Regulations 2001, as amended (or Part V of the 1994 Roads Regulations. No mandatory requirement for EIA therefore arises and there is also no requirement for a screening determination). Refer to Form 1 appended to this report.

7.0 The Appeal

7.1. Grounds of Appeal

One Third Party appeal was received from Towercom Limited. The substantive issues raised in the grounds of appeal may be summarised as follows:

Justification

- The necessity for the proposed mast is questionable as the site is situated at 2.0 m above sea level (ASL) and the existing telecommunication mast located at the Eir Exchange is 6.0 m ASL resulting in the existing and proposed masts being 26 m in height within a distance of 450 m of each other.
- Limerick City and County Council (LCCC) failed to consider that Towercom Limited completed construction of a 20 m telecommunications support structure P.A. Ref. 20616 which is located at the Eir Exchange in Caherdavin approx. 450 m to the east of the proposed development site. It is a lattice structure and can offer greater flexibility for the location of equipment in comparison to a monopole.
- It is owned and managed by Towercom and operated by Eircom and Vodafone.

Target Coverage Area

- The justification lacks clear definition regarding the intended target coverage.
- The need for the proposed structure was initially stated to improve service to the area of residential properties in the wider area and help coverage to any local businesses.
- Following a request for FI, it was stated that the proposed mast is to provide coverage to Knock Hill and Amharc Abhann residential estates currently under construction (Figure 4).
- The coverage maps provided are insufficiently detailed. Reference to 2G, 4G and 5G services is made in the justification report, however the existing coverage plots do not advise which coverage level is shown.
- There are no predicted coverage plots provided to indicate anticipated coverage improvements.

- No details are provided in regard to prospective operators.
- According to the coverage maps, Eir's coverage provision for the target area Caherdavin appears to have been met. The existing Eir Exchange mast is located within this area serving existing residential development and Jetland shopping centre.

Development Plan Policy

- The proposed development does not comply with Objective IN O5 Telecommunications Support (c) as sufficient information to comply with the assessment of non-feasibility of the existing Eir Exchange mast.
- There is availability on the existing mast to accommodate a third operator and the existing tower is capable of being extended to a height of 30 m.
- In regard to compliance with (h) Telecommunications Guidelines for Planning Authorities 1996 and visual impact, the photomontages provided did not include viewpoints from the housing estates to the east or south of the proposed structure, none were provided from the west along the R557 and is therefore not a through appraisal to assess visual impact.
- Objective IN O5 (c) of the development plan and Section 4.5 (Sharing and Clustering) of the Telecommunications Antennae and Support Structures Guidelines for Planning Authorities explicitly encourage co-location, infrastructure sharing. Where existing infrastructure is available and capable of supporting additional equipment, the justification for a new structure should be clearly evidenced. The Guidelines and the development plan policy explicitly encourage co-location and infrastructure sharing. The justification provided is inadequate.

Extension of the Existing Eir Exchange Structure

- The existing Eir Exchange Structure site has the potential for sharing and co-location for telecommunications equipment and will be made available to all parties.
- The existing structure can be extended in height to accommodate additional telecommunications equipment.

- LCCC and the applicant failed to examine if the existing was feasible for use, and did not fully consider Towercom's submission to the planning application.

Other Matters

- The photomontages do not provide a comprehensive assessment of visual impact. Key areas such as nearby housing estates and the R527 were not provided.
- The appeal site is located in a flood zone.

7.2. Applicant Response

A response to the grounds of appeal was received by the applicant. The response to the grounds of appeal may be summarised as follows:

Justification

- Existing Eir Exchange site at Cahirdavin – telecommunication sites in urban environments are positioned in close proximity to one another to achieve coverage overlap between cells to deliver high capacity networks to accommodate a larger population. This is demonstrated in the existing site analysis.
- The existing Towercom site accommodates Vodafone and eir and facilitates both operators in securing coverage locally, however the influence of this cell dissipates over distance. This is demonstrated in the Technical Justification Report submitted in response to the further information (FI) request.
- The maps provided show 'very good' and 'good' outdoor coverage.
- The subject site will provide the coverage footprint to serve the area and the overlap will counteract the reduced cell shrinkage affect that occurs during high demand peak times for data usage.

Co-location and Extension Feasibility

- The existing Towercom structure accommodates eir and Vodafone, however the structure is not a solution for all operators and cannot have influence where its location is at a remove from target coverage areas.

- The existing structure also transmits from the existing ESB Telecoms owned mast at the Gaelic Grounds (c. 693 m away). The arguments put forward by Towercom regarding the need for the proposed development could also have been applied to the existing ESB Telecoms site who could have argued that its site at the Gaelic Grounds addressed all coverage issues, and the existing Towercom structure was therefore not required.
- The existing Towercom structure is limited due to height and remote location relative to the target coverage area, i.e. the area north and south of the Ennis road to serve existing residential development and developments under construction.
- The available space slot at 14 m – 17 m is noted. While the application structure is 24 m high, it is remote from housing and close to the target coverage area and would require planning consent in order for it to be extended to facilitate further operators.

Compliance with Planning Policy and Guidelines

- In accordance with Objective IN O5 Telecommunication Structure, the proposed structure is located within the grounds of a GAA club and is setback from existing residential development.
- The proposed structure is suitable for co-location and has the capacity to accommodate up to 3 mobile telecommunications operators.
- The applicant provides host infrastructure for mobile telecommunications operators nationwide. The road network will not be impacted upon.
- Na Piarsaigh GAA has made its land available to facilitate improved telecommunications coverage.
- The siting and design of the proposed structure will mitigate visual impact. The proposed structure is not situated within a sensitive landscape or a protected area. Existing mature trees assist in screening and softening the visual impact.
- There is an existing entrance serving the site, and a short access track extension is proposed within the site for construction which will integrate back into its natural surroundings over time.

- Decommissioning is addressed by condition 4 of the PAs grant.

Visual Amenities

- Photomontages were taken from the area of highest residential concentration to the northwest and east of the site. View from the R527 as it was considered unnecessary.

Flood Risk

- Flood Risk was not raised by the PA in the initial assessment of the application or as part of the FI request. It was not possible to carry out a Site-Specific Flood Risk Assessment of the proposed development prepared by a consultant engineer during the appeal period and due to the Christmas period. However an appraisal was carried out that is informed by a Site-Specific Flood Risk Assessment prepared by Garland Consulting Engineers carried out for Na Piarsaigh GAA grounds in relation to P.A. Ref. 24/61123 (new gym located c. 190 m north of the appeal site). This notes that the proposed development is located in an area prone to flooding and where a flood event occurred. Due to the nature and use of the proposed development, it would be classified as a less vulnerable development. The justification test does not apply to the proposed development as it is considered to be a minor development. Subject to flood resistant measures as outlined in Section 5.6, the proposed development will not obstruct important flow paths and will not introduce a significant number of additional people to the area or will not entail the storage of hazardous substances. In consideration of the findings of the assessment carried out and the Incorporation of the recommended flood mitigation measures, the proposed telecommunication installation is appropriate from a flood risk perspective.

7.3. Planning Authority Response

None.

7.4. Observations

None.

8.0 Assessment

Having examined the application details and all other documentation on file, including all of the submissions received in relation to the appeal, the reports of the local authority, and having inspected the site, and having regard to the relevant local/regional/national policies and guidance, I consider that the substantive issues in this appeal to be considered are as follows:

- Principle of Development
- Justification for Development & Location
- Visual Impact
- Impact on Residential Amenity
- Flood Risk – New Issue
- Other Matters

8.1. Principle of Development

- 8.1.1. The Planning Authority (PA) considered the proposed development acceptable in principle. I note that the appeal site, located within the Limerick City and Suburbs boundary is zoned 'Open Space and Recreation'. The purpose of this zoning is 'To provide for active and passive recreational resources including parks, sports and leisure facilities and amenities including greenways and blueways'. Development that would result in a loss of open space will not normally be permitted. Having regard to the Land Use Zoning Matrix, I note that proposals for telecommunications structures are open for consideration on such lands.
- 8.1.2. The appeal site has a stated area of 0.041 ha and is located in the southern concern of the Na Piarsaigh GAA Club sports ground. There is an existing access route identified in yellow on DWG Ref. IEM0027-P04 'Mobile Telecommunications Installation Location Map 2'. The proposed access track will be approx. 115 m in length and 3.0 m wide and will be located adjacent to the western boundary of the site and will connect with the identified existing access route.
- 8.1.3. While the proposed site will result in the loss of approx. 0.041 ha of open space, given its location in the southern corner of the overall sports grounds, the loss of this area

would be negligible. This would be due to the limited use of this area as it is located in a corner. I therefore consider the development to be acceptable in principle, subject to compliance with all other policies, objectives and standards of the development plan.

8.2. Justification for Development & Location

- 8.2.1. The grounds of appeal have raised that the need for the proposed development is questionable as there is an existing telecommunications tower located c. 450 m which has the potential for site sharing and co-location. Also it is raised that based on Comreg coverage maps, the target coverage area appears to be met.
- 8.2.2. In regard to site selection, I note that Objective IN O5 (Telecommunication Support) of the development plan encourages shared telecommunications infrastructure, requires co-location of antennae support structures where feasible, and facilitate the public and private sector where possible to ensure coordinated delivery of telecommunications infrastructure. The provision of Objective IN O5 under (c) require operators to submit documentary evidence as to the non-feasibility of co-location of antennae support structures or other sites, where feasible.
- 8.2.3. The Commission will note that the Telecommunication Antennae and Support Structures: Guidelines for Planning Authorities 1996 (the Guidelines) also require justification for site selection where proposed within urban centres. This is referred to as the ‘last resort test’. In this regard, for developments proposed in city suburbs, the Guidelines state that ‘*operators should endeavour to locate in industrial estates or in industrially zoned land*’ and other possibilities should be explored such as commercial or retail areas (e.g. rooftop locations, locating “disguised” masts), existing ESB substations. Preference is also given to the use of tall buildings or other existing structures over a new independent support structure. The Guidelines further note that if these areas, or alternatives provided are not available, then they may be located in residential areas or beside schools.

Last Resort Test & Alternative Sites

- 8.2.4. The appeal site is located in the suburbs at the northwestern periphery of Limerick city centre. The lands between the appeal site and the R527 Condell Road are greenfield/agricultural. New development was noted to be under construction at time of site inspection on lands adjoining the GAA grounds approx. 280 m to the north. This is referred to in the application details as Amharc Abhann residential estate. The lands immediately adjoining

the GAA grounds to the east are characterised by low density housing with the nearest dwellings located approx. 133 m to the east in Chestnut Grove.

- 8.2.5. The applicant submitted a justification for the proposed development which was prepared by a radio engineer for ICON Tower. This document shows maps of the existing coverage in the area. The existing outdoor coverage in the Caherdavin area where the new structure will be located is shown as 'fair', 'good' and 'very good'. The surrounding areas to the east, north, northwest and south are shown as 'good' and 'very good'.
- 8.2.6. I note from the updated RF Technical Justification Report (TJR) in response to the FI request that the applicant's justification refers to the technical requirements for locating at the site. It is submitted that the main driver for the proposed development is to improve voice and high-speed data services to residential and commercial development in the Caherdavin area and wider environs. The technical need for the proposed development is to maintain a high-quality network coverage for 2G/4G/5G voice and data service provision and to deliver good customer experience to residential, commercial and retail development within the area and wider environs and N18. In the absence of the proposed development at the subject site, it is submitted that coverage will suffer for all users in the surrounding area.
- 8.2.7. The TJR further elaborates on external factors that affect network performance which can be affected by physical obstructions, distance and range between the network and devices, the rise of wireless networking with more transmission through the air which can be impacted on by signals operating at similar frequencies.
- 8.2.8. I note that it is acknowledged by the applicant that the coverage maps provided in their submission indicate optimal coverage with all other sites in the vicinity operating at maximum efficiency. I further note from the publicly accessible coverage maps¹ that generally, existing coverage among the 11 listed service providers in terms of 2G and 4G technology is 'good' to 'very good' at the appeal site and the wider area relative to the appeal site. For 3G and 5G coverage, I note that a number of service providers (4) do not have coverage within the target coverage area while the remaining all have 'very good' coverage. It is stated by the applicant that if one or more of the sites in the wider area experiences a technical fault, requires maintenance or upgrading works which would result in equipment power down, then adjacent sites act as a back-up system to maintain a consistent level of service in the area. This would be the purpose of the proposed development and I note that the PA

¹ [Service Coverage - Commission for Communications Regulations](#)

accepted this rational following a request for FI in which the applicant was requested to address the consideration of alternative sites in terms of co-location of the proposed structure. It was determined by the applicant that there was no existing base station options available that could be shared or upgraded to provide the additional necessary coverage, although the applicant has not submitted any documentary evidence as to the non-feasibility which is a requirement of Objective INO 5 (c) of the development plan. Additionally, I note also that distance and the inability to provide coverage as a result to the intended specific area by other existing sites in the vicinity, is cited as the main issue in relation to discounting other existing sites between the appeal site and the other sites in the vicinity.

8.2.9. The appellant outlines that its own existing site which contains a 20 m high latticed structure has capacity for site sharing and co-location for telecommunications equipment, and is made available to interested parties. This would be consistent with Objective IN O5 (a). It is submitted that according to the coverage maps, this structure serves the residential areas within Caherdavin and beyond and the target area identified by the applicant i.e. Knock townland which is located to the west and northwest of the subject site.

8.2.10. In the response to the grounds of appeal, the applicant states that the existing Towercom structure was considered in the response to the PA's FI request. The existing structure facilitates Vodafone and eir in securing coverage locally, however the zone of influence of the structure dissipates over distance. It is also contended by the applicant in response to the grounds of appeal with regard to the site location and the proposed development, that telecommunication sites in city environs are located in close proximity to one another in order to achieve coverage overlap between cells. In relation to the existing Towercom site, it is submitted that there are limitations associated with this existing structure in that the influence of this cell dissipates over distance in particular eastwards (my emphasis) from its zone of coverage influence, and another structure is required to enable cell dominance in the new geographic area. I note from the Comreg coverage maps that it would appear that coverage in this area is 'good' to 'very good'.

8.2.11. I note that a range of sites were discounted by the applicant, 6 in total including the existing Towercom site. Each of the reasons cited relate to the distance of each structure from the targeted site coverage area which in all cases was deemed to be too far away to maintain full coverage. In the case of the sites identified at Westlink Business Park (site 1), this accommodates a 15 m monopole structure and is described as a single user monopole that

is unable to cover the target area. Nearby in Clondrinagh Industrial Estate, this site contains a rooftop mounted structure 14 m high and was discounted due to distance from the coverage target area. I note that both of these structure are located approx. 1.3 km to the northwest of the appeal site adjacent to the R445 and the lands are zoned 'Enterprise and Employment' in the development plan. The site identified at Greenhills Hotel (site 3) on the Ennis road, has a structure mounted on the roof of the building which was deemed too low and it is stated that it is unknow if the site had additional capacity for more MNOs. In the case of the appellant's site (site 4), this was discounted on the basis that the site was 0.5 km away from the target coverage area, and was unable to provide coverage due to lack of capacity on the tower to accommodate more MNOs, nor was it optionally positioned to provide coverage to the targeted area. In regard to the site identified on the Old Cratloe Road (site 5) this structure is identified as a one MNO street works monopole site and would be unable to cover the target area. I note also that the Commission recently granted a Section 254 license application for an 18 m telecommunication structure at Caherdavin in February 2026, ACP Ref. 323090-25 refers. Based on these maps and the lack of information on file to demonstrate otherwise, I note that there does not appear to be a significant absence of coverage in this area as described in the response to the grounds of the appeal and in the response to the FI request and which the applicant has further confirmed in their submission.

8.2.12. Having regard to the foregoing I have had regard to and am satisfied that there has been consideration of alternatives. However, having regard to Objective IN O5 (c) of the development plan, this requires the co-location of antennae support structures on sites where feasible and the submission of documentary evidence in relation to the non-feasibility of co-location as an option. Also, Section 4.3 of the Telecommunications Antennae & Support Structures Guidelines for Planning Authorities, 1999 outlines that operators should endeavour to locate in industrial estates or in industrially zoned land in the context of new proposals in larger towns and in city suburbs. Based on the information provided, I am not satisfied that the applicant has put forth a clear rationale for the construction of a new mast in this suburban area on lands that are zoned for recreation and open space and which are bounded to the north and to the east by existing and proposed residential development. Furthermore, there does not appear to be a significant absence of coverage in this area, and the applicant has not provided sufficient evidence to demonstrate why other sites located in a business park and an industrial estate approx. 1.3 km to the northwest of the

appeal are not available for co-location or sharing, in order to meet the coverage needs of the target area.

8.2.13. I note that the need for the proposed development is to provide enhanced connectivity within the area, and to bridge transmission coverage between existing telecommunication infrastructure and beyond their zone of influence when interrupted. As noted already, there are existing sites identified in the TJR to the north/ northwest on lands that are zoned for 'Enterprise and Employment' which contain 2 no. existing structures. Consideration of co-location on these lands in my opinion was not adequately addressed by the applicant as no documentation has been provided to demonstrate that co-location for a new structure on these subject lands which are appropriately zoned is not an option. Therefore, given the site's context and the area in which it is intended to provide coverage for, I am not satisfied on the basis of the information presented in the TJR that an adequate technical justification has been presented by the application to explain why coverage cannot be achieved through co-location, particularly where it has been acknowledged by the applicant that there is optional coverage in the area. I therefore recommend the Commission refuse permission on this basis as the proposed development would not be consistent with the provisions of Objective IN O5 (Telecommunication Support) of the Limerick Development Plan 2022-2028 (as varied).

8.3. **Visual Impact**

8.3.1. A Visual Impact Assessment was not submitted with the application although a number of photomontages were undertaken which show the proposed mast from a number of different viewpoints from the within the GAA grounds and from the adjoining existing residential development bounded in the site to the north (Knock Hill).

8.3.2. It is raised by the third party appellant that the photomontages do not provide a comprehensive assessment of the visual impact and that key receptor points from existing residential developments and adjoining roads were not included. I consider that photomontages are indicative images intended as supporting information only, as opposed to the plan and elevations on which a planning assessment is based. I am satisfied that sufficient information has been provided and combined with my site inspection to enable a full appraisal of the proposed development.

- 8.3.3. At time of site inspection, I observed a line of mature trees with hedgerow growing intermittently along the eastern and southern perimeter of the GAA grounds. There is an existing earth embankment along the western boundary of the GAA grounds that adjoins the appeal site which is predominately defined by hedgerow with some mature trees.
- 8.3.4. The upper section of the telecommunications mast is the primary element that would be visible in the wider area including the adjoining residential areas to the south and southeast and to the north, as it would extend about the existing mature tree line. It will also be partly visible from the outer ring road R527 Condell Road and will likely to be also visible intermittently further to the west in the direction of Connagh airfield. In my view, at these distances in the wider area, the mast will not appear unduly obtrusive and the impacts would not be significant and would be unlikely to significantly affect the visual amenities of road users.
- 8.3.5. The visual impacts on nearby residents would be greater than on road users. The mast as depicted in the photomontages will be visible in the context of adjoining residential properties. It will be setback c. 330 m from the site to the nearest boundary of the Amharc Abhann residential development that is under construction. In relation to the existing residential development adjoining the site to the east, the site is setback in the southwestern corner of the playing field and will be visible to these existing developments. Given the enclosed nature of the site and the mature trees along the western boundary of the site, the upper element of the mast would be the most prominent. Considering the separation distance between the mast and the houses in the immediate area, the trees along the site boundaries provide intermittent screening. I consider that the impacts will not be significant. It should also be noted that there are tall flood lights within the GAA grounds and the siting of the proposed mast in this context would not appear significantly obtrusive.
- 8.3.6. I note that the site is not located in a sensitive landscape area and is not proximate to any designated site. It is located within a suburban area of Limerick city. The construction of the mast will result in a 24 high monopole in this location. Having regard to the low-lying nature of the area, the enclosed nature of the site and the localised visual impacts and the lack of significant visibility from any of the receptors, I consider that the proposed structure at 24 m in height would not be unduly prominent or obtrusive in the wider receiving environment.
- 8.3.7. It is proposed to construct a 3.0 m wider access track that will extend from an existing access route within the site. The Guidelines indicate that access roads can cause significant visual

impact, however in this case I do not consider that this will arise as it is stated in the application details that the track will integrate into its natural surrounds overtime once infrastructure is in place. In this context, the proposal will not require significant construction and maintenance and having regard to the nature of the proposed track extension, I consider it to be acceptable. In the event that the Commission decides to grant permission, I recommend the inclusion of a condition to remove the access track and replace it with a natural grass surface.

8.4. Flood Risk – New Issue

- 8.4.1. It was raised by the appellant in the grounds of appeal that the site is located within a flood zone. I note that this matter was not raised in the submissions/ observations to the planning application and was not raised either in the PAs assessment.
- 8.4.2. I note that the applicant in their response to the grounds of appeal has sought to address the issue and has noted that as it was not raised specifically by the PA in its assessment, that the time limit related to the appeal period including the Christmas period, a Site-Specific Flood Risk Assessment could not be carried out for the proposed development. The applicant caveats their submission to the grounds of appeal that the services of a consulting engineer to prepare Section 5.0 (Site Location Concerns – Flood Risk) of the response were not engaged. Therefore, a Site-Specific Flood Risk Assessment prepared by Garland Consulting Engineers carried out for Na Piarsaigh GAA grounds in relation to P.A. Ref. 24/61123 (new gym located c. 190 m north of the appeal site) is therefore referred to and relied upon to address the flood risk related to the proposed development.
- 8.4.3. I note that the appeal site is located in Flood Zone A having regard to Map 5 contained in Volume 2a of the Limerick Development Plan 2022-2028. It is a specific requirement of Objective CAF O20 of the development plan that all planning applications in Flood Zones A and B require Site-Specific Floor Risk Assessment (FRA).
- 8.4.4. For completeness I have reviewed the details provided in response to the appeal to address the flood risk associated with the subject development and the overall site. This has indicated that a flood event occurred in 2019 which impacted Na Piarsaigh GAA club, adjoining residential development and Connagh airfield which is located approx. 880 m to the west of the appeal site. The site is also located in an area of benefiting lands within and OPW Arterial Drainage Scheme. The appeal site and the wider environs are located within

a low-lying area and are afforded some protection by existing flood protection embankments. Coastal flood risk and fluvial flood risk are identified as the main sources of flood. The appeal site is therefore vulnerable to flooding. It is submitted having regard to Table 3.1 of the 'Planning System and Flood Risk Management Guidelines, DOEHLG 2009' that the proposed development is of a class type that would be 'less vulnerable development'. I note that 'less vulnerable development' within Flood Zone A require a justification test having regard to Table 3.2 of the Guidelines. The applicant relying on Section 5.28 of the Guidelines considered that the justification test does not apply to the proposed development as it will not obstruct flow paths, impede access to a watercourse or floodplain, or introduce a significant number of additional people to the area or would entail the storage of hazardous substances. The above ground structures and associated development comprise of a 1.0 m diameter monopole and equipment cabinets and will not result in an adverse impact to the existing hydrological regime of the area or increase flood risk elsewhere and the foundations for both the telecommunications structure and equipment cabinets will be constructed below existing ground level. Section 5.6 of the submission addresses flood distance measures. This includes for any new cables, ducting and associated chambers that protrude above existing ground level are to be adequately sealed, equipment will be of flood proof construction, and the provision of demountable flood defences for at least the levels of the fluvial events, where possible. Subject to the mitigation measures to minimise damage to the proposed development as a result of potential flooding, the measures will ensure that the development will be resilient to flooding.

- 8.4.5. While I acknowledge the time constraints that the applicant has highlighted to enable a Site-Specific Flood Risk Assessment carried out by a qualified consultant engineer, and in noting the flood risk assessment carried out relying on data from a previous Site-Specific Flood Risk Assessment carried out for another development within the Na Piarasigh GAA grounds, I consider that in the absence of a Site-Specific Flood Risk Assessment of the proposed development in accordance with Objective CAF O20 (Flood Risk Assessments), that there is insufficient information on file to enable the Commission to determine whether or not the proposal would give rise to possible displacement of flood waters from the site associated with coastal or fluvial flooding or indeed to an exacerbation of pluvial flooding elsewhere in the locality, particularly in light of the site's flooding history. I further highlight to the Commission that the PA has not provided a response to the grounds of appeal. Notwithstanding, as this is a new issue, should the Commission take a different view on the

materiality of the issue of flooding in the context of the development proposed, I note that it is open to them under Section 131 of the Planning and Development Act 2000 (as amended) to request any party to the appeal or any person or body who has made submissions or observations on same to make further submissions or observations in relation to this matter. However, having regard to the other substantive reason for refusal set out below, it may not be considered necessary to pursue the matter.

9.0 AA Screening

Having regard to the nature and scale of the proposed development and the distance from the nearest European site, no Appropriate Assessment issues arise, and it is not considered that the proposed development would not be likely to have a significant effect, individually, or in combination with other plans or projects, on any European site.

10.0 Water Framework Directive

10.1.1. The proposed development is situated within the Na Piarsaigh GAA grounds which are used as open space and for recreational purposes. The nearest River Waterbody and WFD River Sub Basin is North Ballycannon_010 (IE_SH_25N170970) which traverses the GAA grounds and is located approx. 150 to the northwest of the appeal subject site.

The underlying Ground Waterbody is Limerick City Northwest IE_SH_G_140.

The proposed development comprises the construction of a 24 m telecommunications mast, and ancillary ground infrastructure and an extension to an existing access track.

No water deterioration concerns were raised in the planning appeal.

10.1.2. I have assessed the proposed development and have considered the objectives as set out in Article 4 of the Water Framework Directive which seek to protect and, where necessary, restore surface & ground water waterbodies in order to reach good status (meaning both good chemical and good ecological status), and to prevent deterioration. Having considered the nature, scale and location of the project, I am satisfied that it can be eliminated from further assessment because there is no conceivable risk to any surface and/or groundwater water bodies either qualitatively or quantitatively.

The reason for this conclusion is as follows:

- The nature of the development and the nature of the temporary works for its construction.
- Location-distance from nearest Water bodies and lack of hydrological connections

10.1.3. I conclude that on the basis of objective information, that the proposed development will not result in a risk of deterioration on any water body (rivers, lakes, groundwaters, transitional and coastal) either qualitatively or quantitatively or on a temporary or permanent basis or otherwise jeopardise any water body in reaching its WFD objectives and consequently can be excluded from further assessment.

11.0 Recommendation

I recommend that permission is refused for the reasons and considerations set out below.

12.0 Reasons and Considerations

Having regard to:

- a) the proposed location of the telecommunications structure in Limerick city suburbs;
- b) the pattern of development in the vicinity which is characterised by residential development;
- c) the provisions of Objective IN O5 Telecommunication Support of the Limerick Development Plan 2022-2028 (as varied);
- d) the Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities (1996);
- e) the totality of the documentation of file,

it is considered that a satisfactory justification has not been provided for the proposed lattice support structure in this location, particularly in the context of adjoining lands to the northwest that are zoned 'Enterprise and Employment'. The proposed development would, therefore be contrary to Objective IN O5 (Telecommunication Support) of the Limerick Development Plan 2022-2028 (as varied) and 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.

Clare Clancy

Planning Inspector

14th April 2026

Appendix 1: Form 1 EIA Pre-Screening

Case Reference	PL-500419-LK
Proposed Development Summary	24 metre telecommunications pole, equipment cabinet and associated site works
Development Address	Na Piarsaigh GAA Club , Elm Drive Caherdavin , County Limerick
IN ALL CASES CHECK BOX / OR LEAVE BLANK	
1. Does the proposed development come within the definition of a 'Project' for the purposes of EIA?	<input checked="" type="checkbox"/> Yes, it is a 'Project'. Proceed to Q.2.
	<input type="checkbox"/> No, No further action required.
(For the purposes of the Directive, "Project" means: - The execution of construction works or of other installations or schemes, - Other interventions in the natural surroundings and landscape including those involving the extraction of mineral resources)	
2. Is the proposed development of a CLASS specified in Part 1, Schedule 5 of the Planning and Development Regulations 2001 (as amended)?	
<input type="checkbox"/> Yes, it is a Class specified in Part 1. EIA is mandatory. No Screening required. EIAR to be requested. Discuss with ADP.	State the Class here
<input checked="" type="checkbox"/> No, it is not a Class specified in Part 1. Proceed to Q3	
3. Is the proposed development of a CLASS specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) OR a prescribed type of proposed road development under Article 8 of Roads Regulations 1994, AND does it meet/exceed the thresholds?	

<input checked="" type="checkbox"/> No, the development is not of a Class Specified in Part 2, Schedule 5 or a prescribed type of proposed road development under Article 8 of the Roads Regulations, 1994. No Screening required.	
<input type="checkbox"/> Yes, the proposed development is of a Class and meets/exceeds the threshold. EIA is Mandatory. No Screening Required	State the Class and state the relevant threshold
<input type="checkbox"/> Yes, the proposed development is of a Class but is sub-threshold. Preliminary examination required. (Form 2) OR If Schedule 7A information submitted proceed to Q4. (Form 3 Required)	State the Class and state the relevant threshold
4. Has Schedule 7A information been submitted AND is the development a Class of Development for the purposes of the EIA Directive (as identified in Q3)?	
Yes <input type="checkbox"/>	
No <input checked="" type="checkbox"/>	

Inspector: _____

Date: _____