



An
Coimisiún
Pleanála

Inspector's Report

PL-501160-GY-26

Development	To install a 21m monopole type telecommunications support structure, carrying antenna and dishes enclosed within a 2.4-metre-high fenced compound together with associated ground equipment cabinets and associated site works, including an access track within
Location	Farrannamartin, Cloontooa Tuam, Tuam Celtic AFC
Planning Authority	Galway County Council
Planning Authority Reg. Ref.	2660083
Applicant(s)	Phoenix Tower Ireland III Limited
Type of Application	Permission
Planning Authority Decision	Grant
Type of Appeal	Third Party
Appellant(s)	Towercom Limited
Observer(s)	None

Date of Site Inspection

13th July 2026

Inspector

Emma Gosnell

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Appendix 1 – Form 1: EIA Pre-Screening

Appendix 2 – AA Screening Determination (Forms 1 & 2)

1.0 Site Location and Description

- 1.1. The appeal site is located in the townland of Cloontooa in the southern environs of Tuam town in Co. Galway. The site forms part of the c. 4.4ha Tuam Celtic AFC sports complex which is accessed off the Cloontooa Road (L-2113) which lies to the east. The Tuam Athletic Sports Complex comprises of a 2-storey clubhouse and extensive surface car parking on the east side of the lands with an enclosed all-weather synthetic grass pitch and a number of grass pitches with ancillary fencing, safety netting and floodlighting installations being located on remainder of the lands.
- 1.2. The site is adjoined to the south by an enclosed synthetic sports pitch and to the east and south-east by grass sports pitches. The western boundary to the site is a wooden fence bordering an agricultural field with the wider landscape beyond this also being agricultural in character. To the immediate north the site backs onto the rear gardens of a number of residential properties within the Country Meadows estate (specifically No's 70, 70A, 71 and 71A) and it is delineated from same by a c. 1.8m high blockwork boundary wall.
- 1.3. There is an existing Towercom telecoms structure (identified as site GA0346) which facilitates multiple mobile network operators located c. 890m to the north-east of the appeal site at Eir Exchange, Temple Jarlath Court in Tuam town centre.
- 1.4. The L-shaped site, which has a stated area of 0.006ha, forms the north-west corner of the sports complex and comprises of undeveloped land which is independently accessible via a c. 300m long existing gated gravelled trackway which runs along the northern boundary of the complex (the full extent of this pathway does not form part of the red line area).

2.0 Proposed Development

- 2.1. The proposed development comprises of the following:
 - Installation of 1 no. 21m monopole type telecommunications support structure with multiple operator carrying antennae (with 3 no. RRUs per antennae), 1 no. IOT gateway, dish, support poles, fall arrest system and associated lighting.
 - Construction of compound of 2.4-metre-high wire mesh fencing with ball protection cover and 2 no. 2m wide wire mesh fence access gates.
 - 1 no. RFE cabinet and 1 no. ESB mini pillar and vault in fenceline.

- 2 no. 2.05m high outdoor operator cabinets and 1 no. fibre chamber in/ on foundation structure.
- A cable management system within the compound.
- Access via a c.3m track within the grounds of Tuam Celtic AFC sports complex c. 60m of which is to be upgraded to be 3m wide.
- All associated site works.

2.2. The following documentation was also submitted:

- A Cover Letter/ Planning Statement
- A RF Technical Justification Report stating that the proposed *“installation forms part of an established telecommunications network system that Three Ireland Ltd operates in the area and has been carefully chosen to ensure performance levels are maintained. The site is considered the best possible solution to meet both the existing and future demands of its customers in this area. Failure to progress this installation in its current location as can be seen in the plots provided, has a negative impact on the Three network by leaving customers without acceptable service in Tuam”*.
- A Visual Impact Appraisal
- A letter from Three Ireland (dated March 2019) regarding frequency band usage.
- A letter of support (dated 15/01/2016) from Three Ireland Limited.

2.3. The appeal site is not in the ownership of the applicant and a letter of consent (dated 15th January 2025) from the landowner (Mike Togher who is identified as the Chairman of Tuam Athletic AFC) is provided with the application.

3.0 Planning Authority Decision

3.1. Decision

Permission granted on 19/03/2026 subject to 8 no. conditions, generally of a standard technical nature. Conditions of note were as follows:

- No. 2 – operator shall facilitate co-location of other operator’s antennae.
- No. 3 – details of colour scheme to be submitted to PA for agreement.

- No. 4 – requirement to demolish/remove structures when obsolete & reinstate land.
- No. 5 – PA to be informed if installation is to transfer to another owner or operator.
- No. 6 – obstacle light shall be fitted to top of mast.

3.2. Planning Authority Reports

3.2.1. Planning Reports

1 no. PA report (18/03/2026) formed the basis of the decision to grant permission. Points of note arising from the report are as follows:

- **Principle of Development** – utilities & public service installations are open for consideration under site's 'Community Facilities' land use zoning. Siting and small scale of proposal would not conflict with operation/ use of playing pitches.
- **Technical Justification** – The Case Planner's report accepted the technical justification provided with the application, noted proposal required to improve 3G/4G/5G data services to west of Tuam town (along Galway Road and surrounds) which is currently congested/ under-serviced and that there are no existing suitable telecoms structure or buildings with adequate height which would allow for co-location to provide required service improvements, and concluded that the proposal is compliant with PO TKT 21 (Public Utilities) and PO TKT59 (Broadband and Telecommunications).
- **Design** – 21m monopole adjoins community lands/ sports fields, is setback from boundary with neighbouring residential development and visually integrates with existing floodlighting with no potential to negatively impact visual amenity of area.
- **Access** – siting and scale of proposal relative to local road network gives rise to no traffic safety concerns.
- **Noise** – no noise issues will arise from proposal. Limited noise impacts will arise during construction.
- **AA Screening** – proposal not likely to have a significant effect on a Natura 2000 site on account of its nature, scale and the absence of pathway(s) to same.
- **EIA Screening** – proposal is subthreshold. No EIA required.
- **Flood Risk** – site located in Flood Zone C. No risk arises.

Report concluded by recommending permission be granted as detailed in Section 3.1.

3.2.2. Other Technical Reports

None on file - the application was referred to the Tuam Area Office however no response/report was subsequently received.

3.3. Prescribed Bodies

No referrals were made.

3.4. Third Party Observations

A third party submission was received from Ray Ryan on the behalf of Towercom Limited. This raised the following issues:

- Towercom manage an existing 67m rooftop telecoms structure at Eir Exchange, Temple Jarlath Court in Tuam, it is located c. 890m north-east of the proposal.
- The existing telecoms structure is currently hosting mobile operators, can accommodate additional telecommunications equipment and is available to any parties wishing to install additional equipment.

4.0 Planning History

4.1. Appeal Site

There is no known planning history on the site.

4.2. Wider Tuam Athletic AFC Lands

P.A. Ref. 25/60135 – application by Tuam Celtic AFC for the construction of perimeter fencing and floodlighting to existing playing pitch, construction of new warmup pitch with perimeter fencing, ancillary structures including ball stop netting, goal posts, player dugouts and all associated site works, granted permission on 10/06/2025 subject to 9 no. relatively standard conditions.

P.A. Ref. 17/1662 – application by Tuam Celtic AFC for to: a) construct a two storey extension to its existing dressing room facility to include two new dressing rooms, toilets, referees room, and future gym at first floor level; b) internal alterations and upgrade to the

existing dressing room facility and all associated works, granted permission on 05/03/2018 subject to 5 no. relatively standard conditions.

5.0 Policy Context

5.1 National Policy and Guidance

National Planning Framework – Project Ireland 2040 (first revision 2025)

- *NPO 31*: Support and facilitate delivery of the National Broadband Plan.
- *NPO 62*: Support and facilitate delivery of the National Broadband Plan, and Section 2.2 – improving local connectivity to principal communications networks.

Climate Action Plan (CAP) 2025

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

CAP 2025 to be read in conjunction with CAP 2024, 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.

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.

Harnessing Digital: The Digital Ireland Framework (2022)

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

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.

Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities (1996) and DoECLG Circular Letter PL07/12

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.

Section 4.2 provides guidance in relation to design and siting.

Section 4.3 refers to the visual impact of such structures. The Guidelines acknowledge that the applicant will only have limited flexibility as regards selecting a location given the constraints arising from technical radio and engineering parameters. It states that visual impact will, by definition, vary with the general context of the proposed development and that some masts will remain quite noticeable in spite of best precautions.

In city or large town locations the Guidelines state they should be in industrial estates/zoned areas in the first instance and also use tall buildings or structures to attach on. If these areas, or alternatives provided, are not available it states 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. The proposed structure should be kept to the minimum height consistent with effective operation and should be monopole (or poles) rather than a latticed tripod or square structure.

Section 4.6 states that "As part of their planning application operators should be required to furnish a statement of compliance with the International Radiation Protection Association (IRPA) Guidelines (Health Physics, Vol. 54, No. 1 (Jan) 1988) or the equivalent European Pre-standard 50166-2 which has been conditioned by the licensing arrangements with the

Department of Transport, Energy and Communications and to furnish evidence that an installation of the type applied for complies with the above guidelines.”

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 Telecommunications 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.

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

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.

5.2 Regional Policy

Northern & Western Regional Assembly Regional Spatial and Economic Strategy 2020-2032:

Section 3.5: Telecommunication infrastructure is essential for accessing employment, education and healthcare lifelines.

The weakness/ absence of high-quality telecommunications connectivity and infrastructure is also identified as being an important issue for the region (see pages 42 and 262 of RSES).

5.3 Development Plan

The Galway County Development Plan 2023 – 2029 (GCDP) applies.

Tuam

Tuam is identified as a Key Town under the plan's Core Strategy.

Telecoms/ Communication Infrastructure

Chapter 7 refers to Infrastructure, Utilities and Environmental Protection and Section 7.8.2 therein refers specifically to Telecommunications. The following Policy Objectives are particularly relevant:

Policy Objective (PO) ICT 1 (Infrastructure): Support the delivery of high-capacity Information Communications Technology Infrastructure, broadband connectivity and digital broadcasting, throughout the County.

PO ICT 2 (National Broadband Plan): Support and facilitate delivery of National Broadband Plan.

PO ICT 3 (Telecommunications Antennae and Support Structures): To ensure that orderly development of telecommunications throughout the County in accordance with the requirements of the telecommunications Antennae and Support Structures, Guidelines for Planning Authorities, DECLG, 1996, except where they conflict with Circular Letter PI 07/12 which shall take precedence, and any subsequent revisions or expanded guidelines in this area.

PO ICT 4 (Co-location of Antennae): To 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 proposals for new structures.

PO ICT 5 (Siting and Design of Telecommunications Infrastructure): To 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.

PO ICT 6 (Visual Impact and Antennae Support Structures): To operate 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.

Chapter 15 of the CDP sets out relevant Development Management Standards:

DM Standard 42 (Telecommunications Masts): In order to facilitate the evaluation of development proposals for the erection of antennae and support structure with regard to the DoEHLG, Planning Guidelines for Telecommunications Antennae and Support Structures (1996 including any updated/superseding document) and DECLG Circular PI 07/12 regarding the 1996 Planning Guidelines. While the current state of technology requires the construction of masts and antennae in the countryside the following standards will apply:

a) **Landscape Sensitivity:** In instances where telecommunications masts are essentially required in landscape sensitivity Class 3 (Special) or Class 5 (Iconic), a Visual Impact Assessment shall be required with all planning applications for these locations.

b) **Amenity Impacts:** Masts and associated base station facilities should be located away from existing residences and schools.

c) **Landscape Impacts:** Masts should be designed and located so as to cause minimum impact on the landscape. If possible, sites should be located within forest plantations. Access roads shall be permitted only where essential. Where provided, they should not scar the landscape on which they are located. Roads should follow the natural contours of the site in order to minimise their visual intrusion, and should be bordered with shrubs after construction. Masts should be sited to avoid the location of such structures in sensitive landscapes, in nature conservation areas, in highly sensitive landscapes and where views are to be preserved.

d) **Co-Location:** Licensees shall be required to co-locate their services by sharing a single mast or, if necessary, locating additional masts in cluster form. Co-location agreements to be provided where possible. Where new facilities are proposed applications will be required to satisfy the Council that they have made a reasonable effort to share facilities or to locate facilities in clusters.

e) **Security:** Mast compounds should have security fencing and anti-climbing devices designed to local aesthetic and safety requirements.

f) **Redundancy:** In the event of the discontinuance of any mast installation the mast and its equipment shall be removed from the site and the land shall be reinstated.

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.

Landscape Character

Maps 8.1 (Landscape Character Areas) and 8.2 (Landscape Sensitivity) shows Tuam as being an 'Urban Environs Landscape' which is located in an area of 'Low Landscape Sensitivity'.

5.4 Tuam Local Area Plan 2023-2029

Section 1.6 (Land Use Zones) & Land Use Zoning Map

Tuam Celtic AFC sports complex (incl. appeal site) is zoned 'Community Facility'.

Policy objective for 'Community Facility' zoned land is to provide 'To provide for civic, community and educational facilities' with the description of same as follows 'To facilitate the development of the necessary community, health, religious, educational, social and civic infrastructure'. 'Utilities & Public Service Installations' are Open for Consideration on Community Facilities zoned land.

Agricultural field to west of appeal site is zoned 'R-Residential (Phase 1)' with the policy objective 'To protect, provide and improve residential amenity areas within the lifetime of this plan'.

PO TKT 21 (Public Utilities): Facilitate the provision and maintenance of essential public utility infrastructure, together with the necessary ancillary facilities and uses, as appropriate. Development proposals in the vicinity of public utilities infrastructure will be assessed on a case-by-case basis in accordance with proper planning and sustainable development.

PO TKT 59 (Broadband & Telecommunications): Facilitate the sustainable delivery of a high capacity and high-quality ICT infrastructure within the plan area, including telephony and broadband services, to the requirements of the relevant service providers and in accordance with the principles of proper planning and sustainable development.

6.0 Natural Heritage Designations

The site is not located within or adjacent to a Natura 2000 site. The nearest European sites are Lough Corrib SAC (Site Code 000297) located c. 1.9km to the west, Levally Lough SAC (Site Code 000295) located c. 10km to the north-east and the Lough Corrib SPA (Site Code 004042) which is located c. 15km to the south-west. The Belclare Turlough pNHA (Site Code 000234) and Killower Turlough pNHA (Site Code 000282) are located c. 4km to the west of the site.

7.0 EIA Screening

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. No mandatory requirement for EIA therefore arises and there is also no requirement for a screening determination. Refer to Form 1 in Appendix 1 of report.

8.0 Water Framework Directive Screening

An assessment of the proposed development has been undertaken with regard to the objectives set out in Article 4 of the EU Water Framework Directive.

Having considered the nature, scale, and location of the proposed development, it is concluded that the proposal will not result in any risk of deterioration in the status of any water body, including surface waters (rivers and lakes), groundwater, transitional waters, or coastal waters. This applies to both qualitative and quantitative status, and in respect of temporary and permanent effects.

In addition, the proposed development will not adversely affect the achievement of established environmental objectives, including the protection, maintenance, and improvement of water body status, as required under the Directive.

Accordingly, the proposed development is considered to be compliant with the requirements of Article 4.

9.0 The Appeal

9.1. Grounds of Appeal

One third party appeal was received from Ray Ryan on behalf of Towercom Limited (14/04/2026) which raised the following points:

Principle

- It is acknowledged that a weak coverage area exists towards the south-west of Tuam (where Galway Road meets the N17 road).

Technical Justification/ Site Selection

- Co-location can be facilitated (via relocation, upgrade and/or adding equipment to improve coverage) on existing 67m Towercom telecoms structure (GA0346) which is located 890m from appeal site and which currently facilitates all mobile network operators.
- Concerns raised regarding requirement and technical justification for proposed development given its geographical proximity to the existing Towercom structure and the overlapping coverage radii would arise from both structures.
- Technical Justification provided with regard to site selection is inadequate on basis that it failed to fully consider use of Towercom's existing telecom structure or other existing telecoms structures in the Tuam area and did not adequately consider alternative greenfield, industrial or rooftop sites.
- The 'last resort' test under the 1996 Guidelines has not been satisfied.

Policy Compliance

- Proposal does not align with national policy for telecommunications development which requires new telecoms structures be permitted only if co-location unfeasible.
- Proposal does not comply with the following GCDP policy objectives: ICT 3 – 5 which require compliance with the 1996 Guidelines, co-location where feasible with documentary evidence required as to non-feasibility and best practice in the siting and design of communications infrastructure.

9.2. Applicant Response

The applicant's response to the third party appeal was received on 01/05/2026 and raised the following points:

Technical Justification

- Proposal has been fully assessed against requirements of development plan and national/ government policy relating to telecommunications development.
- Updated RF Technical Justification Report (dated 24/04/2026) for proposal at this site location is provided. This outlines that Towercom's existing telecoms structure (GA0346) already covers an extensive geographic area and is operating at maximum network configuration across all available spectrum bands and confirms that optimisation of the existing structure cannot resolve existing network constraints and a new site is required.
- Co-location potential has already been maximised at GA0346 and it is not capable of being further optimised.
- Signal coverage is not the issue, existing congestion and the lack of available network capacity to service future mobile data demand is the issue and the proposal will address same by redistributing traffic and expanding and improving network performance in west Tuam.
- Publicly available coverage mapping is indicative only and only shows predicted signal availability. They do not measure/ show network capacity, congestion, throughput or user experience and cannot therefore be used to determine whether or not a network is adequately performing.
- The appellant's reliance on the above mapping should not be given the same evidential weight as the technical justification provided by the applicant which has been prepared by qualified radio engineers.
- Reference is made in the technical conclusion to planning permission having recently been granted for another telecoms structure (identified as site GA0424) under construction which it is stated will complement the proposal by improving network service to the southeast of Tuam town (no reg. ref. is provided for this permission and it could not be located on the planning register, with the only recent permissions found for telecoms structure being on the north side of Tuam town).

Site Selection

A robust and reasonable assessment of 8 no. alternative greenfield, rooftop, infrastructural and industrial/commercial sites in Tuam (all located to the west of the appeal site) was carried out over the period 2023-2026 – mapping illustrating same being provided.

These sites were determined to be unsuitable on account of legal constraints/contract issues or were rejected by the applicant's radio engineering team on account of their unsuitable topography and/or geographical location which would militate against achieving required coverage objectives.

The feasibility of an alternative site in the form of a shared facility (site GA0424) with another telecommunications provider (Towercom) was also explored (as detailed above).

Policy Compliance

National policy (1996 and 2012) recognises that the siting and design of telecoms infrastructure is primarily dictated by technical and radio engineering requirements which give rise to limited flexibility in location selection.

The applicant has demonstrated that the appeal site has been selected following a detailed technical/ engineering assessment which was accepted by the PA.

National policy supports ongoing investment in telecoms infrastructure to meet increasing data demand and facilitate transition to next-generation networks. The proposal responds to same by addressing both current and future data requirements.

The proposed development is fully compliant with the ICT policies of the development plan, according with both strategic objectives and dev development management requirements. The appellant has not demonstrated material conflict with these policies.

The response is accompanied by an updated RF Technical Justification Report (dated 24/04/2026).

9.3. Planning Authority Response

No response received.

9.4. Observations

None received.

9.5. Further Responses

A response to the applicant's response to the third party appeal was received from the appellant on the 04/06/2026. This raised the following points:

- Grounds of appeal outlined in Section 9.1 of this Inspector's Report are reaffirmed – with the Commission's attention being specifically drawn to those relating to the technical justification put forward and the site selection process followed.

10.0 Assessment

Having examined the application details and all other documentation on file, including all of the submissions received in relation to the appeal, the report/s 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:

- Technical Justification/ Appropriateness of Site Location
- Other Matters
 - Design/ Visual Impact
 - Health Impact

10.1. Technical Justification/ Appropriateness of Site Location

- 10.1.1. The applicant and appellant are in agreement that the west/ south-west side of Tuam town is subject to weak network coverage. I have had regard to the telecommunication infrastructure and data/ mobile coverage mapping which is publicly available on the Commission for Communications Regulation (ComReg) website (accessed on 08/07/2026) which notes that 2G to 5G service for all service providers in this area of Tuam is categorised as fair to good and therefore accept the applicant's justification for the proposed development i.e. that there is a requirement to upgrade the current mobile and internet services in the Tuam area.

- 10.1.2. I note the strategic high level policy support for improving local data coverage and telecommunications connectivity in the interest of enhancing economic and social development in line with the National Broadband Plan – as outlined in Section 5 of this report – and consider that the proposal to improve coverage/ the quality of service is acceptable in principle having regard to same.
- 10.1.3. The proposal subject of this appeal is located within the grounds of Tuam Athletic AFC and is sited on lands with a ‘Community Facility’ zoning where utilities (such as telecommunications infrastructure and wireless communications services) are open for consideration, with their development stated to be facilitated under the policy objective for this zoning. The proposal also adjoins a residential estate (to the immediate north) although I consider that the immediate area has a mixed land use profile which is more heavily weighted toward agricultural and recreational/ amenity uses rather than residential uses.
- 10.1.4. Tuam town is classified as a ‘Key Town’ under the development plan Core Strategy and settlement hierarchy and therefore the appeal site can be understood as being in the vicinity of a large town for the purposes of the 1996 Telecommunications Guidelines.
- 10.1.5. The 1996 guidelines require a robust assessment of alternative locations in order to demonstrate that the proposed location is the optimal one. Section 4.2 (Design and Siting) of the guidelines provides guidance in relation to design and siting and states that “*location will be substantially influenced by radio engineering factors*” with Section 4.3 (Visual Impact) recognising that the applicant will only have limited flexibility as regards selecting a location, given the constraints arising from technical radio and engineering parameters.
- 10.1.6. Development plan policy objectives ICT 4 (Co-location of Antennae) and ICT 5 (Siting and Design of Telecommunications Infrastructure) require best practice in the design and siting of communication antennae and support infrastructure and specifically the co-location of antennae, support structures and sites where feasible (with unfeasibility required to be evidenced) – with these requirements being reiterated by DM Standard 42 (Telecommunications Masts). The 1996 Guidelines also place the onus on the applicant to demonstrate that they have made a reasonable effort to share masts with other telecommunications providers.
- 10.1.7. The appellant considers that the proposal on a standalone site is not justified in policy terms on the basis that the applicant did not adequately consider alternative (greenfield, industrial or rooftop) sites and they contend that co-location of the proposed infrastructure

is capable of being facilitated on the nearby existing Towercom telecoms structure (GA0346) at Eir Exchange, Temple Jarlath Court. This is the crux of their appeal.

- 10.1.8. The applicant disputes the appellant's grounds of appeal and they specifically draw the Commission's attention to the distinction between signal availability/ coverage (which is indicatively shown on publicly available ComReg predictive mapping) and existing network congestion/ lack of future capacity (as per technical justification provided by applicant's qualified radio engineers) - with the proposal seeking to address the latter issue. Their response of 01/05/2026 also provides details of the site selection process undertaken which considered 8 no. alternative sites elsewhere in west Tuam and within a defined search area – which were each evaluated and discounted on account of their technical unsuitability or commercial unavailability i.e. circumstances which are accepted under Section 4.3 of the 1996 Guidelines. I note that many of these were industrial estates/industrially zoned land and commercial/ retail areas as required by Section 4.3 of the 1996 guidelines with regard to proposals in the vicinity of larger towns.
- 10.1.9. With regard to co-location, the applicant seeks to clarify they have undertaken radio engineering analysis which concludes that the existing telecoms structure at site GA0346 is currently operating at maximum capacity and it is not capable of being further optimised for the purposes of resolving existing network congestion and capacity (i.e. rather than coverage) constraints – with technical details and an explanation in respect to same being provided. I specifically refer the Commission to the technical explanation set out under 'Coverage/ Capacity Requirements' in the updated RF Technical Justification Report dated 24/04/2026 in this regard.
- 10.1.10. I note that, in their response to the applicant's response of 01/05/2026, the appellant reiterates earlier points made in their grounds of appeal and do not specifically address the points made by the applicant in respect to the coverage data detailed on ComReg mapping not being the justification for the proposal/ location of the structure or those relating to GA0346 being at capacity and unable to facilitate further co-location.
- 10.1.11. Therefore, having regard to the totality of the information on file, I am satisfied that it has been reasonably evidenced that the site subject of this appeal has been selected following a comprehensive and robust consideration of alternative sites, detailed technical engineering assessment and consideration of radio engineering factors (i.e. such as coverage requirements and physical obstructions) as required in compliance with Sections

4.2 and 4.3 of the 1996 Telecommunications Guidelines and PO ICT 3 of the development plan.

10.1.12. Furthermore, in respect to the feasibility of pursuing a co-location/ clustering strategy in preference to a new free-standing structure, I am satisfied that the matter of the assessment of current infrastructure in the vicinity has been sufficiently explored having regard to the requirements of PO ICT 4 and DM Standard 42. I also consider that adequate documentary evidence as to the technical unfeasibility and unsuitability of GA0346 for the proposed infrastructure has been provided in compliance with the additional requirements of PO ICT 4 and DM Standard 42 (b) and (d) and the 'last resort' test outlined in Section 4.3 of the 1996 Guidelines and – which I note allows for the location of free standing masts in a residential area in such circumstances. I further note that the proposed structure will enable further co-location for other service providers if required in the Tuam area and I consider that this can be ensured by condition.

10.1.13. Overall, I am satisfied that best practice in terms of siting and design has been followed and, as such, that the proposal is in compliance with Ministerial Guidelines and with development plan policy guidance.

10.2. Other Matters

Design/ Visual Impact

10.2.1. The landscape in which the site is situated is relatively low lying and classified as low sensitivity in the GCDP and there are no sensitive views, scenic routes, architectural conservation areas or protected structures in close proximity. The proposed compound would be sited c. 10.6m from the rear gardens of the adjacent residential properties with the monopole structure being located over 15m from same. In this respect, I note that Circular PL07/2012 is explicit in stating that there is no prescribed separation distance requirement between a telecommunications structure and houses with flexibility allowed on a case-by-case basis to facilitate the roll out of a viable and effective telecommunications network.

10.2.2. The 1996 The Telecommunications Guidelines discourage lattice type towers and encourage mono-pole structures. The PA were satisfied with the siting and overall design of the proposed slimline monopole – which I note is relatively standard form for a telecommunications facility – and they considered that it would not give rise to a negative visual impact on account of its integration with existing pitch floodlighting etc.

- 10.2.3. At 21m, I consider that the height of the proposed infrastructure is at the minimum required to be consistent with effective operation. The applicant provides an evaluation of the visual impact of the proposal in the form of 13 no. viewpoint photomontages from the surrounding area and the application documents conclude that *“the visual impact of a new independent structure in this location is considered acceptable”* on the basis of its integration with floodlighting and other ancillary sports infrastructure on within the c. 4.4ha extensive club grounds in addition to the surrounding terrain, existing screening and the views of the site being intermittent. I consider the applicant’s visual analysis to be acceptable and the methodology for viewpoint selection process to be typical and suitable for this type of development.
- 10.2.4. Therefore, having considered the information on file and having regard to my site inspection, I am of the opinion that the landscape at this location has the capacity to absorb further development and changes with potential for the proposal to visually assimilate into same. Whilst the structure will be visible from a number of locations, the visual impact of the proposal is acceptable having regard to its context and to the likelihood that it would not give rise to an incongruous or visually obtrusive feature in this context or to unacceptable visual clutter or cumulative adverse visual impact. For these reasons, I am satisfied that the proposal is compliant with PO ICT 5, PO ICT 6 and DM Standard 42(c).

Health Impact

- 10.2.5. Whilst not raised by the PA at application stage or by the parties to the appeal, I note that Section 4.6 of the 1996 Telecommunications Guidelines and DM WStandard 42 of the GCDP states 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”*. The cover letter submitted with the application states that *“In relation to health impacts the applicant, Phoenix Towers Ireland III Limited wish to advise Galway County Council that the proposed equipment and installation, as detailed in the attached planning application, is designed to be in full compliance with the limits set by the Guidelines of the International Commission on Non-Ionising Radiation Protection (ICNIRP). The site will meet the radiation standards as set by ComReg and the associated licence conditions applied to Mobile Network Operators who will use the site as part of its Network deployment. The site will be available for monitoring to ensure compliance with these standards”*. Therefore, I

am satisfied that a statement of compliance with ICNIRP guidelines has been submitted to demonstrate compliance with DM Standard 42.

11.0 Recommendation

I recommend a GRANT of permission subject to the following conditions.

12.0 Reasons and Considerations

Having regard to the nature, scale, design and siting of the proposed development, comprising a 21-metre-high monopole telecommunications structure with compound and related ground equipment, on lands zoned for 'Community Facilities' within a large town, to DM Standard 42 (Telecommunications Masts), Policy Objectives ICT 6 (Visual Impact and Antennae Support Structures), ICT 5 (Siting and Design of Telecommunications Infrastructure), ICT 4 (Co-location of Antennae) and specifically ICT 3 (Telecommunications Antennae and Support Structures) which seeks to ensure that orderly development of telecommunications throughout the County in accordance with the requirements of the telecommunications Antennae and Support Structures, Guidelines for Planning Authorities, DECLG, 1996 and any subsequent revisions along with Circular PL 07/12 on Telecommunications Antennae and Support Structures and the Climate Action Plan 2025, and in particular Section 10.1.8 (Digital Transformation) which supports the national digital transformation framework and recognises the importance of this transformation to achieve Ireland's climate targets, it is considered that the proposed development would be in accordance with National Policy for telecommunications infrastructure and the current Galway County Development Plan 2023 – 2029. It is also considered that, subject to compliance with the following conditions, the proposed development would not adversely impact the character of the area or be seriously injurious to the visual or residential amenities of the area. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

13.0 Conditions

1.	The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the development shall be carried out and completed in accordance with the agreed particulars. Reason: In the interest of clarity.
2.	Details of the proposed colour scheme for the telecommunications structure, ancillary structures and fencing shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. Reason: in the interest of the visual amenities of the area.
3.	Within 3 months of the completion of the construction, the access road shall be cleared and covered with the natural surface in the vicinity of the road (soil, grass etc). Details of compliance with this condition shall be submitted for the written approval of the planning authority. Reason: In the interest of the visual amenities of the area.
4.	Transmitter power output, antennae type and mounting configuration shall be in accordance with the details submitted with this application and, notwithstanding the provisions of the Planning and Development Regulations 2001, and any statutory provision amending or replacing them, shall not be altered without a prior grant of planning permission. Reason: To clarify the nature and extent of the permitted development to which this permission relates and to facilitate a full assessment of any future alterations.
5.	A low intensity fixed red obstacle light shall be fitted as close to the top of the mast as practicable and shall be visible from all angles in azimuth. Reason: In the interest of public safety.
6.	The developer shall provide and make available at reasonable terms the proposed support structure for the provision of mobile telecommunications antenna of third-party licenced telecommunications operators.

	Reason: To facilitate the colocation of telecommunications infrastructure in accordance with local, regional and national policy.
7.	The construction of the development shall be managed in accordance with a Construction Management Plan, which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. This plan shall provide details of intended construction practice for the development, including tree protection measures, traffic and pedestrian safety measures, hours of working, noise management measures and off-site disposal of construction waste. Reason: in the interests of public safety and residential amenity.

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, following my professional assessment and recommendation set out in my report in an improper or inappropriate way.

Emma Gosnell
Planning Inspector
15th July 2026

Appendix 1

Form 1 - EIA Pre-Screening

Case Reference	PL-501160-GY-26
Proposed Development Summary	To install a 21m monopole type telecommunications support structure, carrying antenna and dishes enclosed within a 2.4-metre-high fenced compound together with associated ground equipment cabinets and associated site works, including an access track.
Development Address	Farrannamartin, Cloontooa Tuam, Tuam Celtic AFC
	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? (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)	☒ Yes, it is a 'Project'. Proceed to Q2.
	☐ No, No further action required.
2. Is the proposed development of a CLASS specified in Part 1, Schedule 5 of the Planning and Development Regulations 2001 (as amended)?	
☐ Yes, it is a Class specified in Part 1. EIA is mandatory. No Screening required. EIAR to be requested. Discuss with ADP.	
☒ 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?	
☒ 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.	
☐ Yes, the proposed development is of a Class and meets/exceeds the threshold. EIA is Mandatory. No Screening Required	
☐ 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)	

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 ☐	Screening Determination required (Complete Form 3)
No ☒	Pre-screening determination conclusion remains as above (Q1 to Q3)

Inspector: _____ **Date:** _____

Appendix 2 – AA Screening Determination

Screening for Appropriate Assessment Test for likely significant effects	
Step 1: Description of the project and local site characteristics Case file: PL-501160-GY-26	
Brief description of project	Normal planning appeal. Proposal to install a 21m monopole type telecommunications support structure, carrying antenna and dishes enclosed within a 2.4-metre-high fenced compound together with associated ground equipment cabinets and associated site works, including an access track at Farrannamartin, Cloontooa Tuam, Tuam Celtic AFC – see Section 2.0 of Inspector's Report for further details.
Brief description of development site characteristics and potential impact mechanisms	The subject site has a stated area of 0.006ha and is located within the grounds of Tuam Celtic AFC in the townland of Cloontooa in the south-western environs of Tuam town in Co. Galway. The surrounding area is characterised by a mix of recreational/ community, agricultural and residential uses as detailed in Section 1.0 of the Inspector's report. There are no European sites on the appeal site or in its immediate vicinity. There are also no watercourses or other ecological features of note on or in the immediate vicinity of the appeal site that would connect it directly to European Sites in the wider area. The nearest watercourse is the CLARE (GALWAY)_060 river which is located c. 600m to the south of the appeal site and separated from same by a substantial bank of agricultural land and commercial forestry. The nearest European sites are Lough Corrib SAC (Site Code 000297) located c. 1.9km to the west, Levally Lough SAC (Site Code 000295) located c. 10km to the north-east and the Lough Corrib SPA (Site Code 004042) which is located c. 15km to the south-west.
Screening report	No
Natura Impact Statement	No
Relevant Submissions	No
Planning Authority	No objections raised on AA grounds – determined that Stage 2 assessment not required.
Step 2. Identification of relevant European sites using the Source-pathway-receptor model Having regard to the source-pathway receptor-model, I consider that there is 1 no. European site which has the potential to be affected by the proposal. I have excluded all other European	

sites on the basis of their substantial physical separation from the appeal site and due to the absence of realistic pathways connecting the appeal site to same.

European Site (code)	Qualifying interests ¹ Link to conservation objectives (NPWS, date)	Distance from proposed development	Ecological Connections ²	Consider further in screening ³
Lough Corrib SAC (Site Code 000297)	Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae) [3110] Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or Isoeto-Nanojuncetea [3130] Hard oligo-mesotrophic waters with benthic vegetation of Chara spp. [3140] Water courses of plain to montane levels with the Ranunculion fluitantis and Callitriche-Batrachion vegetation [3260] Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) [6210] Molinia meadows on calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) [6410] Active raised bogs [7110] Degraded raised bogs still capable of natural regeneration [7120] Depressions on peat substrates of the Rhynchosporion [7150] Calcareous fens with Cladium mariscus and	c. 1.9km to the west.	No From a review of relevant EPA mapping, there appears to be no surface water or other connection between the site and Lough Corrib SAC.	No

	species of the Caricion davallianae [7210] Petrifying springs with tufa formation (Cratoneurion) [7220] Alkaline fens [7230] Limestone pavements [8240] Old sessile oak woods with Ilex and Blechnum in the British Isles [91A0] Bog woodland [91D0] Margaritifera margaritifera (Freshwater Pearl Mussel) [1029] Austropotamobius pallipes (White-clawed Crayfish) [1092] Petromyzon marinus (Sea Lamprey) [1095] Lampetra planeri (Brook Lamprey) [1096] Salmo salar (Salmon) [1106] Rhinolophus hipposideros (Lesser Horseshoe Bat) [1303] Lutra lutra (Otter) [1355] Najas flexilis (Slender Naiad) [1833] Hamatocaulis vernicosus (Slender Green Feather-moss) [6216] Source: NPWS website accessed 07/07/2026.			
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Step 3. Describe the likely effects of the project (if any, alone or in combination) on European Sites

AA Screening matrix

Site Name	Possibility of significant effects (alone) in view of the conservation objectives of the site*	
	Impacts	Effects
Lough Corrib SAC (Site Code 000297)	<u>Direct:</u> None <u>Indirect:</u>	None

	None	
	Likelihood of significant effects from proposed development (alone): No	
	If No, is there likelihood of significant effects occurring in combination with other plans or projects? No	
	Possibility of significant effects (alone) in view of the conservation objectives of the site* Not likely.	

Step 4 Conclude if the proposed development could result in likely significant effects on a European site

I conclude that the proposed development (alone) would not result in likely significant effects on Lough Corrib SAC (Site Code 000297). The proposed development would have no likely significant effect in combination with other plans and projects on any European site(s). No further assessment is required for the project.

No measures specifically intended to avoid or reduce harmful impacts of the proposed development on European sites were taken into account in reaching this conclusion.

Screening Determination

Finding of no likely significant effects

In accordance with Section 177U of the Planning and Development Act 2000 (as amended) and on the basis of the information considered in this AA screening, I conclude that the proposed development individually or in combination with other plans or projects would not be likely to give rise to significant effects on European Sites, namely Lough Corrib SAC (Site Code 000297), in view of this site’s Conservation Objectives and is therefore excluded from further consideration. Appropriate Assessment (and submission of a NIS) is not therefore required.

This determination is based on:

- The small scale and nature of works,
- The c. 1.9km downstream separation distance from Lough Corrib SAC (Site Code 000297), and
- The lack of connections to other European Sites.

