



DELMEC

**Planning and Development Act 2024, Part 2, Section 13, Licensing of appliances and cables, etc.,
on public roads & Section 14, Licences under section 254 of Act of 2000**

Section 254, Planning & Development Act 2000, as amended

Part 17 & Schedule 12, Planning & Development Regulations 2002, as amended

Application for Tele-structure Licence

**Section 254 Licence Application for telecommunications infrastructure along the
public road at grass area at Carragh Hill/Carragh Drive, Knocknacarra Rd, Galway
City.**

Date: 9th December 2025

1.0 Introduction

The applicant, Vantage Towers are a leading tower company in Europe. Their infrastructure and technologies are creating better connections in an ever-changing, increasingly digital world. With over 82,000 towers across 10 markets, Vantage Towers are accelerating the digitisation of communities by connecting people, businesses, and Internet-enabled devices like never before. Vantage Towers combines the scale, stability, and quality of Europe's leading tower network with the agility, optimism, and energy of a start-up. In 2020, Vantage Towers acquired the communications infrastructure of Vodafone Ireland Limited, which consisted of over 1,200 towers across the country. This positioned Vantage Towers as one of the leading providers of Communications installations across the Country. Ireland is experiencing a period of rapid growth across multiple sectors, as numerous companies are deciding to locate their headquarters and operations in the country. With this comes a need for enterprise-grade connectivity – and the next-generation infrastructure to facilitate and sustain that connectivity.

2.0 Development Description

The development will consist of 18 metres high Delmec Macropole slimline street pole, integrated antenna, 1 number 300 diameter transmission dish, one number GPS transmitter, and all ground equipment housed in cabinet on an area beside the public road at the grass area at Carragh Hill/Carragh Drive, Knocknacarra Rd, Galway City. The development will form part of Vodafone's existing 5G and 4G mobile broadband network and provide vital telecommunications. The upgraded coverage will benefit residential areas including Carragh, Hillcrest, Burren View, the wider Knocknacarra Road corridor, the R336 coastal route, and the Gentian Hill and Blake Hill neighbourhoods.



FIGURE 1 SITE PHOTO

3.0 Planned Occupants

The planned occupants are Vodafone who are seeking a location to significantly enhance customer voice and mobile broadband data experience by improving 4G and especially 5G coverage levels provided to the surrounding residential and commercial premises. There is a need for the proposed infrastructure to provide coverage and capacity to meet the area's high demand for wireless services. Once built, the infrastructure will be visited two or three times annually by the operator to access their equipment, therefore, would have no impact on the traffic of the local road.

4.0 Development Location

The subject site is centred at ITM Grid Reference X 526369 Y: 723938 is located beside the public road at the grass area at Carragh Hill/Carragh Drive, Knocknacarra Rd, Galway City.

The proposed site is approximately 17m from the nearest residential property. While the site is not directly in front of the housing, the visual effect will be mitigated by the presence of hedgerow and trees.

Access to the site will be the public road at Carragh Hill/Carragh Drive, Knocknacarra Rd. The cabinet will be visited two or three times annually by the mobile operators accessing their equipment, therefore, would have minimal impact on the main road's traffic. This position is also consistent with An Bord Pleanála decision reference PL18.241306 where it states, "Traffic generated by the proposal post the construction stage would be minimal and so I raise no objection to the proposed means of access."



FIGURE 2: VANTAGE TOWERS LIMITED SITE FROM GOOGLE EARTH AS OF 09/12/2025

Zoning: Residential, mixed residential and other uses:

“To provide residential development and for associated support development, which will ensure the protection of existing residential amenity and will contribute to sustainable residential neighbourhoods”

The subject site is located in the residential area and is open to other uses that will contribute to residential amenities. By locating essential telecommunications infrastructure within or adjacent to residential areas ensures high-quality, reliable coverage for existing, visiting and future residents. By ensuring that residents have access to modern, high-capacity communications infrastructure, the proposal contributes positively to the long-term sustainability of the community.

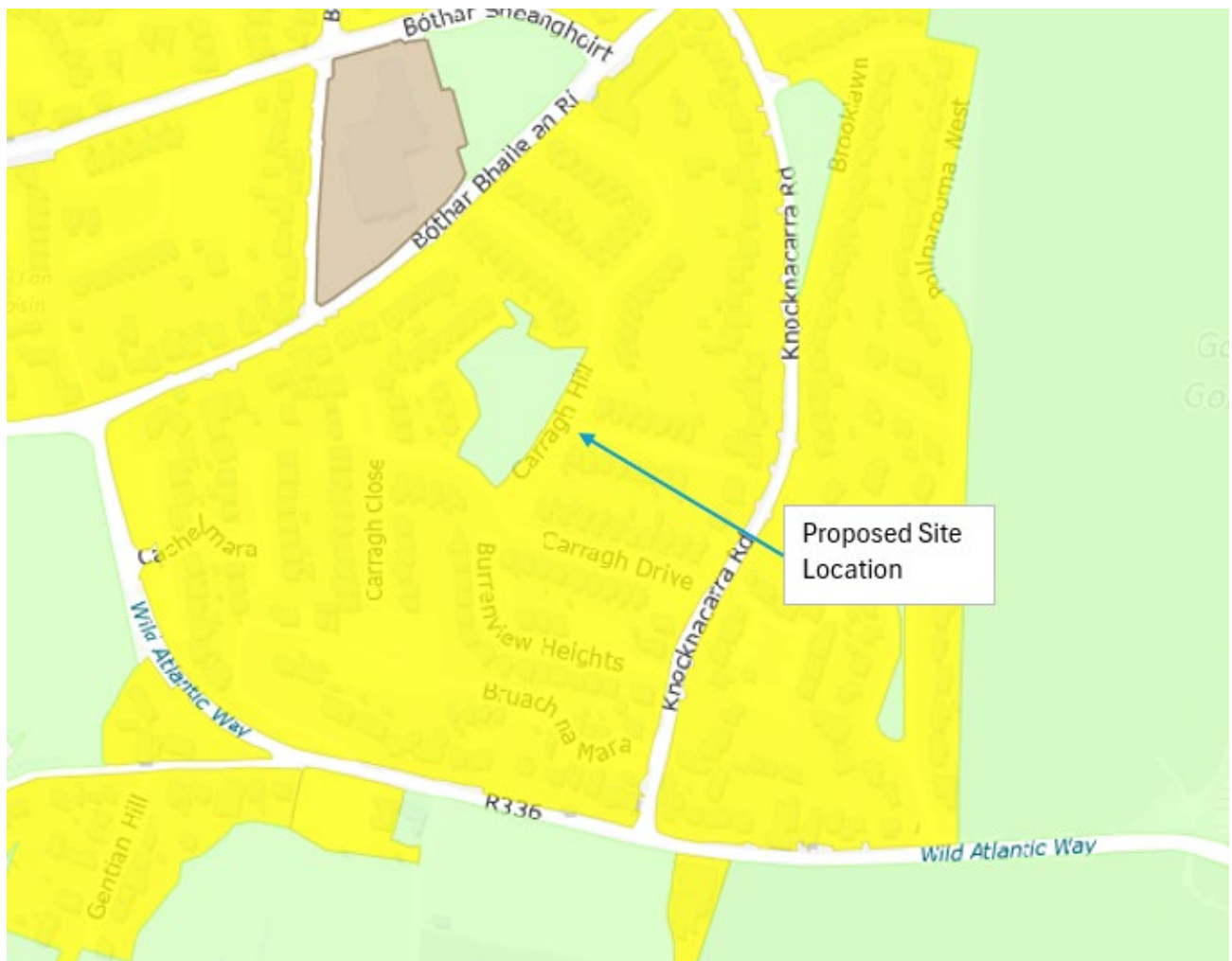


FIGURE 3 ZONING MAP (GALWAY CITY DEVELOPMENT PLAN 2023 - 2029 (GALWAY))

5.0 Comreg Map / Existing Locations discounted

Wherever practicable, Vodafone seeks to co-locate on existing telecommunications infrastructure situated within the identified target area. An analysis of existing telecommunications structures on Comreg's site viewer was carried out, however there were no suitable existing sites that would achieve in the specific coverage targets. The following existing sites were discounted for the reasons detailed below.

Location	Description	Reason
A	VOD_GY165 Southern Hills	225m to the south of the subject site. Roof Top site. Vodafone have been unable to upgrade the technologies on the Southern Hills site, as it is not technically feasible to upgrade this rooftop site.
B	VOD_GY140 – Kingston Hall	200m to the north of the subject site. Roof Top site, It has the latest Vodafone technologies but is unable to cover specific area
C	VOD_GY125 – Clybaun Hotel	This site is 1km to the north-east of the subject site and is too far away from the coverage objective.
D	VOD_GY176 -Cuan Glas	This site is over 1km to the east of the subject site and is too far away from the coverage objective.
E	VOD_GY132 -Pearse Stadium	This site is over 1km to the south-east of the subject site and is too far away from the coverage objective.
F	VOD_GY037 – Galway Bay Hotel	This site is over 1km to the south-west of the subject site and is too far away from the coverage objective.



Figure 4 Existing locations discounted <https://siteviewer.comreg.ie>

6.0 Site Selection Criteria and Assessment

A comprehensive site selection process was undertaken to identify a location capable of supporting the proposed installation while ensuring minimal environmental, visual, and operational impact. The following section outlines the key criteria considered and the rationale behind the final site choice.

Network Performance Requirements

A primary objective of the site search was to identify a location that could provide the required network coverage to the target area. The proposed site demonstrates strong potential to enhance service quality and overall network performance for surrounding residential communities. Coverage modelling confirmed that the location aligns with performance requirements and supports future network demand.

Residential Impact Considerations

Minimising the visual and physical impact on local residents was a critical component of the evaluation. The selected site is not positioned directly in front of any residential properties, thereby reducing potential concerns related to visual prominence, privacy, and residential amenity.

Traffic and Road Safety Assessment

The site was assessed to ensure it would not cause obstruction or pose safety risks to vehicular traffic. Its position avoids any interference with visibility at junctions, corner turnings, or pedestrian crossing points. This ensures compliance with local road safety standards and maintains clear lines of sight for all road users.

Underground Services and Infrastructure Protection

An assessment of existing underground services confirmed that the proposed site does not conflict with known utility routes. This minimises the risk of disruption during construction and ensures that existing water, sewer, electrical, and communication services remain unaffected.

Proximity to Essential Utilities

The practicality of the installation was further supported by the site's proximity to key utility infrastructure, including:

- **ESB power supply**, beside ESB Mini Pillar enabling efficient electrical connection.
- **Existing fibre ducting**, reducing civil works and supporting rapid integration into the existing network.

The selected location meets the site selection criteria, offering strong network performance, minimal visual and residential impact, compliance with traffic safety requirements, and convenient access to necessary utility infrastructure. Based on this assessment, the site is considered highly suitable for the proposed development.

7.0 Alternative Locations Considered

During the site selection process a number of alternative locations were considered and assessed by a desk top review and onsite visits. These locations were discounted for the reasons detailed below.

Location	Description	Reason
A	Green area in Carragh Drive	Location was deemed unsuitable presence of trees and planting, there would be substantial disruption required to connect it to an adequate power supply.
B	Corner at Burren View Heights and Knocknacarra Rd.	Location was deemed unsuitable due to the presence of overhead cables as it would hinder construction activities.
C	Burren View Heights parking area	Location was deemed unsuitable due to the substantial disruption that would be required to connect it to an adequate fibre and power supply
D	R366 Beside Bus stop ID: 522381 - Knocknacarra (Topaz Filling Stat)	Location was deemed unsuitable due to the substantial traffic disruption that would be required during construction.
E	R366 - Knocknacarra Road	Location was deemed unsuitable due to space restrictions.



FIGURE 5 ALTERNATIVE LOCATIONS (GOOGLE MAPS)

Section 254 applications in the vicinity

- An Cimin Mor: EIR_GY_1190 – 1.55km to the North-West - Eir Mobile one operator structure
- Gort Na Bro - EIR_GY_1877– 1.35km to the North-East - Eir Mobile one operator structure

8.0 Delmec Macropole Streetwork Solution

The proposed monopole has undergone many years of research and development to design the most slimline visually unintrusive solution while retaining structural integrity and being fit for purpose. This design by Delmec Engineering has enabled telecommunication operators to take up a smaller spatial footprint and achieve a lower visual impact. Delmec has collaborated with antenna manufacturers to further integrate the antenna onto the slimline monopole to create a continuous cylindrical structure.

The overall height of the proposed monopole with the antenna installed is 18m and the pole measures only 408mm in diameter. The proposed monopole will be coloured RAL 7004 light grey which is considered the most effective colour in blending with the Irish skies.

The Delmec Streetworks cabinet had been designed and developed to take up the lowest spatial footprint possible and will have a low visual impact. It can be painted to the council's requirement to suit the location it is situated in. We have proposed a green colour to fit in with the receiving landscape background of vegetation and trees. Consideration has been given to integrating the power components into the cabinet thus reducing the need for separate power infrastructure further reducing roadside clutter.

9.0 Section 254 Telecommunication Licence

The Section 254 Telecommunication License's goals are to address mobile connectivity blackspots and enhance surrounding mobile network coverage to fully realise the city's potential for connectivity. Under Section 254 of the Planning and Development Act 2000, Local Authorities are tasked with the issuing of licences for the placement of appliances, cables, signs, and/or other items on public roads.

This section of the act outlines the provisions in relation to the licensing of aboveground appliances and cables, etc. on public roads. The government's program for government and the recommendations from the Broadband Task Force has directly led to the evolution of the section 254 license process.

10.0 Previous Section 254 Telecommunication Licence

The acceptance of previous Section 254 license street pole applications for has been mostly positive and numerous licenses have been granted by local authorities across the state.

Galway City Council has granted Section 254 licenses for similar infrastructure developments throughout the city and is broadly supportive of increased broadband services in the county. The following photos are of existing similar telecommunications street poles in Galway City.



FIGURE 6 STREETWORKS – CASTLE PARK ROADS GALWAY CITY



FIGURE 7 STREETWORKS - AN CIMIN MÓR, GALWAY CITY

11.0 Justification for the Mobile Telecommunications requirement

As part of Vodafone’s licensing requirements, and the continuing rollout of their mobile and mobile broadband networks, Vodafone requires this development to provide coverage to the local area. The proposed pole will offer more capacity and improve coverage.

The key objective of the proposed new Streetworks telecommunications site at Carragh Hill, Knocknacarra, is to enable Vodafone to significantly enhance the quality of voice services and mobile broadband performance—particularly 4G and, critically, 5G coverage—for the residential areas of Carragh, Hillcrest, and Burren View, as well as the wider Knocknacarra Road area.

Vodafone currently serves these areas through two rooftop installations located at Kingston Hall (GY140) and Southern Hills (GY165). While the Kingston Hall site has been fully upgraded with the latest 4G and 5G technologies and associated frequency bands, it has not been technically feasible to deliver similar upgrades at the Southern Hills site due to structural and operational limitations inherent to that rooftop location.

As a result, the Southern Hills installation cannot provide the full suite of 4G technologies and frequency bands and, more importantly, cannot accommodate any 5G deployment. This shortfall is incompatible with Vodafone’s network-wide upgrade programme, which requires all sites to support a full complement of modern technologies to meet current and future service demands.

Given the inability to upgrade the Southern Hills site, Vodafone proposes to replace it with the new Streetworks installation at Carragh Hill. The new site will not only deliver substantially improved 4G and 5G services to the previously identified residential areas within Knocknacarra but will also enhance coverage for homes along the R336 coastal road and in the Gentian Hill and Blake Hill neighbourhoods.

The attached Technical Justification document provides coverage predictions and shows the need for the proposed infrastructure to provide coverage and capacity to meet the area’s high demand for wireless services.

The following ComReg Operator coverage maps show that there is a deficit in the 5G coverage, the area to the southern section of Knocknacarra have poor 5G coverage and if any indoor 5G coverage.

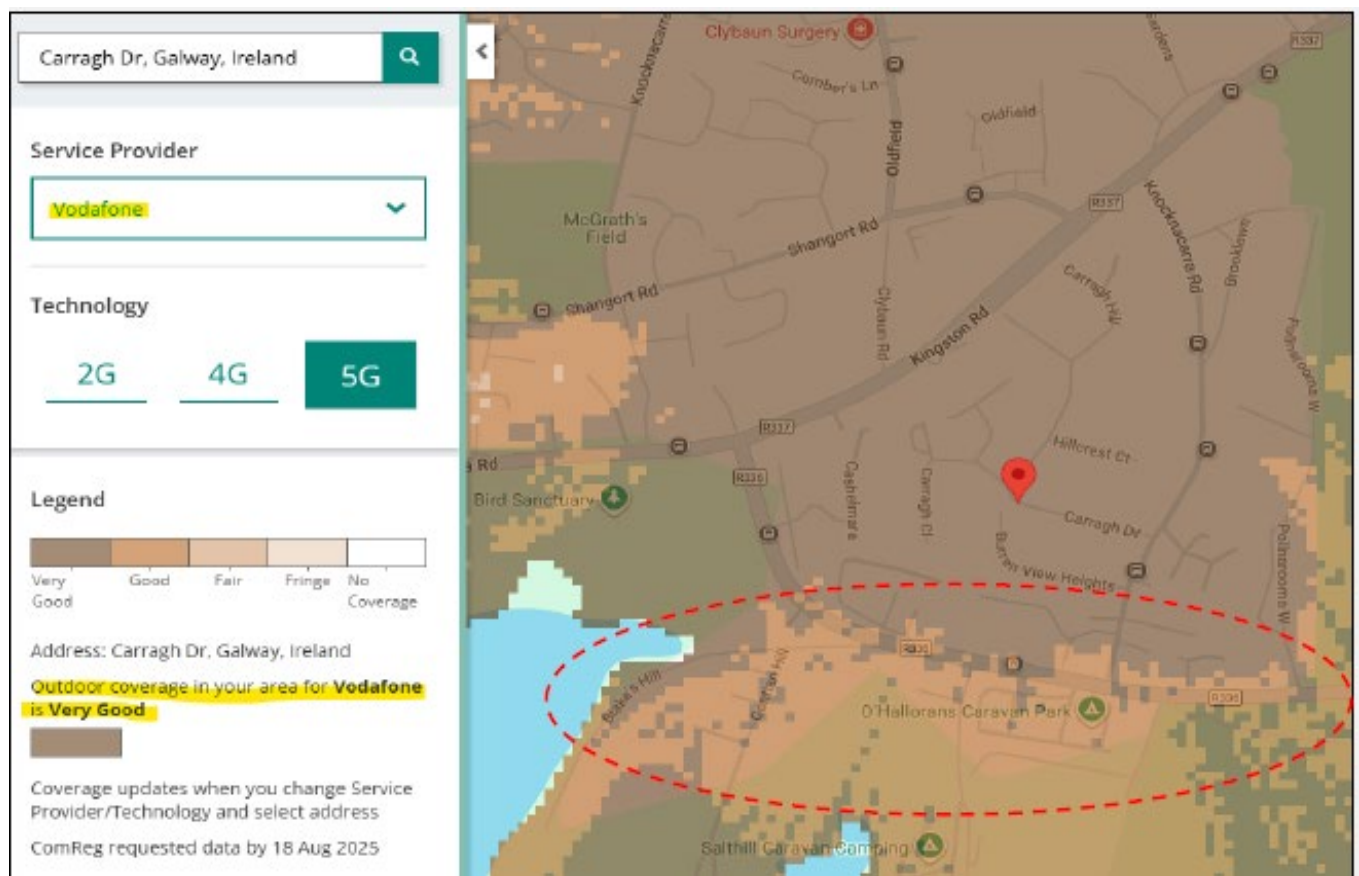


FIGURE 8 VODAFONE COVERAGE

The following coverage prediction maps show the different coverage scenarios and show the proposed structure is required to enable a significant enhancement of customer voice services and mobile broadband performance—most notably 4G and 5G service levels.

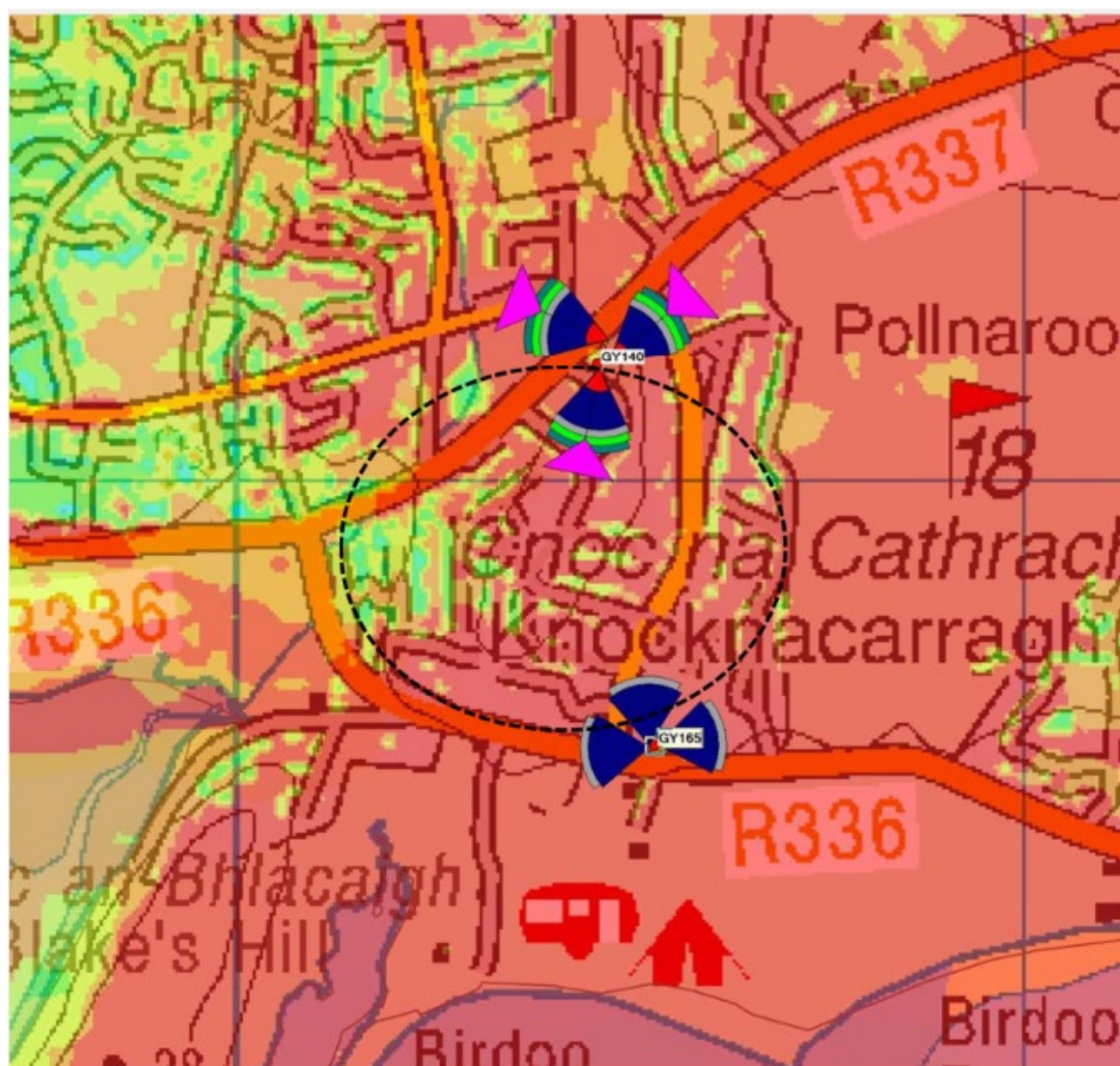
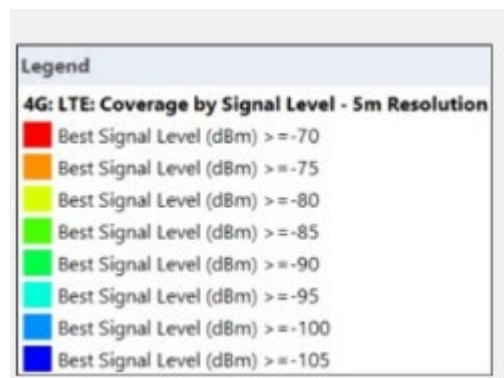


FIGURE 9 EXISTING VODAFONE 4G COVERAGE TO THE GREATER CARRAGH HILL AREA

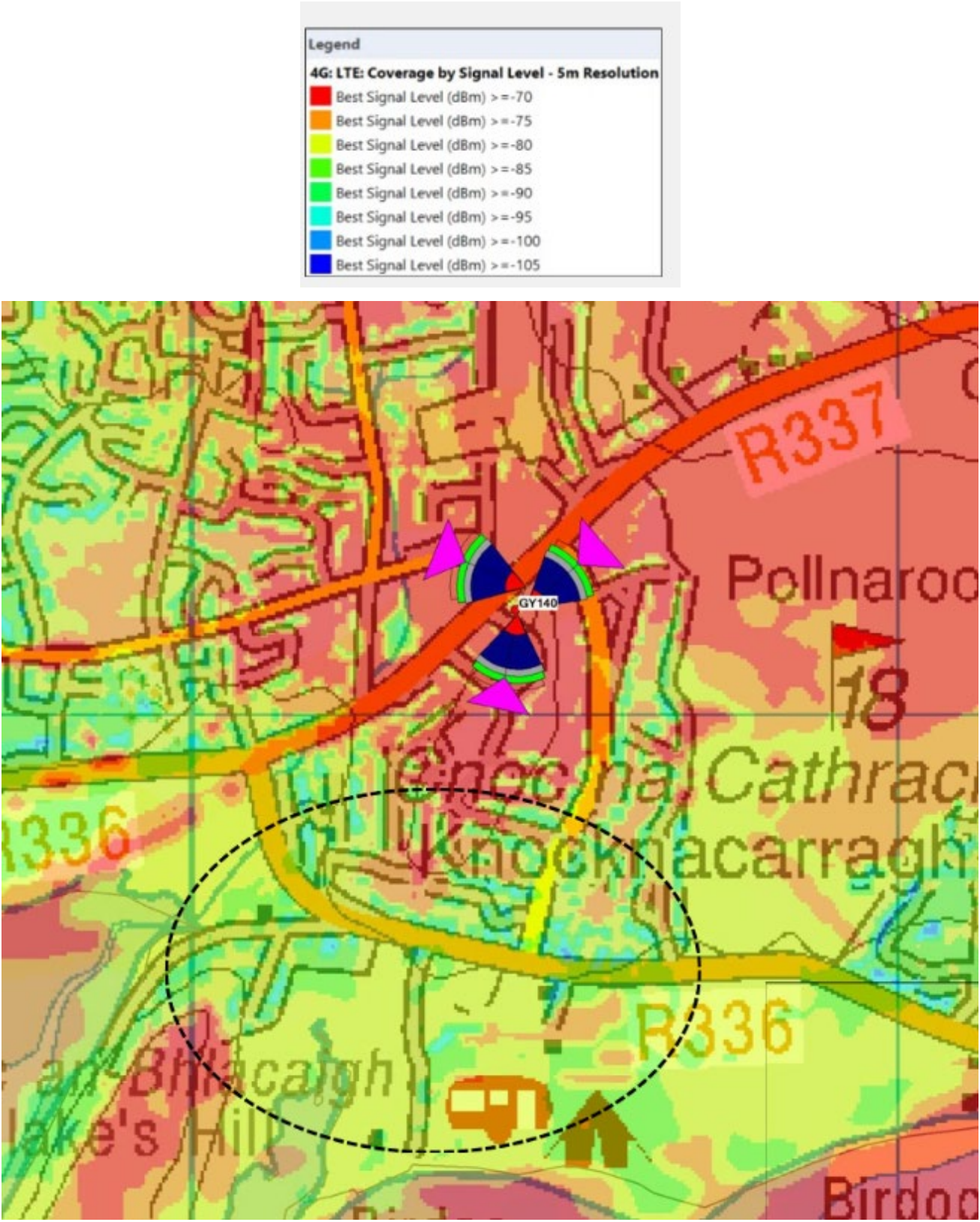


FIGURE 10 VODAFONE 4G COVERAGE TO THE GREATER CARRAGH HILL AREA – WITHOUT THE SOUTHERN HILL SITE.

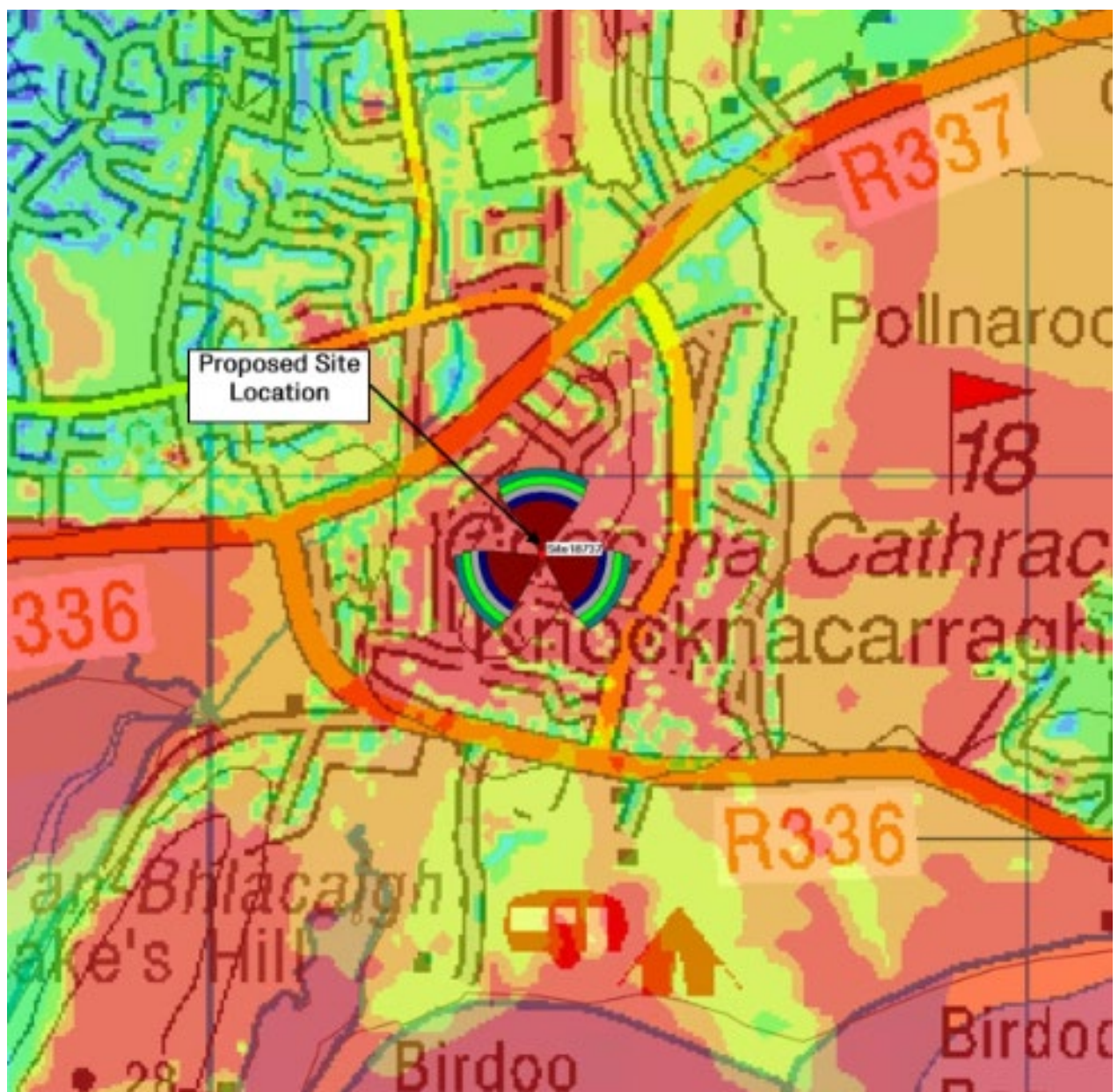


FIGURE 11 PREDICTED VODAFONE 4G/5G COVERAGE TO THE GREATER CARRAGH HILL AREA – FROM PROPOSED NEW SITE.

The coverage predictions map provides a comparison between the outdoor coverage levels to the Knocknacarra area on Vodafone service. The Southern Hill site cannot be upgraded to 5G due to unfeasible technical upgrade reasons. If the proposed development is not granted it will leave only the Kingston Hill site GY140 to serve the Knocknacarra area and the coverage maps clearly show that the coverage levels will remain poor in the greater Carragh Hill area.

Mobile phone operators are obligated by their ComReg licence to provide the following:

- 3Mbit/s to 99% of the population within 3 years and 92% of the geographic area of Ireland within 7 years
- 30Mbit/s to 95% of the population, 90% of motorways, and 80% of primary roads within 7 years.
- 30Mbit/s service to 345 specific locations within 7 years.

If permission for this telecommunications facility is not granted, Vodafone will not meet their license obligations for coverage. It is therefore submitted that the proposed development represents an important component of strategic telecommunications infrastructure within Galway city.

12.0 Requirement

Telecommunications connectivity is now regarded as the fourth utility service, after water, electricity, and gas. Indoor mobile reception remains insufficient in certain buildings in urban areas.

The COVID-19 crisis has shown how vital telecommunications are to keep people connected to each other, their work, educational resources, business needs, and entertainment services. The telecommunications networks coped with an average 35% increase in peak traffic during the COVID-19 crisis to date. With the increased number of people now working from home 1 or 2 days a week, and the increased number of devices putting pressure on the network, the next step is providing upgraded coverage, and it is crucial that this area be provided with 4G and broadband coverage. According to a Vodafone Connected Futures report, “a quarter of those who work from home – or nearly 100,000 adults – say their current broadband service is not sufficient to meet their requirements for e-working, and that it limits the work-related activities they can do from home”. Furthermore, “30% report that slow and unreliable speeds currently prevent them and/or family members from working from home”. As well as removing a competitive advantage for Ireland’s workforce and the employers who need their workforce available to interact with global markets in real-time, the lack of ability to work from home has a knock-on effect in terms of Ireland’s RES-T target to reduce carbon emissions.

Research by iReach on behalf of Irish Life in March 2017, gives an insight into the ownership of smartphones in Ireland, it shows how most Irish adults largely depend on their smartphones every day. The research showed that nearly all Irish adults (90%) own a smartphone, with the top three uses including checking emails (87%), social media (71%) and news/ weather (67%). Other uses for the smartphone include online banking (50%), shopping online (42%) and paying bills (32%). Most Irish people check their phone up to 10 times a day, the highest among older 55+ adults. Twice as many men (34%) as women (17%) stand out as frequent users, checking their phones 41+ times a day. The majority of Irish people (79%) check their phones while using public transport. Second most common places are at work and when out and about meeting friends (both at 70%)

The latest Comreg Mobile Consumer Experience (2022) finds that landline usage has declined and provides evidence that mobile phones are replacing landline, respondents

have indicated that they use their mobile instead. Average user mobile data usage has grown exponentially over the last number of years (more than doubling since 2019), with many users using their mobile devices for access not only for personal services such as social media, streaming services for video and music, sources of news etc., also in many cases as their primary device to access worked related applications such as email, server based files and systems, Teams meetings, video conferencing etc. Mobile phone data usage has become more common place, with 89% now using data, compared to 78% in 2019, particularly when focusing on locations outside of the home. Traditional SMS text is decreasing, on average, since 2017 but there is an upward trend in the frequency of messages sent via internet-based applications in the same period. However, they found that 37% of respondents had experienced loss of signal when using call/text functions and 32% of respondents experienced loss of signal when using data, while more than half experienced daily issues in relation to voice /texts in their homes, with those in rural areas being impacted more. The numbers experiencing dropped calls or not being able to receive a call or send a text has increased in frequency since 2019. This demonstrates a need for improved mobile coverage.

13.0 Visual Impact

Vantage Towers Limited holds the visual impact of any development as a central element to success of the project. The 'Telecommunication Guidelines Antennae Support Structures 1996' state that the visual impact of a communication structure is one of the most important considerations when assessing proposals for communication structures and "vary with the general context of the proposed development" (Section 4.3).

A streetworks DelUrban slimline monopole-type structure was selected for this site in order to reduce visual impact. The structure is of a design and scale that would not be out of character or be a visually obtrusive or incongruous element in an area such as this. It is considered that a monopole structure itself is nondescript in character and design and is not dissimilar in design of a lamp standard or traffic light pole which are Commonplace in Ireland.

It is concluded that the 18-metre pole will be visible from close up, as would be expected but would not be detrimental at this location. The proposed installation has been carefully designed and sited to minimise visual and environmental impact. Its scale, height, and form are appropriate to the

character of the surrounding area, and the associated support development will be sensitively integrated within the existing built environment.

This position is also consistent with An Bord Pleanála decision reference ABP-308491-20 “It is considered that the proposal would not seriously injure the visual amenities of the area and would not seriously injure the residential amenities of the area and of properties in the vicinity

The proposed structure and cabinet have been designed to be as discreet as possible for utility infrastructure and to be of a similar in scale to street lighting. The slimline pole design and colour scheme aim to limit the visual impact the development will have on the area. The cabinet is designed to be as compact as possible to house all of the telecommunication and power equipment in one unit thus reducing the cluttering of smaller cabinets and boxes.

The proposed structure will be coloured light grey which is considered the most effective colour in blending with the Irish skies. The subject development in this location reflects the existing character of development and does not have an adverse visual impact on surrounding development.

When designing this site, the Radio Engineers required height to provide a signal over the surrounding area therefore, the 18m height was selected as no other lower height could provide the required coverage.

Telecommunications installations are often sited in close proximity to residential development and are commonplace in most urban areas across Ireland. This position is consistent with An Bord Pleanála decision reference ABP-307962-20 where it states, “It is not uncommon for telecommunications structures to sited be in close proximity to residential development (particularly in urban areas) and national guidance does not provide for any restriction in terms of the distance between such structures and dwelling houses.”

14.0 Appropriate Assessment

The site is located 280m from the Inner Galway Bay Special Protection Area. The nature of the proposed development is of a limited scale and having regard to the distance from the Natura 2000 European site, the development is unlikely to have a significant effect on the European site either individually or in combination with other plans and projects, therefore, would not require an Appropriate Assessment.

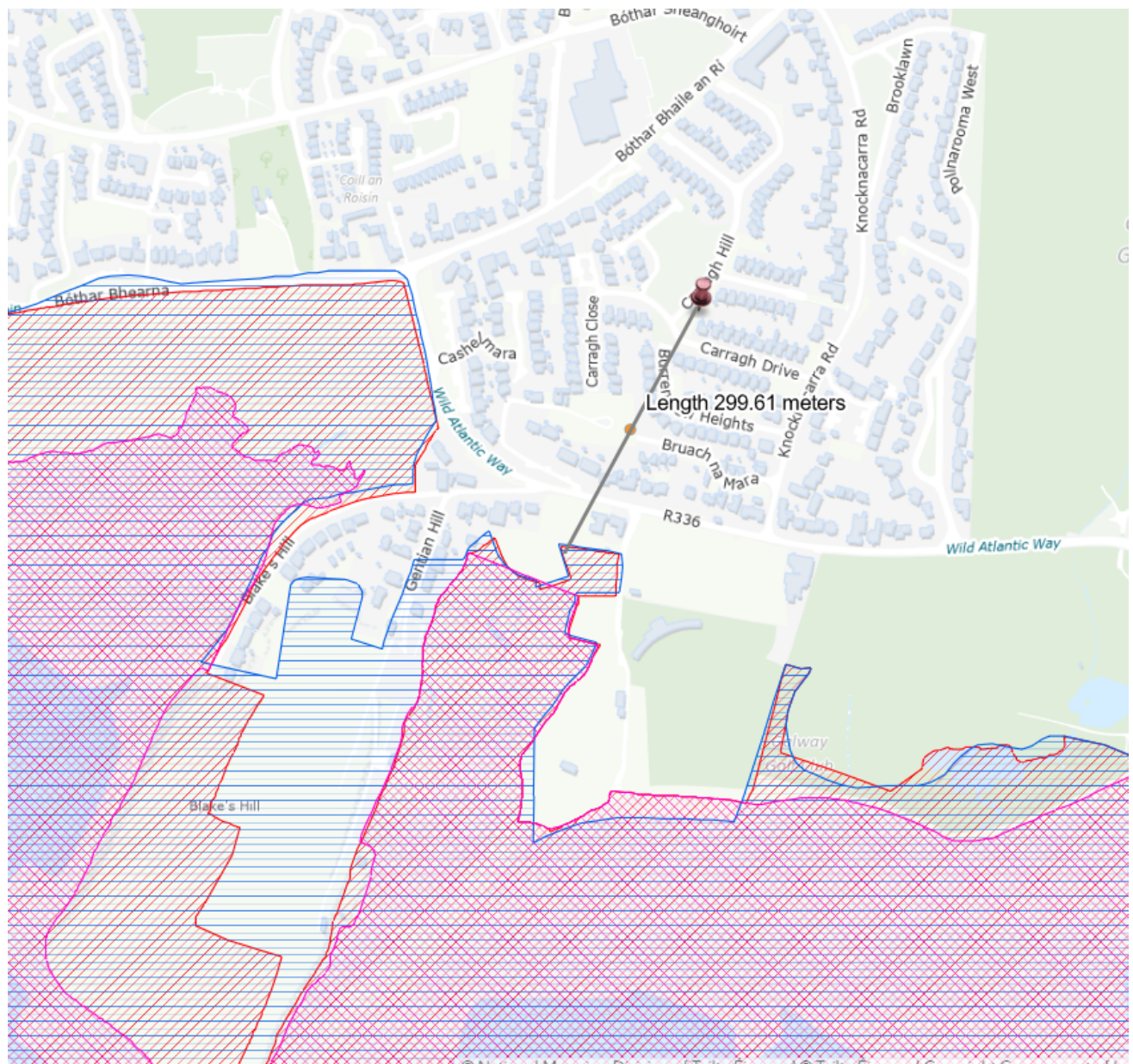


FIGURE 12 SUBJECT SITE IN RELATION TO SPA (NPWS DESIGNATION VIEWER)

15.0 The National Broadband Plan

The National Broadband Plan recognises that access to quality high-speed broadband is essential for today's economy and society, to ensure that Ireland's citizens and businesses continue to enjoy the opportunities and benefits that flow from this transformational digital age. The National Broadband Plan reflects the Government's ambition to ensure that the opportunities presented by this digital transformation are available to every community in Ireland. The Plan emphasises the importance of the delivery of high-speed broadband in Ireland with the need for significant improvements in the quality and speed of broadband connections

"Given the importance of digital engagement for Ireland's economy, jobs and society generally. High speed broadband is a key enabling infrastructure in this regard and will contribute to Ireland's economic recovery."

"Provision of quality high speed broadband across Ireland should ensure that such opportunities are fully harnessed, and that Ireland reaps the benefits of a truly digital economy"

16.0 Digital Connectivity Strategy & The Gigabit Infrastructure Act (GIA)

Ireland's Digital Connectivity Strategy (2022) aims for nationwide Gigabit network access for all homes/businesses by 2028 and 5G in all populated areas by 2030. The Gigabit Infrastructure Act ("GIA") is an EU Regulation designed to remove regulatory barriers and reduce deployment costs for gigabit broadband and 5G infrastructure across the EU. One of the key goals for Ireland under this act are for all populated areas to have 5G coverage by 2030. The act calls for a simplified permitting process and easier access to public owned infrastructure.

The proposed replacement structure aligns with the objectives of Ireland's Digital Strategy and the EU Gigabit Act, both of which promote the provision of reliable, high-quality, next-generation digital connectivity.

17.0 Project Ireland 2040 National Planning Framework

The National Planning Framework (NPF) is a high-level strategic twenty-year policy and planning framework to shape the future growth and development of Ireland, and sets out to deliver balanced social, economic, and physical development between the regions. It is important to consider the NPF in the making of decisions regarding applications for planning permission for telecommunications

installations because the strategy is concerned with all aspects of infrastructure, including telecommunications.

The national strategic outcomes of the NPF support the important role telecommunications networks play to improve digital connectivity and to enable economic growth and improvement in social activities.

National Strategic Outcome 3: Strengthening Rural Economies and Communities highlight the importance of local connectivity to communication (Broadband) networks to improve the fabric of rural life. “For rural Ireland, broadband is essential enabling infrastructure that affords rural communities the same opportunities to engage with the digital economy as it does to those who live in our cities and towns.”

National Policy Objective 24: 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 Strategic Outcome 5: A Strong Economy supported by Enterprise, Innovation and Skills recognises the need for access to high quality broadband as an important factor for future economic growth.

National Policy Objective 48: 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.

The proposed development is essential to the effective delivery of Vodafone’s mobile network in the area, and the structure would be fully in keeping with the objectives of the NPF.

18.0 Northern & Western Regional Spatial & Economic Strategy 2020-2032(RSES)

The RSES details how telecommunications connectivity is a key issue for accessing employment, education and healthcare lifelines, especially in smaller towns, villages and rural areas. It highlights that there is a lack of high-quality modern telecommunications infrastructure that is

accessible throughout the region. This lack of infrastructure impedes higher living standards and is a significant obstacle to economic development.

6.4 Digital Infrastructure – Delivering a Smart Region

Ireland's communications network is responsible for saving lives, encouraging economic growth as well as providing citizens with access to work, entertainment and social media. Staying connected and competitive in a globalised society is key to economic success. Improving digital and mobile telecommunications infrastructure is crucial for revitalizing cities, towns, villages, and rural areas.

6.5 Broadband Connectivity

The government aims to increase nationwide access to broadband, especially in rural areas, with the National Broadband Plan. There are wide swathes of the Northern & Western regions, both rural and urban, with little or no access to broadband. The policy gives consideration to identifying mobile blackspots and seeks to address these.

RPO 6.36 Support the roll-out of the National Broadband Plan within the lifetime of this strategy and grow the regional digital economy.

RPO 6.36 Understand, advocate for, and facilitate the existing and future infrastructure needs of our urban areas, the wider region and beyond – immediate priorities include access to ultra-fast and rural broadband initiatives.

RPO 8.12 To ensure that adequate infrastructure is in place to meet demands from continuing growth and development of the economy and to cater to existing and increased population levels.

The RSES supports actions to strengthen communications to develop a stable, innovate and secure digital communications and infrastructure on all island bases. It recognises that, in the information age, telecommunications networks are essential for enabling social and economic activity. This proposal therefore contributes directly to advancing the objectives and vision of the Regional Assembly.

19.0 Galway City development Plan 2023-2029

The current Galway City development plan sets out policies and objectives to guide how and where development will take place in the in the city over the lifetime of the plan. It provides an integrated,

coherent spatial framework to ensure the county is developed in an inclusive way which improves the quality of life for its citizens, whilst also being a more attractive place to visit and work. The Plan was adopted by Galway City Council on 24th November 2022 and came into effect on 4th January 2023.

Overall, the development plan views telecommunications favorably. Chapter 9, Environment and Infrastructure sets out the local authority policies in relation to Telecommunications and Energy Infrastructure.

9.11 Telecommunications

This section recognises telecommunications infrastructure as essential for developing a competitive, sustainable urban environment. The plan promotes the delivery of high-quality, future-proofed digital services to meet residential, commercial, and community needs. Policies relating to infrastructure, compact growth, sustainable neighbourhoods, and economic development all underline the importance of robust telecommunications networks. High-quality telecommunications are essential for Galway City's social and economic activities and are an important part of the transition to a digital society and Smart City. The council supports and facilitates the improvement of communications infrastructure.

9.12 A Smart City

The council supports the development of Galway as a Smart City that makes best use of digital technology to deliver efficient services to citizens and businesses.

Policy 9.9 Telecommunications and Smart Technology

1. Support the development and expansion of telecommunication infrastructure (including the broadband network) within the city where appropriate, subject to environmental, visual and residential amenity considerations.
2. Ensure that developers of masts facilitate the co-location of antennae with other operators in order to avoid an unnecessary proliferation of masts. Where this is not possible operators will be encouraged to co-locate so that masts and antennae may be clustered.
3. Ensure that development for telecommunication and mobile phone installations take cognisance of the Planning Guidelines for Telecommunications Antennae and Support

(DECLG, Circular Letter PL07/12) and in relation specifically to new free standing masts and antennae, locations in the immediate proximity to residential areas, schools and other community facilities will only be considered where all other more suitable options, including opportunities to locate on tall buildings, rooftops and co-location with existing masts, have been exhausted following an evidenced based evaluation of potential sites.

4. Facilitate the rollout of digital infrastructure to implement a world class digital infrastructure and sensor network that will provide real time data and smart city solutions.
5. Support the actions of the draft Galway City Digital Strategy (2020-2024).

The applicant has considered the development aims and objectives outlined in the development plan. In our view, the proposed development plays a vital role in meeting Galway City's current and future digital infrastructure needs.

By delivering improved mobile phone and broadband coverage, it directly supports the plans strategic objectives, facilitates sustainable growth, and ensures that Galway City remains a modern, connected and economically competitive city well into the future. This proposal will support Galway City Council in meeting its telecommunications policy objectives.

20.0 The Development in context of the “Guidance on potential Location of Overground Infrastructure on Public Roads (April 2015)”

In order to meet the growing demand for telecommunications the National Broadband Plan and Roadworks and Licensing Working Group, issued the above report to provides advice to telecommunications operators on how to accommodate telecommunications infrastructure along all road types, including motorways.

The guidelines highlight the value of high-speed broadband for Ireland's citizenship, education, health, entertainment, and competitiveness. To meet the demand for high-speed fixed wireless and mobile broadband services, operators need to continue making significant infrastructure investments. One barrier identified by the mobile industry is the processes related to obtaining licenses for overground electronic communications infrastructure.

The guidelines were consulted and helped inform the choice of location proposed in this application. Opportunities are generally limited to locations where a wide verge or footpath allows the accommodation of small cabinets and standalone pole to accommodate telecommunications infrastructure. Below are examples given in the guidelines that are similar in nature to the proposed telecommunications pole and cabinet.



The green area adjacent to wall would provide opportunities to accommodate telecommunications infrastructure. If the installation of any equipment were to be considered, when selecting a suitable location, it is necessary to ensure that sightlines for those exiting side roads and entrances would not be adversely affected by any equipment, and that footpaths would not be obstructed. Depending on the location and nature of the equipment, traffic management may be required whenever the site were to be accessed for maintenance etc

Figure 15 EXAMPLE OF SIMILAR LOCATION DEEMED A SUITABLE LOCATION PAGE 104 OF GUIDELINES



FIGURE 16 EXAMPLE OF A SIMILAR POLE GIVEN ON PAGE 40 OF GUIDELINES

The proposal has been designed in accordance with the Guidance on the Potential Location of Overground Infrastructure on Public Roads, ensuring compliance with its requirements and best-practice recommendations.

21.0 The Development in the Context of the Department of the Environment's Guidelines for Telecommunications Antennae Support Structures (July 1996)

The national importance of providing mobile telephony is also highlighted in the Department of the Environment (DOE) guidelines 'The Government's telecommunications policy aims to place Ireland in the top quartile of OECD economies as regards the availability, price and quality of telecommunications services in order to promote industrial and commercial development, to improve personal and household security and to enhance social exchange and mobility'.

The Guidelines also state:

'Planning authorities have a duty under the Local Government Act 1991, in the performance of their functions under any enactment, to have regard to policies and objectives of the Government or any Minister in so far as they may affect or relate to their functions. Government policy on the availability of top-quality telecommunications throughout the state should, therefore, be taken into consideration'

Design and Siting (Section 4.2)

From a radio engineering point of view the base station is ideally located to serve the immediate area of the base station. It is close enough to the target coverage area to provide indoor GSM coverage to the area. It provides good antennae height with sufficient rigidity for effective radio signal propagation and has the structural strength to carry additional, both transmission (dish type) and GSM panel type. The location of the site and height is strategic in that it links a number of neighbouring GSM base stations to the main mobile network switches via SDH (Synchronous Digital Hierarchy) transmission links.

Visual Impact (Section 4.3)

The base station is designed and will be constructed in a manner which make it visually unobtrusive. "Along major roads or tourist routes, or viewed from traditional walking routes, masts may be visible but yet are not terminating views. In such cases it might be decided that the impact is not seriously detrimental. Similarly, along such routes, views of the mast may be intermittent and incidental, in that for most of the time viewers may not be facing the mast. In these circumstances, while the mast may be visible or noticeable, it may not intrude overly on the general view of prospect"

22.0 Circular Letter: PL 07/12 – Telecommunications Antennae and Support Structures

Guidelines

This circular was issued by The Minister of environment, community and Local Government under section 28 of the Planning Development Acts 2000 – 2012 to update certain sections of the telecommunications Antenna and Support Structures Guidelines (1996) which planning authorities use to draft planning policies and assess planning applications. The circular was issued to all Directors of Planning, City & County Managers and An Bord Pleanala.

Health and Safety

The 1996 Guidelines advise that planning authorities should not include monitoring arrangements as part of planning permission conditions nor determine planning applications on health grounds.

This Circular Letter reiterates that advice to local planning authorities. Planning authorities should be primarily concerned with the appropriate location and design of telecommunications structures and do not have competence for health and safety matters in respect of telecommunications infrastructure. These are regulated by other codes and such matters should not be additionally regulated by the planning process.

23.0 Conclusion

The importance of mobile and broadband infrastructure to economic and social sustainability is extensively acknowledged throughout the relevant plans and policies, as outlined in this report. National, regional, and local policy and strategy documents are consistent in acknowledging the necessity for continued investment in telecommunications infrastructure. With the ever-increasing demand for mobile broadband services, and more people working from home since the outbreak of the pandemic, the proposed upgrade of this existing telecommunications site will allow for much-needed enhanced broadband provision to the area.

The proposed installation has been carefully designed and sited to minimise visual and environmental impact. Its scale, height, and form are appropriate to the character of the surrounding area, and the associated support development will be sensitively integrated within the existing built environment. Measures such as strategic positioning, screening, and sympathetic design treatment will ensure that the development does not detract from residential amenity.

Vantage have provided evidence as to the technical need for an installation site in Carragh Hill, Knocknacarra, to improve the network coverage and capacity for 5G and 4G. The addition of this site will allow Vodafone to deliver an improved customer experience to the surrounding residential properties, roads, as well as nearby commercial premises. Failure to progress this installation in the planned location, as seen in the plots provided, negatively impacts Vodafone's network. Leaving customers in this area with reduced voice and data mobile service.

Having regard to the European, national, regional, and local plans and strategy documents, the ministerial Guidelines for this sector, the nature of the site, it is the view of Vantage Towers Limited that the proposed structure meets the requirements of the relevant planning policy and guidance. The development is in accordance with the proper planning and sustainable development of the area.

Vantage Towers Limited respectfully requests that the proposed structure be granted permission.

Yours sincerely



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