

Galway City Council,
Planning Department,
City Hall,
College Road,
Galway,
H91 X40K8

Our Ref: GY_1653 Bushypark

03rd April 2026

RE: Renewal Application for Section 254 License for Installation at N59 Road, Dangan, Galway (E: 527970, N: 727285, ITM) as permitted under Galway City Council Licence Reference LIC 2023-01

Dear Sir/Madam,

Please find attached an application for the Renewal of a Section 254 License, submitted on behalf of the applicant, namely, Emerald Tower Limited, First Floor, Block 12 Riverwalk, Citywest Business Campus, Dublin 24, D24 Y6WP. This Renewal application is being submitted by the applicant's planning consultant, namely, Entrust Planning & Environmental, Unit 1, First Floor, Oranmore Business Park, Oranmore, County Galway, H91 P7X8.

This Renewal License Application comprises:

- Cover Letter & Planning Statement (this document);
- Application Form;
- Letter from Applicant confirming Safety Statement is in place;
- Insurance Document indemnifying Galway City Council
- Confirmation of Public Liability and Employers Liability Insurance of €13 million each;
- Eir ICNIRP Declaration;
- Renewal Fee Sum of €375.00 by cheque.

Schedule of Drawings

No.	Title	Drawing No.	Scale
1	Site Location Map	GY_ 1653_ 01-PD-01	1:1000
2	Site Layout Plan	GY_ 1653_ 01-PD-02	1:100
3	North- East Elevation Plan	GY_1653_ 01-PD-03	1:100
4	South- West Elevation Plan	GY_ 1653_ 01-PD-04	1:100
5	Equipment Details	GY_1653_ 01-PD-05	1:50

We are committed to maintaining a positive relationship with all Local Authorities and we would be happy to provide any additional information in relation to this application. We look forward to receiving your acknowledgement and decision in due course.

Yours faithfully

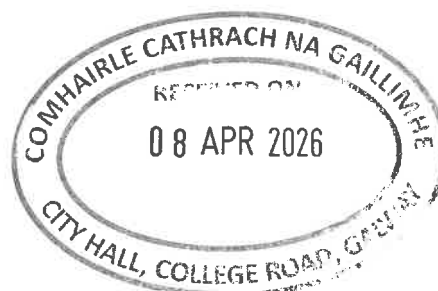
Shauna Cagney

Shauna Cagney

On behalf of Emerald Tower Limited

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**WIRELESS BROADBAND & DATA
COMMUNICATIONS
STREETWORKS POLE**

**COVER LETTER AND PLANNING STATEMENT
FOR RENEWAL APPLICATION
FOR
TELECOMMUNICATIONS INSTALLATION
AT N59 ROAD, DANGAN, GALWAY**

LICENCE REFERENCE: LIC 2023-01

Prepared by

**Entrust Limited
On behalf of Emerald Tower Limited**

April 2026



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1. Introduction

- 1.1. This Planning Statement incorporating Environmental Considerations (the Statement) has been prepared by Entrust Limited, a firm of Chartered Planning Consultants, that specialises in infrastructure planning (the Agent), on behalf of Emerald Tower Limited (the Applicant), in support of a renewal application for a Section 254 License (the License) to Galway City Council (the Local Authority) for; the installation of an 18m dual operator pole, associated equipment, together with ground-based equipment cabinets and all associated site development works for wireless data and broadband services (the proposed development).

2. Background

Applicant

- 2.1. Emerald Tower Limited (applicant) is a wholly owned subsidiary of Phoenix Tower International (PTI), the operating company for its Irish operations. PTI is a United States headquartered company with operations in 15 countries worldwide including in Europe (Ireland, Cyprus, France, Malta, Italy and Spain). PTI owns and operates approximately 14,600 telecommunications sites across the world including the Eir Mobile portfolio of approximately 650 telecommunications sites it purchased in 2020. In Ireland, PTI works by leasing space on its portfolio of telecommunications sites to different mobile operators and other providers including wireless broadband providers, ensuring the optimum environmental solution is achieved by the co-location of different operators on PTI's sites.
- 2.2. Emerald Tower Limited is authorized by ComReg to provide Electronic Communications Services and Networks, which allows them to apply for a license under section 254 (1) of the Planning and Development Act, 2000 (as amended), for the establishment of overground electronic communications infrastructure and associated physical infrastructure.

Operator

- 2.3. The Operator, namely Eircom Limited, trading as eir, is the largest communications provider in Ireland providing an essential public service throughout the country. Its three divisions include a wholesale fixed-line network through its OpenEir unit, providing copper and fibre-based access products to a wide range of Irish telecommunications companies from its telephone exchange network. The company's retail division provides services including fibre broadband and digital TV services for Irish homes and businesses. Eir also operates a national wireless data and broadband network under its own Eir brand and under the GoMo brand, which this proposal is for and which proposes to become a crucial network point in its national wireless high-speed data and broadband network.



Existing S254 Licence now Sought to be Renewed

- 2.4. Galway City Council issued a S254 Licence for the installation of an 18m dual operator pole, associated equipment, together with ground-based equipment cabinets and all associated site development works for wireless data and broadband services on the 12th of May 2023 for a duration of 3 years, subject to 14 No. Conditions.
- 2.5. Notably Condition No. 2 states: *'This licence shall be valid for a period of three (3) years from the date of the issuing of this Section 254 licence permit, the telecommunications structure and related ancillary structures including any access arrangements shall then be removed and the site lands shall be reinstated on removal of the telecommunications structure and ancillary structures unless, prior to the end of the period, permission shall have been granted for their retention for a further period.'*
- 2.6. We now seek a Renewal Licence in this regard. Please note the development was installed and maintained in compliance with the other 14 No. conditions, noted as follows:

Condition		Comment
Condition 1	The development shall be carried out and completed in accordance with the plans and particulars lodged with this Section 254 licence application made on the 10 th of March 2023 and the 18 th of April 2023 but subject, however to the requirements of the further conditions hereinafter incorporated.	Compliant
Condition 2	This licence shall be valid for a period of three years from the date of the issuing of this Section 254 licence permit. The telecommunications structure and related ancillary structures including any access arrangements shall then be removed and the site lands shall be reinstated on removal of the telecommunications structure and ancillary structures unless, prior to the end of the period, permission shall have been granted for their retention for a further period.	Noted above – now subject to this Renewal Application.
Condition 3	Both the HSE Estates and the National Aero-medical coordination centre shall be contacted for agreement prior to the erection of any crane which is to be used during the construction process.	Compliant
Condition 4	Details of the proposed colour scheme for the pole, antennas and equipment container shall be submitted to and agreed in writing	Compliant



	with the planning authority prior to commencement of development.	
Condition 5	Prior to commencement of development, all trees/planting in the vicinity of the development site, shall be enclosed within the root and crown spread by tree protective fencing and shall be maintained in place throughout the construction period during which no works or storage shall take place within the enclosed space.	Compliant
Condition 6	No advertisement or advertisement structure shall be erected or displayed on the proposed structure or within the curtilage of the site without a prior grant of planning permission.	Compliant
Condition 7	Any alterations to public services, public areas or utilities necessitated by the development shall be carried out at the developers expense having firstly obtained the agreement in writing of Galway City Council or other public bodies responsible for such areas or utilities before any alterations are carried out.	Compliant
Condition 8	Surface water run-off associated with the development shall not be permitted to discharge onto the public road or footpath.	Compliant
Condition 9	All construction activity shall be restricted to the following; a. Between 0900 hours an 1800 hours Monday to Friday; b. Between 0900 hours and 1300 hours Saturday, unless otherwise agreed in writing with the Planning Authority; c. No works shall take place on Sundays, Bank Holidays or Public Holidays; d. Deviation from these times will only be allowed in exceptional circumstances where prior written approval has been received from the Planning Authority; e. All workers and visitors to the site shall not park on the adjacent public footpaths or roadways; f. Prior to the commencement of development the developer shall agree in writing with the Planning Authority the times of deliveries of all construction materials to the site,	Compliant



	generally off peak, this is in order to ensure the free flow of traffic along the public roadway and nearby junctions, particularly during peak travel times;	
Condition 10	The transmitter power output, antenna type and mounting configuration shall be in accordance with the details submitted with the application. Notwithstanding the provisions of the Planning and Development Regulations 2011-2024, and any statutory provision amending or replacing them, shall not be altered without a prior grant of planning permission.	Compliant
Condition 11	Prior to the commencement of development evidence of an updated Public Liability Insurance Policy (indemnity of up to €13million) in the joint names of the applicant and Galway City Council shall be submitted to the City Council. The applicant shall supply a copy of the renewed insurance policy to the City Council annually for the time period of Section 254 licence permit;	Compliant
Condition 12	a. The 18m dual operator pole, associated equipment, together with ground based equipment cabinets and all associated site development works shall be removed immediately if requested by the City Council. Equally, the City Council reserves the right to cancel, withdraw, suspend or vary the terms of the licence at any time. No claim for damages or loss of income under any heading shall be taken against the City Council for suspending, cancelling, withdrawing or varying the terms of the licence. b. The site shall be reinstated on the removal of the telecommunications structure and ancillary structures. Details relating to the removal and reinstatement shall be submitted to, and agreed in writing with, the planning authority within one month of the date of removal.	Compliant
Condition 13	a. All costs incurred by the City Council, including any repairs to the public road and services necessary arising as a result of the licence, shall be at the expense of the licensee. Work on or in the public road shall only be carried out by the City Council	Compliant



	b. Access for maintenance purposes, for associated underground or overhead services, shall be available at all times.	
Condition 14	Technical Acceptance requirements set out in TII Publications Design Standard DN-STR03001 (Technical Acceptance of Road Structures on Motorways and Other National Roads) and Appendix G of the TII Publications Design Standard DN-STR-03001 Telecom Mast Registration Procedure and Construction Stage Acceptance shall be adhered to in full.	Compliant

Table 1: Original Licence Conditions and Commentary on Same.

Please find a brief overview of the contents of the original planning application detailed below.

3. Proposed Development for Renewal

Site Location

- 3.1. The site is located on a grass verge adjacent to the N59 Road at the footpath entrance to Dangan Heights a residential area north of Galway. The site surrounds is densely populated by residential estates which are the main receivers of the coverage provided by the development here. The site location is dominated by vertical infrastructure elements such as signage and streetlights which help to absorb and assimilate the proposal into its surrounding urban context.

Site Ownership

- 3.2. The site is located on land owned by Galway City Council.

The Existing Development

- 3.3. The Existing Development comprises an 18m dual operator pole, associated equipment, together with ground-based equipment cabinets and all associated site development works as shown in Figure 1. Since the installation of the Streetpole, it has been in situ and has assimilated well into its surrounding context over time.





Figure 1: Structure In place adjacent to Dangan Heights.

- 3.4. The Street pole has been successfully providing the required high-speed data and broadband coverage to the area since 2023.

Design

- 3.5. It is noted the Design of the Streetworks Pole' will remain unchanged with Eir's antennas encased within the pole, with space for a second operator to support co-location. The equipment dimensions are reiterated as follows:

Streetworks Pole		Cabinets (1 & 2)	
Height	18m	Height	1) 1.65m, 2) 1.65m
Diameter or Width	406mm (Diameter)	Length	1) 1.3m, 2) 1.9m
		Depth	1) 0.8m, 2) 0.8m
Area	0.13m ²	Area	1) 1.04m ² , 2) 1.52m ²
Volume	2.33m ³	Volume	1) 1.768m ³ , 2) 2.584m ³
Colour	Grey	Colour	Dark Fir Green

Total Streetworks Pole & Cabinets			
Area	2.69m ²	Volume	6.682m ³
Footpath Width 1.9m, Cabinet Doors Open 1.9m, Cabinet Doors Closed 1.9m			

Dishes (2)	300mm (Diameter)	Antennas (encased inside pole)	4m H x 406mm (Diameter)
Colour	Goose Grey	Colour	Goose Grey

- 3.6. As part of eir Mobile's continued network improvement programme, it is now requested that the Section 254 Licence for this structure is renewed to maintain the data and broadband service provided by the Streetpole.



- #### 4. Discounted Options

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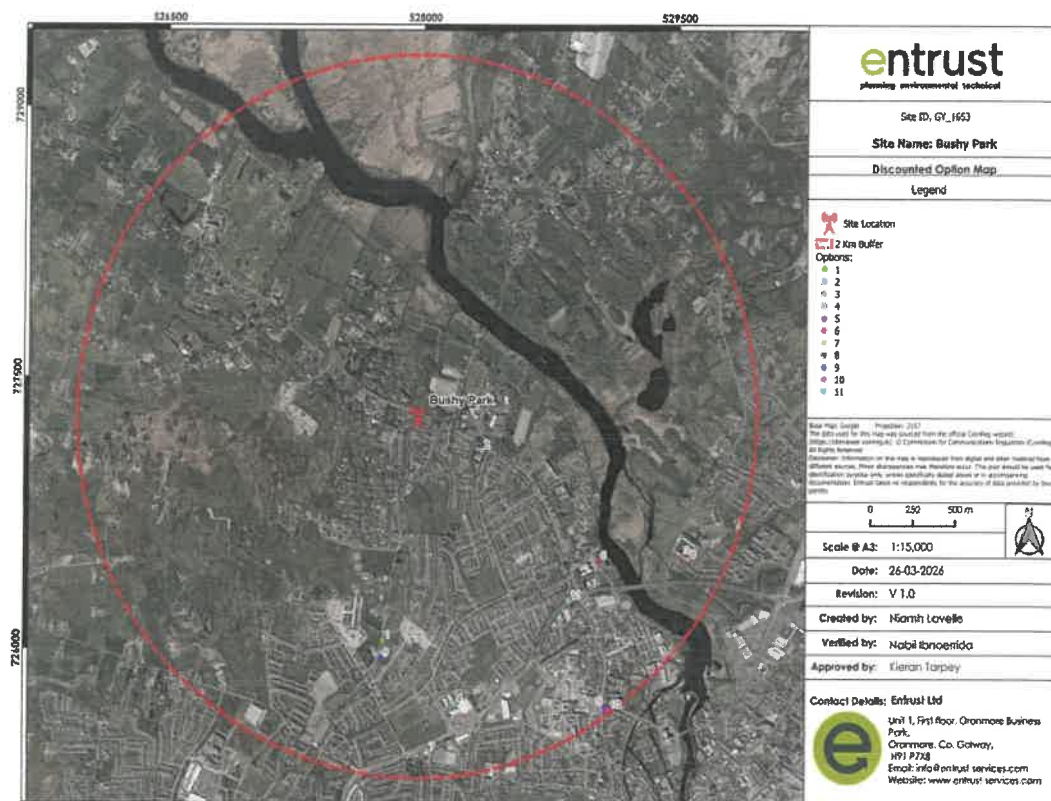


Figure 3: Discounted Options Map

No.	Site ID	Co-ordinates	Reason for Discounting
1	EIR_GY_1936	E: 133811 N: 227613	Eir infrastructure is already present at the site; however, it is located too far from Bushy Park and the surrounding areas to deliver high-speed data services, as it falls outside the designated search radius.
2	VOD_GY047 EIR_GY_3961 THR_GA0381	E: 133811 N: 227613	Eir, Vodafone, and Three are all co-located on this rooftop site; as a result, it would not meet Eir's coverage objectives or provide any improvement in service. Additionally, the site falls outside the designated search radius.
3	EIR_GY_3974	E 133811 N: 227613	Eir is already present on this site, but this existing infrastructure is too distant to provide high-speed data services to Bushy Park and surrounding locations, as it lies outside the search ring.
4	THR_GA0003	E: 133811 N: 227613	Three is located on this rooftop site, so it would not meet Eir's coverage objective here and therefore would



			not improve coverage. It is also outside the search ring.
5	THR_GA0272	E: 133811 N: 227613	Three is located on this rooftop site, so it would not meet Eir's coverage objective here and therefore would not improve coverage. It is also outside the search ring.
6	THR_GA0293	E: 129084 N: 226460	Three is already installed on this rooftop site; therefore, it would not satisfy Eir's coverage requirements or contribute to any enhancement in service. Furthermore, the site lies beyond the defined search radius.
7	EIR_GY_3967 VOD_GY022	E:128072, N: 225397	Due to its position beyond the defined search radius and its limited proximity to Bushy Park, Eir's existing network is unable to meet the required connectivity standards.
8	VOD_GY113	E:129600, N:226470	The site is located at a distance that prevents it from delivering the level of network coverage required by Eir. It would therefore not effectively meet coverage objectives or ensure reliable signal strength, making it unsuitable as a viable option for addressing Eir's connectivity needs.
9	VOD_GY128	E: 127792, N: 225922	The site is situated too far away to provide the level of network coverage required by Eir. As such, it would not effectively achieve coverage objectives or deliver reliable signal strength, rendering it unsuitable for addressing Eir's connectivity needs.
10	VOD_GY184 EIR_GY_3980	E: 129130, N: 225650	Eir is already present on this site, but this existing infrastructure is too distant to provide high-speed data services to Bushy Park and surrounding locations, as it lies outside the search ring
11	VOD_GY022 EIR_GY_3967	E: 128070, N: 225393	The site is located too far from the target area to deliver the level of coverage required by Eir. Consequently, it fails to meet coverage objectives and cannot provide reliable signal strength, making it an unsuitable and



			ineffective option for addressing Eir's connectivity needs.
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Table 2: Discounted Options

5. Technical Justification for Renewal and Continuance of Service

- 5.1. Eir has advised that as part of Eir Ltd licensing requirements and the continuing rollout of their 3G, 4G and 5G networks, Eir requires the continuance of operation at the subject site in this area of Bushypark, Co. Galway. Please refer to Figures 4 and 5 below illustrating the benefits of renewing this licence by showing the coverage it currently provides and the coverage deficits that would occur should it be removed at this time.
- 5.2. Furthermore, Eir confirms that without this Streetworks Pole, there would not be adequate indoor service or capacity for high-speed mobile broadband in and around the area. Eir's current coverage in this area specifically in Dangan Heights, Circular Road, Bushypark, Aughnacurra and the Upper Newcastle Rd and surrounding areas would experience reduced quality of service and capacity if the site was removed.
- 5.3. Please refer to Figures 4 and 5 below which show coverage with and without the subject telecoms Street Pole. We therefore respectfully request that Galway City Council grant the renewal of this Section 254 Licence.



Figure 4: Coverage Map with subject Streetpole (current situation)





Figure 5: Coverage Map without subject Streetpole

6. Conclusions

- 6.1. Taking into consideration all the relevant factors set out here in this document and detail in the appended original submission, it is considered that the renewal of the S254 Licence at the subject location is in accordance with the proper planning and development of the area. The installation will continue to provide high quality indoor service for high-speed mobile broadband to Dangan Heights and surrounding area.
- 6.2. Therefore, in the absence of any significant harm to the site and its surrounds and in view of supporting policy at national and local level in favour of this proposal, the applicant therefore respectfully asks the Local Authority to grant a Renewal of the existing S254 Licence.

