



DANARCH
PLANNING, DESIGN AND
PROJECT MANAGEMENT SERVICES

To whom it may concern

Please find enclosed section 254 License application on behalf of Shared Access Ltd for the erection of a telecommunications mast in Elm Part, Renmore, Galway

As agents on the application could you please ensure that all correspondence regarding this application is sent to

Ian Daniels

Danarch,

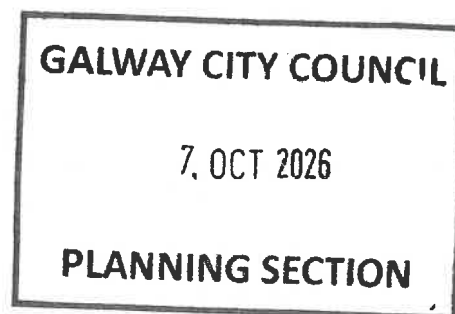
Ground Floor, Old Windmill Court, Lower Gerard Griffin Street,

Limerick

Please don't hesitate to contact us should you require any clarification regarding the attached application

Yours sincerely,

Ian Daniels



Limerick Office:

Old Windmill Court,
Lower Gerald Griffin Street,
Limerick
061 411399

www.danarch.ie

VAT - 3227736VH

Waterford Office:

Worklab
24-26 IDA Business Park
Cork Road, Waterford
0513 65700



Galway City Council
City Hall
College Road
Galway

07/10/2026 10:22:18

Receipt No. : L1/0/1294176

Shared Access Ltd
C/O Turnkey Planning &
Architectural Services
RE. Telecomms Communication
License
Location: Elm Park, Renmore

OTHER FEES PLANNING	625.00
GOODS	625.00
VAT Exempt/Non-vatable	
Elm Park, Renmore	

Total : 625.00 EUR

Tendered :
Cheques 625.00
1180

Change : 0.00

Issued By : CASHIER - M.T.
From : CASH OFFICE - CITY HALL
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Comhairle Cathrach na Gaillimhe
Galway City Council

Application / Renewal of Telecommunications Structure Licence

PLANNING AND DEVELOPMENT ACT 2000-2012 (Section 254)

&

PLANNING AND DEVELOPMENT REGULATIONS 2001-2011 (Article 201)

1. APPLICANT DETAILS

Address of proposed Telecommunications Structure	Elm Park, Renmore, Galway, Co. Galway
Applicant Name	Shareel Access Ltd
Applicant Address (Optional)	Old Windmill Court, Lower General Griffin Street, Limerick
Eircode	
Telephone	061 443 99
Email	lan@danarch.ie
Period Licence needed	_____ weeks/months/years from <u>Dec</u> 202 <u>6</u> to <u>Dec</u> 202 <u>31</u>

Purpose for which it is needed	Telecommunications
Proposed Location Co-Ordinates - Data should be to ITM (Irish Transverse Mercator) coordinate system.	132 173 , 225 215

Description of the proposed Telecommunications Structure	installation of a 15m high telecommunications mast
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2. <u>INSURANCE DETAILS</u>	
Name of Insurance Company	
Policy No.	
Policy Expiry Date	
Public Liability Insurance Policy is required to provide cover to a minimum value of €6.5m indemnifying Galway City Council against third party claims.	
3. <u>FEEs</u>	
Fee per Year	€125.00



Comhairle Cathrach na Gaillimhe
Galway City Council

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Applicant Address (Optional)	Old Windmill Court, Lower General Griffin Street, Limerick
Eircode	
Telephone	061 443 79
Email	lan@danarch.ie
Period Licence needed	_____ weeks/months/years from <u>Dec</u> 202 <u>6</u> to <u>Dec</u> 202 <u>31</u>

Licence Fee is €125.00 per Year	Insert No. of Years required: <u>5</u> x €125.00 = € <u>625</u>
Total due:	€ <u>625</u>

4. <u>Check list:</u> ☐ The completed Signed Application form. ☐ The appropriate fee (as outlined above); ☐ A public liability policy or cover note - indemnity up to €6.5M in the joint names of the applicant and Galway City Council; ☐ Site location map to the scale of 1:100 clearly identifying the proposed licence area in red. ☐ Photos, measurements and details as follows: (i) Photos and montages of the proposed physical infrastructure (mast/pole/cabinet) including detailed measurements. (ii) Details of pedestrian protection and convenience, where necessary, with photos and measurements. (iii) Traffic management plans during construction/installation, where necessary. (iv) Clearly outline the number and location of existing appliances, apparatus or structures, on, under, over and along the public road or footpath. <u>Incomplete applications will not be accepted and will be returned to the applicant</u>

Submit by post to:

Planning Department,

Galway City Council,

City Hall,

College Rd,

Galway

H91 X4K8

Or email to: planning@galwaycity.ie



16/09/2026

To whom it may concern,

This is to confirm that the Three Ireland GSM/3G/4G/5G proposed base station at Elm Park, Renmore only utilises the frequency bands as licenced by Comreg to Three Ireland Ltd. and causes no risk of external interference to other licenced frequency band usage.

Three Ireland propose to operate **LTE 700 MHz, LTE 800 MHz, GSM 900 MHz, UMTS 900 MHz, LTE 900 MHz, LTE 1800 MHz and 5G 2100 MHz, 3700Mhz** network technologies in frequency bands as licenced to Three Ireland by the Irish Communications Regulator Comreg.

Three Ireland GSM and UMTS radio frequency bands:

ESTI Specifications	Description
FDD (Paired Channels)	890 to 900 MHz and 910 MHz to 915 MHz: mobile transmit, base station receive (Uplink)
	935 to 945 MHz and 955 MHz to 960 MHz: base station transmit, mobile receive (Downlink)

Three Ireland LTE radio frequency Bands:

ESTI Specifications	Description
FDD (Paired Channels)	713 to 723 MHz: mobile transmit, base station receive (Uplink)
	768 to 778 MHz: base station transmit, mobile receive (Downlink)
FDD (Paired Channels)	842 to 852 MHz: mobile transmit, base station receive (Uplink)
	801 to 811 MHz: base station transmit, mobile receive (Downlink)
FDD (Paired Channels)	1750 to 1770 MHz: mobile transmit, base station receive (Uplink)
	1845 to 1865 MHz: base station transmit, mobile receive (Downlink)
FDD (Paired Channels)	1710 to 1725 MHz: mobile transmit, base station receive (Uplink)
	1805 to 1820 MHz: base station transmit, mobile receive (Downlink)

	1965 to 1980 MHz: mobile transmit, base station receive (Uplink)
FDD (Paired Channels)	
	2155 to 2170 MHz: base station transmit, mobile receive (Downlink)

Three Ireland UMTS only radio frequency bands:

ESTI Specifications	Description
FDD (Paired Channels)	1920 MHz to 1935 MHz: mobile transmit, base station receive (Uplink)
	2110 MHz to 2125 MHz: base station transmit, mobile receive (Downlink)

Three Ireland 5G radio frequency bands:

ESTI Specifications	Description
FDD (Paired Channels)	1710 to 1725 MHz: mobile transmit, base station receive (Uplink)
	1805 to 1820 MHz: base station transmit, mobile receive (Downlink)
TDD (Unpaired channel)	3700 to 3800 MHz: mobile transmit, base station receive (Uplink)
	3700 to 3800 MHz: base station transmit, mobile receive (Downlink)

Three Ireland operates mobile base station radio equipment manufactured by Nokia, Samsung and Ericsson. The base station equipment and ancillary radio network infrastructure only operate within the above designated frequency bands. Bands are allocated by Comreg to operators to ensure that no Mobile Phone Operator transmits, near to, or within, the frequencies of any other licenced mobile service supplier.

Three Ireland's radio equipment complies with the relevant EU radio equipment regulations: -

Radio Equipment Directive (RED) 2014/53/EU:

- Article 3.1a Product Safety and Health
- Article 3.1b Product Electromagnetic Compatibility
- Article 3.2 The effective usage of the spectrum allocated to radio communications

In addition, all Three Ireland base stations also comply with the International Commission on Non-Ionising Radiation Protection (ICNIRP) Guidelines as per the guideline limits specified in:

- ICNIRP, 1994, International Commission on Non-Ionising Radiation Protection, Guidelines on limits of exposure to static magnetic fields

- ICNIRP, 2001, Review of the epidemiological literature on electromagnetic fields and health Environmental Perspectives, 109 (Supp. 6): 911-934
- ICNIRP, 2020, International Commission on Non-Ionising Radiation Protection, 2020, Guidelines for limiting exposure to time varying electric, magnetic, and electromagnetic fields (up to 300 GHz), Health Physics 118(00):000–000; 2020

All base stations in the Three Ireland Network adhere to the guidelines on limits of EMF exposure set out by the International Commission on Non-Ionizing Radiation Protection. This commission is an independent scientific body made up of experts from all the different disciplines qualified to assess possible adverse health effects. It is a formally recognised non-governmental organisation and makes representations to the World Health Organisation and the European Union.

The mobile Telecoms industry is heavily standardised and policed to ensure that operators always operate within the safety limits and tolerances defined by the EU and the National regulator.

The communications regulator in Ireland carries out random testing of sites throughout Ireland to ensure that all Base Stations are transmitting below the limits defined within the ICNIRP guidelines.

If any further details are required, please contact Three Ireland for more information.

Regards,

Karol Slattery

Radio Engineer

Radio Access Networks

Brendan Byrne

Head of Deployment

Radio Access Networks

Planning Application for Section 254 License for the Erection of a Telecommunications Installation.

Fuchsia Drive, Renmore, Galway.

On behalf of Shared Access Ltd.

Date: September 2026 | Pegasus Ref: P26-1704

Author: Dafydd Gwilym

Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
V1	September 2026	DG	RM	Initial Draft
V2	September 2026	DG	-	Internal Review
V3	September 2026	DG	-	Client Comments

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1. Introduction

- 1.1. This Planning Statement is submitted in support of an application for a Section 254 Licence for a telecommunications mast situated to the east of a junction between Elm Park Fuchsia Rd, Renmore, Galway. An initial five-year period under the provisions of the Planning and Development Act 2000 (as amended) is sought. The application is made by Shared Access Limited on behalf of Three Ireland for the erection of overground electronic communications infrastructure in the form of a new telecommunications mast intended to provide enhanced 3G and 4G as well as new 5G in-fill network digital communications coverage for one of Ireland's largest mobile network operators.

Section 254 Licence Process

- 1.2. Section 254 (1) (ee) of the Planning & Development Act, 2000 (as amended), states that a person shall not erect, construct place or maintain overground electronic communications infrastructure and any associated physical infrastructure on, under, over or along a public road save in accordance with a licence under Section 254. Section 254 (5) states that, in considering an application for a licence under this section, the planning authority shall have regard to:
- a) The proper planning and sustainable development of the area;
 - b) Any relevant provisions of the development plan, or a local area plan;
 - c) The number and location of existing appliances, apparatuses or structures on, under, over or along the public road; and
 - d) The convenience and safety of road users including pedestrians.
- 1.3. The Application Site is situated within an area that meets the definition of a 'public road'. Section 2 of the Planning & Development Act, 2000 (as amended) states that "public road" has the same meaning as in the Roads Act, 1993. Section 2 of the Roads Act, 1993 (as amended) defines a public road as meaning 'a road over which a public right of way exists and the responsibility for the maintenance of which lies on a road authority'. Section 2 also states that 'road' includes, amongst other things, any street, lane, footpath, square, court, alley or passage.
- 1.4. This Planning Statement, accompanying supporting information and drawing package is provided in accordance with the requirements of Section 254 (5)(a) to demonstrate that the proposal has had due regard to the requirements of the Act listed above and also the provisions of the Galway City Council Development Plan 2023–2029.
- 1.5. The statement is divided into the following sections:
- A description of the site and surrounding area including any relevant planning history;
 - A description of the development proposed;
 - A review of town planning and transport policy considerations set down within the Galway City Development Plan 2023–2029; and

- An explanation of the technical, operational and town planning factors that have informed the siting and design of the development.

1.6. A number of other accompanying documents have been submitted in support of the application, and these should be read fully in conjunction with this statement. These include a Technical Justification for the development provided by Three Ireland Radio Planners, an ICNIRP Certificate, certifying that the installation will safely operate from a public health perspective, evidence of public liability insurance and computer generated images showing a visual representation of how the proposal will appear within its surrounding context.

2. Application Background

Context

- 2.1. This Section 254 application for a telecommunications mast is made by Shared Access Limited in conjunction with Three Ireland. The purpose of the application is to provide both new and enhanced digital connectivity to a part of Galway that currently suffers from a poor level of service provision.

Mobile Connectivity in the 21st Century

- 2.2. Mobile phones and other similar communication devices have become ubiquitous both for business and personal use throughout Ireland. As wireless technologies have advanced, mobile connectivity has become about more than phone calls and text messaging, it involves mobile broadband and data transfer, providing services and connecting users and businesses across all parts of daily life. In 2018 some 4.5 million people in Ireland were using the 3G and 4G mobile network. Associated data use has increased by over to 500% since 2011¹ to the point where digital mobile technology now forms a basic utility for most people and effective and reliable access to digital communications networks has become a public utility and an important aspect of daily life.
- 2.3. It has been widely accepted that the development of mobile networks across Ireland has been inconsistent, with some communities across the country excluded from modern telecommunications and the basic and complex services that they provide. This can be equally true in urban areas as rural areas, particularly where villages and towns expand to provide new residential and commercial areas which, in turn, increase the demand for digital connectivity. Mobile Network Operators such as Three Ireland are constantly reviewing their network coverage, identifying areas of demand where coverage is insufficient and upgrading their network to ensure that access to advanced, modern communications infrastructure is provided across the Country.
- 2.4. Recognising the vital role of the digital sector to the economy, the Government committed to establishing a Mobile Phone and Broadband Taskforce (the 'Taskforce') in 2016. The role of the Taskforce was to identify tangible actions to address broadband/mobile phone coverage deficits and to improve the quality of broadband and mobile voice services being provided to citizens across Ireland. Numerous aspects of the Taskforce's recommendations are now coming into effect. For example, in February 2019 ComReg launched its National Outdoor Coverage Map for mobile coverage which provides an effective tool for identifying areas deficient in coverage.
- 2.5. The Taskforce's report sets out that over the period from 2011 to 2016 the telecoms industry has invested €3.3 billion in Ireland. They set out that this is roughly equivalent to Ireland's annual public capital programme. As a result, 1.4 million homes and businesses in Ireland can now access high-speed broadband of at least 30Mbps and 4G data services are available to more than 90% of the population². Since 2016 this roll out has continued where mobile

¹ <https://www.gov.ie/en/organisation/departments-of-the-environment-climate-and-communications/?referrer=https://www.dccae.gov.ie/en-communications/publications/Documents/58/1%20FINAL%20Assessment%20of%20Macro%20Impacts%20of%20Internet-Digital%20-%20Indecon%20Report%20-%20March%202016.pdf>

² <https://www.dccae.gov.ie/documents/Taskforce%20Report.pdf>

network operators are seeking to provide enhanced or new coverage to coverage blackspot areas.

- 2.6. Increasing consumer demand, especially for data, is putting demands on mobile operators for improved connectivity and more capacity on their networks. This is driven by the widespread adoption of 4G and 5G enabled smartphones and the rapid uptake of tablet devices, and the way consumers are now using them, often choosing to do so even when they have a fixed connection available. The Government has ambitious aspirations for improving connectivity and coverage as demonstrated through the various national, regional and local policy mechanisms. All these factors result in the need to continuously review, upgrade and improve mobile networks, which will not function without the necessary infrastructure on which they rely.

Shared Access Limited

- 2.7. Shared Access Limited are an independent owner and operator of wireless communications infrastructure. The company develops and builds conventional telecommunications installations and is a leading investor for 'In Building and Distributed Antenna Systems'. They are at the cutting edge of telecommunications technology and roll-out across Ireland. Once developed, Shared Access Limited manage the site ensuring maintenance, health and safety and site access are kept to the highest standards and within agreements with the site provider/landlord.

3. The Application Site

- 3.1. Centred at ITM grid reference X: 132173 Y: 225215. The Site is located on the western side of Elm Park, at its junction with Fuchsia Drive. The Site is situated within the built up area of Galway, being well within the settlement limits and surrounded by existing development on all sides.
- 3.2. The Site is situated to the rear of an existing broadband cabinet and forms part of a larger area of open grassland. A small shrub, measuring approximately 1.5–2m in height, is located immediately to the south of the Site. Within 10m to the north, there is a semi mature tree measuring 8m in height as shown within the submission drawing package. Mature trees are located to the north of the wider grassed area, with these trees reaching approximately 18m in height. Street furniture surrounding the site is comprised of low level street lighting columns measures approximately 4m in height.
- 3.3. The immediate surroundings of the Site comprise a mixture of residential properties, open grassland and recreational space. Residential properties are located to the east of the Site, on the opposite side of Elm Park. These properties principally present side elevations towards the Site and therefore have limited direct intervisibility with the proposed installation.
- 3.4. Residential properties are also located to the south of the Site, with the closest properties situated approximately 25m away. The view from the properties is intervened by Fuchsia Road and includes the existing street infrastructure including streetlights and a broadband cabinet.
- 3.5. To the west of the Site is an area of open grassland designated for open and recreational space. The mature vegetation to the north, together with the existing residential development surrounding Elm Park, provides a degree of visual enclosure to the Site. Wider intervisibility with residential properties is also possible from properties to the south-west of Pinewood Grove and to the south of Blackthorn Park, located further to the west. However, given the separation distance from the Site, any effects on the visual amenity of these properties are expected to be limited.
- 3.6. The Site is located within land zoned for Recreation and Amenity, which provides for recreational and amenity uses under the Development Plan. The Site is therefore located within an area where the existing open character and recreational function of the land are relevant considerations in assessing the suitability of the proposed installation. Paragraph 11.2.2 confirms that public utility uses may contribute to the zoning objectives of Recreation and Amenity Land Use Zoning.
- 3.7. The wider area is also subject to environmental and heritage designations. Inner Galway Bay Special Protection Area (SPA) is located off the coast to the south of the Site. Inner Galway Bay is also designated as a proposed Natural Heritage Area (pNHA).
- 3.8. Development Plan
- 3.9. There are no hospitals or schools within 300m of the site. The nearest school is Scoil Chaitriona Junior and Secondary School over 300m to the north of the Site. Galway Hospice Foundation is situated to the north of the school, approximately 400m to the north of the site.

- 3.10. There are no specific townscape or heritage designations that affect the site. It does not form the part of any protected view or vista and there are no protected structures within the vicinity of the site. The site is not within an Architectural Conservation Area.
- 3.11. There are no tall buildings or structures within the vicinity of the site. The dominant character of buildings is relatively low lying residential units of 6–8m in height.
- 3.12. To the southwest of the Site, along Hawthorn Drive, is a linear designated Protected View. This is a constraint for telecommunications development in that area. The selected Site is screened and located away from the designated Protected View.



Figure 1 – Map showing Protected Views along Hawthorn Drive (Protected View shown with zigzag blue line)

Existing Telecommunication Installations

- 3.13. There are existing telecommunications installations within the wider surroundings of the Site. A telecommunications mast was identified on the roof of Flannery's Hotel, approximately 615m to the north of the Site. An approved S254 (appeal ref. LC61.318659) has been approved at the southwestern corner of Renmore Playing Fields, approx 180m to the northwest of the Application Site. As of July 2026, no telecommunication equipment is constructed at the Site.
- 3.14. A further large telecommunications mast was identified within the Military Barracks approx 700m to the south-west of the Site. These existing installations form part of the established telecommunications infrastructure within the wider area.

4. The Development Proposed and Alternative Sites Considered

(a) The Development Proposal

- 4.1. The development proposed is shown in detail in the drawings submitted and involves the installation of a 15m telecommunications mast and 1no. associated equipment sitting atop a concrete plinth. The purpose of the mast is to provide a public utility, in this case digital communications coverage, principally to east Galway. The mast will provide enhanced 3G, 4G and new 5G coverage.
- 4.2. A new mast is required because it is not possible for Three Ireland to upgrade any of their existing sites or utilise another existing site in use by another mobile network operator. There are no tall buildings within the surrounds that could accommodate the equipment required to provide an uplift in coverage. As such, it has been concluded by the network operator that a new, ground based mast is required.
- 4.3. The principal elements of the proposal are as follows:
- Erection of 15m telecommunications mast measuring 406mm in diameter situated on a concrete plinth sunk 1.25m into the ground. The mast will be installed using a root foundation.
 - The width of the mast is consistent for the entire height of the mast. This is a design feature that minimises the profile of the mast, thereby reducing the overall visual impact associated with the installation.
 - 1no. antennas fixed to the upper section of the mast. The antennas will provide digital communications coverage in all directions from the site (360 degrees).
 - 1no. 300mm transmission dish fixed to the top of the mast at a maximum height of 15.4m.
 - 1no. single bay cabinet on proposed concrete foundation. The cabinet measures 882mm x 2053mm x 774mm (1.401m³). Doors are built into the cabinet to allow for maintenance access. The doors will be orientated such that they will not open onto any pavement area or associated pedestrian areas.
 - 1no. GPS Beacon Antenna fixed to mast at 10m via a steel bracket.
 - Minor excavation works to facilitate mast and cabinet foundation.
- 4.4. The respective materials and finishes of the electronic communications apparatus proposed are as follows:
- The mast is made of untreated galvanized steel that be painted Signal Grey (RAL 7004)
 - Cabinets to be painted Signal Grey (RAL 7004)

- 4.5. The slim-line design of the proposal is considered as a stealth design in the telecommunications industry, intended to be deployed in residential areas where mast design can assimilate with existing street furniture such as lampposts compared to more conventional types of telecommunication installations such as lattice masts.
- 4.6. The 15m height of the mast has been carefully considered, the applicant acknowledging that the visual impact of the mast is a key consideration where, generally, a lower mast would reduce overall visual impact and the distance from which the installation may be visible in the wider surrounds. The height selected is based on a balance between the technical operational requirements of the installation when viewed against impact on townscape amenity. In order to avoid the requirement for more masts to be deployed to serve Galway, Three Ireland are proposing 15m as this provides sufficient coverage to allow the site to provide continuity of service coverage when working in tandem with other existing sites in the wider surrounds also operated by Three Ireland.
- 4.7. In addition, the specific pole type selected is known within the telecommunications industry as a 'Streetworks pole'. This pole is specifically designed for deployment of up-to-date 4G and 5G technologies in rural and urban areas, maximising site efficiency and coverage from the installation. This in turn will reduce the overall pressure for the number of telecommunication installations serving the wider area because the mast design allows for coverage of a greater area, thereby reducing pressure for other new installations. In simple terms, the mobile network operator is seeking to deploy as few sites as possible to manage network demand.
- 4.8. The siting of the mast has been carefully considered, having regard to the residential character of the surrounding area. Notwithstanding this, telecommunications infrastructure needs to be located within the area where there is a demand for improved network coverage and capacity. The proposed Site therefore represents a suitable location that balances the operational requirements of the telecommunications network with the need to minimise potential effects on surrounding residential properties. The properties to the north of the Site do not generally face directly towards it and, as such, are expected to experience limited visual effects.
- 4.9. It will not be required to remove any tree or hedgerow as part of the proposed development. The proposal will not reduce the width of the existing pavement at all. The Site has been selected due to the existing communication infrastructure in order to assimilate as far as possible.
- 4.10. The mast is a slim line structure, deliberately similar in width to other items of street furniture in the immediate surrounds such as lampposts so as not to appear of an incongruous scale to equipment that already characterises the street scene. The antenna is situated at the very top section of the mast which is the same width as the main section of the mast. The design of the mast is intended to be slim and discreet. This means that the operational capacity of the mast is more limited than for conventional telecommunications masts. In simple terms, the smaller a mast is, the less structural capacity it will have to accommodate telecommunications equipment. In this instance the mast has been specifically designed for use by Three Ireland only and no other operators will utilise the Application Site. The mast cannot accommodate other operators, as the proposed slimline pole has been specifically selected to minimise visual impact. Designing the mast to facilitate co-location would require a larger and more substantial structure, which would undermine the objective of the slimline design.

- 4.11. An initial licence period of 5 years is sought. Given the site will serve the built-up residential area of Galway the Applicant expects network demand to exist in perpetuity and would accept a longer licence period if the Planning Authority deem appropriate (for example, 10 years).

(b) Network Coverage

- 4.12. The primary focus of the project is to deliver enhanced 3G and 4G and new 5G data service provision to Galway and the surrounds. There is currently limited coverage across southwestern Galway including Renmore and the delivery of these technologies would be a major benefit of the proposed development.
- 4.13. The proposed installation will provide the benefit of delivering improved connectivity to people living, working, or visiting those locations where existing MNO services may be poor.
- 4.14. To demonstrate this, the application is supported by radio coverage plots produced by the network planner (RF Technical Justification Report). The coverage plots thematically show that there would be a significant uplift in coverage within the surrounds. The coverage plots show where the gap in the coverage is, which is considered the starting point for the search. In practical terms this uplift in coverage would allow users of mobile handsets to access 3G, 4G and 5G coverage in an uninterrupted way and allows for high data speed usage. This is a significant and demonstrable benefit of the proposal that should weigh strongly in favour of granting planning permission.

(c) Alternative Site Assessment

- 4.15. Before arriving at the conclusion that there are no other preferable sites available for the construction of the proposed mast, the applicant in conjunction with Three Ireland has undertaken a consideration of alternative sites and a site finding exercise. The purpose of this exercise is to determine whether an existing installation can be upgraded, whether there is a tall building in the surrounds that might accommodate the equipment (thereby avoiding the requirement for a new mast) or whether a new installation is required. It is policy for Three Ireland to upgrade an existing installation where possible in preference to deploying a new site, since this reduces the proliferation of masts across their network.
- 4.16. The area within which any given base station can be located must be carefully selected to ensure that the base station will complement and not interfere with other installations situated on the wider network. Site-specific characteristics must also be given due consideration in assessing the most feasible option in terms of radio coverage, planning, design and ease of construction. In simple terms, there are a number of complex and interrelated factors that must combine in order that any given prospective site for a telecommunications base station be appraised as technically acceptable.
- 4.17. The applicant has adopted a sequential approach to base station development, prioritising the shared use of existing masts or the installation of antennas on buildings and other structures before considering new ground-based masts.
- 4.18. In accordance with DOE guidance document "Telecommunications Antennae and Support Structures 1996 and Circular Letter Note PL07/12, the Applicant's network rollout team investigated the following siting and design options using a sequential approach to site selection:

- i. Upgrading their own existing base stations;
- ii. Using existing telecommunication structures belonging to another communications operator;
- iii. Installations on existing high buildings or structures;
- iv. Using small scale equipment; and
- v. The erection of a new ground-based mast.

4.19. Prior to undertaking the above outlined sequential approach to site finding, the radio network planner must identify an area of search (sometimes referred to as a Cell Search Area) within which a site must be located, in order to effectively and efficiently provide the uplift in coverage levels required. In this case, the area of search has focused on Renmore since this is where an uplift in coverage is required.

4.20. The existing coverage plot below shows the existing Three Ireland coverage to the surrounding area. Whilst there is good coverage in the northern area on the below plan, there are significant areas of residential properties in Renmore with poor signal. The current uptake of devices has put additional pressures on the network meaning existing base stations are undergoing significant upgrades in technology to meet this demand and so are critical in maintaining current and future service provision. Failure to progress with the proposed development would mean that the below demonstrable gap in service coverage would remain, making it increasingly difficult for Three customers to access fast, reliable digital connectivity.

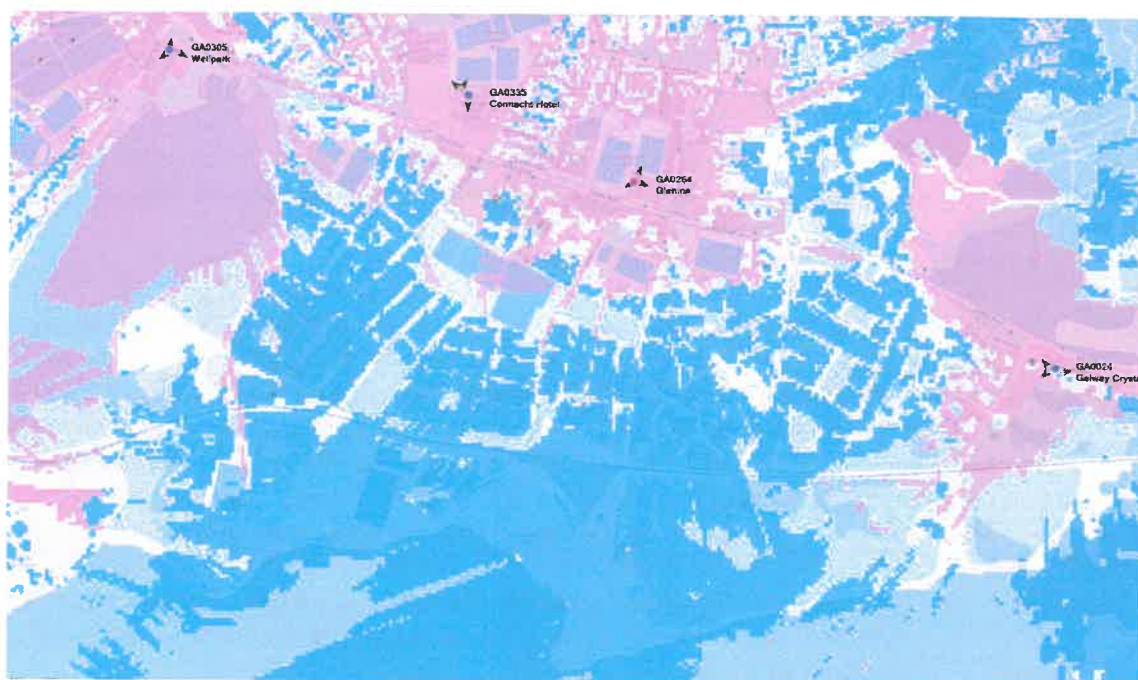


Figure 2 – Existing 4G Coverage Plot (Poor – Blue; Fair – Green; Good – Yellow; Excellent – Red.

4.21. The objective of the Radio Planner is to enhance 3G and 4G coverage and provide new 5G coverage to Renmore and Galway. Accordingly, the following Site Search Area was defined, within which the Radio Planner assessed that a new site had the capability of providing the

uplift in coverage required. The Cell Search Area below broadly matches the area identified as deficient in coverage shown above.

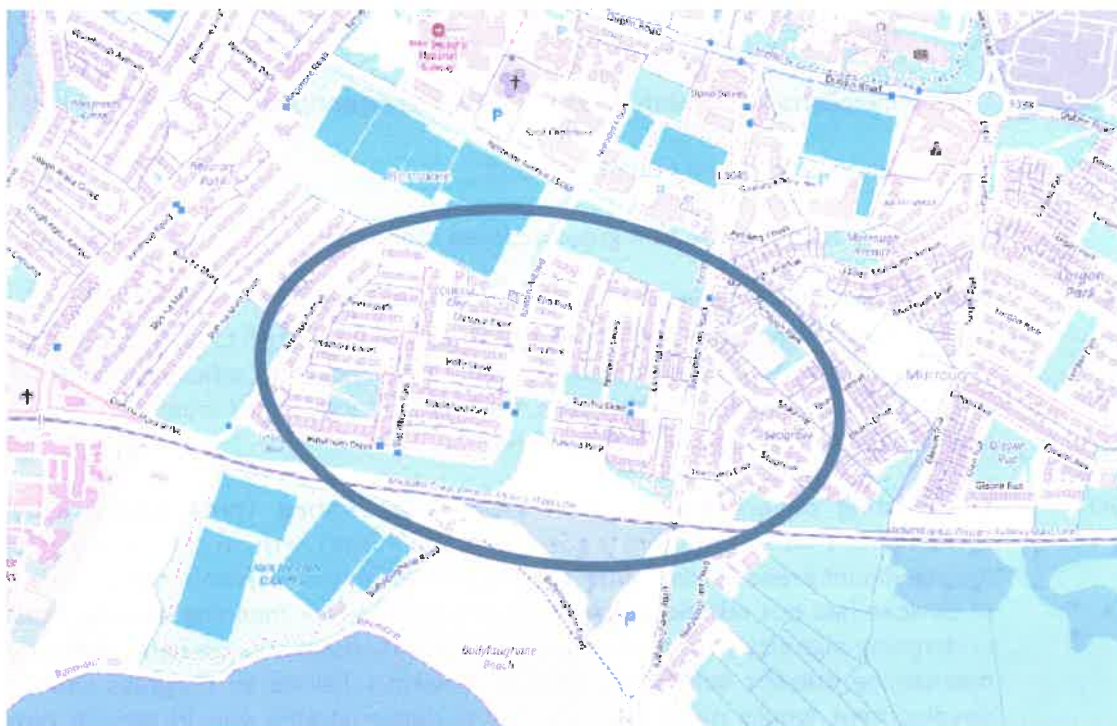


Figure 3 – Site Search Area

- 4.22. The Site Search Area encompasses land in the residential area of Renmore. There are small areas of open space and a railway line to the south. In simple terms, any installation must be within the Site Search Area to be able to effectively provide the uplift in coverage required.
- 4.23. Having established the Site Search Area, the applicant assessed alternative sites in accordance with the sequential methodology outlined above as follows:
- (i) Upgrading their own existing base stations;
- 4.24. Three Ireland has identified that within the search ring area identified above there are no existing suitable telecom structure or buildings with adequate height to locate RF equipment to clear the surrounding clutter and provide coverage to the target area. The Radio Planners preference would typically be to upgrade any existing site rather than propose a new site elsewhere in the surrounds because this makes for a more effective, planned digital communications network and avoids the costs and risks associated with deploying a new site. In this case, the Radio Planner has made an assessment of the following Sites:
- Three decommissioned GA0007 at Liam Mellows GAA. It was not possible to upgrade this site with new equipment as the structure was a pole that was part of a ball stopper at the back of the pitch.
 - Three GAO264 and Vodafone VOD_GY166 located on the rooftop of the Flannery's Hotel. This site is 600m from the planned site and does not provide coverage to target area.

- Three GA0335, Vodafone VOD_GY075 and Eir GY_3495 are all located on the rooftop of the Connacht Hotel located 640m from the planned site, but it does not provide coverage to the target area in Renmore.
- Three GA0305 is located on the rooftop of the Huntsmann which is outside the search area at 1.2km from the planned new site.
- Three GA0024 and Eir GY_1441 are located on the rooftop of the Galway Crystal Hotel, but this also outside the search area at 1.3km from the planned new site.

(ii) Using existing telecommunication structures belonging to another communications operator

4.25. As stated above, Three Ireland has identified that within the search ring area identified above there are no suitable telecom structure or buildings with adequate height to locate RF equipment to clear the surrounding clutter and provide coverage to the target area. The following Sites were assessed:

- Defence Force Tower with Vodafone VOD_GY081 located at 35m on the structure, however this site is not available to Three.
- Vodafone VOD_GY198 is located on a chimney of a commercial premises at approximate 7m. It is not possible to add addition equipment and with the height limited it would not provide coverage to the target area.
- Eir GY_3759 are located on the flood light pole Galwegians Rugby Club. This site is 600m from the planned site and does not provide coverage to target area.

iii) Installations on existing high buildings or structures

4.26. There are no high buildings or structures within the site search area and this has been discounted as an option.

(iv) Using small scale equipment.

4.27. Due to the geographical area which requires coverage, small scale equipment was deemed inappropriate in this location and has been discounted.

(v) The erection of a new ground-based mast.

4.28. Following the sequential assessment outlined above, the applicant concluded that a new ground based mast solution would be required to produce sufficient coverage and facilitate network upgrades.

4.29. For a site to be considered viable, the following parameters must be considered:

- A site must be available and free from legal constraints;
- A site must be accessible to build upon and safe for future maintenance;
- A site must be accessible to services at a viable cost to the development;

- A height of 15m is required as defined by radio planners to fill the gap in coverage. A site must be available to accommodate a structure of this size;
- The site must have sufficient space at ground level within the public realm; and
- The site must not negatively impact the accessibility for pedestrians.

4.30. Upon concluding that it is not possible to upgrade any existing installation and that there are no tall buildings within the surrounds that are suitable for upgrade, the applicant moved to the next sequential phase; the erection of a new ground-based mast within the Cell Search Area. The below map shows the locations of alternative sites considered. The accompanying table provides the justified reasoning as to why each of these sites was discounted.



Figure 4 – Discounted Options

Option Reference	Location (Grid Reference)	Reason for Discounting
B	132301, 225175	Site B is located on a small grass verge to the northeast of the LimeLeaf convenience store. The land to the west and south of the grass verge are parking spaces associated with the convenience store. The Site is located to the west of

		the junction between a Roselyn Gardens and Fuchsia Drive. The Site was discounted due to the small land take available and potential impact on parking at the business.
C	132117, 225388	Site C is located in the southeastern corner of Renmore Playing Fields, adjacent to Rowan Avenue. The Site is located at a junction between Rowan Avenue and the St James GAA Clubhouse. Trees bound the eastern boundary of the playing fields along Rowan Ave. The Site was discounted due to the potential cumulative impacts of the development adjacent to the approved scheme located to the south and that the Site is located outside of the search area for the proposed mast.
D	132099, 225190	Site D is located to the north of a bus stop along Rowan Avenue. The Site was discounted due to its proximity to protected view points to the south and the open nature of the location with no visual screening.

Table 1 – Discounted Options

- 4.31. The above map and accompanying assessment, demonstrates that there are no alternative sites for the erection of a new ground-based mast available which are capable of providing an uplift in coverage as required. The Application Site has been proposed as the most sequentially preferable site. The radio planner accordingly produced the below Proposed Coverage Plot showing the predicted effect of the mast in situ. It can be seen that coverage will extend across Renmore and east Galway, and the car park to the south at Galway Bay and the railway intersecting the search area. This is a major benefit of the scheme that should weigh heavily in favour of granting the requested licence.

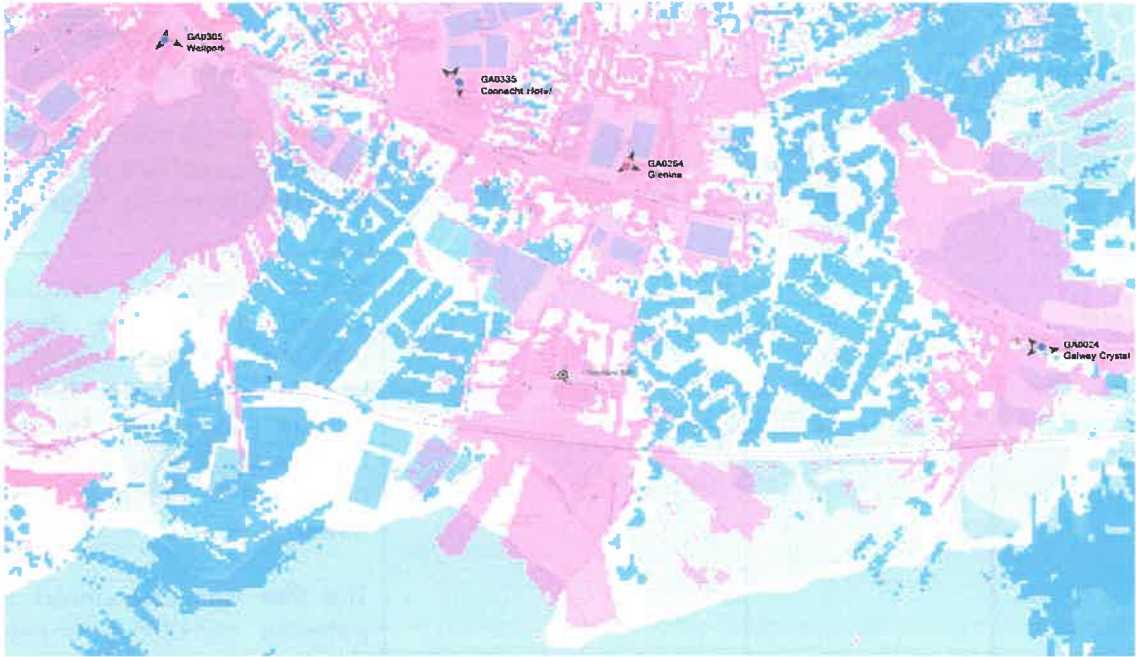


Figure 5 – Proposed Coverage Plot

5. Compliance with Town Planning Policy

5.1. In this section, national, regional and local planning policy guidance pertinent to the Application Site and development proposal is identified.

5.2. The relevant national policy guidance includes:

- National Planning Framework – Project Ireland (First Revision – April 2025);
- Department of the Environment Guidelines for Telecommunications Antennae Support Structures (July 1996); and
- Circular Letter PL/07/12 – Telecommunications Antennae and Support Structures Guidelines (October 2012).

5.3. Relevant regional and local policy guidance includes the following:

- Galway City Development Plan 2023–2029.

National Policy

5.4. The National Planning Framework for Ireland was first published in February 2018, and updated in April 2025. It is a high-level plan for growth and development across the country. The Framework is supported by a companion document, the National Development Plan, a ten-year strategy for public capital investment.

5.5. The Framework identifies 10 No. National Strategic Outcomes. Digital connectivity cuts across a number of these objectives and it is clear that connectivity is considered integral to the delivery of these ambitions which includes:

- A Strong Economy, supported by Enterprise, Innovation and Skills – *‘Delivering this outcome will require the coordination of growth and place making with investment in world class infrastructure, including digital connectivity...’*

5.6. This is reflected in Section 2.2 which provides an Overview of the NPF Strategy, recognising the new economic opportunities arising from digital connectivity. The link between economic development and telecommunications is further underlined in the accompanying text to National Policy Objective 62 which states that *“In the information age, telecommunications networks play a crucial role in enabling social and economic activity.”*

Department of the Environment and Local Government Guidelines for Telecommunications Antennae Support Structures (1996)

5.7. These statutory Guidelines aim to provide relevant technical information on telecommunications installations and to offer general guidance on planning considerations so that the environmental impact is minimised and to help ensure a consistent approach is adopted by the various planning authorities. The Guidelines are also intended to be of assistance to operators and to the general public in understanding how the process works.

5.8. It is acknowledged by the Government through the publication of updates in 2012 that the guidelines are dated. Nevertheless, they have not been superseded and still provided key

guidance and observe a number of important factors with regard to telecommunications development that is still relevant:

- Design and Siting – The design of the antennae support structure and to a great extent of the antennae other than ‘dishes’ will be dictated by radio and engineering parameters. There may be only limited scope in requesting changes in design.
- Visual Impact – The visual impact is among the more important considerations which have to be taken into account in arriving at a decision on a particular applications. In most cases the applicant will only have limited flexibility as regards location, given the constraints arising from radio planning parameters.
- Sharing Facilities and Clustering – Sharing of installations (antennae support structures) will normally reduce the visual impact on the landscape. The potential for concluding sharing arrangements is greatest in the case of new structures when foreseeable technical requirements can be included at the design stage. All applicants will be encouraged to share and will have to satisfy the authority that they have made a reasonable effort to share.

5.9. In addition, the guidelines acknowledge that the size of a cell area can vary from 0.5km to 70km depending on the type and scope of equipment to be installed (Section 2.2). The guidelines state that factors such as the nature of terrain, extent of urban clutter and numbers of potential or actual users of any given system will influence cell size.

5.10. Section 4.3 of the 1996 Guidelines provides further guidance on the siting of new free-standing masts. The guidance states that only as a last resort should free-standing masts be located within or in the immediate surrounds of smaller towns or villages. If such 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 applicant has demonstrated, through a sequential approach to alternative site assessment, that there are no other preferable sites that can accommodate the development and that the siting of the proposed development has been specifically selected to minimise visual impact because of the proximity of the site to a band of mature trees to the rear.

5.11. The guidelines also address health and safety matters stating that the ICNIRP (International Commission on Non-Ionising Radiation Protection) statement on health and safety concluded that there is “no substantive evidence that adverse health effects can occur in people exposed to levels of non-ionising radiation at or below the ICNIRP guideline figures’ where all operators must conform to these guidelines.”

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

5.12. This circular was published in October 2012 where Planning Authorities are advised to approach applications for telecommunications structures in a pro-active manner and differently from that advised within the 1996 Telecommunications Guidelines.

5.13. The DHPCLG (formerly the Department of the Environment, Community and Local Government) issued a Circular Letter (PL 07/12) in October 2012 to local authorities updating certain sections of the Telecommunications Antennae and Support Structures Guidelines (1996). Key issues clarified and updated included:-

- Planning authorities should not attach conditions limiting any permissions to a temporary period.
- Use of bonds or cash deposits in order to control the removal of installations should cease and should be controlled by way of condition; and
- Planning authorities should primarily be concerned with the appropriate location and design and do not have competence for health matters which are subject to other legislation.

Local Policy

- 5.14. Local planning policy is set down within the Galway City Development Plan 2023-2029. Section 9.11 of the plan states that:

"the availability of a high quality, efficient telecommunications network is an essential enabler of social and economic activity in the city. The continued development of telecommunications and digital infrastructure is critical to the ongoing development of the knowledge economy, digital innovation, the development of digital enterprises and to ensure the security of systems. Galway City's digital infrastructure was categorised as 'developed/ highly developed by the Digital Readiness Assessment carried in 2018, however it will require continued investment to keep pace with the transition to a digital society and Smart City.

Galway City Council is committed to supporting the delivery of world class communications infrastructure and the implementation of the Digital Strategy for Galway City (2020-2024), once adopted."

- 5.15. Policy 9.9 'Telecommunications and Smart Technology' supports the development and expansion of telecommunication infrastructure (including the broadband network) within the city where appropriate, subject to environmental, visual and residential amenity considerations. The Policy goes on to state that development for telecommunication and mobile phone installations take cognisance of the Planning Guidelines for Telecommunications Antennae and Support (DECLG, Circular Letter PLO7/12) 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.

- 5.16. Specific Development Standards are set out at Paragraph 11.18 which says *"In considering applications for proposed telecommunication infrastructure and installations, the Council will have regard to the Planning Guidelines for Telecommunications Antennae and Support Structures, Guidelines for Planning Authorities, DECLG 1996 and Circular Letter PLO7/12 2012 updating sections of these guidelines. Proposed installations shall have cognisance of any existing aircraft flight paths, where appropriate."*

- 5.17. Associated Local Plan Policy Objectives are:

- Policy 3.5 Sustainable Neighbourhoods: Established Suburbs:

- Facilitate consolidation of existing residential development and densification where appropriate, ensuring new development responds positively to the character of the area and has regard to existing favourable local pattern, form and density, and protects the amenity of existing and future residents.
- Policy 5.9 Open Spaces: Public Realm
 - Implement the Public Realm Strategy for the public domain which contributes to the creation and maintenance of high quality and successful open spaces.
- Policy 8.7 Architecture, Urban Design and Placemaking:
 - To develop and adopt a citywide architectural framework that promotes high-quality design, supports the character and distinctiveness of Galway's neighbourhoods, and encourages development that responds creatively to local context, conservation principles, industrial heritage, archaeology and the wider built environment, ensuring that new buildings, places and spaces contribute positively to Galway's evolving urban identity
 - Encourage high quality urban design in all developments.
 - Proposals for buildings which are taller than the prevailing benchmark heights will only be considered where they do not have an adverse impact on the context of historic buildings, ACA's, residential amenity or impinge upon strategic views, in accordance with the Urban Density and Building Height Study for the city.
- Policy 8.8 Public Realm:
 - Rationalise materials, street furniture and planting in Galway to create well-designed, coordinated public realm.

6. Balancing Operational and Environmental Considerations (including Visual Impact Assessment)

- 6.1. The special operational and technical factors that require specific siting of an electronic communications mast should be balanced by the need to minimise environmental and visual impact and the need to protect local amenity. Electronic communications installations are principally guided by the technical need for the site and the technical constraints placed upon transmitting a signal to the required coverage area whilst also recognising that the environmental impacts must also not be unacceptable.
- 6.2. The siting and design of such installations is therefore always underpinned by the need to strike an acceptable balance between visual impact and technical constraints. As explained previously, the search for a suitable site for the telecommunications mast, and the radio planning work undertaken, has been carried out with the unique challenge of dovetailing coverage to remedy historic gaps in the coverage provided by Ireland's Mobile Network Operators whilst proposing sustainable development that is in compliance with the Galway City Development Plan. In the context of the technical and operational constraints that apply, the development proposed is acceptable in the planning balance having regard to the following factors.

Siting

- 6.3. Technical requirements have dictated the siting of the proposed equipment. Beginning with the Cell Search Area, the operator has spent a considerable amount of time and resources identifying a potential site as well as discounting potential alternative options for siting equipment and selecting a proposed location that is considered to presenting an acceptable balance between operational/technical requirements and visual impacts. Coverage maps and radio planner technical justification have been provided which thematically show the coverage that will be provided from the installation and it has been explained that the installation will provide new 5G service provision in an area where this technology is currently not provided.
- 6.4. In line with the requirements of national and local planning policy, Shared Access Limited has concluded following detailed site survey and desktop assessment process that there are no existing suitable telecommunications installations for the operator to share (either via their own network or another operator's network), that would provide the necessary coverage to the target coverage area and that there are no existing tall buildings or structures that are available that could host the equipment. Therefore, a new ground-based installation is required. Following desk-based assessment and site visits, Shared Access Limited has concluded that the Application Site is acceptable in both operational terms and town planning terms and that there are no other alternative sites that are preferable in either town planning or technical terms that could be progressed.
- 6.5. As shown in the Site Search Area the area is predominantly characterised by residential development. It is therefore established through the Alternative Sites Assessment Section that the Application Site is the most sequentially preferable Site and minimises impacts on visual amenity and key viewpoints.

- 6.6. The proposed coverage provided by the mast will provide uplift in service to the local area which is a location where residents and businesses might reasonably expect to be able to access the latest mobile network technology.
- 6.7. Near distance views of the mast would be possible but these would not appear stark or incongruous within the streetscene because there are already a number of vertical steel structures in the immediate surrounds that characterise the site and surrounds and views would generally be seen against the backdrop of existing planting that would serve to soften views and provide a degree of background camouflage for the mast.
- 6.8. Applications for licenses made under Section 254 are required to demonstrate that the convenience and safety of road users and pedestrians will not be prejudiced by the development. The drawings that accompany the submission show that the proposed installation will not be situated on or adjacent to a pavement area that facilitates pedestrian movements. The equipment would have no effect on vehicle movements and would not prevent lines of sight for moving vehicles along the surrounding road network.
- 6.9. The proposed installation will not cause any traffic generation as it is not itself a visitor destination. Maintenance of the equipment cabinets is usually a handful of times per year, where the network engineer would arrive at the site via van and be able to park adjacent to the Site and access the equipment.

Appearance

- 6.10. Given the specific technical requirements, the design of the mast has been carefully considered to accommodate the required equipment in the lowest possible profile. The operator has sought to minimise the visual impact of the proposal, acknowledging that the mast will result in a change to the street scene and that it is in the interests of public amenity that this change is minimised as far as practicably possible. The mast will be coloured grey which has been well established as the best colour for minimising impact upon urban landscape. This is also the colour to match the existing street furniture in the surrounds.
- 6.11. The proposed solution is designed to be as aesthetically sensitive as possible and proposes the minimum height and amount of ancillary equipment required to improve surrounding network coverage. The number of cabinets have been kept to a minimum in order to achieve maximum connectivity in as discreet a form possible. The proposed development will not encroach upon the pavement area at all and there would be no impact on pedestrian movement.
- 6.12. In order to minimise the overall visual impact of the proposals, Shared Access Limited are proposing the most efficient configuration of equipment at the lowest height at which the radio signal would provide a meaningful uplift in radio coverage, thereby complying with the requirements of the Development Plan to minimise impact on residential amenity and visual amenity whilst simultaneously providing the economic and social benefits that flow from the provision of this public utility.
- 6.13. Telecommunications apparatus by their very nature must be taller than surrounding built and natural form to ensure its efficient operation. The design of the mast is ultra stealth, which has operational trade-offs that the operator has accepted in order to minimise the impacts of the design of the local character. To suggest that its appearance is unacceptable because the proposal is taller than other vertical forms in the landscape such as trees and lampposts would be to miss the technical constraint faced by operators; that the antenna must be

situated above clutter that would prevent propagation of radio signal. As such, the proposal should not be considered negatively due to it being taller per se than other vertical features within the surrounding landscape.

- 6.14. If the mast height were to be reduced in this location, this would result in a degraded service due to the blocking effect from the surrounding clutter and would not provide the required uplift in coverage. This effect is explained in Section 4 of this statement and within the accompanying Technical Justification. This would especially be the case for the higher frequency technologies.
- 6.15. The application is accompanied by computer generated images (CGI Photomontages) which provide a visual representation of the proposed development. Three viewpoints have been provided in order to give a visual representation from different angles and approaches to the Application Site from different places. The applicant has selected these viewpoints based on their own visits to the site and their experience of deploying similar telecommunications infrastructure elsewhere across Ireland.
- Viewpoint 1: The viewpoint is located to the north along Elm Park. The CGI photomontage show that the proposed mast is partially screened by the existing vegetation and that the structure assimilates with other existing street furniture and streetlights. The mast will be able to assimilate with surrounding street furniture by virtue of being painted a similar colour.
 - Viewpoint 2: This shows short range views from the opposite side of Fuchsia Drive. The photomontage shows that the streamline design selected for the Site limits visual impact and demonstrates that the design aligns with other street furniture. This image shows that the installation will not encroach onto the existing pavement area serving Elm Park
 - Viewpoint 3: This photomontage is a long-distance view from Hawthorn Drive. The viewpoint shows how the streamline design of the structure blends into the existing vegetation and with other street furniture such as the streetlights. This image shows that the mast will be taller than surrounding trees and lampposts but, overall is of a comparable scale such that it will not unacceptably injure or damage local amenity
- 6.16. Using the submitted drawing package together with the photomontages, it is possible to gain an understanding of the existing context for the Application Site and what the visual impact of the proposals would be. The photomontages show that the scale of the mast is comparable with existing street furniture and would be capable of assimilating into the existing street scene without the mast appearing incongruous or an alien feature. It is noted that the site is situated in a location where short distance views of the site would be possible however:
- The mast is of a slim line design which minimises overall visual profile in the wider streetscape.
 - The mast will be painted grey, a recessive colour that will assist with the mast assimilating with the surrounding environmental and sky, particularly from medium and longer distance views.
- 6.17. The operator's equipment cabinet is similar to those of other statutory undertakers which are commonplace in both rural and urban areas. 3G, 4G and 5G signals by their very nature

(as they carry high data rates) do not penetrate over long distances, just a few hundred metres, depending on the topography of the land, building clutter and vegetation including trees in the area which can reduce their effectiveness – telecommunication installations to be close to their customer demand. Therefore, a new site is required to provide digital communications coverage to this cell area.

- 6.18. In line with planning policy, the proposed installation is an item of essential infrastructure providing a public utility and therefore will not cause any loss of privacy, nor will any occupants of nearby properties be overlooked. The column does not emit any noise, odour, vibration, artificial light or disturbance from air. The only noise emitted is from a cooling fan within the equipment cabinets, which only operate during hot weather conditions (>30 degrees centigrade). However, within a few metres the noise is inaudible, particularly when taking into account the ambient noise levels of the area which include passing traffic.
- 6.19. The equipment proposed is designed to be installed in urban areas and is entirely vandal proof.

Economic Benefits

- 6.20. The Galway City Development Plan recognises the importance of digital connectivity in supporting economic activity and productivity, both for individuals and business where the demand for digital connectivity is high consistent with the number of people trying to access 3G, 4G and 5G coverage. Digital connectivity is a central element of the wider Government vision to turbocharge the economy and to stabilise and strengthen economic growth across Ireland. This is because low productivity, skill shortages, and a widening divide between the affluent areas of the country and the less fortunate can be partly attributed to the digital divide, and the need for improved connectivity infrastructure.
- 6.21. More recently, the trend of greater homeworking for some trades and professions is facilitated by good fixed-line and wireless broadband connectivity where this exists. This is specifically referred to in the Galway Development Plan. Increased connectivity in the area will therefore help drive local economic growth, create high skilled jobs and support businesses, as well as promote digital inclusion. It will also drive energy and transportation efficiency, as an improved road user experience.

Public Benefits

- 6.22. The public benefits associated with the provision of enhanced digital connectivity as a public utility are as follows:
- Provide enhanced 3G and 4G as well as new 5G digital connectivity for a major mobile network operator as part of their national network in an area where there is currently and historically poor levels of coverage.
 - Provide a new mast that forms part of the planned network expansion of the mobile network operators in Galway that will deliver new network capability through the provision of new 5G service to an area where there currently is none.
 - Improve the ability of local businesses, home workers, and industry to operate and compete effectively through access to modern communications thereby helping to maintain and increase local employment opportunities and sustain economic development.

- Provide coverage to the large number of residential dwellings that are located in close proximity to the Application Site in every direction.
- Contribute towards the Government's long-standing and well documented commitment to maintaining and improving communications networks across all of Ireland and also to the Strategic Objectives of the NPF in terms of delivering sustainable growth.

- 6.23. Modern communications in all of their different and emerging forms, including mobile communications, help maintain high and stable levels of economic growth and employment. Hence, the Irish Government's continued commitment to the growth and development of modern electronic communications.
- 6.24. Modern communications, including mobile communications, aid social progress, which recognises the needs of everyone.
- 6.25. Modern communications, including mobile communications, provide effective protection of the environment by helping reduce the need to travel by enabling modern working practices such as greater home working. Such practices alleviate the pressure for new commercial development such as offices, through more efficient and flexible use of existing accommodation. For the same reasons, modern communications, including mobile communications, help ensure the prudent use of natural resources.
- 6.26. The proposals would enhance 3G and 4G service provision into this area and provide new 5G coverage also. Improved digital connectivity will contribute to supporting economic growth, enhance the competitiveness of industry and allow for investment into smart technologies.
- 6.27. Drawing these strands together, the development proposed accords with the town planning and transportation policy framework and should therefore be acceptable in the planning balance. Consequently, the Section 254 licence should be granted.

7. Design Considerations

- 7.1. This section provides a description of the process adopted in the design of the proposals and explains the access considerations.

Amount, Design, Layout and Scale of the Development

- 7.2. The scale, layout and design of the development have been guided by the special technical and operational factors affecting the need to provide coverage while having regard to the need to minimise visual impact as far as practicably possible, already referred to elsewhere in this statement. With regard to the main component elements of the development proposed:

- The mast required cannot be hidden, but any impacts on the landscape and visual amenity will be limited and moderated by confining height to what is required for operational reasons. Compared to other forms of vertical infrastructure also found in the streetscape, the mast proposed is a benign structure: it is much lower than television broadcast masts; it is lower and does not form a string of structures that march across the countryside like electricity transmission towers; and it does not move like wind turbines, which are typically higher and are usually developed in clusters. In essence, the mast should be considered and assessed as a functional part of the utilities infrastructure serving Renmore and Galway. Streetworks masts are generally found in urban and residential areas throughout Ireland.
- Alternative designs like tree masts have been considered, but they cannot accommodate the amount of apparatus necessary provide 3G, 4G and 5G coverage across the target area. Moreover, such structures have a larger ground-based land take requirement than the proposed mast which makes them unviable in the Application Site location. Even if a tree mast could be designed to support such apparatus, it would still amount to an engineering solution unlikely to replicate the natural features and character of a tree and would appear as a prominent and incongruous feature in the wider landscape.

Equipment Cabinets

- 7.3. The number of equipment cabinets has been limited to what is required to meet the operator's current and foreseeable network requirements. The location and design of the equipment cabinets, and the electronic communications equipment housed within them, reflects their functionality and the technical and operational requirement to be in reasonable proximity to the apparatus it supports. This avoids exceptionally large runs of feeder cables and associated supporting trays, and the subsequent loss of signals.

Access considerations

- 7.4. Once constructed, the development will be unmanned requiring only periodic visits, typically once every two to three months for routine maintenance and servicing.
- 7.5. In accordance with all relevant health and safety legislation and guidelines, access to the Application Site will be restricted to authorised personnel and the routine maintenance and servicing of the apparatus will only be carried out by properly trained and qualified staff.

Appearance

- 7.6. The proposed design involves installation of a 15m tall mast along with ancillary development comprising an equipment cabinet required for the mast to function effectively.
- 7.7. A mast no greater than 15m is proposed since this is the height required in order for the installation to function effectively within the surrounding strategic network. A taller mast would not result in an efficient radio network since this would result in unnecessary overlapping cell coverage whilst a shorter mast would not provide effective coverage.
- 7.8. The proposed location was considered to be an optimum solution to address the issue of coverage gap and meet the technical requirements, while keeping the environmental impact on the landscape as minimum as possible.

8. Health and Safety

- 8.1. Every installation on a site owned or managed by Shared Access Limited is designed to be compliant with the international standards adopted by the Irish Government. A certificate confirming compliance with the relevant ICNIRP guidelines on public exposure has been supplied with this application.
- 8.2. The ICNIRP guidelines seek to protect against the well-known thermal effects of radio emissions and include a significant precautionary factor. These guidelines apply to all forms of electronic communications and mobile technology is one of the lowest powered of these.
- 8.3. National planning guidance remains clear, provided an application is certified as ICNIRP compliant, local planning authorities should not seek to effectively set different guidelines through the refusal of planning permission.

9. Summary and Conclusions

- 9.1. In summary, the application is in respect of the installation of a 15m telecommunications mast necessary to improve connectivity to Renmore and the surrounding area for Three Ireland. The proposed installation will enhance 3G and 4G coverage whilst providing new 5G coverage to a defined target area in accordance with the planned expansion of the digital communications network serving Galway.
- 9.2. A licence for the installation is sought via Section 254 procedure. Applications made under this procedure require the Local Planning Authority to have regard to the proper planning and sustainable development of the area, relevant provisions of the Development Plan, the number and location of existing apparatus and structures, and the convenience and safety of road users including pedestrians. In accordance with these requirements, this Planning Statement has been provided to accompany the submission and sets out the justification as to why the proposal accords with the relevant planning policy framework.
- 9.3. The public benefits of providing improved connectivity to Renmore and the surrounding area are clear from the information provided. Digital connectivity is recognised as important infrastructure within the Galway City Development Plan, which supports the development and expansion of telecommunications infrastructure where appropriate. The proposed development will provide enhanced 3G and 4G coverage together with new 5G coverage to an area where there is currently limited coverage and will therefore contribute to the social and economic benefits associated with improved digital connectivity.
- 9.4. As is demonstrated in this statement, all reasonable steps have been taken to minimise the visual and other impacts of the development, having regard to the technical, operational and town planning constraints that apply. It has been demonstrated that the required service cannot be provided by upgrading an existing installation elsewhere on Three Ireland's network and that there are no suitable telecommunications structures operated by another Mobile Network Operator or tall buildings within the Site Search Area that can accommodate the required equipment.
- 9.5. Prior to the selection and design of the Application Site, the applicant considered a range of alternative options which were assessed and discounted on technical, operational and planning grounds. The assessment has demonstrated that there are no available sites to co-host the required equipment and that a new ground-based mast is required. The applicant has explained that the 15m mast proposed is the minimum height required to deliver the necessary uplift in coverage, with a lower installation unable to provide effective coverage due to the surrounding buildings, vegetation and other urban clutter.
- 9.6. The proposed installation has been designed to minimise its visual and physical impact. The slim-line streetworks-style mast is intended to assimilate with existing street furniture within the urban environment, while the associated equipment has been limited to that required for the operation of the installation. The proposal will not require the removal of any trees or hedgerows and will not reduce the width of the existing pavement. The installation will also not adversely affect pedestrian or vehicular movements.
- 9.7. The proposed antennas will comply with all relevant health and safety requirements and will be compliant with the ICNIRP guidelines. An appropriate ICNIRP Certificate has been submitted with the application confirming compliance with the relevant guidelines.

- 9.8. This statement and the other accompanying material demonstrate that the proposal is in accordance with the relevant local Development Plan policies and national planning policy, including the National Planning Framework and the Government's guidance relating to telecommunications infrastructure. The proposal represents an appropriate response to an identified deficiency in the local telecommunications network and has been carefully sited and designed to balance the technical requirements of providing improved digital connectivity with the need to minimise potential visual and amenity impacts.
- 9.9. On this basis, it is considered that the proposed telecommunications mast represents an appropriate form of development in this location and that the proposal accords with the relevant planning considerations applicable to a Section 254 application. Accordingly, the Section 254 licence should be granted.

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Registered Office: 33 Sheep Street, Cirencester, GL7 1RQ



Client Information Letter

Date: 5th October 2026

Client Name: Shared Access Limited, Shared Access Iberia S.L, Shared Access Limited - Sucursal Em & STE Shared Access Limited

We, Aon, as insurance brokers, provide our services to you in accordance with our terms of business agreement only. We are writing to you to confirm that the contract(s) of insurance described below (the '**Insurances**') are in force at the date of this letter. All of the Insurances are subject to their specific policy terms, conditions, exceptions, warranties and limitations, not all of which are summarised below, but which are detailed in the policy document.

Business Description: Designers and project management for Turn-Key implementation of radio telecommunication solutions, Installation of telecommunication devices, cabling, aerials/antennae and purchasers of ground rents from landowners on telecom sites.

Period of cover 30th September 2026 to 29th September 2027

Class: Public / Products and Employers Liability
Insurer / Policy Number: Hiscox Insurance Co Ltd / HUPI6 9141473
Public/Products Liability Limit of Indemnity: €15,000,000 any one incident/in the aggregate in relation to Products
Employers Liability Limit of Indemnity: €15,000,000 any one incident

Class: Excess Public / Products Liability
Insurer HDI Global SE - Ireland
Policy Number: 110-76204182-30012
Limit of Indemnity: Public Liability €15,000,000 any one occurrence or all occurrences of a series consequent upon or attributed to one source or original cause in excess of the underlying €15,000,000.

Products Liability €15,000,000 any one period of insurance in excess of the underlying €15,000,000.

Class: Excess Public / Products Liability
Insurer Chubb European Group SE
Policy Number: RICASO02069124
Limit of Indemnity: Public Liability €20,000,000 in excess of the underlying €30,000,000.

TOTAL €50,000,000 Public & Products Liability.

Class: Professional Indemnity
Insurer / Policy Number: AIG Europe S.A. / DCB10823
Limit of Indemnity: €2,500,000 in the aggregate

Class: Excess Professional Indemnity
Insurer Allianz plc 50% and Liberty Mutual 50%
Policy Number: DNPFP7999932
Limit of Indemnity: €4,000,000 in the aggregate in excess of the underlying €2,500,000 in the aggregate

Hiscox Insurance Company Ltd - Public & Products Liability note of interest:

If any of **your** clients listed below make a claim against **you** for which **you** are entitled to an indemnity under this **policy**, **we** will, if **you** request and the client agrees, pay directly to the client the amount of the indemnity which **we** agree **you** are entitled to in respect of the claim:

Westmeath County Council
Cork City Council

If applicable, any third party questionnaire which we have been asked to complete on your behalf and which we have completed as requested by you in connection with a request for information about your Insurances is attached to this letter. For the remainder of this letter any reference to "letter" shall also include a reference to any such questionnaire accompanying the letter (where applicable).

We accept no obligation to inform any other person or entity should any of the Insurances be cancelled, assigned or changed in such manner as to affect the accuracy of this document. Unless we specifically agree otherwise in writing, and to the fullest extent permitted by law, we do not accept any liability to anyone other than you, our client (and any such liability to you will be subject to any limitations contained in our terms of business agreement, and/or any other agreement, with you) for the content of this letter.

Under no circumstances shall any third party to whom/which this letter is disclosed be entitled to rely on its contents. Any and all liability to any third party is hereby expressly excluded.

This letter shall not amend, extend or alter the coverage afforded by the Insurances; it is provided for information only and is not to be understood as providing advice to you or anyone else on any decision which is under consideration. The reader of the letter is responsible for any assumptions he/she makes as to the coverage afforded by the Insurances, which may be subject to important conditions and/or exclusions.

Yours faithfully,
Ben Green
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Client Service Advisor
Commercial Risk Solutions
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RF Technical Justification Report

For proposed mobile telecommunications

Site ID: SR4110

Address: Elm Park, Renmore, Galway

Prepared by:

Karol Slattery – Radio Engineer, Three Ireland

Date: 15/09/2026



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Introduction

This section provides a brief technical justification for the proposed installation (radio base station) at Elm Park . The installation is required to provide voice and 2G/3G/4G/5G data service in Renmore. The installation forms part of an integrated telecommunications network system which has been meticulously planned out to provide best possible network performance within the limitations encountered in this suburban environment.

The current uptake of devices has put additional pressures on the network meaning existing base stations are undergoing significant upgrades in technology to meet this demand and so are critical in maintaining current and future service provision. Failure to progress this installation will have a negative impact on Three's network and its customers.

Network Planning and Performance

The site selection process at the network planning stages is central to creating an overall network that is efficient and meets customer expectation but also meets the regulatory systems within which the network is operating. Aside from the land-use planning and property procurement, addressed in other sections of the report, there are many external factors that affect network performance. Performance can be affected by various issues such as the technology of the devices used, the local environment the signals need to travel through, the fundamental physics behind wireless transmission and more. Some of these cannot be avoided and measures must be taken to try to minimise these negative effects. The following will briefly elaborate on some of these issues to understand the limitations on site choice for radio planners.

Physical Obstructions

Wireless signals can have trouble penetrating solid objects which can be any numbers of things such as hills, buildings and single walls. The more obstructions you have between the transmitter and receiver, the more chance there is that the signal strength will be affected so sites are chosen with as clear a line of site to the next base station as possible.

Network Range & Distance between Devices

The further apart the networked devices that are trying to communicate with each other are, the more the signal strength drops. This is due to the way that wireless signals propagate covering a wider area as they travel further and because of this, as the signal spreads more, the weaker it becomes.

Wireless Network Interference

Wireless Networking is becoming increasingly common and therefore more wireless transmissions are being sent through the air. Signals operating at similar frequencies can cause interference with each other and have a significantly negative effect on the performance of the network. This means that more widely used frequency bands can be severely affected by the overcrowding of wireless signals to a point where a device will not operate at an acceptable level.

Signal Sharing

Wireless Networks allow more than 1 device (Smart phone, Tablet etc.) to communicate with a base station at any one time. This sharing of connection means that the more customers accessing the network, the more devices the base station must try and communicate with instantaneously. The point of access must delegate its resources to each subscriber individually per the number of transmitting radios it operates on.

Network Usage- Bandwidth / Data Speeds

With the widespread take-up of Smart Phones and other 4G internet ready mobile devices a more common problem is network usage. The more people utilising the network bandwidth, the less bandwidth there is to share between them. As bandwidth requirements increase with for example when accessing video streaming and other bandwidth intensive applications, existing base station technologies need to be upgraded in or to maintain performance. The proposed 3G services provided on 900 MHz band and 4G services delivered on the 700 MHz band give a larger cell coverage area compared to older 3G on 2100 MHz band and provide better building penetration / indoor coverage. The 4G services provide data speeds far more than 3G services (up to 10 times faster) and can outperform fixed line broadband services in a lot of cases and especially in rural areas.

Local Environment Characteristics

Particular to indoor networks or coverage, wall construction properties can be one of the biggest inhibitors of wireless signals. Construction materials used in building and offices have different levels of effect; concrete is a usual suspect in badly performing indoor network coverage. Basically, the thicker the walls, the less success the signal will have penetrating through it whilst maintaining a high strength.

Coverage Requirements

The main driver for the new site at Renmore is to improve voice and data coverage for the residential and business users in Elm Park, Pinewood Grove, Fuschia Drive, Holly Grove, Blackthorn Park, Rowan Avenue, Chestnut Close, Roselyn Garden, Ballyloughane Rd, Larchfield Avenue and Tearmann Eala which currently experiences sub-optimal coverage with poor service in the area.

Existing options

Three Ireland obviously has a policy to keep costs down and build the minimum number of sites to provide acceptable to good service. Unfortunately, within the search ring area identified below there are no suitable telecom structure or buildings with adequate height to locate RF equipment to clear the surrounding clutter and provide coverage to the target area.

Existing Sites Analysed



1. Three decommissioned GA0007 at Liam Mellows GAA. It was not possible to upgrade this site with new equipment as the structure was a pole that was part of a ball stopper at the back of the pitch.
2. Defence Force Tower with Vodafone VOD_GY081 located at 35m on the structure, however this site is not available to Three.
3. Vodafone VOD_GY198 is located on a chimney of a commercial premises at approximate 7m. It is not possible to add addition equipment and with the height limited it would not provide coverage to the target area.
4. Three GA0264 and Vodafone VOD_GY166 located on the rooftop of the Flannery's Hotel. This site is 600m from the planned site and does not provide coverage to target area.
5. Eir GY_3759 are located on the flood light pole Galwegians Rugby Club. This site is 600m from the planned site and does not provide coverage to target area.
6. Three GA0335, Vodafone VOD_GY075 and Eir GY_3495 are all located on the rooftop of the Connacht Hotel located 640m from the planned site, but it does not provide coverage to the target area in Renmore.
7. Three GA0305 is located on the rooftop of the Huntsmann which is outside the search area at 1.2km from the planned new site.
8. Three GA0024 and Eir GY_1441 are located on the rooftop of the Galway Crystal Hotel, but this also outside the search area at 1.3km from the planned new site.

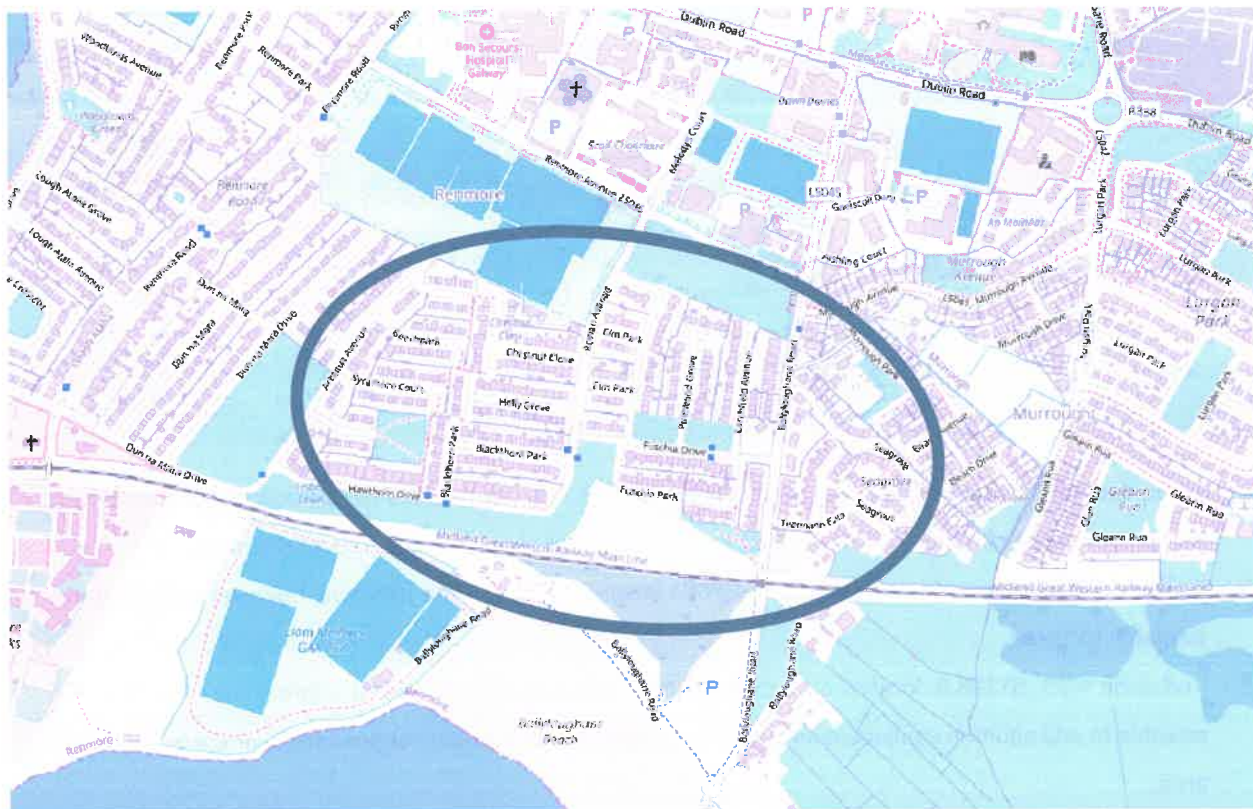
Service Coverage Plots / Predictions

Please note that the coverage maps provided illustrate optimal coverage with all other sites in the vicinity operating at maximum efficiency. Should one or more of these sites experience a technical fault, require maintenance or

upgrading works which would result in equipment power down, the adjacent sites act as a back-up system to maintain a consistent level of service in the area. This explains the importance of each base station in the overall network and ensures network resilience in network operations.

The coverage maps illustrate the service coverage from the proposed installation at Renmore.

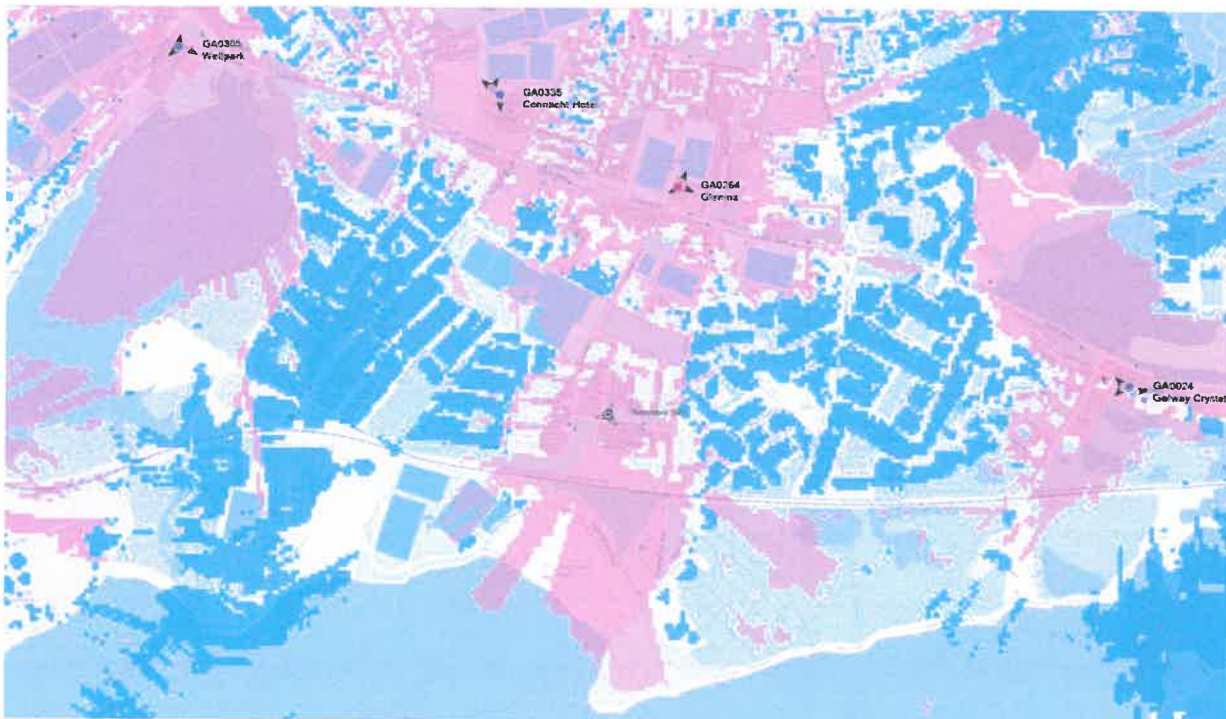
Search Ring



Existing 4G coverage in Renmore



Planned 4G coverage in Renmore with new site



Coverage legend



Technical Conclusion

The evidence provided within this document demonstrates the technical need for a new base station site at Elm Park to improve voice and data coverage in Renmore. The 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 coverage.