



An
Bord
Pleanála

Inspector's Report ABP306419-20

Development	Erection of a 18-metre high telecommunications structure with new entrance and access track.
Location	Bohan's Field, Antfield Townland, Aghamore Co. Leitrim.
Planning Authority	Leitrim County Council.
Planning Authority Reg. Ref.	19/117.
Applicant	Signal Infrastructure Limited.
Type of Application	Permission.
Planning Authority Decision	Grant.
Type of Appeal	Third Party -v- Grant.
Appellant	Ronan Mc Cormack.
Observers	The residents of Finnalougha & Antfield, Aghamore.
Date of Site Inspection	15 th March 2020.
Inspector	Paul Caprani.

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1.0 Introduction

ABP306419 relates to a third-party appeal against the decision of Leitrim County Council to issue notification to grant planning permission for the erection of a 18-metre high telecommunication structure and associated equipment on a to the east of the N4 south of Carrick-on-Shannon Co. Leitrim. It is argued that the proposed development could have adverse health implications as it is proximate to a local school, it is also argued that the mast will have a significant visual impact and that co-location policies have not been adequately assessed. An observation was also submitted supporting the grounds of appeal

2.0 Site Location and Description

- 2.1. That appeal site is located in a rural area near the small settlement of Aghamore near the N4 national primary route approximately 13 km south of Carrick on Shannon. The site is located in the townland of Antfield, and is accessed via a local road which runs to the east of and roughly parallel to the N4. The access road serving the site is characterized by large scale ribbon development.
- 2.2. The telecommunication mast is to be situated within a field approximately 180m to the west of the access road to the rear of a house and shed fronting onto the local road. The land which is to accommodate the mast is c. 80 A.O.D. A water reservoir tank is located on lands further to the rear of the proposed mast.

3.0 Proposed Development

Planning permission is sought for the construction of a 18-metre high lattice type tripod mast structure. At its base the mast has a width of 3 metres. This tapers to a width of approximately 2.1 metres at the apex. It is proposed to accommodate an array of antennae and dishes in the upper portion of the mast. The mast will be surrounded by 2.4-metre-high palisade fencing. A number of telecommunication broadband cabinets will be located within the compound surrounding the mast. The compound on which the mast is located is approximately 68 square metres in size (8.25 metres by 8.25 metres). The mast and various equipment cabinets are all

located on a concrete plinth. A c.180 long and 3 m wide access track will be provided from the public road to the east of the site

4.0 **Planning Authority's Decision**

4.1. **Decision**

- 4.1.1. Leitrim County Council issued notification to grant planning permission on 19th of December, 2019 subject to 6 standard conditions.

4.2. **Documentation Submitted with the Planning Application**

- 4.2.1. A covering letter submitted with the application states that the area in which the proposal is located has insufficient coverage. A planning report was also submitted detailing the:

- Applicant
- The end users of the mast
- The site and its surroundings
- The proposal
- Visual Impact

- 4.2.2. - Technical justification for the proposal; this includes coverage maps in the report indicating that there is a coverage blackspot in the area surrounding the site.

- Planning policy on telecommunications
- Designated Areas

- 4.3. Also submitted was letters from other operators expressing a willingness to co-locate on the proposed mast.

- 4.4. Finally, Radio Emissions Statement was also submitted.

4.5. **Planning Authority Assessment**

- 4.5.1. A report from the **Irish Aviation Authority** stated that it has no observations to make in relation to the application.

4.5.2. A **Letters of Objection** was submitted raising issues in relation to proximity to residential development, a national school and visual amenity.

4.6. **Further Information Request**

4.6.1. The **Planner's Report** notes the policies and provisions contained in the Leitrim County Development Plan as well as national guidance in relation to telecommunication masts. The assessment notes some deficiencies with regard to the information on file and requests additional information in relation to the following:

- A map detailing all buildings in the vicinity of the site.
- The applicant is requested to carry out further details of research relating to alternative greenfield sites which may be more suitable including existing floodlight support structures associated with GAA facilities in the vicinity.
- Screening for Appropriate Assessment.
- A map indicating available sightlines
- The applicant is requested to address 3Rd party submissions on file.

4.7. **Further Information Submission**

The applicant submitted further information 11th of November 2019.

- A map was submitted indicating the nearest residential dwellings and other developments in the vicinity of the proposed telecommunication mast. It is considered at the location the mast strikes a balance between facilitating the provision of such infrastructure and sustaining residential amenity and protecting the built and natural environment.
- The applicant has explored alternative greenfield sites. These sites are set out in the response. A total of 6 sites were investigated. Following a review of potential sites, it was determined the subject site was the best and most optimum location to provide a satisfactory level of service.
- A screening exercise for appropriate assessment was undertaken. It is noted that the subject site is not located within or contiguous to any Natura 2000 sites. A

separate Screening Report was submitted as part of the response; it concluded at the proposed development will not have a significant impact on qualifying interests and conservation objectives of Natura 2000 sites.

- Further details are provided in relation to sightlines at the proposed access to the site. A separate report has been submitted with the response and it indicates that the proposal fully accords with the sightline requirements of Leitrim Co Council.
- Finally, this submission addresses third party concerns in respect of the proposed development.

4.8. Further Assessment by Planning Authority

- 4.8.1. Further letters of objection were submitted, the contents of which have been read and noted.

A further assessment by Leitrim Co Council considered the information submitted. It assessed the application in the context of the additional information submitted and the various issues raised in the 3rd party submissions. The assessment specifically addressed concerns in respect of visual impact, health concerns, proximity to residential dwellings, devaluation of properties, traffic, ecology, heritage, co-location issues and planning policies. The Planning Report concluded that the benefits of the proposed development outweigh the limited visual impact arising, therefore the proposal would be in accordance with the proper planning on sustainable development of the area. Planning permission was therefore granted for the telecommunications mast.

5.0 Planning History

There appears to be no relevant planning history associated with the appeal site.

6.0 Grounds of Appeal

- 6.1. The decision of Leitrim County Council to issue notification to grant planning permission was the subject of a third-party appeal by Ronan Mc Cormack of Antfield Annaduff. The grounds of appeal are outlined below.

- Concerns are expressed regarding the long-term negative impact that a new powerful radio transmission equipment will have on the local public health within the community.
- The visual impact of the proposed structure will greatly adversely affect the visual amenities of the area. A less intrusive design which blends into the natural environment is required.
- The appellants demand that co-location should occur with existing telecommunication structures in the vicinity.
- If permitted, the proposed lattice structure could be easily upgraded from a 4G mobile telecommunications mast into a 5G telecommunications mast with unpredictable consequences on the residents of the area. Is there any current planning provision to prevent the applicant to install 5G radio transmission equipment?
- Deep concerns are expressed on the potential health impact of the children in the local community, particularly given the sites close proximity to a local National School. It is questioned whether less densely populated areas have been investigated for providing such infrastructure.

7.0 Appeal Responses

7.1. Applicant Response to the Grounds of Appeal

7.2. A response was submitted on behalf of the applicant Signal Infrastructure Limited. The first part of the response sets out details and background of Signal Infrastructure Limited, which is according to the information contained on file, Ireland's newest telecommunications infrastructure provider. A major aim is to ensure that telecommunications coverage in rural blackspots can be addressed in a cost-effective way. The applicant is also proposing to deliver and contribute to the roll out of national broadband.

7.3. Specifically, in relation to the issues raised in the grounds of appeal the following is stated.

- The type of equipment used is in compliance with the licensing terms and conditions and the applicant must meet strict requirements on the type and nature of technology used on the networks so as not to cause interference with other radio communication. There are no existing antennae support structures in this area to co-locate equipment, nor is there a suitable building on which such equipment can be located. Development will be in full compliance with the limits set down by the Guidelines of the International Commission on Non-Ionizing Radiation Protection.
- As part of the design process, a visual impact assessment was undertaken. 10 viewpoints were assessed within a radius of 700 meters. The visual impact was assessed in proximity to the National School and local church. It is considered that the proposed development would be well concealed from view where the structure will be only partially visible. The overall visual impact is considered to be minimal to moderate. It is noted that the visual impact was also addressed in the planner's report where it was concluded that the visual impact would be of local significance only. While the proposal will be visible from houses in the vicinity, the impact cannot be described as unacceptably overbearing or over-powering so as to have an adverse impact on living conditions. The benefits in terms of providing improved services outweigh any adverse visual impact.
- In terms of co-location the site is designed to support mobile and broadband communications and equipment for other mobile network operators. It is reiterated that there currently is an indoor deficit in coverage within the area. The proposed development will address this deficit. The response to the grounds of appeal sets out details of existing telecommunications sites which were investigated in the area. On review of potential sites, it was determined that the proposal represented the best possible solution
- In respect of upgrading of the mobile telecommunication mass to 5G, the response reiterates that planning authorities are urged to concern themselves with design and siting issues only and should defer any health and safety issues to the relevant authorities, in this instance ComReg.
- With regard to the potential impact the local National School, it is considered that the proposed installation will generally have a positive impact on the school by improving the coverage and capacity of mobile phone services in the area. It is

considered that adequate justification of the proposed installation has been provided in section 6 of the Planning Report submitted with the original application. Alternative locations were assessed, and these locations included Annaduff GAA club, Leitrim GAA Center of Excellence and alternative greenfield locations. On foot the assessment undertaken the subject site was determined to be the best possible solution to provide the satisfactory level of service.

7.4. Leitrim County Council's Response to the Grounds of Appeal

A response to the grounds of appeal was submitted on 14th of February 2020. It is summarised below:

- While the health concerns are noted the Planning Authority, as noted in national guidelines, should be primarily concerned with the appropriate location and design of telecommunications structures. It does not have the competence to deal with health and safety matters in respect of such infrastructure.
- Visual impact assessment was carried out by the applicant and it is noted that there will be limited visual interconnectivity between the proposed development and the local church and National School. It is reasonably concluded in the assessment that the proposed development will not produce a significant adverse visual impact on the local wider area. Photomontages have also been submitted depicting visual impact. On foot of a site inspection, the planning authority concurs with the conclusions set out in the visual impact assessment
- It is noted that the proposed structure is aimed at servicing a particular black spot experienced in the area as well as trying to improve broadband coverage. Maps submitted with the application illustrate this deficiency. The applicants have looked at alternative sites that could potentially accommodate the proposed development and goes no to detail reasons as to why these could not be pursued. It is considered that the applicant has provided satisfactory evidence this is the only and the most optimal location available to the applicant.
- The Planning Authority is satisfied that the proposed development is in accordance with national strategy and local policy in terms of supporting the provision of a modern telecommunications infrastructure throughout the County. The site is not located in an area which is deemed to be a sensitive landscape it is not

covered by any specific amenity designation. It is therefore commended that the Board uphold the decision to grant permission.

8.0 Observations

8.1. One observation was submitted by the residents of Finnalougha & Antfield.

- It expresses concerns in relation to the negative visual impact that would arise from the proposal. And this, it is argued, would result in a devaluation of homes and properties in the surrounding area.
- Concerns are expressed that the proposal will have a health impact on church and school goers in the vicinity from radiation.
- Health and noise implications are also concern. It is stated that many newspaper articles medical studies and research documents all indicate the concern that various health problems can surface for residents in close proximity to masts. Noise levels are also a concern.
- It is suggested stop the presence of a telecommunications mast in Drumsna is sufficient for coverage of the area. It is also suggested that the applicants have not adequately assessed alternative sites including farmlands under the ownership of the applicant which are further away from houses in the vicinity.
- While the national telecommunications strategy is acknowledged, there is also need to build such structures further away from people's houses.

9.0 Planning Policy

9.1. **Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities, Department of the Environment, July 1996.**

Section 4.2 of the Guidelines relate to design and siting. It notes that the location will be substantially influenced by radio engineering factors. In terms of the visual impact it is also stated that great care will have to be taken when dealing with fragile or sensitive landscapes and with other areas designated or scheduled under the planning acts or other legislation.

It is also stated that only as a last resort, and if alternatives suggested in the guidelines are either unavailable or unsuitable, should freestanding masts be located in residential areas or beside schools.

9.2. **Leitrim County Development Plan 2015-2021**

The Leitrim County Development Plan 2015-2021 applies.

The subject site is located on agricultural land and no land-use zoning objectives apply.

Section 4.11.8 sets out policies in relation to telecommunication infrastructure. The council recognizes the importance of advanced communications infrastructure for an information-based society as a key support for business education and research.

The council will support and facilitate the provision of advanced communication networks and services to the extent required to contribute to national regional and local competitiveness and attract inward investment. The council will also encourage the further coordinated and focused development and extension of communications infrastructure including broadband connectivity in the County, particularly in district towns as a means of improving economic competitiveness

Policy 132 states it is the policy of the council to ensure that all areas of the County have adequate mobile communication coverage and in particular service providers will be encouraged to provide services in areas identified as having low /no coverage.

Section 4.11.8.2 specifically relates to telecommunication antennae. The council recognise the importance of a high quality telecommunications service and will seek to achieve a balance between facilitating the provision of telecommunications services in the interests of social and economic progress and sustaining residential communities and environmental quality, while having to regard to the diverse views and concerns of various interested parties and acknowledging concerns of people with regard to public health.

Policy 134 states it is the policy of the council to support the provision of a modern telecommunications infrastructure throughout the County while seeking to ensure that such equipment is so sited, that will not adversely impact on the visual or residential amenities of any of the areas within the County or on the natural beauty or archaeological heritage of the County, or give rise to genuine public concern on

health grounds having regard to the standards of the National Radiation Protection Association and World Health Organization.

9.3. **DoE Circular Letter PL 07/12**

Section 2.3 of the circular notes that the 1996 Guidelines advise that planning authorities should indicate in the development plans any locations where, for various reasons, telecommunications installations would not be favored or special conditions would apply, and suggested that such locations might include lands whose high amenity value is already recognized in the development plan, protected structures or sites beside schools. While the policies above are reasonable, there has been a growing trend for the insertion of development plan policies and objectives specifying minimum distances between telecommunications structures from houses and schools e.g. up to 1 km. Such distance requirements without allowing for flexibility on a case by case basis, can make the identification of sites for new infrastructure very difficult. Planning authorities should therefore not include such separation distances as they can inadvertently have a major impact on the rollout of viable effective telecommunications network.

10.0 **EIAR Screening Determination**

The subject development does not fall within a class for which EIAR is required.

11.0 **Planning Assessment**

I have read the entire contents of the file, visited the site in question and I consider the critical issues in determining the current application and appeal before the Board are as follows:

- Principle of Development
- Visual Impact
- Health Impact
- Proximity to School and Church

- Alternative Sites

11.1. Principle of Development

- 11.1.1. The documentation submitted with the original application to Leitrim County Council clearly indicated that there is a coverage of blackspot in the local rural area surrounding the subject site. (See Section 6 of report submitted with the original application).
- 11.1.2. It is also apparent that there are numerous policy statements in the development plan which seek to improve the communication networks in the county and to encourage the provision of telecommunications and broadband equipment to achieve the best possible communication infrastructure. It is acknowledged that this will help facilitate industrial, economic and social growth within the county. It is therefore clear that subject to qualitative safeguards, the Council seeks to encourage and facilitate such structures. The principle of the development is therefore acceptable in this instance as the applicant has demonstrated that there is a need to provide such infrastructure in the general location and that the provision of such infrastructure is fully in accordance with development plan policies.

11.2. Visual Impact

- 11.2.1. Concerns are expressed in the grounds of appeal that the proposal will constitute an eyesore and is of inappropriate design. The proposed telecommunications mast is located on somewhat elevated land which is set back approximately 180 from the local access road. The proposed telecommunication mast is at the lower end of telecommunication masts generally in terms of height, at 18 metres. The site is not particularly well screened as it is located in an open field. However, views along the local access road towards the site are somewhat truncated by intervening buildings and some stands of mature trees. The fact that there is an existing water reservoir tank to the rear of the proposed mast indicates that there is a precedent for infrastructure / utilities in the area. Furthermore, having regard to the large scale and extensive ribbon along the road, it cannot be reasonably argued that the receiving landscape is in anyway pristine and the provision of a mast would result in a profound visual impact. This point is reflected in the fact lands in which the site is located does not attract any scenic amenity designation in the development plan.

- 11.2.2. The applicant has submitted, as part of the original application, photomontages which indicate that the mast in question would not have any significant adverse or material impact on the visual amenities of the surrounding area. Having inspected the subject site and its surroundings, I consider that the vantage points chosen may not represent the worst case scenario in terms of visual impact. And the mast may be more prominent than that suggested in the photomontages submitted. Nevertheless, I consider that overall, having inspected the subject site and its surroundings, the visual impact is acceptable. There can be no doubt that the mast will be visible from vantage points along the surrounding road network and from the grounds of the local primary school and church. However, having regard to the proliferation of dwellings in general and linear development along the surrounding roads, I do not consider that a telecommunication mast at this location would be unacceptable from a visual point of view.
- 11.2.3. Finally, I note that the proposed mast is set back 180m from the road and this in my view would reduce the visual impact from public vantage points. The separation distances between the mast and the dwellings in the vicinity is at least 150m. This in my view is a sufficient distance to ensure that the mast will not have an overbearing impact on residential dwellings in the vicinity. I therefore consider the proposed development would be acceptable in terms of visual amenity.

11.3. **Health Impact**

- 11.4. Concerns were expressed in both the grounds of appeal and the observations submitted that the proposed development could have long time health implications for those living in the vicinity of the proposed mast. The applicant in response to the grounds of appeal have advised that the proposed mast and telecommunications equipment is designed so as to be in full compliance with the limits set by the Guidelines of the International Commission of Non-Ionizing Radiation Protection. The applicants have also stated that the site will meet the radiation standards as set by ComReg. On this basis I have no reason to believe that the proposed mast would constitute a health issue for persons residing in the vicinity of the development. Finally, in relation to this matter, I would make reference to both the 1996 Guidelines and the DOE Circular from 2012. Both documents advise that planning authorities should not determine applications on health grounds and that in determining a planning application, planning authorities should be primarily concerned with the

appropriate location and design of the structures because the planning authorities do not have the competence for health and safety matters in respect of telecommunications infrastructure.

- 11.4.1. The Commission for Communications Regulations (ComReg) is the licensing authority for the use of radio frequency in Ireland. As the licence authority for radio communications in Ireland, ComReg is responsible for ensuring that communication operators comply with the licensed conditions relating to non-ionising radiation. Any potential health issues arising from the telecommunication mast is a matter for ComReg and not An Bord Pleanála. It is assumed that the telecommunication structure will be operated in accordance with ComReg Guidelines and therefore will not pose any health risk to anybody living or working in the vicinity of the subject site.

11.5. Proximity to Community Buildings

- 11.5.1. The application site is located in a rural area with a significant and generous distance between the proposed telecommunication mast and the National School and Church. The distance between the mast and the school building is in excess of 400m. Likewise the separation distance between the proposed mast and the Church building is c.450m. These are both generous separation distances in my opinion and will not represent a material threat in terms of health or noise. I would again reiterate that the Commission for Communications Regulations (ComReg) is the licensing authority for the use of radio frequency in Ireland. As the licence authority for radio communications in Ireland, ComReg is responsible for ensuring that communication operators comply with the licensed conditions relating to non-ionising radiation. Any potential health issues arising from the telecommunication mast is a matter for ComReg and not An Bord Pleanála. It is assumed that the telecommunication structure will be operated in accordance with ComReg Guidelines and therefore will not pose any health risk to anybody living or working in the vicinity of the subject site.

11.6. Alternative Sites

- 11.6.1. The grounds of appeal suggest that the applicant has not sufficiently investigated alternative sites which may be better suited for the development of a mast. The appeal states that less densely populated area would prove to be more suitable. A key consideration is the fact that the mast must be located in the area it is intended to serve. Maps have been submitted with the application which indicates that the

area in the vicinity of the proposed mast represents a black spot in terms of coverage. This in my view limits the general geographic area in which the mast can realistically be located. I have argued above, and invite the Board to agree, the location of the mast incorporates appropriate and generous separation distances so as to ensure that development will not impact residential amenity in terms of noise generation, health implications, or being overbearing in visual terms.

- 11.6.2. Furthermore, the applicant in the response to grounds of appeal provides details of alternative sites which have been investigated. The research undertaken by the applicant indicates that any potential co-location of equipment would not meet the coverage requirements of the target area generally due to the distance of the masts in question.
- 11.6.3. While I'm generally satisfied that the subject site is suitable to accommodate a mast, for reasons elaborated upon above, I do note that the existing water tower located approximately 120 meters further to the southwest of the proposed site was not investigated for the purposes of meeting the coverage requirements of the target area. I also noted during my site inspection that a number of antennae and dishes are located upon this structure. While I am generally satisfied that mast proposed under the current application is acceptable from a planning perspective, The Board may wish prior to determining the application, to seek further information as to whether or not the use of the water tower structure is suitable to meet the coverage requirements.

12.0 **Conclusions and Recommendation**

Arising from my assessment above, I consider the proposed development to be in accordance with the policies and provisions in the development plan which seek to encourage and facilitate the provision of telecommunication and broadband infrastructure within the County. Furthermore, I do not consider that the proposed development will be unacceptable from a visual amenity, health or more general amenity point of view. I do note that the applicant does not appear to have investigated the possibility of co-locating the telecommunication infrastructure upon the existing water tower structure to the south-west of the site. The Board may wish to investigate this further prior determining the application. However I am

nevertheless satisfied that the mast location as proposed is acceptable and I therefore consider the proposed development to be in accordance with the proper planning and sustainable development of the area.

13.0 Appropriate Assessment

The nearest Natura 2000 site is Clooneen Bog SAC which is located c.10.5 kilometres to the south of the subject site. Having regard to the nature and scale of the proposed development and the nature of the receiving environment together with the proximity to the nearest European site, no appropriate assessment issues arise and it is not considered that the proposed development would be likely to have a significant effect individually or in combination with other plans or projects on a European site.

14.0 Reasons and Considerations

Having regard to:

- (a) the National Strategy regarding the provision of mobile communication services,
- (b) the Guidelines relating to Telecommunication Antennae and Support Structures which were issued by the Department of the Environment and Local Government to Planning Authorities in July, 1996, as updated by the Circular Letter PL/07/12 issued by the Department of the Environment, Community and Local Government on the 19th day of October, 2012,
- (c) the nature and scale of proposed telecommunications support structure,
- (d) the site's location c.180 metres from the public road,

it is considered that subject to compliance with conditions below, the proposed development would not seriously injure the visual amenities or landscape character of the area or the residential amenities of the area and would therefore be in accordance with the proper planning and sustainable development of the area.

14.1. Conditions

1. The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, as amended by the plans and particulars submitted on the 11th day of November 2019 except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to the commencement of development and the development shall be carried out and completed in accordance with the agreed particulars.

Reason: In the interest of clarity.

2. Prior to the commencement of development, details of the proposed colour scheme for the telecommunications structure, ancillary structures and fencing shall be submitted to and agreed in writing with the planning authority.

Reason: In the interest of visual amenity.

3. Surface water drainage arrangements for the proposed development shall comply with the requirements of the planning authority.

Reason: In the interest of public health.

4. Details of the proposed landscaping scheme shall be submitted to and agreed in writing with the planning authority prior to the commencement of development.

Reason: In the interest of visual amenity.

5. The transmitter power output antennae type and mounting configuration shall be in accordance with details submitted with the application and notwithstanding the provision of the Planning and Development Regulations 2001, any statutory provisions amending or replacing them shall not be altered without a prior grant of planning permission.

Reason: To clarify the nature and extent of the permitted development and to facilitate a full assessment of any future alterations.

The site shall be reinstated upon the removal of the telecommunication structure and ancillary structures. Details of the reinstatement shall be submitted to, and agreed in writing with, the planning authority prior to the commencement of development.

Reason: In the interest of orderly development.

Any change in the ownership of the site or the operator of the structure shall be communicated with the planning authority.

Reason: In the interest of clarity.

Where technically possible and subject to normal commercial arrangements the applicant/operators shall facilitate the co-location of antennae for other licenced telecom service providers.

Reason: In the interest of visual amenity.

Paul Caprani,

Senior Planning Inspector.

14th March 2020.