



An
Bord
Pleanála

Inspector's Report

ABP-308546-20

Development	Removal of 13 metres telecommunications structure and replaced with a 24m multi-user support structure.
Location	Lands adjacent to Windmill House, Garristown Townland, Garristown, Co. Dublin
Planning Authority	Fingal County Council
Planning Authority Reg. Ref.	F20A/0397
Applicant(s)	AP Wireless Ireland Investments Ltd.
Type of Application	Planning Permission.
Planning Authority Decision	Refuse Permission.
Type of Appeal	First Party
Appellant(s)	AP Wireless Ireland Investments Ltd.
Observer(s)	Signal Infrastructure Limited.
Date of Site Inspection	11 th January 2021.

Inspector

Elaine Sullivan

1.0 Site Location and Description

- 1.1. The subject site is located on agricultural lands in north County Dublin, approximately 1km to the south-east of Garristown Village. It is accessed directly from local road L5040 and is positioned on an exposed ridge with the lower-lying land to the south. The surrounding land is agricultural and open in character with no prominent features or trees. The approach road from the west is bounded by large coniferous trees that shield direct views but the approach road from the east is more open with lower hedgerows along the road.
- 1.2. The appeal site has a footprint of 100sqm and is part of a larger site of 0.25ha, which is within the same ownership. This site comprises a large agricultural building of c.527sqm approximately 19m to the north-east of the appeal site and Windmill House, which is a detached two-storey dwelling approximately 60m to the east of the site. The site known as Quinn's Farm is located c. 80m to the east of the site and contains a dwelling to the front and a number of outbuildings to the rear. Planning permission was recently granted on this site for a 21m monopole telecommunications structure, (Ref. ABP-307642/20).
- 1.3. There is currently a 13m monopole in place on the site with 3 antennas and one dish fixed to the top. Additional telecommunications equipment are fixed to the front and rear of the agricultural building. A pole extending to a height of 10m is fixed to the southern elevation of the building and, on the northern elevation, there are 3 wall-mounted, 2m long panel antennas and 1 300mm RT dish. All of this equipment would be removed under the subject proposal.

2.0 Proposed Development

- 2.1. The planning application submitted to the Planning Authority was for the removal of a 13m, free-standing monopole telecommunications support structure complete with 3 no. 1.8m antennas and 1 no. 0.6m dish and, its replacement with a 24m multi-user, triangular, lattice- structure together with associated exchange cabinets.
- 2.2. The structure would have a galvanized finish and all ground based equipment would be coloured in dark green fir finish, (RAL 6009).

- 2.3. The new structure would be positioned approximately 6m to the south of the existing pole. It would be enclosed with a 2.4m high palisade fence on 4 sides and would have the capacity to carry telecommunications equipment for 3 separate operators.
- 2.4. Under the subject proposal all communications equipment fixed to the agricultural building would be removed. These structures were originally installed under exempt development regulations.
- 2.5. As part of the appeal the applicant has put forward a range of different options which are examined in detail in Section 6.

3.0 Planning Authority Decision

3.1. Decision

Planning permission was refused by the Planning Authority for the development for the following reasons;

1. The site is designated in the Fingal Development Plan 2017 – 2023 as a ‘Highly Sensitive Landscape’. In respect of these areas, Objective NH35 seeks to resist development such as masts which would interfere with the character of highly sensitive areas and Objective NH36 seeks to ensure that new development does not impinge in any significant way on the character, integrity and distinctiveness of highly sensitive areas through the introduction of incongruous landscape elements. In addition Objective DMS144 seeks to encourage the location of telecommunications based services at appropriate locations avoiding the location of structures in highly sensitive landscapes. The proposed structure, given its scale, height and design would be visually prominent, would adversely affect the visual amenities of the area and would contravene materially Objectives NH35, NH36, DMS144, IT07 and IT08 of the Fingal Development Plan 2017–2023 and would be contrary to the proper planning and sustainable development of the area.
2. The proposed development by reason of scale, height, design and proximate location relative to existing dwellings would have a significant negative impact on existing dwellings in the area, would adversely impact on their residential amenity and would subsequently lead to a devaluation of these properties. As

such, the proposed development would be contrary to the proper planning and sustainable development of the area.

3.2. Planning Authority Reports

3.2.1. Planning Reports

The report of the Planning Officer, (October 2020), informed the decision of the Planning Authority and includes the following;

- The subject site is located within an area a rural area that is designated as a 'Highly Sensitive Landscape'.
- There are preserved views along the local road, R130, which is on the lower ground to the south-west of the site and along the local road to the north west of the site.
- The need for additional telecommunications infrastructure in this area is acknowledged.
- There are also Eir antennas attached to the northern façade of the agricultural building and to the rear of the building is a 10m high pole that was used by Digiweb for broadband but is now used by the landlord for CCTV. The applicant states that the antenna and pole are exempt under the Planning and Development Regulations 2001, and specifically under Class 31, (K), (iii) and Class 31, (b).
- As these structures have not been subject to assessment under the planning process, and have not been party to public consultation, the existing structures do not form a precedent on the site for similar or higher structures.
- The subject site is located approximately 110m west of a Recorded Monument, DU003-006, which is identified as a 'Mound' by the Department of Arts, Heritage and the Gaeltacht, (DAHG). The Department's website mapping states that the Mound is built over. Given the distance from the mound, it is not anticipated that the proposed structure would impact on the recorded monument.

- Whilst some visual screening will be provided by the existing evergreen trees and the agricultural shed on the site, there will be prominent views of the structure from the local road, L5040, (as shown in the Photomontage, Viewpoints 1 & 2).
- The proposed structure will be highly visible when viewed from R130 to the south of the site and from longer range views from the south. These views, (as per Viewpoint 4 in the Photomontage), show the position of the structure on a prominent ridge line within an area of high scenic value. The structure will be clearly visible from the vantage points to the south-west and north-west, where there are protected views along these roads. It would also be clearly visible from vantage points in the immediate vicinity and particularly from residential properties in the immediate vicinity of the site.
- It is considered that, the proposed development, by virtue of its location on a visually prominent ridgeline would be seriously detrimental to the landscape character of the area and would be contrary to Objectives NH35, NH36, NH38 and DMS144 of the Fingal Development Plan.
- The proposed structure by reason of its scale, height, design and siting on a visually prominent ridgeline within a designated sensitive landscape would form an intrusive and discordant feature and would interfere with designated views. It would be seriously injurious to the landscape character and visual amenities of the area of which it is an objective of the Development Plan to protect.
- The proposed lattice design is a visually dominant type of structure in general but particularly so in a highly sensitive landscape. Newer and more slimline types of monopole designs exist, yet the applicant has not justified why these alternative solutions were not investigated in consideration of the sensitive landscape setting.
- The proposed lattice design with its exterior ancillary equipment constitutes a visually incongruous element in this sensitive landscape setting and would be contrary to Development Plan objectives IT07, IT08 and NH37, which requires a best practice and high quality design approach towards the development of mast, tower and antennae telecommunications infrastructure.

- It is considered that the proposed development by reason of its scale, height and design and proximate location relative to existing dwellings would have a significant and negative impact on residential dwellings in proximity and would adversely impact on their residential amenity and subsequent devaluation of these properties.
- No additional parking will be required for the proposed use. Access would be for maintenance purposes only and would be via an existing access.
- The Planning Authority welcome and encourage engagement with service providers prior to the submission of planning applications in order to identify the optimum location and design solution. Objective IT06 of the Development Plan specifically refers to this. The applicant did not engage in pre-planning for the application.
- If permitted, the proposed development would lead to a proliferation of telecommunications structures on visually prominent ridgelines within designated, sensitive landscapes within the County.

3.2.2. Other Technical Reports

- Transportation Department – No objection.
- Water Services Department – No objection.
- Environmental Health, Air & Noise Unit – No objection. Planning conditions recommended.

3.3. Prescribed Bodies

- Dublin Airport Authority – No objection.
- Irish Aviation Authority – No objection.
- Irish Water – No objection.

3.4. Third Party Observations

Three observations were received.

A submission from a local resident expressed concerns that the huge mast on a rural road will spoil the landscape and devalue their home.

Garristown Community Council submitted an observation that included the following comments;

- The proposed structure, given its scale, height and design would be visually intrusive, would adversely affect the visual amenities and character of the area and would contravene materially Objectives NH35, NH36 and DMS 144 of the Development Plan.
- The site is within a cluster of houses. The 24m structure would diminish the enjoyment and amenity of these properties. There is also a concern regarding electromagnetic field radiation and public health.
- The site is adjacent to a mound – Recorded Monument Number 156 (DU 004-018). The proposal would materially contravene Objective CH25 of the Development Plan which seeks to ensure that proposals for large scale infrastructure projects consider the impacts on the architectural heritage and seek to avoid them.
- It should not be necessary to install such a high structure to improve coverage in the area. The application is speculative and further antennae could be attached without permission.
- It would appear that no significant effort was made to identify an alternative more appropriate site. The possibility of installing a less intrusive monopole structure was also not explored.

Signal Infrastructure Ltd. submitted an observation to notify the Planning Authority that it had lodged an appeal against the decision to refuse planning permission for a 24m telecommunications mast on the adjoining site in the Garristown area, (ABP Ref. 307642/20; PA Ref F20A/0188), and that a decision is due in November 2020. Signed letters of support from eir, Vodafone and Imagine were submitted with the appeal which indicates their interest in co-locating onto this new tower if granted.

4.0 Planning History

Subject site – Within the Blue Line Boundary

F06A/1667 – Planning permission granted by the Planning Authority in January 2007 for a dormer bungalow with associated waste-water treatment and well.

F06A/1667E1 – Extension of duration of permission to the 1st March 2017 was granted by the Planning Authority in August 2011.

Other Planning History in proximity to the site:

ABP307642/20, (PA Ref. F20A/0118) – Planning permission granted by An Bord Pleanála on the 20th of October 2020 on foot of a 1st party appeal for the construction of a 21 metre high monopole telecommunications structure carrying antenna and dishes and enclosed within a 2.4m high palisade fence compound. This site is located directly to the east of the subject site.

This development was amended at appeal stage from a 24m lattice structure to a 21m monopole. The applicant was Cignal Infrastructure Limited and the end user is stated as Eir.

F18A/0588 – Planning permission refused by the Planning Authority on the 4th October 2019 for the construction of a 24m high monopole with telecommunications equipment attached along with ancillary ground based equipment, cabinets and fencing. The proposed development was to be located at Garristown village, on lands bounded by the Mall to the west, Garristown Community Centre to the south-west, agricultural lands to the east and by an industrial building to the north. The applicant was Three Ireland (Hutchinson) Ltd. and they would also be the operator/end user.

The reasons for refusal are as follows;

1. The site is designated in the Fingal Development Plan 2017 – 2023 as a ‘Highly Sensitive Landscape’. In respect of these areas, Objective NH35 seeks to resist development such as masts which would interfere with the character of highly sensitive areas and Objective NH36 seeks to ensure that new development does not impinge in any significant way on the character, integrity and distinctiveness of highly sensitive areas through the introduction of incongruous landscape elements. In addition Objective DMS144 seeks to encourage the location of telecommunications based services at appropriate locations avoiding the location of structures in highly sensitive landscapes.

The proposed structure, given its scale, height and design would be visually prominent, would adversely affect the visual amenities of the area and would contravene materially Objective NH35, Objective NH36 and Objective DMS144 of the Fingal Development Plan 2017–2023 and would be contrary to the proper planning and sustainable development of the area.

2. The subject site is located adjacent to Garristown Architectural Conservation Area (ACA) and to 2 no. Protected Structures (i.e. RPS Ref 122 ‘Church of the Assumption’ and RPS Ref. 123 ‘Garristown Library’). Objective CH25 of the Fingal Development Plan 2017–2023 seeks to ensure that proposals for large scale developments and infrastructure projects consider the impacts on the architectural heritage and seek to avoid them and that such projects should be sited at a distance from Protected Structures. Having regard to the sitting, height and design of the proposed structure, the proposed development would contravene materially Objective CH25 of the Fingal Development Plan 2017–2023, would adversely affect an architectural conservation area, visually detract from the setting of the neighbouring Protected Structures and would be contrary to the proper planning and sustainable development of the area.

5.0 Policy Context

5.1. Fingal Development Plan 2017 – 2023

- 5.2. The following sections of the Development Plan are relevant to the proposed development;

Zoning: The site is zoned RU, the objective of which is to ‘Protect and promote in a balanced way, the development of agriculture and rural-related enterprise, biodiversity, the rural landscape and the built and cultural heritage.

There are Preserved Views from the R130, which lies to the south-west of the site.

There is a Recorded Monument; DU003-006 – Mound, approximately 90m to the east of the subject site.

7.4 – Information and Communication Technology;

Objective IT07 – Require best practice in siting and design in relation to the erection of communication antennae.

Objective IT08 - Secure a high quality of design of masts, towers and antennae and other such infrastructure in the interests of visual amenity and the protection of sensitive landscapes, subject to radio and engineering parameters.

9.4 – Landscape Character;

The site is located in the ‘High Lying Character Type’ landscape character area, which is identified as a ‘highly sensitive landscape’, (Sheet 14 Green Infrastructure).

The development plan states: ‘The High Lying Character Type is categorised as having a high value. The elevated area is very scenic, with panoramic views and strong hedgerows... There is little obtrusive or inappropriate development in the area and there is a pronounced absence of any substantial coniferous woodland. The area’s importance is highlighted by the High Amenity zoning covering substantial parts of the area’.

Principles for Development;

- Skylines, horizon and ridgelines should be protected from development.
- Sites with natural boundaries should be chosen, rather than elevated or open parts of fields. The form of new developments should be kept simple and they should be sited within existing shelter planting or within the contours of the land to minimise visual impact.
- Clustering with existing farmhouse and/or farm buildings is generally preferable to standalone locations.

Objective NH35 - Resist development such as houses, forestry, masts, extractive operations, landfills, caravan parks and large agricultural/horticulture units which would interfere with the character of highly sensitive areas or with a view or prospect of special amenity value, which it is necessary to preserve.

Objective NH36 - Ensure that new development does not impinge in any significant way on the character, integrity and distinctiveness of highly sensitive areas and does not detract from the scenic value of the area.

Objective NH37 - Ensure that new development meets high standards of siting and design.

Objective NH38 - Protect skylines and ridgelines from development.

NH40 - Protect views and prospects that contribute to the character of the landscape, particularly those identified in the Development Plan, from inappropriate development.

Section 12.10 ‘Telecommunications Antennae and Support Structures’ is also relevant, containing a number of objectives to control the development of such infrastructure:

Objective DMS143: ‘Require the co-location of antennae on existing support structures and where this is not feasible require documentary evidence as to the non-availability of this option in proposals for new structures.’

Objective DMS144: ‘Encourage the location of telecommunications based services at appropriate locations within the County, subject to environmental considerations and avoid the location of structures in fragile landscapes, in nature conservation areas, in highly sensitive landscapes and where views are to be preserved.’

Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities (1996)

4.3 – Visual Impact - The guidelines note that visual impact is one of the more important considerations which have to be taken into account and also that some masts will remain quite noticeable in spite of the best precautions.

It may be considered that the impacts are not seriously detrimental if when viewed from main roads or walking routes that masts are visible but are not terminating views. Similarly, the mast may not intrude overly if the view of the mast is intermittent or incidental. Local factors such as topography, scale of the object in the wider landscape and its positioning with respect to the skyline, shall be taken into consideration.

It is acknowledged that upland and mountainous areas will be favoured by operators as offering the best location for coverage. Masts on hilltops will by definition remain visible.

4.5 – Sharing Facilities and Clustering – Applicants will be encouraged to share facilities and to allow clustering of services and will have to satisfy the Planning Authority that they have made a reasonable effort to share.

DoECLG Circular Letter PL07/12

This Circular was issued to Planning Authorities in 2012 and updated some of the sections of the above Guidelines including ceasing the practice of limiting the life of the permission by attaching a planning condition.

5.3. Natural Heritage Designations

5.4. The subject site is not located within or adjacent to any designated European Site.

5.5. EIA Screening

Having regard to the limited nature and scale of the proposed development it is considered that there is no real likelihood of significant effects on the environment arising from the proposed development. The need for environmental impact assessment can, therefore, be excluded at preliminary examination and a screening determination is not required.

6.0 The Appeal

6.1. Grounds of Appeal

The main grounds of appeal can be summarised as follows;

- The appellant has put forward some alternative designs for the structure for the Bord's consideration and include;
 - The proposed galvanized 24m lattice structure or a,
 - 24m lattice structure in green finish,
 - 24m monopole in galvanized finish,
 - 24m monopole in green finish,
 - 21m galvanized lattice structure,

- 21m galvanized monopole, (no visualisations included).
- The appellant states that in the best interest of landscape and visual impacts that the optimum design for the proposal would be the 21m galvanized monopole as it would be seen in harmony with the permitted pole, (ABP 307642/20), on the neighbouring site at Quinns Farm and would therefore not be viewed in isolation as an incongruous structure. However, if the structure is reduced in height to 21m, it will restrict the development to carrying 2 users rather than 3 as each user requires a 3m 'slot' at the top of the mast, (i.e. to top of antennas at 18m, 21m and 24m).
- The existing structures on site are not capable of meeting the needs of the telecommunications providers to provide high speed data and internet services. In effect, the proposal is for a 7m extension to the 17m structure on the site; or 4m should the 21m option be preferred.
- It will reduce the number of structures in place on the site and as such would reduce the visual impact and avoid unnecessary proliferation.
- The proposal will greatly improve the wireless broadband indoor data coverage for Garristown and the surrounding rural area. The proposed height of 24m is the absolute minimum available to house three separate operators, (or 2 on a 21m mast), that will allow the criteria to be met without the obstruction of trees and/or buildings.
- Vodafone own the equipment on the existing mast and have submitted a letter, (dated 24th September 2020), expressing their support of the application to replace the structure and that the existing location is the preferred option for their telecommunications equipment in the area. They have also advised the applicant that 'the extra height notably improves Vodafone's coverage in the northwards direction. It is also hoped that it will help improve coverage in Garristown village 1km away that is largely restricted by terrain'.
- All mobile operators have an obligation to provide 100% coverage throughout the country. The Garristown area is an existing blackspot where coverage needs to be improved. Unlike the older 2G technology, which had a range of

up to 10km, the newer 4G, and to some extent 3G, can only be a few hundred metres away from the demand. Therefore, in order to meet demand, the new telecommunications installation is required in close proximity to Garristown village.

- Although permission was granted by the Board for a 21m monopole on the adjoining site, (ABP 307642/20), it will most likely not be able to accommodate more than 2 users, (at 18m and 21m), due to line-of-sight blockages of radio signals due to local building and vegetation. Therefore, the subject proposal is still required for Vodafone's antennas, and, at 21m will be able to support a second user, or at 24m will be able to support three users.
- Recent refusals in the area represent a blanket ban on telecommunications structures by the Planning Authority in a time when demand has increased as people are being asked to work from home.
- Visual impacts of the proposed structure(s) are assessed in the accompanying Photomontages, (Enclosure 5), which examine the impact from 4 viewpoints. The images show that the change in the landscape from the proposed development would be relatively moderate to minor, which is not significant.
- The Landscape Assessment submitted with the appeal concluded that, 'The proposal is anticipated to have some Moderate landscape impacts locally such as in the immediate area and on the local road network, however with distance, the impacts diminish with a resulting Minor impact. Given the small scale nature of this proposal at 24m (or 21m) high and occupying no more than 100 square metres, it is considered that this proposal will Not result in any Significant landscape impacts on the qualities of this locally designated landscape taken as a whole'.
- The subject site is a better location than the adjoining site where a 21m monopole has been permitted, (ABP 307642/20), as it has some screening from significant mature coniferous trees along the road and it is set further back from the 141m contour. It is also screened by a large agricultural building and will provide some planning gain by removing 3 structures and replacing them with 1.

- The proposal is in accordance with Objectives IT01 – IT08 as set out in Section 7.4 – Information and Communication Technologies, of the Fingal Development Plan. It is also in accordance with the 1996 Government Guidelines with regard to the site location and co-location of providers.
- The Planner’s Report states that no pre-application consultations took place. The applicant has provided a copy of a letter submitted to the Planning Authority on the 16th of June 2020 requesting a pre-application consultation.
- Alternative designs have been proposed that reduce the visual impact of the proposal and are similar in nature to that permitted on the adjoining site. This strategy conforms with the 1996 Guidelines for Planning Authorities which states that ‘where it is not possible to share a support structure the applicant would, where possible, be encouraged to share a site or to site adjacently so that masts and antennae may be clustered’.
- In terms of impact on residential amenity, land-use planning does not afford a right to a view beyond one’s own property boundary. In relation to the proposal, it is not considered that the mast would result in an intolerable, dominating impact or an overbearing effect on the residential dwelling to the east. As such there would be no significant diminution on the existing residential amenity of this property.

6.2. Planning Authority Response

A response was received from the Planning Authority on the 2nd December 2020 and includes the following;

- Fingal County Council recognises the essential need for high quality communications and information technology whilst having regard to the impact of the proposals on the environment.
- The current Fingal Development Plan 2017-2023 includes robust landscape protection policies, particularly as set out in Chapter 9 – Natural Landscape that are explicit in the protection of highly sensitive landscape settings with a high value.

- The Planning Authority welcomes engagement with service providers prior to the submission of planning applications to identify the optimum location and design. The applicant did not engage in pre-planning for the application.
- The proposed development would form a visually obtrusive and discordant feature at this location and would be seriously injurious to the landscape character and visual amenities of the area.
- Planning permission was recently granted by An Bord Pleanála, (Ref. ABP 307642/20), for a 21m monopole structure approximately 110m to the east of the subject application. If permitted, the proposed development would lead to a proliferation of telecommunications infrastructure on visually prominent ridgelines within designated sensitive landscapes.
- By virtue of its scale, height, design and proximate location relative to existing dwellings, the proposal would adversely impact on the residential amenity of existing dwellings and would subsequently lead to a devaluation of these properties.
- It is therefore recommended that the decision of the Council be upheld.

6.3. Observations

An observation was received from Cignal Infrastructure Limited who are the applicants for a similar development on the adjoining site at Quinns Farm, which is approximately 110m to the south-west of the subject site. Cignal Infrastructure Limited had lodged their own appeal (Ref. ABP 307642/20) against a decision by Fingal County Council, (PA Ref. F20A/0118). A decision to grant permission for a 21m monopole structure at Quinns Farm was issued on the 20th October 2020.

The observation states that the permitted development is designed to support broadband communications for two mobile network operators and one wireless broadband provider. Letters of support from Eir, Vodafone and Imagine were submitted with the appeal which indicates their interest in co-locating onto the structure when built. The installation will provide a secure, purpose built, co-located telecommunications installation that is in accordance with the policy on

sharing telecommunications structures as per the 1996 Guidelines for Planning Authorities.

7.0 Assessment

7.1. Having inspected the site and considered the contents of the appeal in detail, the main planning issues in the assessment of the appeal are as follows:

- Principle of development
- Justification of development
- Visual impact
- Impact on Residential Amenity
- Appropriate Assessment.

7.2. Principle of Development

Under the 'RU' zoning for the site, telecommunications structures are not specifically listed under development that is 'Permitted in Principle' or 'Not Permitted'. However, I note that Utility Installations are permitted in principle. The nature of the installations is not defined within the Development Plan. Therefore, the proposed development will be assessed on its merits.

7.3. Justification for Development

The existing structure currently carries telecommunication equipment for Vodafone, who are also identified as the end user of the subject proposal. The development is justified on the basis that Vodafone's current coverage in the area is not satisfactory to provide wireless broadband services and the existing pole is not suitable for an upgrade as it is structurally unstable. The appeal states that the provision of a 24m structure would help to 'future-proof' the service in the area for years to come.

Whilst specific details of the site selection process were not included in the application, it was stated that the applicant undertook a sequential approach as per County Development Plan and 1996 Government Guidelines. Geographical

requirements included a location at a relatively high point in close proximity to the cell search area of Garristown village and the ComReg Site Finder mast register was also used to search for existing sites in the area.

During the assessment of alternative sites, it was decided that in accordance with the 1996 Government Guidelines, the most environmentally favourable solution was to develop the existing Vodafone structure. In doing so it would be possible to decommission the existing Vodafone tower and the existing Eir mobile antennas attached to the agricultural building and to provide one single structure rather than three individual structures.

Having reviewed the information available regarding the existing coverage in the Garristown area and in particular for 4G coverage, it is clear that there is a deficiency in the service. Given the presence of an existing structure on the site, it is a reasonable approach to explore the possibility of upgrading existing infrastructure.

7.4. Visual Impact

As part of the appeal, a number of different design options have been put forward for consideration. These include the original proposal for a 24m galvanized, lattice structure as well as the following options;

Option 1 – 24m lattice structure in green colour finish

Option 2 – 21m lattice structure in galvanized colour finish,

Option 3 – 24m monopole structure in galvanized colour finish and,

Option 4 – 24m monopole structure in green colour finish.

Option 5 – 21m monopole structure in galvanized finish.

Photomontages have been submitted for the first four options with images shown from the same 4 viewpoints; 3 points along the local road, (L5040), to the north-east and north-west of the site and, one from the Fieldstown Road, (R130), to the south-west. 3D representations of Option 5, the 21m monopole structure have not been included.

Having visited the site and reviewed all on the development options, I am of the opinion that the lattice structures are wholly unsuitable for the site and would result in

a dominant and visually obtrusive form of development on the exposed ridge, which would result in a significant and negative visual impact on the surrounding area.

There are a number of telegraph poles in place along the roadway to the north of the site and also traversing the fields to the east. Within this context, and when viewed from afar, a monopole structure would be a more appropriate design response rather than a lattice structure. Although this would be less visually intrusive than a lattice design, it would be prominent and clearly visible within the context of the wider rural landscape, which is open in character.

In my opinion the most significant visual impact would be from the south and south-west of the site. When approaching the site from the west, some screening is provided by the large conifer trees to the north of the site, and, when approaching from the east, the views would be intermittent as the structure would be partially shielded by agricultural buildings and dwellings. This view is demonstrated as View 2 in the Photomontage images.

Views from the R130 to the north-east would be obstructed by the roadside hedges, but where gaps appear along the road, there are unobstructed views to the site. The view from the R130 is included in the Photomontage as 'View 4'.

Having reviewed the area, it is my opinion that, the most prominent and unobstructed views would be from the L1030, (Ashbourne Road), which is further removed from the site but is at a higher level than the R130. As such, it provides clear vistas across the landscape and to the subject site to the west. This location has not been included in the Photomontage images.

Although the site would be visible from some points on the R130 and from the L1030, the large conifer trees along the northern boundary of the site and the agricultural building to the east, mitigates somewhat against the visual impact of the lower section of the structure. In my view, if a galvanized finish was to be applied to the monopole structure it would also help to reduce the visual impact of the structure given the prevailing colour of the sky and the horizon. However, I would recommend that the lower, 21m structure be the preferred option to further reduce the visual impact.

There is a consideration regarding the cumulative impact of the subject proposal and the recently permitted 21m monopole on the adjoining site at Quinns Farm, (ABP

307642/20). Both structures would be clearly visible from the areas to the south and south-west of the site. However, given the context of the subject site, when the proposed development is viewed in combination with the permitted development, it is my opinion that the collective impact would not seriously injure the landscape character and visual amenity of the area.

Whilst the structure would be visually prominent, it is positioned against a backdrop of large trees, within an agricultural setting and does not interfere with the uninterrupted vistas of the rolling landscape from the R130, which are preserved views. The revised monopole design and the reduction in height is a more appropriate response to the setting of the site within a sensitive landscape and would not detract from the scenic value of the area. Therefore, the proposal does not materially contravene Objectives DMS144, NH35, NH36, IT07 and IT08.

Should the Bord be minded to grant permission for the development, I would recommend that Option 5, a 21m monopole with a galvanized finish, be considered as the preferred option. I note that the reduced height would also limit the potential for the number of operators to co-locate on the structure. However, on balance, I consider this to be reasonable give the proximity of a second 21m telecommunications structure on the adjoining site, which also has the potential to offer co-location. The removal of the additional infrastructure on the agricultural building would be a welcome planning gain.

7.5. Impact on Residential Amenity.

The two closest dwellings, Windmill House and Quinns Farm, have an economic interest in the provision of telecommunications structures on their lands. Planning permission has been granted for a 21m monopole at Quinns Farm and the subject site is within the same ownership as Windmill House to the west. Apart from these properties, the house in closest proximity to the site is approximately 106m directly to the north-east of the site. The upper level of the structure will be visible from the front of the house but will be partially obscured by the agricultural building and the large conifer trees.

Other houses along the L5040 and the R130 are at some remove from the site and, whilst the structure would be visible from the rear of their dwellings, it would be not

be at such close proximity to directly result in any diminution of existing residential amenity.

I note the concerns raised in third party observations to the Planning Authority in respect of the devaluation of neighbouring property. However, having regard to the assessment and conclusion set out above, I am satisfied that the proposed development would not seriously injure the amenities of the area to such an extent that would adversely affect the value of property in the vicinity.

7.6. Appropriate Assessment

Having regard to the nature and scale of the proposed development, which is outside of any Natura 2000 site, I do not consider that any Appropriate Assessment issues arise and I do not consider 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

8.0 Recommendation

8.1. I recommend that planning permission be granted for a 21m high monopole structure with a galvanized finish.

9.0 Reasons and Considerations

9.1. Having regard to the nature and scale of the proposed development for a 21m monopole telecommunications structure with a galvanized finish, it is considered that subject to the conditions set out below, the proposed development would be in accordance with the Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities 1996 and with the policies and objectives of the Fingal County Development Plan 2017-2023, and the RU zoning for the site, and would not seriously injure the visual or residential amenities of the area or the amenities of property in the vicinity of the site. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

10.0 Conditions

1.	<p>The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, and as amended by the further plans and particulars submitted by the applicant on the 29th day of October 2020, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the development shall be carried out and completed in accordance with the agreed particulars.</p> <p>Reason: In the interest of clarity.</p>
2.	<p>The development as permitted shall comprise a 21m monopole structure with a galvanized finish with associated cabinets. All ground based equipment and infrastructure shall be coloured in dark green fir finish, (RAL 6009).</p> <p>Reason: In the interest of clarity.</p>
3.	<p>Details of the proposed colour scheme for the telecommunications structure, ancillary structures [and fencing] shall be submitted to and agreed in writing with the planning authority prior to commencement of development.</p> <p>Reason: In the interest of the visual amenities of the area.</p>
4.	<p>Surface water drainage arrangements for the proposed development shall comply with the requirements of the planning authority.</p> <p>Reason: In the interest of public health.</p>
5.	<p>No advertisement or advertisement structure shall be erected or displayed on the proposed structure or its appendages or within the curtilage of the site without a prior grant of planning permission.</p> <p>Reason: In the interest of the visual amenities of the area.</p>

6.	<p>Within six months of the date of cessation of use, the telecommunications structure and ancillary structures shall be removed, and the site shall be reinstated at the developer's expense. Details relating to the removal and reinstatement shall be submitted to, and agreed in writing with, the planning authority prior to the date of cessation of the use of the structure.</p> <p>Reinstatement shall be deemed to include the grubbing out of and replanting of the access track created in association with the development permitted herein.</p> <p>Reason: In the interest of the visual amenities of the area.</p>
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Elaine Sullivan
Planning Inspector

29th January 2021