



An
Bord
Pleanála

Inspector's Report

ABP-309348-21

Development	Replacement of existing telecom pole support structure and attached equipment with proposed new lattice tower support structure carrying relocated equipment and addition of new antennas, dishes and associated equipment.
Location	Eir Exchange, Ballinaboola, Newbawn, Co. Wexford.
Planning Authority	Wexford County Council
Planning Authority Reg. Ref.	20201383
Applicant(s)	Vodafone Ireland Limited
Type of Application	Permission
Planning Authority Decision	Grant Permission
Type of Appeal	Third Party
Appellant(s)	Enda Howard and others
Observer(s)	None

Date of Site Inspection

20th April 2021

Inspector

Emer Doyle

1.0 Site Location and Description

- 1.1. The appeal site, which has a stated area of 0.01 hectares is located on the eastern edge of Ballinaboola village, Co. Wexford. The N25 is located adjacent to the site to the north, the R736 is located adjacent to the site to the west, and agricultural land is located to the rear of the site.
- 1.2. The site is roughly triangular in shape. There are three separate monopoles with heights of c. 10m together with an Eir Exchange building on the site. There are a number of advertising signs on the boundary with the R736.

2.0 Proposed Development

- 2.1. Permission is sought for the replacement of an existing telecommunications support structure.
- 2.2. The proposed structure comprises of a 20m lattice tower (overall height of 21.5m to top of lightning finial) carrying antennas, dishes and associated equipment.
- 2.3. The proposed development provides for 4 No. ground level operators cabinets and these would be available to other telecommunication and broadband operators.
- 2.4. Wooden fencing of 2.4m height is proposed to the north and east.

3.0 Planning Authority Decision

3.1. Decision

Permission granted subject to 4 No. Conditions.

Condition 2 required that the proposed mast shall be finished in a dark green or dark grey colour, and the proposed equipment cabinets shall be finished in a dark green colour only.

All other conditions are of a standard nature.

3.2. **Planning Authority Reports**

3.2.1. Planning Reports

- The planner's report notes that no landscaping plan was submitted with the application. It was considered that the southern boundary was mature and this would mitigate the visual impact of this tall structure. It was noted that the mast is a standard 21.5m structure and as such was a 'familiar, if not overly attractive element of the modern landscape.' It was noted that there are no specifically visual receptors in the area.

3.2.2. Other Technical Reports

Area Engineer: No objection subject to conditions.

Roads Design: No objection subject to conditions.

3.3. **Prescribed Bodies**

3.3.1. No reports.

3.4. **Third Party Observations**

3.4.1. Two No. observations were submitted to the Planning Authority. The issues raised are similar to the grounds of appeal.

4.0 **Planning History**

4.1.1. None relevant.

5.0 **Policy Context**

5.1. The Wexford County Development Plan 2013-2019 (as extended) is the relevant development plan for the area.

Relevant policies include the following:

TC04

To require a demonstration of need for the proposed mast, having regard to the requirements for the co-location of masts and facilities where practicable and technically feasible. It will be the requirement of the applicants to satisfy the Planning Authority that a reasonable effort has been made to share installations. In situations where it is not possible to share a support structure, applicants will be encouraged to share a site or to locate adjacently so that masts and antennae may be clustered.

TC06

To minimise, and avoid where possible, the development of masts and antennae within the following areas:

- Prominent locations in Upland, River Valley and Coastal landscape character units and in 'Landscapes of Greater Sensitivity'
- Locations which impede or detract from existing public view points to/from Landscapes of Greater Sensitivity, rivers, estuaries or the sea
- Areas within or adjoining the curtilage of protected structures
- Areas on or within the setting of archaeological sites,
- Within or adjacent to Natura 2000 sites

The Council may consider an exemption to this objective where:

- An overriding technical need for the equipment has been demonstrated and which cannot be met by the sharing of existing authorised equipment in the area, and
- The equipment is of a scale and is sited, designed and landscaped in a manner which minimises adverse visual impacts on the subject landscape unit.

5.2. Guidelines

- The aim of the "Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities, 1996" is to offer general guidance on planning issues so that the environmental impact is minimised, and a consistent approach is adopted by the various planning authorities. Circular

Letter PL 07/12, issued in October 2012 by the Minister for the Environment, Community and Local Government under section 28 of the Planning and Development Acts 2000-2012, updated certain sections of the Guidelines.

5.3. Natural Heritage Designations

5.3.1. None relevant.

5.4. EIA Screening

Having regard to the limited nature and scale of the proposed development and the absence of any connectivity to any sensitive location, 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.

6.0 The Appeal

6.1. Grounds of Appeal

The grounds of appeal can be summarised as follows:

- The proposed development is a latticed tower and in close proximity to a residential area and as such is contrary to national policy.
- Details of other sites examined have not been submitted.
- Permission was granted for a site in Cushinstown GAA grounds c. 900m south west of the proposed tower under 20190965.
- There is no evidence in the original application that it is not possible to co-locate with the existing telecommunication towers in close proximity to the site.
- No consideration was given to the proximity to Ballynabola House.
- The current monopole is only half the height of the proposed lattice tower and would take away from work carried out by the local community which was funded both locally and from the Town and Village Renewal Scheme.

- The existing boundary is badly maintained and the boundary fencing on the R736 is constantly used for the erection of unapproved advertising.

6.2. Applicant Response

The response from the applicant can be summarised as follows:

- The current proposal would facilitate co-location of operators in line with national policy.
- The proposed 20m lattice tower is the preferred method of support structurally capable of supporting the loads of both equipment and environmental.
- It is considered that the use of an existing utilities property and replacement of an existing telecommunications site to expand and enhance voice, data and mobile broadband service is in line with the Telecommunications Guidelines and Circular Letter PL07/12.
- The proposed development would not generate a significant level of traffic and traffic movements for maintenance purposes would occur approximately four times a year.
- There have been telecommunications structures on the site for many years however, the existing 10m wooden support structure cannot meet current or future demand without being upgraded.
- Having regard to the distance from the Eir Exchange, the proposed telecommunications structure at Cushinstown GAA club and other sites at Begerin and Carrigbyrne Hill are not suitable.
- It is considered that the proposed development would not impact on Ballynabola House.
- Should An Bord Pleanála consider it appropriate, a landscaping condition could be included as a potential mitigation measure to lessen the visual impact.
- The structure has been placed to the rear of the Eir exchange building to gain as much distance from the village and dwellings as possible.

6.3. **Planning Authority Response**

- None.

6.4. **Observations**

- None.

7.0 **Assessment**

7.1. Having examined the application details and all other documentation on file, including all of the submissions received in relation to the appeal, and inspected the site, and having regard to relevant local/regional/national policies and guidance, I consider that the main issues in this appeal are as follows:

- Principle of Development
- Visual Impact
- Appropriate Assessment

7.2. **Principle of Development**

7.2.1. Permission is sought for the replacement of an existing telecommunications support structure with a new lattice tower structure. The site is located at the edge of the village of Ballinaboola, Co. Wexford along the N25.

7.2.2. Information submitted with the appeal response indicates that the existing 10m wooden pole is not capable of supporting a full configuration of equipment from any additional new operators by virtue of its lightweight design. It is stated that the existing 10m support structure cannot meet current or future demand without being upgraded.

7.2.3. The rationale for the proposed replacement is to improve the coverage and capacity of mobile telecommunications and broadband services in the area. It is stated that the site was identified as an established utilities location with significant potential for a multi-user telecommunications site.

- 7.2.4. Technical information has been submitted with the application in Section 3.0 of the Planning Report. This indicates that the nearest sites are a Three Ireland 21m monopole at Carrigbyrne Hill 2.5km east of the site and a Vodafone and Eir Mobile 30m lattice tower 3.5km northwest of the site at Begerin. I note also that there is a development proposed at the GAA grounds at Cushinstown c. 900m from the site which is currently under construction. The technical justification submitted with the application indicates that existing 4G coverage is 'Fair'.
- 7.2.5. The appeal response indicates that operators are utilizing the existing suitable structure by co-locating with other operators in the surrounding area where possible. It is considered that the site at Cushinstown, 'given it's significant distance from the Eir Exchange, its location further from Ballinaboola village and the N25 route, and similarly to the other above mentioned sites at Carrigbyrne and Begerin', the proposed infrastructure is required as a replacement support structure capable of co-location.
- 7.2.6. Having regard to the information submitted, I am satisfied that the applicant has demonstrated that there is a need for a replacement structure at this location and that the subject site is an existing telecommunications site with a long history of telecommunications use. As such, I consider that the principle of development is acceptable.

7.3. Visual Impact

- 7.3.1. The main concerns raised in relation to visual impact include the proximity to dwellings, the proximity to Ballynabola House, a protected structure, and the impact on the village of Ballinaboola.
- 7.3.2. The village of Ballinaboola is an attractive village outside New Ross which is divided by the N25. It was clear to me on the site inspection that the village is well maintained and cared for by local residents. I note that the appeal states that 'the proposed 21.5m lattice tower would have a serious impact on the entrance to the village, becoming a defining feature which would take away from work carried out by the local community with funding from the Town and Village Renewal Scheme.' Such work includes regular maintenance rota for public areas, flower beds and planting pots, installation of naming stones at either end of the village, the first community

Christmas tree unveiled in 2019, followed by the addition of a second tree for Christmas 2020. It is stated that there is a renewed sense of pride of place in the area in the last 7 to 8 years.

- 7.3.3. An objection submitted to the Planning Authority states that during the same time the Eir compound has deteriorated including the rotting of the perimeter fence, dumping of rubbish inside the stone wall at the entrance, and random unauthorised advertisements on the perimeter fence.
- 7.3.4. I am of the view that the site is at the edge of the village within an existing utilities site. The site has a long history of telecommunications structures and it is proposed to remove two of the three existing c.10m high monopoles and replace same with a 21.5m high lattice type structure. I consider that there is a significant distance of c. 350m to Ballinaboola House from the site and as such, I do not consider that the impact on same will be detrimental.
- 7.3.5. I note that the closest houses are across the regional road from the site. Having regard to the long standing use of the site by telecommunications structures, I do not consider that the impact above and beyond the existing impact will be unduly significant.
- 7.3.6. I note that significant effort and money has been invested into improving the appearance and amenities of the village of Ballinaboola in recent years. There is some existing mature landscaping on the site to the rear and it is proposed to erect the structure along the existing line of vegetation and in proximity to the Exchange building to gain as much screening as possible. In addition, the appeal notes the landscaping condition included by the Planning Authority and considers that a similar condition could be included by An Bord Pleanála as a potential mitigation measure to lessen the visual impact in the area.
- 7.3.7. Whilst, I note the concerns in relation to visual impact, I consider that the main impact would be localised and would not be severe as to constitute a detrimental visual impact in the area.

7.4. Appropriate Assessment

- 7.4.1. Having regard to the nature and scale of the proposed development, and its proximity to the nearest European 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 permission as follows:

9.0 Reasons and Considerations

Having regard to the National Planning Framework, the Wexford County Development Plan 2013 -2019 (as extended), the Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities, 1996 and associated Circular Letter PL07/12, the existing pattern of development in the area and existing use of the site, and the nature and scale of the proposed development, it is considered that, subject to compliance with the conditions set out below, the proposed development would not seriously injure the landscape character and visual amenity of the area or the amenities of property in the vicinity. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

10.0 Conditions

1. The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, 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.

Reason: In the interest of clarity.

2. The site shall be landscaped in accordance with a comprehensive scheme of landscaping, details of which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

Reason: In the interest of visual amenity.

3. 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.

Reason: In the interest of the visual amenities of the area.

4. 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.

Reason: In the interest of the visual amenities of the area.

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

Reason: In the interest of public health.

6. 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.

Reason: In the interest of the visual amenities of the area

Emer Doyle
Planning Inspector

27th April 2021