



An
Bord
Pleanála

Inspector's Report ABP-309390-21

Development	Installation of an overground electronic communications infrastructure on Local Authority land adjacent to a water tower on L1409 at Rosegreen, Co. Tipperary.
Location	Local Authority land adjacent to a water tower on L1409 at Rosegreen, Co. Tipperary.
Planning Authority	Tipperary County Council
Planning Authority Reg. Ref.	2020/002
Applicant(s)	Signal Infrastructure Ireland
Type of Application	Section 254 Licence
Planning Authority Decision	Refusal of Licence
Type of Appeal	First Party
Appellant(s)	None
Observer(s)	None
Date of Site Inspection	19 th October 2021
Inspector	Phillippa Joyce

1.0 Site Location and Description

- 1.1. The appeal site is located in Rosegreen village, County Tipperary. The village is formed at a crossroads between the main street, regional road R688 connecting the towns of Cashel and Clonmel, and local road L1409. The site is located on the western bound arm of the L1409 from the village crossroads.
- 1.2. The site is rectangular in configuration with an area of c.8 sqm, and is located on the southern side of the L1409. The site comprises an area of hard standing/ road edge at the end of the public footpath and adjacent to the public road.
- 1.3. Adjacent to the east of the site on the footpath are existing Eir telecommunications cabinets, while further along the footpath and roadway are electricity poles with overhead wires, streetlights, speed signs, and a wooden pole with two transmissions dishes. To the south/ southwest of the site is an Irish Water services site with a water tower, palisade fencing, earthen mound, hardstanding area, and a number of metal crates and portacabin structures. In the vicinity of the site are agricultural lands, detached residences, and a graveyard.

2.0 Proposed Development

- 2.1. The proposed development comprises a 15m communications structure (described as a 'smart streetpole solution' type) and an associated operator cabinet. The structure comprises a pole, which is 0.32m in diameter and 12.3m in height, and antennae (three antenna indicated) mounted at the top of the pole measuring 2.7m in height and 0.94m in width. A 0.3m diameter dish is mounted on the pole close to the base of the antennae. The pole will be galvanised, painted, light grey in colour, and the antennae will be in a covered sheath matching in finish to the pole. All cables run internally within the structure. The cabinet is a rectangular structure, green in colour, with principal dimensions of 1.6m in height, 1.2m in width, and 0.8m in depth.
- 2.2. The proposed development will be connected to existing underground services, ESB electricity supply and Eir fibre broadband. In conjunction with the provision of the pole and cabinet, it is proposed to extend the public footpath and kerb line surrounding the proposed telecommunications infrastructure.

3.0 Planning Authority Decision

3.1. Summary of the Decision

On the 18th September 2020, the planning authority decided to not grant the section 254 licence for one reason as follows:

1. *Having regard to:*

- a) *The Guidelines relating to Telecommunications Antennae and Support Structures which were issued by the Department of the Environment and Local Government to planning authorities in July 1996;*
- b) *The highly visible context of the site location and lack of screening;*
- c) *The proximity to nearby private residence;*
- d) *The limitations in information on coverage from other sites considered.*

It is considered that the proposed development would be contrary to the proper planning and sustainable development of the area.

3.2. Planning Authority Report

The planner's memorandum is the basis for the planning authority decision, the key points of which can be summarised as follows:

- Reference to policy in the South Tipperary County Development Plan including Policy TI 14 Telecommunications and Specific Objective SO 2 of the settlement plan for Rosegreen;
- Policy extracts cited from national planning guidelines (visual impact, clustering, last resort location), and Circular PL 07/12 (changes to guidelines policy on temporary conditions, separation distances, bonds);
- Visually prominent location with little screening;
- Negative impact on the character of the approach road to the village; and
- Coverage maps lack clarity on what is being represented and do not show the coverage that could be achieved through sharing or co-location with other existing structures.

There are no other reports from internal sections of the planning authority.

3.3. **Prescribed Bodies**

There are no submissions from prescribed bodies.

3.4. **Third Party Observations**

There are no submissions from third parties.

4.0 **Planning History**

There is no planning history at the site from a review of the planning register, nor referred to by the planning authority.

5.0 **Policy Context**

5.1. **National Policy**

Telecommunications Antennae and Support Structures: Guidelines for Planning Authorities, 1996

- 5.1.1. The national planning guidelines, and the subsequent Circular Letter: PL 07/12, are relevant to proposals for telecommunications structures. The planning guidelines provide guidance on design, siting, sharing facilities and clustering of structures.
- 5.1.2. Sections 4.2 and 4.3 of the planning guidelines identify design and siting, and visual impact respectively as being among the most important considerations in assessing a proposal of this nature. Of relevance to the appeal determination, the guidelines highlight the following:
- Care needs to be taken when dealing with fragile or sensitive landscapes, or areas with specific landscape protection designations;
 - In most cases an applicant will only have limited flexibility as regards location, given the constraints arising from radio planning parameters;
 - Some masts will remain quite noticeable in spite of the best precautions;
 - Along major roads...masts may be visible but yet are not terminating views...in such cases it might be decided that the impact is not seriously detrimental;
 - Along such routes, views of the mast may be intermittent and incidental, in that for most of the time viewers may not be facing the mast. In these circumstances,

while the mast may be visible or noticeable, it may not intrude overly on the general view of prospect;

- There will be local factors which [will determine] the extent to which an object is noticeable or intrusive – intermediate objects (buildings or trees), topography, the scale of the object in the wider landscape, the multiplicity of other objects in the wider panorama, the position of the object with respect to the skyline; and
- Only as a last resort should free-standing masts be located within or in the immediate surrounds of smaller towns or villages. If such a location should become necessary, sites already developed for utilities should be considered and masts and antennae should be designed and adapted for the specific location. The support structure should be kept to the minimum height consistent with effective operation.

5.1.3. Section 4.5 of the planning guidelines identifies the importance of sharing of installations and clustering structures to reduce the visual impact on the landscape. Of relevance to the appeal determination, the guidelines highlight the following:

- All applicants will be encouraged to share and will have to satisfy the authority that they have made a reasonable effort to share; and
- Where it is not possible to share a support structure the applicant should, where possible, be encouraged to share a site or to site adjacently so that masts and antennae may be clustered.

Circular Letter: PL07/12

5.1.4. Issued in October 2012, Circular Letter: PL07/12 updates certain sections of the planning guidelines. In relation to conditions, the Circular advises against the inclusion of any relating to a temporary time period, monitoring arrangement, security bond in the event of obsolescence, or development contribution.

5.2. Local Policy

South Tipperary County Development Plan 2009 (as varied, as extended).

5.2.1. The applicable development plan for the appeal is the South Tipperary County Development Plan 2009 (CDP). Relevant CDP policy relates to Rosegreen village, which is designated as a local service centre in the CDP settlement plans, and to the proposed development as telecommunications infrastructure.

5.2.2. The appeal site is located within the boundary of the Rosegreen settlement plan. Specific Objective 2 of the settlement plan states:

SO 2:

To support the preparation of an Enhancement Scheme for Rosegreen which includes a focus on enhancement of entry points to the village and also definition of core area by way of paving, street lighting, parking provision, street furniture etc.

5.2.3. The site is zoned as objective 'SP: Social & Public' which seeks 'To provide and improve social and public facilities'. The SP zoning objective extends from that of the adjacent Irish Water utility/ services site. The CDP zoning matrix does not specifically identify telecommunications or utility as a use type, which would indicate the permissibility or otherwise of the proposed development under the SP zoning objective.

5.2.4. In such instances, the CDP states that an assessment of a proposed development will be undertaken in terms of compliance with the policies set out in the written statement and the development management standards set out in Chapter 10. While there is policy, as cited below, there are no specific development management standards in the CDP in respect of telecommunications infrastructure such as the proposed development.

5.2.5. Section 9.9.2 Telecommunications Infrastructure of the CDP recognises there is a balance between facilitating the provision of mobile telecommunications infrastructure and the need to protect residential, visual amenity and the natural and built environment. Specifically:

Policy TI 14 Telecommunications:

It is the policy of the Council to facilitate proposals for masts, antennae, and ancillary equipment in accordance with Telecommunications Antennae and Support Structure: Guidelines for Planning Authorities, DEHLG, 1996. Development proposals will be facilitated, where it can be established that there will be no significant adverse impact on the surrounding areas and the receiving environment, particularly in the following locations:

(i) Primary and secondary amenity areas or locations that would be detrimental to designated listed views.

(ii) Within significant views or setting of national monuments or protected structures.

5.2.6. The site is not located within a primary or secondary amenity area (CDP Figure 7.1), a location with designated listed views (CDP Appendix 4) or the setting of an archaeological monument or protected structure (CDP Rosegreen Settlement Plan). The site is located to the southwest of national monuments associated with the graveyard, and is not within their setting.

5.3. Natural Heritage Designations

5.3.1. The appeal site is not located in or immediately adjacent to a European Site, a Natural Heritage Area (NHA) or a proposed NHA. There are no watercourses at or near the site.

5.3.2. The European Site designations in proximity to the appeal site include (measured at closest proximity):

- Lower River Suir SAC (002137) is c.10km to the west and c.10.6km to the east.

5.4. Environmental Impact Assessment Screening

5.4.1. Having regard to the nature and scale of the proposed development, there is no real likelihood of significant effects on the environment. 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 following is a summary of the main issues raised in the first party grounds of appeal:

- Refusal of licence arises from the planning authority's lack of understanding of the section 254 process, and incorrectly considering that planning permission is required;
- Rosegreen village is a blackspot on Eir's mobile network, and a site in or close to the village centre is required to provide indoor mobile and data coverage;

- The closest existing telecommunications infrastructure is c. 5km from the village and accordingly co-location was ruled out;
- Selection of the site and the design of the proposed structures have been carefully considered, and are in compliance with the guidance for last resort development in the outskirts of a village in the planning guidelines;
- While higher than the average utility pole, a minimum height of 15m is required for the structure to clear local obstacles and provide the necessary coverage;
- Additional photomontages are submitted with the appeal, there are 12 in total, from a wider number of vantage points on the approach roads (L1409 and R668) into the village;
- Difficult to provide screening for roadside pole development;
- Planning authority's opinion that the 15m pole would be highly visible in the area and concern for associated impact is unjustified;
- Questions the refusal reason reference to proximity to residences as the existing residential properties are not immediately proximate and there is no scientific or valid basis for not permitting telecommunications development in proximity to residential development;
- Coverage information submitted is clear, attesting to the requirement for and benefits of the proposed development; and
- Alternative locations were ruled out as unsuitable or unattainable, and therefore it is a pointless exercise to determine the coverage from the other sites considered.

6.2. Planning Authority Response

The planning authority has responded to the appeal reiterating the concerns raised previously and requests that the decision to refuse to grant a licence be upheld by the Board.

6.3. Observations

There are no observations on the appeal.

7.0 Assessment

7.1. I consider the main items in determining this appeal are as follows:

- Principle of Development;
- National Planning Policy for Telecommunications Infrastructure;
- Visual Impact;
- Residential Amenity;
- Other Issues; and
- Appropriate Assessment Screening.

I propose to address each item in turn below.

7.2. Principle of Development

7.2.1. The applicable development plan is the South Tipperary County Development Plan 2009 (as varied, as extended). The appeal site is located within the development boundary of Rosegreen village. The site is zoned as SP: Social & Public with the objective 'To provide and improve social and public facilities'. While the CDP does contain a zoning matrix, telecommunications or utility use are not expressly identified as a use type. The CDP indicates in such cases that regard will be had to other applicable policies and development management standards. For the appeal, these other planning considerations arise from the national and local policy on site selection and co-locating of equipment with other masts, which are considered in the subsections below.

7.2.2. In summary, I consider it reasonable to conclude that the proposed development, comprising communications infrastructure to provide mobile and data services to the public is clearly in accordance with the SP zoning objective, and is acceptable in principle subject to other planning considerations.

7.3. National Planning Policy for Telecommunications Infrastructure

7.3.1. The planning authority's refusal reason refers to regard being given to the Telecommunications Antennae and Support Structure: Guidelines for Planning Authorities. In the planning authority's memorandum, general policy extracts from the guidelines are cited on siting, visual impact, and a preference for co-sharing.

7.3.2. For the appeal, I consider the relevant policy from the national planning guidelines to be in respect of site suitability with a consideration of the existing conditions and extent of visual impact, and justification for the proposed development with a consideration for co-location and/ or clustering instead of free-standing structures. I propose to address each in turn.

Site Suitability

7.3.3. Section 4.3 of the guidelines outline that it is only as a 'last resort' that free standing masts should be located within a village context. The applicant highlights that the policies do not prohibit siting telecommunications infrastructure in villages, such as the proposed development, but that where required as a last resort, the siting of suitably adapted pole infrastructure is acceptable in all locations.

7.3.4. The applicant submits that once co-location was ruled out (as discussed below), the appeal site was selected due to the nature of the site, the extent of existing adjacent utilities, the lesser visual impact (as discussed in the following subsection), and its being the best available option to provide the necessary coverage in the blackspot area identified in the Eir mobile network (as discussed below).

7.3.5. In respect of site suitability, I consider the existing telecommunications infrastructure at and adjacent to the site (the existing Eir cabinets on the footpath, the existing underground electricity and fibre optic cables, and an existing wooden pole with two dishes c.50m to the east of the site) to be a material consideration. As too is the existence of the Irish Water services compound with a water tower of notable height and range of ancillary infrastructure which is located directly adjacent to the site. Section 4.3 of the planning guidelines advises that due to such reasons, the appeal site can be considered as an appropriate site for the proposed development in the village, and one that would be preferable to a new location within the village or in a residential estate.

Justification for Proposal

7.3.6. In respect of justification for a proposal, the planning guidelines place a strong emphasis on the co-sharing of mast structures, and if not possible, of applicants providing documentary evidence of the non-availability of other masts. Section 4.5 of the guidelines states that an applicant will have to satisfactorily demonstrate that

they have made a reasonable effort to share, and if sharing is not possible, clustering of masts may be appropriate.

- 7.3.7. In the initial report submitted to the planning authority and supplemented with information in the appeal, the applicant indicates that there are no existing telecommunications masts within a 2km radius of the site. Details are provided of structures identified within a 5km radius, the closest two masts being 4km and 4.6km distance respectively.
- 7.3.8. The applicant outlines that Eir, as the mobile service operator, has a coverage blackspot (as discussed below) in its mobile network in the Rosegreen area which the applicant, as a registered infrastructure provider, is seeking to address through the proposed development. With regard to range and distance, the applicant states that a location in the village centre, or in close proximity to the centre, is required to meet the demands for high data speed as is now being required by customers (home workers and local enterprise). To meet this need, the applicant indicates that the proposed development is required within a narrow search ring area, which I estimate from the image submitted as being c.1km in radius.
- 7.3.9. The applicant submits that co-locating with the existing masts was investigated but was dismissed due to their excessive distance from the area to be served. I have reviewed available mapping information from ComReg and concur with the low incidence and notable distance of masts within and from the Rosegreen area. In this regard, I accept that co-location and/ or clustering with existing telecommunications infrastructure is not an available or feasible option in this instance.
- 7.3.10. The appeal includes a Site Justification Report (Appendix 3, also contained in the initial licence application to the planning authority). The report outlines five options examined as alternative locations for the proposed development and the reasons for dismissing same. These include an adjacent farm but the landowner withdrew consent, a Coillte forest but was too distant and at a lower elevation to provide the necessary coverage, commercial premises in the village but was too low for attachment of equipment or did not have suitable access for maintenance, green areas at the cross roads junction but considered to have a greater visual impact, and a green area at the football pitch in the village centre but considered to have a greater visual impact.

- 7.3.11. The planning authority's refusal reason also refers to the limitations in the coverage information from the other sites considered. In its assessment, the planning authority stated that the coverage maps lacked clarity on what was being represented and did not show the coverage that could be achieved through the preferable options of site sharing or co-location.
- 7.3.12. In the appeal, the applicant responds by stating the Eir coverage plots submitted with the application clearly show the extent of the blackspot where no indoor voice or data services are presently available, indicate the requirement for the proposed development, and the benefits of same once operational. The applicant outlines that as alternatives were ruled out due to being unsuitable or unobtainable, it is a pointless exercise to determine the coverage from the other sites considered.
- 7.3.13. I have reviewed the coverage information provided with the application and the position of the applicant in the appeal. The coverage referred to is indoor coverage with images provided of the extent of current and proposed coverage. The extent of the new coverage associated with the proposed development is evident. While I note the planning authority's concern and that this supportive information is absent, I do accept (in this instance and not to be construed as a precedent) that there are no other more suitable alternatives to the proposed development and therefore the additional coverage information is not considered necessary to allow a determination on the appeal.
- 7.3.14. In conclusion, I am satisfied that the applicant has sufficiently demonstrated that the subject site is the 'last resort' in so far as there are no alternatives for co-locating equipment, for clustering adjacent to existing structures, or for erecting free standing structures in other village locations, that that would address the blackspot in the operator's mobile network, provide the necessary coverage, and be more suitable than the proposed development (free standing structure) at the appeal site (on the footway, and adjacent to existing services uses and infrastructure). As such, I consider the proposed development complies with the requirements of the Telecommunications Antennae and Support Structure: Guidelines for Planning Authorities.

7.4. **Visual Impact**

- 7.4.1. The planning authority's refusal reason refers to the highly visible context of the site location and a lack of screening. The planning authority's memorandum also states that the proposed development would negatively impact on the character of the approach road to the village and be at variance with CDP Specific Objective SO 2 of the Rosegreen settlement plan.
- 7.4.2. The applicant submits that the design approach taken for the proposed development has been to minimise the visual impact of the structures. I note the selection of a slimline pole with enclosed antennae of design similar to other existing services poles, with a maximum height of 15m and a subtle-coloured galvanised finish. The operator cabinet is simple and unobtrusive in scale, design, and finish. I consider the design approach to the proposal to be reasonable and acceptable.
- 7.4.3. In the application, the applicant had submitted three photomontages of viewpoints along the L1409, approximately 100m from the proposed development. In the appeal, the applicant acknowledges the limitations of these and has provided additional photomontages, 12 in total, of the proposed development from vantage points in the village and on the public roads within a stated 500m radius of the site. A visual assessment is undertaken of the photomontages using a methodology from the EPA Guidelines for describing the level and type of impact.
- 7.4.4. I have visited the site, travelled in and around the village, and reviewed the applicant's photomontages. I do not consider the receiving landscape to be fragile, as described in Section 4.3 of the planning guidelines, or of a sensitivity that the site would be unable to be developed. For the small number of properties in the vicinity of and with aspects towards the site, the proposed mast will be visible and will exert a visual impact. I note there is no residence directly opposite the site, nor is the site a terminating view in the village. For pedestrians and drivers on the public road, the visual impact of the structures will be intermittent and incidental.
- 7.4.5. In establishing the visual sensitivity of the site and receiving area, I note that the context is urban (albeit a village), the site is adjacent to existing telecommunication infrastructure, and there are other utility poles (telecommunication, electricity, and streetlights), overhead wires, road signage, and importantly, the water tower, which characterise the skyline at this location. In this regard, I do not agree with the planning authority's view that the site is highly sensitive, or that the proposed

development would negatively impact the character of the approach road or prejudice the overall delivery of CDP SO: 2.

- 7.4.6. Furthermore, I note that the CDP has not identified or attached any landscape value, preserved view, heritage, or other such amenity designation to the site and/ or its receiving area. With regard to local policy on visual impact, CDP Policy TI 14 states that proposals for telecommunications infrastructure will be facilitated if there is no significant adverse impact on the surrounding areas and the receiving environment, specifying certain locations. The appeal site is not located within any such locations, those being a primary or secondary amenity area, a designated listed view location, or within a significant view or setting associated with a national monument or protected structure.
- 7.4.7. With regard to national policy on visual impact in villages, the planning guidelines advise that sites already developed for utilities should be considered (as per the proposed development), that masts and antennae should be designed and adapted for the specific location (as per the proposed development), and the support structures should be kept to the minimum height consistent with effective operation (as per the proposed development).
- 7.4.8. In summary therefore, I consider that the visual impact associated with the proposed development would be within acceptable parameters as allowed for in the national and local policy context. I consider that the proposed development to be in compliance with Sections 4.2 and 4.3 of the planning guidelines and with Policy TI 14 and Specific Objective SO 2 of the CDP.

7.5. Residential Amenity

- 7.5.1. The planning authority's refusal reason refers to proximity of the proposed development to nearby residences. The reference is broadly made, and the nature of the concern is not specified. In my opinion, the proposed development is a use class that is not injurious to residential amenity per se through overlooking or undue overshadowing, nor is it a use associated with significant disturbance and/ or nuisance caused through traffic generation, noise, or other public health issue.
- 7.5.2. In respect of traffic generation, save for initial construction traffic, maintenance trips arising from the proposed development would be minimal and there is sufficient

capacity within the road network to absorb same without loss of amenity to adjacent properties.

7.6. Other Issues

- 7.6.1. I highlight three relevant issues to the Board which are miscellaneous in nature and can be grouped as other issues, including services, scope of section 254, and duration of licence.
- 7.6.2. In respect of services, the applicant indicates that the existing footpath and kerb line will be extended around the proposed structures. The works will involve the road opening licence process and will be done in agreement with the planning authority. The applicant has identified water services infrastructure, electricity and fibre cables and indicates the proposed development will not impact same. In the event of the licence being granted, I recommend this be addressed by way of condition.
- 7.6.3. In respect of the scope of section 254, the applicant submits that the refusal of the licence arises from the planning authority's position that the proposed development requires planning permission. The applicant includes in the appeal correspondence received from the planning authority indicating same during the assessment process. In any event, the planning authority undertook an assessment and issued a decision to refuse to grant the licence application. I have reviewed the provisions of section 254, relevant legal definitions, and undertaken a site inspection. In my opinion the appeal site comprises a footway, and the proposed development comes within the scope of a section 254 licence application process.
- 7.6.4. In respect of the duration of the licence, I note that Circular PL 07/12 states that the attachment of conditions to permissions for telecommunication infrastructure which limit their life to a set temporary period should cease. However, given that this appeal relates to a section 254 licence application for development on a footway which is public land, it is considered reasonable that the licence be granted for a specified duration thereby enabling the planning authority to reassess the suitability of proposed development at the end of the appropriate period. I note that the Board has specified a period of three years in similar cases (eg. ABP 308857-20, ABP 307354-20, ABP-305114-19, and ABP-306033-19), and I recommend this be addressed by way of condition.

7.7. Appropriate Assessment Screening

7.7.1. Having regard to the nature and scale of the proposed development, the nature of the receiving environment, the physical separation distances to European Sites, and the absence of ecological and/ or hydrological connections, the potential of likely significant effects on European Sites arising from the proposed development, alone or in combination effects, can be reasonably excluded.

8.0 Recommendation

8.1. I recommend that the section 254 licence be granted for the reasons and considerations outlined below, and subject to the following conditions.

9.0 Reasons and Considerations

Having regard to the provisions of section 254 of the Planning and Development Act 2000, as amended, to local and national policy objectives, as represented in the South Tipperary County Development Plan 2009 (as varied, as extended) including the zoning of the lands SP: Social & Public 'To provide and improve social and public facilities', to the Telecommunications Antennae and Support Structures: Guidelines for Planning Authorities, 1996 issued by the Department of Environment, Heritage and Local Government as section 28 Statutory Guidelines, as updated by Circular Letter PL 07/12 in 2012, and to the nature and scale of the development, it is considered that, subject to compliance with the conditions set out below, the proposed development would not seriously injure the visual or residential amenities of the area or of property in the vicinity, would not be prejudicial to public health and would be acceptable in terms of traffic safety and convenience. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

10.0 Conditions

1.	The licence is for a 15m telecommunications structure comprising a freestanding pole with antennae and associated operator cabinet only, in accordance with the details submitted to the planning authority on the 1 st day of May 2020.
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	<p>Reason: In the interest of clarity of the nature and extent of the permitted development to which the licence relates and to facilitate a full assessment of any future alterations.</p>
2.	<p>(a) The licence shall be valid for a period of three years only from the date of this Order. The telecommunications structure and ancillary structure shall then be removed unless, prior to the end of the period, a further licence under section 254 of the Planning and Development Act 2000, as amended, has been granted for their retention for a further period.</p> <p>(b) The site shall be reinstated on removal of the telecommunications structure and ancillary structures. Details relating to the removal and reinstatement shall be submitted to and agreed in writing with the planning authority at least one month before the date of expiry of this licence.</p> <p>Reason: To enable the impact and acceptability of the development to be reassessed, having regard to changes in technology and design during the specified period.</p>
3.	<p>No advertisement or advertisement structure shall be erected or displayed on the telecommunications structure and ancillary structure 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>
4.	<p>Final design and construction details of the footpath and kerb line shall be agreed in writing with the planning authority prior to commencement of development, and completed to the satisfaction of the planning authority at the developer's expense.</p> <p>Reason: In the interests of orderly development, the amenities of the area and pedestrian safety.</p>
5.	<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>

6.	The structures shall not interfere with existing services, existing drainage systems and shall not obstruct pedestrian access. Reason: In the interests of orderly development and pedestrian safety.
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Phillippa Joyce
Senior Planning Inspector

22nd October 2021