



An
Bord
Pleanála

Inspector's Report

ABP-312030-21

Development	24 metre high monopole telecommunications structure and associated site works.
Location	Annie May's Pub, Main Street, Newcastle, Co. Dublin, D22 XV65
Planning Authority	South Dublin County Council
Planning Authority Reg. Ref.	SD21A/0248
Applicant(s)	Vantage Towers Ltd.
Type of Application	Permission
Planning Authority Decision	Refuse
Type of Appeal	First
Appellant(s)	Vantage Towers Ltd.
Observer(s)	Jennifer Cagney Mark Higgins
Date of Site Inspection	24 March 2022
Inspector	Ian Boyle

1.0 Site Location and Description

- 1.1. The appeal site is located within the historic core of Newcastle Village on the south side of Main Street, which runs through the town on an east - west axis. It is to the rear of Annie May's Pub and adjacent takeaway and occupies the southwest corner of the adjoining surface car park.
- 1.2. The site is near the junction between Main Street and Peamount Road (R120) to the north, there is an access road leading to St. Finian's National School and residential housing to the east, the grounds of St. Finian's National School are directly to the south, and St Finian's Roman Catholic Church is to the west.
- 1.3. Newcastle has a traditional village layout. Main Street accommodates a number of Protected Structures and there is a mix of single and two-storey suburban housing and neighbourhood shops. The surrounding area is characterised by mainly commercial, retail and residential housing type uses.
- 1.4. Greenogue Business Park and Casement Aerodrome are roughly 1.5km to the east and northeast, respectively.
- 1.5. The site has a stated area of 48sqm.

2.0 Proposed Development

- 2.1. The proposed development is for a 24m high monopole telecommunications support structure, together with an antenna, dishes, cabinets, and ancillary cabinet and operating works. The support structure is a freestanding lattice frame tower and would be capable of accommodating multiple service operators.
- 2.2. The development would be within a 6m x 8m compound and enclosed by a palisade security fence. The compound is intended to house equipment for the service provider Vodafone.
- 2.3. The purpose of the proposed development is to provide improved telecommunications' services and network coverage in the area.

3.0 Planning Authority Decision

3.1. Decision

The Planning Authority refused permission for one reason, which was, having regard to the scale, height and design of the proposed telecommunications structure, its location within the Newcastle Architectural Conservation Area, and its proximity to St. Finian's Roman Catholic Church (Protected Structure), the proposed development would be visually obtrusive and form an overbearing and obtrusive feature in these 'village centre zoned' lands.

It would, therefore, be contrary to the provisions of the South Dublin County Development Plan 2016-2022 and to the proper planning and sustainable development of the area.

3.2. Planning Authority Reports

3.3. Planning Reports

- The Planner recommended a refusal for the reason set out above.
- The appeal site is subject to zoning objective 'VC' - 'To protect, improve and provide for the future development of village centres'.
- The proposed 24m lattice tower would have a significant negative impact on the surrounding area. It would be located within proximity of St. Finian's Roman Catholic Church (Protected Structure, RPS 232), Newcastle National School (Protected Structure, RPS Ref. 230), and the Newcastle Architectural Conservation Area (ACA).
- The Applicant has not submitted a detailed Visual Impact Assessment, or contiguous drawings of adjoining structures, which would be required to fully assess the proposed development on the surrounding area.
- The proposal would contravene Development Plan UC3 Objective 1, which is to protect and conserve the special character of the historic core of traditional villages and HCL4 Objective 2, which is to ensure that new development within or adjacent to an Architectural Conservation Area (ACA) preserves or

enhances the special character and visual setting of the ACA including vistas, streetscapes and roofscapes.

- The proposed development would have an adverse impact on the visual amenity of the surrounding residential area and contravene Objective IE4 Objective 3, which is to permit telecommunications antennae and support infrastructure throughout the County, subject to high quality design, the protection of sensitive landscapes, and visual amenity.
- The 24m telecommunications tower would obtrusively dominate the vistas of the graveyard and church associated with St. Finian's Roman Catholic Church.
- The proposal would also change the character and setting of Newcastle village and contravene Development Plan HCL3, Objective 1, which is to ensure the protection of Protected Structures.
- The site is under the 'Inner Horizontal Surface' for Casement Aerodrome. However, the Applicant has not submitted information to demonstrate that the proposed development is not an obstacle to aerodrome. In the event of further consideration of the proposal, further information is required on this issue.

3.4. Other Technical Reports

Conservation Officer: No report received at time of writing. However, the Planner considered the previous conservation report issued in relation to Reg. Ref. SD18A/0162. (This was in relation to a proposed extension to the existing pub onsite to accommodate new bar and dining facilities, kitchen, toilets, storage facilities, an open garden at the rear, and betting office.)

Heritage Officer: No response.

Surface Water & Drainage: No objection.

Roads Section: No response.

3.5. Prescribed Bodies

An Taisce: The application should be assessed with regard to the impact on the amenity of the area and relevant provision of the Development Plan. Consideration should be given to the nearby school.

Department of Defence: No response.

3.6. Third Party Observations

A total of 7 no. third party observations were received by the Planning Authority, including from residents in the surrounding area and St. Finian's National School.

1 no. representation made by Cllr. Francis Timmins objecting to the proposed development:

The main issues raised can be summarised as follows:

- The proposal would have an overbearing height and tower over children playing, of pupils attending the local primary school, and children attending a nearby crèche.
- Residents were not informed of the proposal or consulted in any way.
- Health implications caused by dangerous emissions and radio frequency radiation, which could be harmful to people living in the area.
- The 24m mast would have implications on the Baldonnell flight path and Casement Aerodrome.
- Negative effect on quality of life and on the resale value of homes in the area.
- The proposed lattice tower would have a negative impact on the visual amenity of the nearby National School.
- The proposed development is visibly obtrusive and would damage the visual amenity of the scenic historical village of Newcastle due to its central location and that it would diminish the church tower due to its excessive size and height.

- The mast would be an eyesore and would take away from the ethos of Newcastle being a beautiful heritage village. The structure would damage the aesthetic look of the village.
- Nearby Greenogue and Grange Castle are better options to accommodate the proposed mast.
- More people are working from home now and the proposed mast would be a permanent negative change for people living in the area.
- There would be negative ecological impacts on wildlife, bats, birds and bees.

4.0 Planning History

Reg. Ref. SD18A/0162: The Planning Authority granted permission in August 2018 for the demolition of existing single storey structures and the construction of an extension to the existing public house (Annie May's), comprising bar and dining facilities, kitchen, toilets, storage facilities, an open garden at the rear, a betting office (67sq.m) and ancillary site work.

Reg. Ref. SD11A/0075: The Planning Authority granted retention permission in May 2011 for an extension to the front of the existig public house (The Gondola) and ancillary site works.

5.0 Policy Context

5.1. Guidelines for Planning Authorities on Telecommunications Antennae and Support Structures, 1996

- 5.1.1. The *'Guidelines for Planning Authorities on Telecommunications Antennae and Support Structures'* (1996) set out government policy for the assessment of proposed new telecommunications structures ('the 1996 Guidelines'). The Guidelines state that the rapid expansion of mobile telephone services in Ireland has required the construction of base station towers in urban and rural areas across the country. This are an essential feature of all modern telecommunications networks. In many suburban situations, because of the low rise nature of buildings and structures, a supporting mast or tower is needed.

- 5.1.2. Section 4.3 of the Guidelines refers to visual impact and states that only as a last resort should free-standing masts be located within, or in the immediate surrounds, of smaller towns or villages. If such locations 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. and should be a monopole (or poles) rather than a latticed tripod or square structure.
- 5.1.3. The Guidelines also state that visual impact is among the more important considerations that should be considered in arriving at a decision for a particular application. In most cases, the Applicant will only have limited flexibility as regards location, given the constraints arising from radio planning parameters, etc. Visual impact will, by definition, vary with the general context of the proposed development.
- 5.1.4. The Guidelines state that the approach will vary depending on whether a proposed development is in:
- a rural/agricultural area;
 - an upland/hilly, mountainous area;
 - a smaller settlement/village;
 - an industrial area/industrially zoned land; or
 - a suburban area of a larger town or city.
- 5.1.5. The Guidelines state that some masts will remain quite noticeable despite best precautions. For example, there will be local factors which have to be taken into account in determining the extent to which an object is noticeable or intrusive. This may include 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, weather, lighting conditions, etc. Softening of the visual impact can be achieved through a judicious choice of colour scheme and through the planting of shrubs, trees etc as a screen or backdrop.

5.2. **Circular Letter PL07/12**

Circular Letter PL07/12 revised elements of the 1996 Guidelines under Section 2.2 to 2.7. It advises Planning Authorities to:

- Cease attaching time limiting conditions or issuing temporary durations to telecommunications masts, except in exceptional circumstances.
- Avoid including minimum separation distances between masts or schools and houses in Development Plans.
- Omit conditions on permissions requiring security (i.e. bond/cash deposits).
- Not include monitoring arrangements on health and safety or to determine planning applications on health grounds.
- Include waivers on future development contribution schemes for the provision of broadband infrastructure.

5.3. **South Dublin County Development Plan 2016-2022**

Zoning

- The subject site is zoned 'VC – Village Centre' under the South Development County Development 2016-2022 ('Development Plan').
- The objective of this zoning is 'to protect, improve and provide for the future development of Village Centres'.
- Public Services, which includes telecommunications, are listed as permitted in principle under the zoning.
- The Development Plan states that the Village Centre zoning will support the protection and conservation of the special character of the traditional villages and provide for enhanced retail and retail services, tourism, residential, commercial, cultural and other uses that are appropriate to the village context.

Other Designations

The site is also subject to the following designations:

- Area of Archaeological Potential
- Site of Geological Interest
- Record of Monuments and Places (DU020-003 Newcastle Village)

Table 1.1 of the Development Plan identifies Newcastle as a 'Small Town'.

Section 1.7.4 states that Newcastle should retain a village character.

Section 5 Urban Centres and Retailing

UC, Policy 3, Village Centres

It is the policy of the Council to strengthen the traditional villages of the County by improving the public realm, sustainable transport linkages, commercial viability and promoting tourism and heritage value.

- UC3 Objective 1: To protect and conserve the special character of the historic core of the traditional villages and ensure that a full understanding of the archaeological, architectural, urban design and landscape heritage of the villages informs the design approach to new development and renewal, in particular in Architectural Conservation Areas (ACAs).
- UC3 Objective 4: To continue to improve the environment and public realm of village centres in terms of environmental quality, urban design, safety, identity and image.

Section 7.4.0 'Information and Communications Technology'

The widespread availability of a high quality Information and Communications Technology (ICT) network within the County will be critical to the development of the County's economy, and will also support the social development of the County.

IE4 Objective 1:

To promote and facilitate the provision of appropriate telecommunications infrastructure, including broadband connectivity and other innovative and advancing technologies within the County.

IE4 Objective 3:

To permit telecommunications antennae and support infrastructure throughout the County, subject to high quality design, the protection of sensitive landscapes and visual amenity.

IE4 Objective 4:

To discourage a proliferation of telecommunication masts in the County and promote and facilitate the sharing of facilities.

Section 9 Heritage, Conservation and Landscape

HCL, Policy 3, Protected Structures

It is the policy of the Council to conserve and protect buildings, structures and sites contained in the Record of Protected Structures and to carefully consider any proposals for development that would affect the special character or appearance of a Protected Structure including its historic curtilage, both directly and indirectly.

- HCL3 Objective 1: To ensure the protection of all structures (or parts of structures) and the immediate surroundings including the curtilage and attendant grounds of structures contained in the Record of Protected Structures.
- HCL3 Objective 2: To ensure that all development proposals that affect a Protected Structure and its setting including proposals to extend, alter or refurbish any Protected Structure are sympathetic to its special character and integrity and are appropriate in terms of architectural treatment, character, scale and form. All such proposals shall be consistent with the Architectural Heritage Guidelines for Planning Authorities, DAHG (2011) including the principles of conservation.

HCL, Policy 4, Architectural Conservation Areas

It is the policy of the Council to preserve and enhance the historic character and visual setting of Architectural Conservation Areas and to carefully consider any proposals for development that would affect the special value of such areas.

- HCL4 Objective 2: To ensure that new development, including infill development, extensions and renovation works within or adjacent to an Architectural Conservation Area (ACA) preserves or enhances the special character and visual setting of the ACA including vistas, streetscapes and roofscapes.
- HCL4 Objective 4: To reduce and prevent visual and urban clutter within Architectural Conservation Areas including, where appropriate, traffic management structures, utility structures and all signage.

Section 11.6.2 Information and Communications Technology

In the consideration of proposals for telecommunications antennae and support structures, applicants will be required to demonstrate:

- Compliance with the Planning Guidelines for Telecommunications Antennae and Support Structures (1996) and Circular Letter PL 07/12 issued by the DECLG (as may be amended), and to other publications and material as may be relevant in the circumstances,
- On a map, the location of all existing telecommunications structures within a 2km radius of the proposed site, stating reasons why (if not proposed) it is not feasible to share existing facilities having regard to the Code of Practice on Sharing of Radio Sites issued by the Commission for Communications Regulation (2003),
- Degree to which the proposal will impact on the amenities of occupiers of nearby properties, or the amenities of the area (e.g. visual impacts of masts and associated equipment cabinets, security fencing treatment etc.) and the potential for mitigating visual impacts including low and mid-level landscape screening, tree-type masts being provided where appropriate, colouring or painting of masts and antennae, and considered access arrangements, and
- The significance of the proposed development as part of the telecommunications network.

5.4. Other National and Regional Policy

- *Project Ireland 2040 – The National Planning Framework (NPF), 2018*
- *The East and Midlands Regional Spatial Economic Strategy (RSES), 2019*
- *Architectural Heritage Protection: Guidelines for Planning Authorities, Department of Arts, Heritage and the Gaeltacht, 2011*

5.5. Natural Heritage Designations

No designations apply to the subject site.

The closest European Site is the Glenasmole Valley SAC (Site Code: 001209), which is at a remove of approximately 9.7km to the southeast.

The pNHA Grand Canal (Site Code: 002104) is approximately 2.4km to the northwest.

6.0 The Appeal

6.1. Grounds of Appeal

The main grounds of appeal can be summarised as follows:

- The proposed development meets the Development Plan objectives and requirements of the 1996 Guidelines the best it can, bearing in mind the technological requirement for services in the area.
- There is a very limited choice of design and the proposed monopole has a minimalistic design that is suited to an urban environment. The design and height of the structure would enable sharing.
- The coverage details and alternative sites considered (discounted structures) have been provided with the original application.
- No photomontages were provided with the original application, which was unfortunate. However, visual impact is addressed by the appeal.
- Three of the Irish Telecomm provided are located in the Greenogue Business Park. However, the distance is too great to allow for Vodafone to achieve its technical objectives.
- The subject site is the only realistic location for the proposal in respect of technological and planning requirements. It is acknowledged that the proposal would have a visual impact. However, it would not dominate the nearby Church and any impact would be intermittent only. There are no protected scenic routes of views in the area.
- The Conservation Officer's Report for Permission Reg. Ref. SD18A/0162 (an extension to the pub) suggests that there is flexibility in assessing new development proposal in the Newcastle ACA. Therefore, Objectives UC3-1

and HCL4-2 which are in relation to the protection of the special character and historic core of the village are not as important as the Refusal implies.

- With regard to HCL4-4, it is submitted that the proposal is not urban clutter, but an important utility for the economic development of Newcastle.
- There are two Protected Structures nearby (the School and Church). However, these will not be negatively impacted upon by the development proposed. The monopole could be painted in different colours to help reduce impact, however.
- Many of the third party concerns were in relation to non-planning considerations, such as impact on public health.
- The Applicant references various supporting national planning policies taken from the NPF, National Development Plan 2018-2027, etc.
- The demand created from new working-from-home practices highlight the need for supporting infrastructure, such as the proposed telecommunications structure.
- The coverage for 3G and 4G services in Newcastle is weak. There is no existing infrastructure capable of accommodating the equipment. The appeal site is the only realistic option available in the centre of Newcastle. The Comreg coverage maps show that it is not just Vodafone that is unable to provide adequate network. Therefore, the Applicant intends to enable other operators on the structure.
- The Applicant would accept a condition requiring the proposed monopole to be reduced in height from 24m to 18m. This would reduce the coverage area, however.
- The Board is requested to overturn the Planning Authority's Decision and to grant permission for the proposed development.

6.2. Planning Authority Response

- The Planning Authority confirms its decision. The issues raised in the appeal have been covered in the Planner's Report.

6.3. Observations

2 no. observations were received from Jennifer Cagney and Mark Higgins who are residents in the area. These generally reiterate the concerns in the third party submissions to the Planning Authority.

The main issues raised by the observers include the following:

- The proposed development would impact on the school and church.
- The radio waves emitted would be harmful to children and staff at the school.
- The application references that 3 antennae are included, but the appeal mentions that more could be included in time.
- There are other locations in the area that would allow for the same line of sight but have a better distance from houses and local amenities.
- Children could gain access over the security fence, which would be dangerous.
- There are large industrial estates on either side of town, including Greenogue and Grange Castle, which would be better placed sites for the proposed development. If these are too far away, there are numerous green fields around the village, some of which are very close to the appeal site.

6.4. Further Responses

None.

7.0 Assessment

The main planning considerations relevant to this appeal case are:

- Visual and Amenity Impact
- Site Selection (Alternatives Considered)
- Appropriate Assessment

7.1. Visual Impact

- 7.1.1. The Planning Authority's reason for refusal is due to the scale, height, design, and proximity of the proposed development to sensitive receptors, including St. Finian's Roman Catholic Church (Protected Structure) and the historic core of Newcastle Village, which is a designated ACA. The refusal also states that the proposal would result in visual and urban clutter within this sensitive setting, be visually obtrusive, and form an overbearing and obtrusive feature in these village centre zoned lands.
- 7.1.2. HCL Policy 3, HCL3-1, and HCL3-2, which are referenced above in Section 5.3, seek to protect and ensure careful consideration of development proposals that could potentially affect the special character, or appearance, of a Protected Structure.
- 7.1.3. I note that there are several Protected Structures in proximity to the site, which should be considered in the context of the proposed development. This includes St. Finian's Roman Catholic Church (RPS Ref. 232) (also on the National Inventory of Architectural Heritage (NIAH), Ref. 11212002), which is directly west of the site, and Newcastle National School (RPS Ref. 230)¹ (also on the NIAH, Refs. 11212004 and 11212004), which is approximately 60m to the west. I note that the structures are referenced in the Planner's Report and considered as part of their assessment.
- 7.1.4. There are further Protected Structures roughly 80m to the west (RPS Ref. 229, NIAH Ref. 11212005), and 200m to the east (RPS Ref. 227, NIAH Ref. 11213001), respectively. Both structures are detached houses. They are orientated to face onto Main Street and contribute to the historic character of the town centre. In my opinion, given the nature of the proposal, which is for a tall telecommunications structure, the sensitive nature of the site's receiving environment, and that Newcastle Village is a designated ACA, the application should have included a detailed visual assessment, including viewpoints from each of these buildings, and a review of how they would be affected by the subject proposal.
- 7.1.5. Objective UC3-1 seeks to protect and conserve the special character of the historic core of traditional villages and ensure that a full understanding of the archaeological, architectural, urban design and landscape heritage of the village informs the design

¹ The building is currently used as a childcare facility called 'Choice Childcare Newcastle'. St. Finian's National School is situated approximately 150m to the south (Eircode: D22 A388).

approach to new development and renewal, particularly in Architectural Conservation Areas (ACAs). Objective IT07 requires best practice in siting and design in relation to erecting communication antennae. Objective IT08 seeks to keep visual impact to a minimum and requires that detailed consideration be given to the siting and external appearance of the proposed equipment.

- 7.1.6. No Landscape / Visual Impact Statement was provided in the application, or the appeal, only photographs. For such a sensitive receiving environment, it is reasonable to expect that such an assessment should have been provided. This would typically take the form of a series of photomontages comprising closeup and longer views of the proposed development, and an evaluation of the visibility and prominence of the proposal against its immediate environs, but also the wider townscape. Contiguous drawings are also lacking, which could have provided further context and information in relation to the site's receiving environment. In the absence of this material, it is not possible to accurately assess the visual impact of the proposed development and, for this reason, I would recommend that permission be refused.
- 7.1.7. Furthermore, whilst I acknowledge that public services are listed as acceptable in principle under the zoning for the site, I am not satisfied that the location of a 24m mast – or a 18m one² – would be appropriate in this context. This part of Newcastle Village is a historic town and there is a church and school located cheek by jowl to the appeal site. There is also a residential area directly to the north of the site, across Main Street, which has not been considered by the proposal. I note that the prevailing building height in the vicinity is low and mainly one to two storeys.
- 7.1.8. There are further other sensitive designations that apply to the site, including an Area of Archaeological Potential, Site of Geological Interest and Record of Monuments and Places - DU020-003 Newcastle Village. In this regard, Section 1.2 of the 1996 Guidelines is relevant, where it is stated that 'accordingly, fragile landscapes have to be treated sensitively, scenic views preserved, archaeological/geological sites and monuments, and buildings of historical and architectural interest protected and sacred areas respected'.

² I note that the Applicant would accept a condition requiring the proposed mast to be reduced in height to 18m.

- 7.1.9. The proposed development – perhaps to accommodate multiple service providers – is a form of lattice tower, and whilst not a tripod structure, it would be bulkier and heavier in appearance than a more modern, slim, and contemporary designed monopole mast.
- 7.1.10. The structure would be visually unattractive, in my opinion, and unsuited to this area, particularly having regard to its relatively wide and bulky nature. It would not be able to be satisfactorily screened, in my view, due to its prominent height, location, and the absence of any tall buildings or structures in the vicinity. It would tower over the adjacent church and school building/campus and be a prominent physical feature in the townscape of the village. Therefore, I do not believe the proposal is consistent with the 1996 Guidelines, which states that proximity to listed buildings and other monuments should be avoided.
- 7.1.11. In conclusion, I consider that the siting of the mast in this prominent and sensitive setting would seriously injure the visual amenities of the area, would negatively affect the character of the historic town core, including that of Protected Structures, and be contrary to the relevant Development Plan policies and objectives that apply, including Objective UC3-1, Objective HCL3-1, and Objective HCL4-4.

7.2. Site Selection (Alternatives Considered)

- 7.2.1. The Development Plan supports the widespread availability of a high quality Information and Communications Technology (ICT) network within the County. Objective IE4-3 seeks ‘to permit telecommunications antennae and support infrastructure throughout the County, subject to high quality design, the protection of sensitive landscapes and visual amenity’.
- 7.2.2. I have examined the Comreg Outdoor Coverage Mapping for 3G network coverage for the area. Vodafone’s coverage for the appeal site varies between ‘good’ and ‘fair’, which means that there is a mix of strong signals with good data speeds but that marginal data with drop-outs is possible at weaker signal levels. The 4G Outdoor Coverage Map shows that there is a larger prevalence of ‘fair’ coverage and that its network signal is sparser than 3G. It is clear that other parts of the County, including towards Greenogue Business Park to the east, and further to the south, have better service coverage, which ranges between ‘very good’ and ‘good’.

- 7.2.3. The *Telecommunication Guidelines and Planning Circular PL07/12* encourages co-locating antennae on existing support structures and requires documentary evidence of the non-availability of this option for proposals for new structures. It also states that the shared use of existing structures will be required where there is an excessive concentration of masts located in a single area. Telecommunication facilities are encouraged to primarily locate within existing industrial estates, or industrially zoned land, in the vicinity of larger suburban areas or towns, insofar as this is possible.
- 7.2.4. The Applicant submits that there are no industrial estates in the vicinity of the appeal site, or the surrounding area, however. There is also a general absence of other taller structures in the vicinity, which could potentially be used to accommodate the development proposed.
- 7.2.5. The application was accompanied by a report entitled 'Charter House Infrastructure Consultants' where under Section 4.1, 5 no. alternative locations were examined within a 2km radius of the subject site. This includes locations at Rathcreedan (1.3km to the south), Athgoe (1.6km to the southwest), Greenogue Business Park (two sites, 1.7km to the east, respectively), and Greenstar Dump Td (1.7km to the east). However, due to technical requirements, none of these locations were suitable and it was considered that the only realistic option is the subject site.
- 7.2.6. Notwithstanding the above, I do not accept that all alternatives have been fully considered by the Applicant. Generally, there are many masts in towns, or on the periphery of towns, around the country, which are more discreetly located than that proposed, be it to the rear of taller buildings, on rooftops, or in green field areas outside the main town thoroughfare / centre.
- 7.2.7. Having reviewed the information contained within the original application and appeal, I am not satisfied that alternative sites have been fully explored and consider that the proposal is not justified having regard to the sensitive nature of the site and its surrounding vicinity.

7.3. **Appropriate Assessment**

Given the nature and scale of the development proposed, which is for a telecommunications support structure and ancillary works, and separation distance

from the nearest Natura 2000 site, it is considered that the proposal would not be likely to have a significant effect individually or in combination with other plans and projects on a European site and there is no requirement for a Stage 2 Appropriate Assessment.

8.0 Recommendation

I recommend that planning permission should be refused for the reasons and considerations as set out below.

9.0 Reasons and Considerations

Having regard to the Telecommunications Antennae and Support Structures Guidelines for Planning Authorities issued by the Department of Housing, Planning and Local Government in 1996 (as updated by Circular Letter PL 07/12); the South Dublin County Development Plan 2016 – 2022, including Objectives UC3-1, HCL3-1 and HCL4-4; the height, scale and prominent location of the proposed development in an area that is zoned ‘Village Centre’ and designated as an Architectural Conservation Area, and its proximity to Protected Structures, including St. Finian’s Roman Catholic Church (RPS 232) and Newcastle National School (RPS Ref. 230); it is considered that the proposed development would have an unacceptable impact and adversely affect the visual amenities of the area. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

Ian Boyle
Planning Inspector

23rd March 2022