



An
Bord
Pleanála

Inspector's Report

ABP-312528-22

Development	Erection of a 20m high lattice telecommunications support structure together with antennas, dishes and associated equipment
Location	eir Exchange, Barrack Lane, Granard, Co. Longford
Planning Authority	Longford County Council
Planning Authority Reg. Ref.	2195
Applicant(s)	Eircom Ltd
Type of Application	Permission
Planning Authority Decision	Refuse
Type of Appeal	First Party
Appellant(s)	Eircom Ltd.
Observer(s)	None.
Date of Site Inspection	27 th of July 2022
Inspector	Caryn Coogan

1.0 Site Location and Description

- 1.1. The subject site is an Eircom Exchange site located in the centre of Granard town Co. Longford. The site is located along Barrack Lane, which is to the north of Main Street.
- 1.2. The site, 0.013Ha, is located within the Harp Business Park of Granard. There is a single storey utilities building on the site, with a monopole on one façade and a palisade fence.
- 1.3. The area includes a very large vacant building overlooking the site to the north.
- 1.4. There are two existing masts along Barrack Lane, one at the Garda Station 130metres south east of the site and another new 21m lattice structure located 190metres north-west of the site, owned by Cignal.
- 1.5. There are industrial units to the top of Barrack Lane which is elevated, and overlooks the subject site.

2.0 Proposed Development

- 2.1. The proposal is for a 20metre high lattice telecommunications support structure together with antennas, dishes and associated equipment at the Eir Exchange. The applicant, Eir has indicated that the development is required to significantly improve its service provision in Granard.
- 2.2. Following a response to the further information received on 02/12/2021, the applicant stated locating the mast at an existing exchange enables Eir to utilise existing utilities and underground linkages. There were photomontages to demonstrate the visual impact of the structure. The proposed structure will provide coverage for a significant number of residents, businesses and enterprises.

3.0 Planning Authority Decision

3.1. Decision

Longford Co. Co. refused the proposed development for two reasons:

1. The proposed development by way of its size, design and location would have a negative impact on the scenic, heritage and cultural value of the area, and the landscape features of special historic and cultural interest protected under Policies LCA 1 & LCA 3 respectively of the Longford County Development Plan 2015-2021. The proposed development and the precedent it would set, would therefore contravene this objective and as such would be contrary to the proper planning and sustainable development of the area.
2. The Planning Authority is not satisfied that the proposed development complies with '*Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities*' published by the DOE in 1996 in relation to the investigation of more suitable alternative sites for the proposed structure and the scope for the sharing of installations. A site adjacent to the proposed location already scope for co-location, and therefore should be considered as a suitable aerial/ mast to locate proposed antennae/ dish structures. In light of this the development would, therefore, add to the existing proliferation of such structures at this elevated rural location and be contrary to the proper planning and development of the area.

3.2. Planning Authority Reports

3.2.1. Planning Reports

- The Longford County Development Plan was renewed during the assessment of the planning application.

3.3.2 Other Technical Reports

None

3.3. Prescribed Bodies

HSE stated a statement of compliance with International Radiation Protection Association.

Dept. of Communications, Climate Action and Environment – No objections.

3.4. Third Party Observations

Signal submitted an observation to the planning application. A summary of the submission is as follows:

- Longford Co. Co. Granted planning permission for a 21metres multi-user lattice tower telecommunications tower adjacent to the subject site. The structure is in place and provides a safe, secure co-located installation.

4.0 Planning History

There is no relevant planning history relating to the subject site or the proposed development.

5.0 Policy Context

5.1. Development Plan

Longford County Development Plan 2021-2027

The subject site is zoned Industrial ‘*To primarily provide for industrial/ workshop , warehouse and commercial or business development including compatible uses such as office and distribution.*’

The site is located within an Area of Archaeological Potential around Monument LF 010-055

5.9 Information and Communication Infrastructure

The provision of a high-quality competitive information and communications telecommunications (ICT) service is essential in order to promote industrial and commercial development, and to enhance social inclusion and mobility. There is a reliance on the provision of such services for industrial, commercial, tourism and social development and the expansion of ICT infrastructure is key to meeting the needs of the County’s population and a digital economy. This is addressed further in Chapter: Economic Development Strategy. ICT investment is essential for furthering the social and economic development of County Longford. The provision of an efficient broadband service is critical in the development of a knowledge-based

economy, and as such the need to build new infrastructure to provide increased capacity in order to raise the quality of coverage and to meet the demand for services is recognised. As witnessed during the restrictions arising from the COVID-19 pandemic, the availability of high-quality ICT infrastructure, particularly broadband, is a vital feature of modern business and enterprise. The pandemic provided a unique opportunity to evaluate the infrastructural capabilities of remote working at a mass-level through demands on internet connectivity and appropriate channels of communication and highlighted the importance of high-quality ICT infrastructure. 5.9.1 Telecommunications Infrastructure Fast, reliable and cost-effective telecommunications can encourage economic development in an area and can enhance quality of life in a number of areas by offering new choices in education, entertainment and communications. There are a number of mobile voice and data service providers operating across the county including Vodafone, O2, Three and Meteor. The Council will have regard to planning guidelines provided by the DoEHLG 'Telecommunications Antennae and Support Structures, Guidelines for Planning Authorities' in assessing proposals for telecommunications infrastructure and support structures. The Planning Authority will work with the telecommunications providers to facilitate the development of infrastructure that respects the recognised values of the natural and built heritage and will seek to encourage the co-location of masts and antennae on existing structures within the county.

County Development Plan policies.

CPO 5.174

Promote orderly development of telecommunications infrastructure throughout the county in accordance with the requirements of the following: - 'Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities' (1996), except where they conflict with Circular Letter PL 07/12 which shall take precedence, and any subsequent guidelines. - 'Guidance on the potential location of overground telecommunications infrastructure on public roads', (Dept of Communications, Energy & Natural Resources, 2015).

CPO 5.175

Ensure that the location of telecommunications structures should minimise and /or mitigate any adverse impacts on communities, public rights of way and the built or natural environment.

CPO 5.176

Encourage co-location of antennae on existing support structures and to require documentary evidence as to the non-availability of this option in proposals for new structures. The shared use of existing structures will be required where the numbers of masts located in any single area is considered to have an excessive concentration.

5.2 National Planning Policy

5.2.1 Project 2040

There are several objectives aimed at supporting broadband rollout, including support for the National Broadband Plan (2012), Project 2040 and the National Development Plan 2018-2027.

5.2.2 National Planning Framework

Objectives include:

- Improving local connectivity to principle communication, energy, transport and water networks.
- For rural Ireland broadband is an essential infrastructure
- National Policy Objective 24: Support and facilitate delivery of the National Broadband Plan as a means of developing further opportunities for enterprise, employment, education, innovation and skills.

5.2.3 National Development Plan 2018-2027

The government recognises that access to quality high speed broadband is essential for today's economy and society.

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

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.

Section 4.3 of the Guidelines states with respect to Visual Impact:

There will be local factors which have to be taken into account in determining 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, weather and lighting conditions, etc.

Section 4.5 Sharing Facilities and Clustering Sharing of installations (antennae support structures) will normally reduce the visual impact on the landscape. The potential for concluding sharing agreements is greatest in the case of new structures when foreseeable technical requirements can be included at the design stage. All applicants will be encouraged to share and will have to satisfy the authority that they have made a reasonable effort to share. Where the sharing of masts or towers occurs each operator may want separate buildings/cabinets. The matter of sharing is probably best dealt with in pre-planning discussions. 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. On hill tops clustering may not offer any improvement from the point of view of visual intrusion but in urban or suburban areas use of the same structure or building by competing operators will almost always improve the situation. Support structures used by emergency or other essential services are not suitable for sharing with public mobile telephone services

5.2.5 Circular Letter: PL 07/12 Telecommunications Antennae and Support Structures Guidelines

5.2. Natural Heritage Designations

Nearest site 10km east:

Site Code : 004061

Site Name : Lough Kinale and Derragh Lough SPA

6.0 The Appeal

6.1. Grounds of Appeal

Towercom has taken this appeal on behalf of Eircom Ltd following a refusal by Longford Co. Co. for the 20metres lattice telecommunications structure. A summary of the grounds of appeal is as follows:

6.2 ***Response to Refusal – Reason No. 1***

Longford County Development Plan 2015-2021-2027

The development plan states the importance of telecommunications and the need was exacerbated by Covid. There is substantial pressure on services. The digital communications industry has grown exponentially.

Reason No1 cited two policy statements

LSA 1 : It is the policy of the Council to protect and enhance the County's landscape character by ensuring that development retains, protects and where necessary enhances the appearance and character of the local landscape. Proposed developments, where located or adjacent to sensitive landscapes may be required to provide a landscape report detailing how the proposal will impact on the landscape and mitigation measures to be taken where necessary to address negative impacts. Proposals that have a detrimental impact on the landscape will not normally be permitted.

LCA 3 : It is the policy of the Council to preserve views and prospects as illustrated on the accompanying map as part of Appendix 6 and as listed in the following tables. (relating to scenic views).

With regard to LCA 1 the planning report reference protected structure LF 010-055.The Church, which is a National Monument.

It is submitted most views towards the monument are blocked by a row of houses. The proposed structure will be one of a small aspect of manmade structures on view which include buildings, silos, masts. There is no impact on scenic, heritage or

cultural views or the landscape features of the historical core. The landscape features are located on the western part of the town.

With regard to LCA 3 the closest scenic view is F.S. 14 Moatfield, Grandhill, Ballybrien, Ballymacroly. This route runs between the N55 and the R194 to the west of the town. The proposed structure is not a terminating view and would blend into an already busy townscape. The proposed structure does not conflict with the views.

The telecommunications structure granted under 2081 is within an area of archaeological importance and was not the subject of the same refusal even though the same parameters were applicable. The structure granted planning permission is similar in height, style and location.

Under the development plan, Granard is recognised as an important growth town with growth forecast in all aspects. The need for communications is essential for economic development and the future of Granard.

6.2 ***Response to Refusal – Reason No. 2***

The second reason for refusal cites the Guidelines for Planning Authorities published by the DOE in 1996, and specifically to the investigation for more suitable alternative sites and the scope for sharing installations. The roof top of the existing building on site is insufficient to provide the required local coverage to meet demand. Vodafone transmits from a structure attached to the exchange building, this has been in operation since 1988 and consists of a pole attached to the side of a building. As well as Eir, Vodafone also benefits from the links associated with the exchange. The exchange is on Vodafone National Fibre ring and the new proposed structure provides increased structural capacity for Vodafone to install radio link dishes to allow backhaul transmission capacity from surrounding sites to be aggregated back to the high-capacity point of collection. The fibre network is not available at the alternative site mentioned within the refusal, and it is regrettable this was not made clear to the planning office at the time, however the links that are secured from the exchange are very important for the operation of services by both Eir and Vodafone. The current installation is unable to provide 4G and 5G services. The upgrade will also enhance the current 2G and 3G services.

- Design and Siting : This section is 4.2 of the Guidelines. The lattice is 20m of minimum height and is located alongside an Eircom exchange in Barrack

Lane. The site is in between residential and industrial zoning. The garda mast is to the southeast of the site and the Cignal mast is 190metres northwest, both on Barrack Lane. The three structures could be regarded as cluster along Barrack Lane.

- Visual Impact: The Guidelines state that only as a last resort should free standing should be located in towns and if it becomes necessary then on sites that have already been developed for utilities. The alternative site suggested in the reason for refusal is unsuitable because it does not provide the necessary established links available from the exchange. The design accords with the existing masts either side. This is an established location for two service providers.
- Site Sharing and Clustering: The proposed development has the facility for sharing. The Eircom exchange is an established facility providing an important operational service for Vodafone and eir, and the existing Cignal mast does not offer the scope for co-location.

6.3 Eir and Voafone's current service provision requires fit for purpose infrastructure from which to transmit.

6.2. Applicant Response

No further response.

6.3. Planning Authority Response

There were no further comments made by the planning authority on appeal.

7.0 Assessment

7.1. Having inspected the site, considered the appeal file and planning policy, I consider the appeal should be assessed under the following headings:

- Reasons for refusal
- Planning Policy
- Appropriate Assessment.

7.2 Reasons for Refusal

7.2.1 The first reason for refusal:

The proposed development by way of its size, design and location would have a negative impact on the scenic, heritage and cultural value of the area, and the landscape features of special historic and cultural interest protected under Policies LCA 1 & LCA 3 respectively of the Longford County Development Plan 2015-2021. The proposed development and the precedent it would set, would therefore contravene this objective and as such would be contrary to the proper planning and sustainable development of the area.

Firstly, the site is located in an Area of Archaeological potential in the centre of Granard town. However, Barrack Lane, provides access to an industrial site, and a large derelict/ vacant building. The subject site is an existing eircom exchange utilities site, located halfway along Barrack Lane. There are no protected structures, vernacular streetscapes, or quality architectural features along the street. The setting of the subject site is currently a nondescript and somewhat lifeless urban setting, and I do not agree with the planning authority's description that the immediate vicinity of the site has '*scenic, heritage and cultural value*'.

7.2.2 The development plan policies cited in the reason for Refusal No. 1, are from the former Longford County Development Plan 2015-2021, are, in my opinion are not relevant to the subject site or location. They are as follows:

LSA 1 : *It is the policy of the Council to protect and enhance the County's landscape character by ensuring that development retains, protects and where necessary enhances the appearance and character of the local landscape. Proposed developments, where located or adjacent to sensitive landscapes may be required to provide a landscape report detailing how the proposal will impact on the landscape and mitigation measures to be taken where necessary to address negative impacts. Proposals that have a detrimental impact on the landscape will not normally be permitted.*

LCA 3 : *It is the policy of the Council to preserve views and prospects as illustrated on the accompanying map as part of Appendix 6 and as listed in the following tables. (relating to scenic views).*

With regard to LCA 1, the Planning Report on the application file, references a protected structure LF 010-055 The Church, which is a National Monument. I noted from my inspection, most of the views towards the Monument from the site and the immediate vicinity, are blocked by a row of houses. The proposed lattice structure will be one of a small aspect of manmade structures on view which include buildings, silos, masts. There will be no material or visual impact on scenic, heritage or cultural views or the landscape features of the historical core as a result of the proposal. The architectural features are located on the western part of the town a considerable distance from the site and the views from same are blocked by buildings. Looking at the site from a distance in the context of the National Monument, there will be no material impact on the visual qualities of the area or hindrance of views towards the church. I conclude, Reason No. 1 of the Refusal is not relevant to the current proposal, and it should be dismissed.

7.2.4 In terms of the second reason for refusal, the planning authority consider the proposed development does not comply with the 2006 Department Of Environment publication, '*Planning Guidelines for Telecommunications Antennae and Support Structures*' in terms of investigation into alternative sites and scope of sharing installations. An existing new lattice structure less than 200metre north of the subject site is cited in the reason for refusal as a suitable for co-location. The planning authority considered the proposed development would add to the proliferation of such structures at an elevated 'Rural' location. I consider the planning authority has incorrectly described the location as rural, the site is in the town of Granard town, one of the main settlements in Co. Longford. The proposal must be considered in the context of its urban location, where masts, antennae and dishes are a regular occurrence in built up areas and on rooftops.

7.2.5 There are two existing masts located along the same street, Barrack Lane, one beside the Garda Station, circa 130m just south of the subject site, and the new 21metre lattice structure circa 190metres north of the site. In response to the reason for refusal the applicant has submitted to the Board that the roof top of the existing Eircom exchange on site, is insufficient to provide the required local coverage to meet with local demand for 3G and 5G services. Vodafone transmits from a structure attached to the exchange building, this has been in operation since 1988 and consists of a pole attached to the side of a building. As well as Eir, Vodafone

also benefits from the links associated with the exchange. The exchange is on Vodafone National Fibre ring and the new proposed structure provides increased structural capacity for Vodafone to install radio link dishes to allow backhaul transmission capacity from surrounding sites to be aggregated back to the high-capacity point of collection. The applicant further claims the fibre network is not available at the alternative site (Cignal) mentioned in the second reason for refusal. The current installation to the north of the site is unable to provide 4G and 5G services. The proposed upgrade will also enhance the current 2G and 3G services. It is further submitted by the applicant that the proposed lattice is 20m of minimum height and is located alongside an Eircom exchange in Barrack Lane. The site is in between residential and industrial zoning. The appellant states, the garda mast and the Cignal mast both on Barrack Lane could in conjunction with the proposed mast, be regarded as cluster along Barrack Lane.

7.2.6 In my opinion, the piecemeal nature of these planning applications for telecommunications structures in Granard is unacceptable. It is my opinion, the second reason for refusal should be upheld. The receiving built environment has no defined streetscape and lacks urban character. The subject site is a single storey utility building which includes a pole and small dish. The site is enclosed by a palisade fence. In my opinion, the existing Cignal mast at the top of Barrack Lane creates a significant visual impact when viewed from the street because of its elevated siting. To permit another similar structure within 200metres of the existing structure along Barrack Lane would represent an excessive concentration of masts within a confined area, especially when taken in conjunction with the mast at the Garda station at the southern extremity of Barrack Lane.

7.2.7 Having considered the justification for an additional mast at the subject site because the fibre network is not available to the Cignal site, I believe this issue would need to be addressed further by Cignal to investigate further if the deficiency can be overcome, which is most likely can given the proximity of the mast to the fibre. I note Cignal made an observation at the planning application stage, and it stated co-locations was possible and available on the existing new lattice structure. I consulted the online Comreg Coverage Maps and certain operators have very good 3G, 4G and 5G coverage in the area, and I accept the coverage for Eir and Vodafone is not as

good, but this does not imply they could not co-locate onto the existing lattice structure.

7.2.8 Planning Policy

I do not accept the applicant's justification for another mast at this location is reasonable. There is no technical evidence submitted to support the applicant's contention that the operators cannot be served by existing masts in close proximity to the site. It would appear, the operators are haphazardly applying for planning permission for new communications structures without due consultation between the providers to share and co-locate in accordance with the Ministerial Guidelines. The Telecommunications Guidelines state that only as a last resort should masts be located within or in the immediate surrounds of smaller towns or villages, or in a residential area or beside schools. If such a location should become necessary, sites already developed for utilities should be considered. I accept this is an Eircom exchange site, a new modern lattice structure should only be considered on this site when it has been demonstrated that co-location and provision of required coverage is not possible on the newly constructed lattice structure less than 200metres from the site.

7.2.9 In my opinion, another mast within such a confined area represents a concentration of telecommunication masts that will be detrimental to the visual amenities in the town, given the cluster impact of such towers on the urban landscape. Whilst I accept the site and the immediate area do not possess great townscape qualities, the area has development potential, and a cluster of masts could potentially impact negatively on the visual qualities of the area.

7.3 Appropriate Assessment

The nearest Natura 2000 site is (Lough Kinale and Derragh Lough SPA, Site Code : 004061) located c. 10km to the southeast of the appeal site. Having regard to the limited extent of the proposed works and the significant distance between the appeal site and the Natura 2000 network, I do not consider that there is any likelihood of significant effects in this case. Accordingly, no Appropriate Assessment issues arise, and it is not considered that the proposed development would be likely to have a significant effect either individually or in combination with other plans or projects on a European site.

8.0 Recommendation

I recommend the planning authority's decision to refuse planning permission for the proposed development be upheld.

9.0 Reasons and Considerations

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 existing 21metres freestanding structure within 200metres of the subject site,

(c) the close proximity of the proposed structure to another existing mast south of the site along Barrack Lane

it is considered that the proposed development does not comply with national guidelines as the applicant has failed to demonstrate sufficiently the subject site was a last and only location in Granard to enhance the existing coverage in the area, in addition to the proposal represents a haphazard and piecemeal approach to providing the required coverage in the area to the detriment of the visual amenities of the town. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

Caryn Coogan
Planning Inspector

26th of August 2022