



An  
Bord  
Pleanála

## Inspector's Report ABP312583-22

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<b>Development</b>	Erection of 30m high lattice telecommunications support structure.
<b>Location</b>	Trudder Townland, Newtownmountkennedy, Wicklow.
<b>Planning Authority</b>	Wicklow County Council.
<b>Planning Authority Reg. Ref.</b>	211339.
<b>Applicant(s)</b>	Vantage Towers Ltd.
<b>Type of Application</b>	Permission.
<b>Planning Authority Decision</b>	Refuse.
<b>Type of Appeal</b>	First Party.
<b>Appellant(s)</b>	Vantage Towers Ltd.
<b>Observer(s)</b>	James and Sandra Whelan Ruth Prenderville Emmet and Gemma Rafter.
<b>Date of Site Inspection</b>	<a href="#">Click here to enter text.</a>
<b>Inspector</b>	Mary Mac Mahon.

## 1.0 Site Location and Description

- 1.1. The site is located to the south-west of Newtownmountkennedy, in an upland agricultural field off a local road, south of the R765. The site is visible from the R772, the former N11. The Duck Walk, where some of the observers, live, is nearly directly in line with the site, some 500 metres east. The Duck Walk is elevated above the R765.
- 1.2. The area north of the site is being developed for residential use. The local Newton GAA club is south-west of the site, with flood lighting around the pitch. While there is little screening on the site, the upland western side of the local road is quite heavily treed, providing a backdrop to the proposed development. The site access is an agricultural field entrance, north of the 80 kph speed limit. The lands here are rising, with views to the uplands south and west and the sea to the east. The angle masts for the ESB line are visible to the east from this location. The level on the public road is stated as 108 ASL. The level on the site is stated as 107 ASL. The site area is stated as 0.0796 ha.

## 2.0 Proposed Development

- 2.1. The proposed development is for a lattice tower of 30 metres in height, with associated antennas and dishes with 2 no. operator cabinets. 2.4 metre high palisade fencing is proposed as boundary treatment. Access to the tower is to be via a 240 metre long access route, 3 metres in width.

## 3.0 Planning Authority Decision

### 3.1. Decision

Refused for one reason:

*“Having regard to:*

- (a) The design, scale and height of the proposed lattice structure at circa 30 meters directly adjacent to lands zoned for proposed residential development and a future schools campus;*

*(b) The failure of the applicant to submit a visual impact statement noting the location of the protected view No. 46 circa 500 to the south east of the application site;*

*(c) The failure of the applicant to provide sufficient evidence that there is a need for the structure at this location noting that they only have provided coverage data and a letter of support from one service provider;*

*It is considered that the proposed development would be contrary to the development standards for masts and telecommunications structures as set out in the Wicklow County Development specifically with regard to Objective T2 and Appendix 1 of the Wicklow County Development Plan noting its location directly adjacent to lands zoned for residential development and a future schools campus. The proposed development would seriously detract from View 46 listed in the County Development Plan for preservation and would have a negative impact on the visual amenity of the area. To permit this development would therefore be contrary to the proper planning and sustainable development of the area.”*

### **3.2. Planning Authority Reports**

#### Planning Report

The Planning Officer noted that a number of submissions have been received in relation to the proposed development. A summary of the submissions is provided. It is noted that while the site is zoned for agricultural use, lands to the north are zoned for Community and Education use and lands to the northwest for residential use.

The proposed development is acceptable in principle, subject to environmental and visual amenity constraints and compliance with development plan policy. There is a general prohibition on new support structures not being permitted in or within the immediate surrounds of a residential area or beside schools.

Rockfield residential development is under construction and part occupied, circa 145 metres to the north. An application is under consideration, with the nearest proposed dwelling, some 25 metres from the proposed mast [this has been subsequently permitted].

An alternative site was considered at the Newtown Business and Enterprise Centre, but was not satisfactory for the applicant.

The planning authority has serious concerns about the location of the mast, given its proximity to residential development and that the lands are to be re-zoned for Community and Education uses in the draft development plan [there is a note on the file stating that this is not a consideration at this time as the plan is only draft].

No visual impact assessment has been provided, which is critical given the protected view, View ID 46.

No Statement of Compliance with the International Radiation Protection Association Guidelines.

The need for the mast has not been satisfactorily demonstrated, as only one service provider has given a letter of support and maps supplied indicate that 4G coverage is 'Good' or 'Very Good' in the area.

There are a number of other similar structures within 3km radius of the site. The applicant states that these are either too far away or the antennae would be too low to secure the required coverage.

No details on the finish of the access road, fencing or works to the agricultural entrance are provided, nor in relation to cabling.

Refusal recommended.

#### Other Technical Reports

Roads – no objections.

Irish Water – standard observations.

## **4.0 Planning History**

None on the site.

#### Site to the north:

21/1000 – application for 57 no. houses to the north of the site. A Decision to Grant has been issued by the planning authority (05.05.2022).

Other applications for Vantage Towers Ltd refused for similar reasons.

## 5.0 Policy and Context

### 5.1. National Policy

#### *National Development Plan 2021-2030*

NSO3 – Strengthen Rural Economies and Communities notes the National Broadband Plan.

The plan refers to the impact of Covid 19 and future requirements for working from home. It notes on page 48 that 92% of broadband is provided through the private sector. It states:

*“Public investment in broadband is generally limited to subsidising the service to households in rural and dispersed locations where it is not economically viable for the private sector to do so due to the significant costs. The National Broadband Plan which is currently being rolled out will subsidise broadband in these locations through public expenditure.”*

It states that the National Broadband Plan will take 5 to 7 years for completion of the network. It will serve 1.1 million people.

A Digital Strategy for Schools is discussed. On page 139, it states:

*“The Digital Strategy for Schools is a priority initiative which seeks to further embed digital technology teaching, learning and assessment in primary and post-primary schools. Capital investments in connectivity and equipment, alongside teacher upskilling, are essential to the embedding of digital technologies in education across all classrooms. The ongoing embedding of the use of digital technologies in teaching, learning and assessment underpinned by this strategy is being supported over the period of the NDP Investment in appropriate ICT infrastructure will support curricular developments such as Computer Science at senior cycle, the planned review of the primary maths curriculum (to include computational thinking), and the implementation of the STEM strategy. Investment is also required to ensure that availability of high speed broadband in all areas, as envisaged under the National Broadband Plan, can be optimised through appropriate connectivity in schools.”*

Strategic Investment Priorities for schools includes “*Underpinning the ongoing embedding of the use of digital technologies in teaching, learning and assessment.*”  
*Project Ireland 2040 National Planning Framework (2018)*

The overview of the strategy refers to improving local connectivity to broadband. Shared goals include a strong economy and strengthened rural communities, both of which refer to broadband and digital connectivity.

National Policy Objective 21 seeks to enhance the competitiveness of rural Ireland, and to encourage ICT-based industries.

National Policy Objective 24 is to support and facilitate delivery of the National Broadband Plan as a means of developing further opportunities for enterprise, employment, education, innovation and skills development for those who live and work in rural areas.

#### *National Broadband Plan*

The plan applies to 23% of the population, which receive internet speeds of less than 30Mbps. In Wicklow, only two schools have access to a Broadband Connection Point at present. When I checked the National Broadband site on 05.05.2022, it stated that the area of the subject site was not included in the National Broadband roll-out. The nearest broadband connection point is 10km away, in Wicklow County Council headquarters.

#### *Our Rural Future 2021-2025*

In this plan, it notes that national broadband connection points for schools will only be rolled out where existing or planned commercial services does not provide for highspeed broadband. Highspeed broadband is defined as 100Mbps.

#### *Circular Letter PL07/12 Telecommunications Antennae and Support Structures Guidelines*

This provides some updates to the national guidelines published in 1996. It recommends that temporary permissions are not provided. No separation distances should be indicated in development plans and should be judged on a case by case basis.

Bond, restoration and financial contribution conditions should not be included in permissions.

Planning applications should not be determined on health grounds.

#### *Telecommunications Antennae and Support Structures Guidelines 1996*

*“The Government’s telecommunications policy aims to place Ireland in the top quartile of OECD economies as regards the availability, price and quality of telecommunications services in order to promote industrial and commercial development, to improve personal and household security and to enhance social exchange and mobility.” Page 2.*

It states that higher masts are usually required in rural areas.

*Whatever the general visual context, great care will have to be taken when dealing with fragile or sensitive landscapes, with other areas designated or scheduled under planning and other legislation, for example, Special Amenity Areas, Special Protection Areas, the proposed Natural Heritage Areas and Special Areas of Conservation and National Parks. Proximity to listed buildings, archaeological sites and other monuments should be avoided.*

- *Along major roads or tourist routes, or viewed from traditional walking routes, masts may be visible but yet are not terminating views. In such cases it might be decided that the impact is not seriously detrimental*
  
- *Similarly 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 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.*

*In the vicinity of larger towns and in city suburbs operators should endeavour to locate in industrial estates or in industrially zoned land. The possibilities offered by some commercial or retail areas should be explored whether as rooftop locations or by way of locating “disguised” masts.*

- *Such locations might include, for example, lands whose high amenity value is already recognised in the development plan or sites beside schools which might give rise to local concerns,*

*Only as a last resort and if the alternatives suggested in the previous paragraph are either unavailable or unsuitable should free-standing masts be located in a residential area or beside schools. 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 and should be monopole (or poles) rather than a latticed tripod or square structure.*

## **5.2. Regional Policy**

### **Regional Spatial and Economic Strategy 2019-2031**

*“RPO 4.2: Infrastructure investment and priorities shall be aligned with the spatial planning strategy of the RSES. All residential and employment developments should*



*be planned on a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for services (e.g. water supply, wastewater, transport, broadband) is available to match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded.” Page 51*

*Orderly Growth: This encompasses connectedness aimed at facilitating a network of skills and talent living in our settlements. It requires a support network of infrastructure - including broadband - in order to make the Region more connected and competitive. Page 124*

*RPO 8.25: Local authorities shall:*

- Support and facilitate delivery of the National Broadband Plan.*
- Facilitate enhanced international fibre communications links, including full interconnection between the fibre networks in Northern Ireland and the Republic of Ireland.*
- Promote and facilitate the sustainable development of a high-quality ICT network throughout the Region in order to achieve balanced social and economic development, whilst protecting the amenities of urban and rural areas.*
- Support the national objective to promote Ireland as a sustainable international destination for ICT infrastructures such as data centres and associated economic activities at appropriate locations.*
- Promote Dublin as a demonstrator of 5G information and communication technology. Page 199*

### **5.3. Development Plan**

*The Wicklow County Development Plan 2016-2022 applies.*

*In Chapter 9, it states the objectives in relation to telecommunications infrastructure:*

*T1 To facilitate the roll out of the National Broadband Plan and the development/expansion of communication, information and broadcasting networks,*

*including mobile phone networks, broadband and other digital services, subject to environmental and visual amenity constraints.*

*T2 The development of new masts and antennae shall be in accordance with the development standards set out in Appendix 1 of this plan.*

*T3 To ensure that telecommunications structures are provided at appropriate locations that minimise and / or mitigate any adverse impacts on communities, and the built or natural environment.*

Appendix 1 requires that operators justify the need for new installations; to adopt a sequential approach to the location of new infrastructure in urban areas, (clustering near existing masts, industrial estates, rooftops of commercial/retail areas, in parks and open space areas, where a disguised mast maybe required). It states that:

*“New support structures shall not be permitted within or in the immediate surrounds of a residential area or beside schools.”*

In relation to rural areas, sites should not be located in direct lines of sight of protected views. Access roads should not scar the landscape. Taller masts should be only considered if as a result, fewer masts are needed. Monopoles are required. The plan also includes a number of recommended conditions that do not take the Circular into account.

In relation to protected views, the development plans states:

*NH52 To protect listed views and prospects from development that would either obstruct the view / prospect from the identified vantage point or form an obtrusive or incongruous feature in that view / prospect. Due regard will be paid in assessing development applications to the span and scope of the view / prospect and the location of the development within that view / prospect.*

The site is located in the North East Mountain Lowlands, which is an Area of High Amenity. The plan notes that these are Transitional lands located between the corridor zone and the AONB, comprising of Trooperstown Hill, large tracts of forestry lands, including Devil’s Glen (a listed County Geological site) and a number of views and prospects in particular those surrounding the Vartry Reservoir.

However, in relation to Urban Areas, the plan states:

*“All locations designated as ‘settlements’ in the County settlement hierarchy (i.e. areas falling within Levels 1-6) are considered ‘urban’ areas for the purpose of landscape classification. In terms of landscape classification, these settlements have already been deemed suitable for development (of the type allowed by the settlement strategy and the development standards of this plan) and the impacts on the wider landscape of such development has already been deemed acceptable. Therefore it will not be necessary for developments in urban areas to have regard to the surrounding landscape classification or to carry out landscape or visual impact assessment.”*

The site is in a protected view, V46 Old N11 NTMK – view toward the north and west. In regard to protected views, the plan states:

*“Where listed views / prospect occur in settlements, it is not the intention that all lands in the view / prospect will be ‘sterilised’ from development. Any application for development in such locations will be required to provide an assessment of the view / prospect and an evaluation of how the development would change or interfere with that view / prospect. Views and prospects listed for the towns of Bray, Wicklow, Arklow and Greystones-Delgany are listed and mapped in each individual Town Development Plan / Local Area Plan. The policies and objectives set out in this Plan shall apply to all views/prospects listed for preservation in these local plans.”*

*Newtownmountkennedy Local Area Plan 2008-2018*

Please note that the LAP has expired.

The site is located in the development boundary of Newtownmountkennedy. It is located in View 3 of the Local Area Plan. Part of the site, where the access road is located, is zoned Active Open Space. This zoning objective is to provide for active recreational open space. The mast is located in Agricultural zoned lands. The objective of this is to provide for agricultural uses with an option for the life of the County Development Plan 2004-2010 to provide for a business, office, science and technology park set in open parkland with extensive landscaping, a high architectural standard of layout and building design with low site coverage.

Telecommunications installations are not listed on the Land Use Matrix. Uses not recorded in the Land Use Matrix will be considered in relation to the general policies of the plan and the zoning objectives of the particular area.

The *Draft Local Area Plan 2021-2027* retains the Active Open Space zoning on the access route, but the telecommunications compound comes within the Community and Education land use zoning. Lands east of that zoning are now indicated to be zoned for Employment uses.

#### 5.4. **Natural Heritage Designations**

5.5. Having regard to minor scale and the foreseeable emissions from the proposed development no Appropriate Assessment issues arise, and it is not considered that the proposed development would be likely to have a significant effect individually or in combination with other plans or projects on a European site.

#### 5.6. **EIA Screening**

The proposed development does not come within a class of development where Environment Impact Assessment is required.

### 6.0 **The Appeal**

6.1. Charterhouse Infrastructure Consultants has submitted this appeal on behalf of the First Party. A letter of support from Three Ireland is also included, stating that the current uptake of devices has put additional pressure on the network.

#### 6.2. **Grounds of Appeal**

- The decision by the planning authority is requested to be granted, having regard to national and regional policy.
- A lattice tower is necessary for faster installation than a monopole and to be able to easily provide for a number of different service providers at the same height.
- The proposed development will provide for 5G services, which can only support a smaller area than 4G or 3G.

- The height is required to provide greater coverage and because of the topography of the area, which requires line-of-sight between dishes on the network.
- Particularly for 5G services, these need to be close to the source of demand.
- The location future-proofs coverage for further development of the area.
- There was insufficient time at appeal stage to prepare a Visual Impact Statement.
- There will be some visual impact due to the height of the proposed structure. However, impacts on the protected views will be intermittent or minimal.
- If smaller structures are necessary to facilitate the level of coverage necessary, more structures will be needed.
- There are other protected views in Newtownmountkennedy and some impact would arise in these views. The benefit of the current location is that there are no impacts on protected structures, national monuments, etc.
- There is increasing demand for greater connectivity in a world where digital services are growing rapidly, with mobile phones only one component. Digital communication is essential for the economy, education and lifestyle.
- The current level of service in Newtownmountkennedy is limited, in terms of coverage and capacity.
- Modern homes, with higher standards of insulation, are more difficult for the mobile signal to penetrate, as evidence by Comreg.

### 6.3. Planning Authority Response

None received.

#### 6.4. Observations

James and Sandra Whelan (which includes photomontages, maps and other information).

- View ID 46 is a protected view in the current development plan.
- To permit the development would be contrary to NH52 of that plan.
- Failure to provide a visual assessment, which is consistent with the applicant's approach on other applications and appeals, where there is local opposition.
- A VIA is necessary for an informed decision to be made.
- The mast is too tall for the planting to hide it; it will be visually obtrusive.
- Permission for residential development has been granted in the area and so to permit this structure would be contrary to development plan policy.
- A primary school is to be located north of the site and a secondary school is needed. The site is zoned for Community and Education in the draft development plan.
- No justification for the proposed tower – independent information from Comreg shows the area as having 'Good' or Very Good' coverage.
- Fibre Broadband is being expanded.
- Not all telecommunications infrastructure is shown on the appellant's map – WK0146, a kilometre to the east.
- Other options are available.
- No reference to 5G in the application.
- No archaeological assessment.
- No sight visibility lines demonstrated at the junction with the road.
- Information missing.

Ruth Prenderville, on behalf of Newtownmountkenedy Town Team.

- Welcomes the proposed development as network coverage in the area is unreliable.

- Agricultural lands should not be used for telecommunication infrastructure.
- Wicklow County Council declared 5G free zone and the observer seeks guarantees that the site will not be used for 5G purposes.
- Refers to the draft development plan policies on sequential approach.
- Inappropriate to locate it besides a school.
- Lattice design will be an eyesore.

Emmet and Gemma Rafter and is accompanied by photographs.

- There are other towers in the area.
- Need for a visual assessment, particularly from the R772 and R765.
- National telecommunications policy cited.
- Would be a dominant feature in the area – a monopole design would be preferred. Ideally, the mast could be disguised as a tree as occurs in Marley Park.
- Planting will be ineffective.
- Fibre network will be available.
- Health and safety matters.
- Need for the proposed development has to be balanced with visual impact.

## 7.0 **Assessment**

7.1. The issues in this planning appeal in my opinion are:

- Policy matters in relation to telecommunications;
- The need for the telecommunications infrastructure at this location;
- The visual impact of the proposed development.

7.2 The specific government guidelines in relation to Telecommunications Infrastructure were published in 1996. A Circular Letter was published in 2012 updating matters. While no new specific guidelines have been published for telecommunications

structures for planning purposes, the National Planning Framework and the National Development clearly consider that access to high speed broadband is essential to ensure that Ireland remains highly connected. Furthermore, a Digital Strategy for Education has been published and schools will require access to high speed broadband services. The Covid-19 pandemic made everyone aware of the vital role that broadband plays in ensuring that society and the economy can function and grow. It would appear that the government is targeting a 100Mbps speed for schools and a minimum of 30Mbps for all persons, irrespective of location.

- 7.3 The National Broadband Plan is targeted at persons in rural areas that cannot achieve the minimum of 30Mbps, which affects 23% of the population. It is intended to benefit those who would not otherwise be provided with private, commercial broadband. It is therefore intended as a safety net, as opposed to a replacement for private telecom networks. It is not an alternative to these networks. Therefore, I am satisfied that national government policy is strongly supportive of enhanced telecommunication infrastructure and sees both private and public networks providing for seamless access for all locations.
- 7.4 Furthermore, educational policy is moving to a greater reliance on digital methods – be it the use of laptops and ipads to replace school books or the necessity to provide for on-line teaching during the Covid pandemic.
- 7.5 Regional policy recognises the need for supporting infrastructure, including telecommunications, to support orderly growth.
- 7.6 The *Wicklow County Development Plan 2016-2022* policy on telecommunications is also supportive of the roll out of broadband, the mobile phone and other digital services. Certain policies in Appendix 1 of the plan are not consistent with national policy – in relation to Health and Safety Criteria, Obsolete Structures and the use of temporary permissions. However, these are not fundamental to the matters in this appeal. The more crucial issue is the location of the telecommunications mast in proximity to residential areas and a future school campus. The prohibition of infrastructure in these areas is contrary to the 1996 guidelines, which notes that such locations can be considered as a last resort. Furthermore, national policies in regard to the provision of education via digital means, cannot be implemented without there being the necessary telecommunications infrastructure to support this policy. The



policy in the county development plan predates current national policy and now lags behind it. The proximity of the telecommunications site to a residential area and future schools campus is not a reason for refusal of planning permission, in my opinion.

- 7.7 The need for the telecommunications infrastructure at this location will be examined next. The First Party notes that 5G will become the dominant service in the near future. 5G provides for significantly higher internet speeds than 4G. 4G provides between 100-300 MBps. 5G provides 10-30 GBps – circa 100 times faster. It has greater capacity so congestion on the network is decreased. However, cell sizes are smaller. Therefore, there is a greater need for telecommunications infrastructure.
- 7.8 In the case of Newtownmoutkennedy, the First Party states that the topography is raised in the north, dips in the middles and rises again in the south. Therefore, the height of 30 metres is needed to secure coverage, as line of sight is needed.
- 7.9 Additional infrastructure is needed as more development will arise in the future. I also note the Comreg report, which finds that new building materials, which provide greater insulation, also reduce the level of mobile signal in the indoor environment. All the new homes in the area will be built to this higher standard.
- 7.10 I checked the Comreg site for outdoor coverage for Vodafone and Three. The coverage differs. Vodafone coverage has less Very Good coverage than Three in this location. The maps are based on outdoor coverage is much easier to receive, so does not equate to the same levels of indoor coverage. These maps only therefore can represent a guide to indoor coverage levels, which if new insulation levels are involved, are even less accurate. From the information provided, I am satisfied that coverage in the area needs to improve – particularly for Vodafone.
- 7.11 The Wicklow development plan looks for a sequential approach for telecommunications in urban areas. The site is located within the development boundary for Newtownmountkennedy and so can be classed an urban area, notwithstanding the active open space and agricultural zonings that applied to the site. The First Party in the application states that the Newtown Business and Enterprise Centre, north-east of the site, was assessed but was found not high enough and there was insufficient space for the compound. I would concur that the current site is the most optimal for telecommunications purposes.

- 7.12 The final issue is the visual impact of the proposed development. The provision of a visual impact statement would have been helpful and in accordance with development plan policy, particularly in a protected view. However, the absence of verified views and photomontages, does not preclude an assessment of the visual impacts of the proposed development.
- 7.13 The lattice structure is 30 metres. It is located within a landscape of high visual amenity and a protected view. The observers suggest that a monopole or a mast in the form of a tree would be more suitable. In my opinion, the lattice structure will be visible in the landscape, but will be viewed in the main, particularly from the protected view, against a backdrop of forested terrain. Therefore, the mast will be an article in the view, rather than the focus of the view. There are angle masts in the area, so the use of a lattice structure is not alien in the landscape. There will be visual impacts, but I am satisfied these will not be so detrimental to warrant refusal of permission. I also note that more industrial zoning is anticipated in the viewshed of the protected view, under the draft development plan and so this view is likely to be transformed in the future.
- 7.14 The planning authority notes that dwellings units are planned within 25 metres of the proposed development (these have since been granted planning permission – 05.05.2022). I estimate that the proposed development will be to the side of these dwellings, rather than facing them directly. Therefore, the injury to the amenities of these dwellings would not be detrimental.

## 8.0 Recommendation

- 8.1. I recommend a grant of permission.

## 9.0 Reasons and Considerations

Having regard to national planning policy supporting the need for enhanced telecommunication infrastructure, as set out the National Planning Framework and the National Development Plan and in particular, to support the Digital Strategy for

Schools and the location of the site within the development boundary of Newtownmountkennedy it is considered, that the proposed development, would not be detrimental to protected views, would not seriously injure the residential and visual amenities of the area, and would therefore be in accordance with the proper planning and sustainable development of the area.

## 10.0 Conditions

1.	<p>The development shall be carried out and completed in accordance with the plans and particulars lodged with the application as amended by the further plans and particulars submitted the 08 day of November, 2021 except as may otherwise be required in order to comply with the following conditions. Where such conditions require points of detail to be agreed with the planning authority, these matters shall be the subject of written agreement and shall be implemented in accordance with the agreed particulars.</p> <p>In default of agreement, the matter(s) in dispute shall be referred to An Bord Pleanála for determination.</p> <p><b>Reason:</b> In the interest of clarity.</p>
2.	<p>Prior to commencement of development, details of the access route, including finishes, shall be agreed with the planning authority.</p>
3.	<p>Surface water from the site shall not be permitted to drain onto the adjoining public road.</p> <p><b>Reason:</b> In the interest of traffic safety.</p>

4.	<p>Landscaping of the site shall be carried out in accordance with a landscaping scheme, which shall include hedging planted inside the boundary fence, which shall be submitted to and agreed in writing with planning authority prior to the commencement of development.</p> <p><b>Reason:</b> In the interest of the visual amenities of the area.</p>

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Mary            Mac            Mahon  
 Planning                            Inspector

16 May, 2022