



An
Bord
Pleanála

Inspector's Report

ABP-315613-23

Development	Construction of a replacement telecommunications support structure.
Location	Eir Exchange, Ballintemple, Walsh Island, Co. Offaly.
Planning Authority	Offaly County Council.
Planning Authority Reg. Ref.	21/804.
Applicant(s)	Towercom Limited.
Type of Application	Permission.
Planning Authority Decision	Refuse.
Type of Appeal	First Party.
Appellant(s)	Towercom Limited.
Observer(s)	OnTower Ireland Limited c/o INDIGO.
Date of Site Inspection	17 th November 2023
Inspector	Clare Clancy.

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1.0 Site Location and Description

- 1.1. The appeal site is located in the townland of Ballintemple to the north of Walsh Island village. It adjoins the settlement boundary of the village, however the site is not zoned. Walsh Island is located approx. 16 km (as the crow flies) to the south east of Tullamore town.
- 1.2. The site is set back approx. 25 m from the adjoining public road and is enclosed by a metal fence. Within the site there is a 14.5 m lattice structure, antenna and other attached equipment. The existing flat roofed eir utility / equipment building which is positioned at the rear of the site. The site is immediately bounded to the southeast by an existing habitable single storey dwelling and adjoining outbuildings. The road leading up to the site from the village is characterised by a mix of single storey, dormer and two storey dwellings. The site is bounded to the north by a council owned depot. There is another mast located approx. 150 m to the northeast of the site, the height of which is 24 m.

The area in which the site is located is elevated relative to the village to the south and to the wider area north of the site.

2.0 Proposed Development

The proposed development seeks to replace the existing telecommunications support structure on the site, which has overall height 14.5 m, with a new lattice tower which will have an overall height of 25.5 m.

The proposed new structure will carry the existing telecommunications equipment from the existing structure, and it is further proposed to add new telecommunications antennas, dishes and associated equipment. It is also proposed to provide ground level equipment cabinets.

3.0 Planning Authority Decision

3.1. Decision

By order dated 15th December 2022, Offaly County Council issued notification of decision to Refuse Permission for the proposed development for the following reason:

Having regard to Development Management Standard (DMS) 111 of the Offaly County Council 2021-2027 which seeks to consolidate the number of telecommunications masts required in the County and having regard to provisions of the Telecommunications Antennae and Support Structures: Guidelines for Planning Authorities, as updated by Circular Letter: PL 07/12 of 2012, and taking into account the existence of another telecommunications structure 150 m north east of the proposed mast, serving the same geographical area as that proposed in this case, it is considered that the application has not satisfactorily demonstrated that coverage could not be achieved through co-location with another operator on an existing telecommunications structure.

Therefore, the proposed development would be contrary to DMS 111 of the Offaly County Council 2021-2027 and contrary to Section 4.5 of the above Ministerial Guidelines, and would therefore be contrary to the proposed planning and sustainable development of the area.

3.2. Planning Authority Reports

3.2.1. There are two planning reports that form the basis of the assessment and the decision of the planning authority.

The first planning report dated 23rd February 2022 outlined the relevant development plan policy as contained in the Offaly County Development Plan 2021-2027, the relevant national planning policy guidelines, the planning history of the site, the third party submission and internal consultations.

Appropriate Assessment Screening was carried out and concluded that the development would be unlikely to have significant effects on any European Sites.

3.2.2. Request for Further Information.

The planning authority sought further information to address concerns in relation to the following:

- The lack of consultation by the applicant with other telecommunication operators in the immediate area in terms of the sharing of existing sites and support structures.

- Further assessment was required on the visual impact arising from the proposed development.
- The nature of the existing structure on site in terms of its authorised use as the height is greater than what was previously permitted on the site.
- To address the third party submission received.

3.2.3. The applicant sought a 3 month extension of time for the submission of the response to the further information request which the planning authority agreed to, thereby extending the time frame to 23rd November 2022.

3.2.4. The second planning report dated 13th December 2022 assessed the responses received to the further information request concluding that a sufficient justification in regard to the need for the proposed development was not adequate, the details provided in regard to assessing visual impact did not present an accurate representation of the visual impact of the proposed development, that the increased height of the existing structure from that originally permitted on the site was exempted development (Class 29), and that the telecom structures owned by Ontower Ireland Ltd to the northeast was granted permission to Three Ireland in 2010 and that the appeal site was in situ prior to this.

3.2.5. Other Technical Reports

Water Services & Environment: No objection. Conditions recommended.

Area Engineer Edenderry Municipal District: No objection.

3.3. **Prescribed Bodies**

None.

3.4. **Third Party Observations**

There was one submission made by OnTower Ireland Limited c/o INDIGO in relation to the proposed development. The submission highlighted the following:

- OnTower Ireland Ltd own and operate an existing 24 m multi-user monopole structure approx. 150 m to the north east of the appeal site, which was granted permission under 10/138.

- This site provides wireless broadcast facilities for the operator Three Ireland Limited in the Walsh Island area.
- This site has capacity for additional equipment and can be upgraded to facilitate increased use.
- This site owners and operators were not contacted by Towercom Ltd. in regard to co-location, and there is no requirement for a second telecoms site in the area.

4.0 Planning History

4.1. Appeal Site:

P.A. Ref. No. 89/328 Permission granted to erect a steel self supporting mast, 9.15 m high.

4.2. Relevant Adjacent Site to the north:

P.A. Ref. No. 10/138, ABP Ref. 19-237067 (October 2020) Permission granted to erect a 23 m high antenna. The decision was appealed by a third party and the decision to grant was upheld. Condition 2 related to a 5 year permission.

P.A. Ref. No. 21/268 Retention permission granted and condition no. 3 of grant requires the mast to be made available for co-location with other third party licensed mobile telecommunications operators.

5.0 Policy Context

5.1. National Policy

National Planning Framework Project Ireland 2040

NPO 24 – 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.

NPO 48 – Supports the development of a stable, innovate and secure digital communications and services infrastructure on an all island basis.

Telecommunications Antennae and Support Structures: Guidelines for Planning Authorities (1996) as updated by Circular Letter PL 07/12.

The Guidelines set out the criteria for the assessment of telecommunications structures. The guidelines aim to provide a modern mobile telephone system as part of national development infrastructure, whilst minimising environmental impact. Amongst other things, the Guidelines advocate the sharing of installations and clustering of antennae is encouraged as colocation will reduce the visual impact on the landscape (Section 4.5).

Circular Letter PL07/12 This Circular Letter revised the Telecommunication Antenna and Support Structures Guidelines, 1996. (October 2012)

This Circular was issued to Planning Authorities in 2012 and updated some of the sections of the above Guidelines including:

- 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 planning permissions requiring security in the form of a bond/cash deposit.
- 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.

It also reiterates the advice in the 1996 Guidelines that planning authorities should not determine planning applications on health grounds and states that, 'Planning authorities should be primarily concerned with the appropriate location and design of telecommunications structures and do not have competence for health and safety matters in respect of telecommunications infrastructure. These are regulated by other codes and such matters should not be additionally regulated by the planning process'.

Circular PL03/2018 - Revisions to Development Contributions Guidelines in respect of Telecommunications Infrastructure

This includes a requirement that Local Authority Development Contribution Schemes include waivers and reductions for broadband infrastructure (masts and antennae). The waiver applies to any telecommunications infrastructure both mobile and broadband. This includes masts, antennae, dishes and other apparatus or equipment being installed for such communications purposes.

5.2. Offaly County Development Plan 2022-2027

5.2.1. Chapter 5 Economic Development Strategy

- Section 5.8 sets out the council's policy in relation to information and communication technologies.
- Section 5.8.1 (Broadband and Wi-Fi) and Section 5.8.2 (Telecommunications) are relevant to the planning application. Communications Infrastructure Policies and Objectives are set out in Sections 5.9 and 5.10.
- Section 5.9 Energy Policies set out the relevant policies relating to Communications Infrastructure, in particular:

ENTP-40 It is Council policy to promote and facilitate the sustainable development of a high quality Information and Communications Technology (ICT) network in the county in order to achieve balanced social and economic development whilst protecting the amenities of urban and rural areas.

ENTP-41 It is Council policy to support and facilitate the delivery of the National Broadband Plan and the Offaly Digital Strategy as a means of developing further opportunities for enterprise, employment, education, innovation and skills development.

ENTP-43 It is Council policy to achieve a balance between facilitating the provision of telecommunications services in the interests of social and economic progress and protecting residential amenity and environmental quality. The Council will have regard to the Department of the Environment, Community and Local Governments Guidelines on Telecommunications Antennae and Support Structures (and any future editions) and Circular Letter

PL07/12 (Telecommunications Antennae and Support Structures) in assessing development proposals.

ENTP-44 It is Council policy to avoid the unnecessary proliferation of masts in the county through collocation of antennae on existing support structures and masts.

5.2.2. Chapter 13 Development Management Standards

- DMS 111 (Telecommunications) outlines the necessary requirements for planning applications.
 - i. A reasoned justification as to the need for the particular development at the proposed location in the context of the operator's overall plans for the county having regard to coverage;
 - ii. Details of what other sites or locations in the county were considered, and reasons why these sites or locations are not feasible;
 - iii. Written evidence of site-specific consultations with other operators with regard to the sharing of sites and support structures. The applicants must satisfy the Council that a reasonable effort has been made to share installations. In situations where it not possible to share a support structure, the applicants will be encouraged to share a site or to locate adjacently so that masts and antennae may be clustered; and
 - iv. Detailed proposals to mitigate the visual impact of the proposed development, including the construction of access roads, additional poles and structures. Where possible they should be located so as to benefit from the screening afforded by existing tree belts, topography or buildings. On more exposed open sites, the Council may require an alternative design or colour finish to be employed, unless where its use is prohibited by reasonable technical reasons.

5.2.3. Chapter 4 Biodiversity and Landscape

- Section 4.14 defines the landscape characters of the county. The appeal site is located in an area designated as 'low landscape sensitivity'.
- Section 4.16 provides the policies in regard to biodiversity and landscape.

5.2.4. Volume 2 Settlement Plans

- Walsh Island Village Plan – The appeal site is located outside of the settlement boundary for the village and is unzoned. The settlement plan provides policy objectives for the village on housing and sustainable communities, economic development and regeneration, and healthy place making and infrastructure objectives.

5.3. **Natural Heritage Designations**

The following natural heritage designations are located in the general vicinity of the proposed development site:

- River Barrow and River Nore SAC site code 002162, located approx. 8.59 km to the south.
- Raheen Lough pNHA site code 000917, located approx. 5.90 km to the south west.
- Dangan Bog NHA site code 002033, located approx. 7.85 km to the north west.

5.4. **EIA Screening**

The proposal is for a telecommunications structure with antennae and dishes. As such, it does not come within the scope of any of the Classes of development that are potentially the subject of EIA.

6.0 **The Appeal**

6.1. **Grounds of Appeal**

The first party appeal against the planning authority's notification of decision to refuse permission, which is accompanied by a Vodafone site justification report, can be summarised as follows:

6.1.1. Need for Proposal

- The existing structure is inadequate in terms of height and structural capacity for multiple operators equipment.

- Vodafone has operated from the site since 1990 and the site is newly added to the Vodafone National fibre ring which is described as a 'high-capacity fibre point of connection'. The new structure with greater height will increase line of sight range to surrounding sites to enable them to be connected to the high-capacity network.
- Vodafone require direct connection to this fibre point of connection. This is not achievable with the Cellnex site located 145 m from the appeal site.
- To improve the coverage and capacity of mobile telecommunications and broadband services in this area, consistent with the Offaly County Development Plan 2022-2027, national policy and guidelines.
- Lattice tower is the preferred method of infrastructure support as it is structurally capable of supporting the loads of both equipment and environmental loads without movement.

6.1.2. Site Suitability

The appeal site is suitable for the proposed development for the following reasons:

- The site is located within an established utilities site where there is a long term precedent for telecommunications use established at the site.
- The is situated on the outskirts of Walsh Island village adjoining the existing council depot / reservoir site thereby clustering with existing utility type development to the north of the village thus minimising any adverse impacts of the community.
- Reference is made to Section 2.3 of Circular Letter PL07/12 whereby it sets out that planning authorities should not include separation distances from telecommunications structures as they can inadvertently have a major impact on the roll out of a viable and effective telecommunications network
- Walsh Island village is the intended area for coverage and the main objective for the existing and future operators of the telecommunications structure would be to provide indoor voice and data services to the house, businesses and roads located in the area.
- Replacing an existing telecommunications support structure.

- Facilitating co-location with multiple users and operator's equipment.
- Reducing the potential number of free-standing structures in the areas.
- Locating in low sensitivity landscape character area.

6.1.3. Policy Context

- Local Development Plan Policies

In terms of compliance with the provisions of the Offaly County Development Plan 2022-2027, the proposal meets the aims of policies ENTP-40, ENTP-43 and ENTP-44.

- The Guidelines for Telecommunications 1996 – with specific reference to where it states '*if locations within or in the immediate surrounds of smaller towns or villages are necessary, sites already developed for utilities should be considered and installations should be designed and adapted for the specific location*'. In this case, it is submitted that the existing infrastructure is unable to accommodate multi-operator equipment and so its replacement is necessary, being favourable to new free-standing infrastructure in the area.

National & Regional Supporting Guidelines and Framework Documents

- The proposed development supports and aligns with several of the objectives set out in the National Planning Framework Project 2040 (NPO 24), the National Development Plan 2018-2027 and the Report of the Mobile and Broadband Taskforce and Action Plan for Rural Development.

Planning Precedent

Planning precedent has been established whereby Offaly County Council granted a similar proposal (PA Ref. 22/317), for a replacement structure of similar height and design to that proposed in the appeal. The location of the development permitted under 22/317 within an Eir Exchange, of this height and scale was considered acceptable by the council.

6.2. **Applicant Response**

N/a.

6.3. **Planning Authority Response**

The planning authority's response to the grounds of the appeal can be summarised as follows:

- The Board's attention is brought to the technical reports on the file.
- That the Board supports the planning authority's decision to refuse permission in this case.

6.4. **Observations**

None received.

6.5. **Further Responses**

None received.

7.0 **Assessment**

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

- Principle of Development and compliance with the Development Plan.
- Visual Impact.
- Residential Amenity – New Issue.
- Appropriate Assessment.

7.1. **Principle of Development**

- 7.1.1. Towercom Ltd who are the owners of the site, are seeking to replace the existing structure on the site. The key point that is raised in the appeal in relation to the proposed development is that the existing structure is inadequate in terms of height and structural capacity to cater for multiple operators' equipment, and for that reason the appellant seeks to replace it with a new higher and more robust structure that will

be capable of meeting current and future demand in facilitating multiple operators and their telecommunications equipment.

7.1.2. The application was refused permission on the basis that it is contrary to policy DMS 111 of the Offaly County Development Plan (CDP) and Section 4.5 of the Telecommunications Antennae and Support Structures: Guidelines for Planning Authorities, as updated by Circular Letter: PL 07/12 of 2012, as well as having regard to the fact that there is an existing telecommunications mast located approx. 150 m to the northeast of the appeal site.

7.1.3. The reasoned justification to meet the requirements of DMS 111 (i) was based by the applicant on the technical requirements for the current operator at the site, Vodafone.

I note that Vodafone has operated at the appeal site since 1990. The existing infrastructure at the site has limitations in terms of height and use of antenna. Vodafone require greater height and the installation of omnidirectional antenna to provide increased services such as advanced 4G and 5G, and greater coverage.

Part of policy DMS 111 states that applicants must investigate the sharing or colocation of alternative site locations and provide evidence of same. In response to the planning authority's further information request in relation to DMS 111 (ii), I note that the requirements for Vodafone were not considered to be achievable at the site located approx. 150 m to the northeast. The reason given was that the appeal site is 'newly' on the Vodafone national fibre ring and is described as a 'high-capacity Fibre Point of Collection (PoC)'. A site selection justification is provided by Vodafone within the appeal (Appendix A) outlining the technical reasons why the appeal site is deemed to be appropriate, but no rationale is provided in relation to the existing adjoining site and mast in terms of why it is not feasible.

7.1.4. No written evidence of any site-specific consultations with other operators or owners of sites was provided to examine the possibility of sharing of sites or support structures at application stage. I note that the third party submission made in relation to the planning application highlighted this fact with regard to the existing nearby mast. No further rationale has been provided as part of the appeal, and I note also that the same reasons given by Vodafone to the further information request are also made in the appeal. Vodafone have stated that they require direct connection to the fibre point of connection which is not achievable at the adjoining site to the northeast, but it is

unclear why this is the case as it is not stated, particularly when the adjoining mast to the northeast is of a similar height.

7.1.5. The policy of the council set out in ENTP-44 and DMS 111 seeks to address the issue of minimising impacts on surrounding visual amenities and in particular, to avoid the unnecessary proliferation of masts in an area. While I acknowledge that the appeal site has an established telecommunications use, I do not consider that a strong case has been put forward by the applicant to justify a new 24 m mast in this area, the visual effect of which is considered below.

7.1.6. Precedent

Within the appeal submission, reference is made to a planning application granted by Offaly County Council for a similar type development (replacement of existing telecommunications support structure 17.5 m in height, with new 24 m lattice tower carrying transferred equipment from the existing structure etc). This site is located in the village of Braknagh, which is located approx. 9 km to the southeast of the site. The case is made that both are similar in height and design and Offaly County Council considered this particular development to be of an appropriate design within the surrounding environment. However, it is my consideration that the subject application / appeal should be considered on its own merits and on a site-specific basis, having regard to national and local policy and other relevant planning considerations.

7.2. **Visual Impact**

7.2.1. Visual Amenity

The receiving environment is a rural area in Co. Offaly. The topography of the wider area is low-lying and the area in which the appeal site is situated is locally elevated. The area is characterised by agricultural landholdings and there is sporadic one-off houses along the local approach roads leading to the village. The landscape is classified in the CDP as 'low landscape sensitivity' and can absorb appropriately designed and located developments in all categories, including telecommunications masts.

The site is located at the northern end of the village which is the highest point of the village, when coming from the south. From the appeal site, the topography falls to the west, north and northeast. The site is set back from the public road and is enclosed

by fencing. There is mature trees and hedgerow along the roadside boundary leading up to the site from the village which affords intermittent screening to the appeal site. There is an existing dwelling and sheds immediately adjoining the site to the southeast.

The proposed structure is for a 24 metre robust triangular lattice tower. I consider it to be a significant communications tower with a multitude of antennas and dishes at the top of the structure in a triangular formation. Two double bay ground equipment cabinets will be located at the base of the tower.

7.2.2. A Visual Impact Assessment including photomontages were provided in response to the further information request. It demonstrates views from the approach roads to the north and south of the site and from the east. It shows that the views along the approach road coming from the south of the village will be intermittent while the approach from the north will be prominent. I noted from my site inspection that this would be the case. However, I am not entirely convinced by the proposed view(s) leading from the village up to the site as illustrated, particularly Photomontage view 2. I noted that the visual prominence of the structure when coming from the village would be more significant closer to the appeal site, as it is located at the highest point just outside the village settlement boundary.

When viewed from the approach road that leads up to the site coming from the north as well as from the northeast, the visual impact of the structure would be significantly greater. I also noted the visual prominence of the existing mast located in the vicinity of the appeal site. While this area could be described as somewhat elevated above the surrounding wider area, it is not as elevated as the appeal site, and the existing mast is located at a lower ground level. The mast is clearly visible, but its impact is not significant in the wider area. Notwithstanding, both the existing mast and the proposed mast would be apparent on the approach road from the north and the new structure significantly more so. I also viewed the appeal site from the east and the wider area along the R400 and noted that the visual impact would be intermittent given the distance and the presence of screening along the public roads.

Having regard to the function of the replacement mast and the technical requirements for the new mast that requires it to be of greater height so that it operates without any impediment that would interrupt signals for the purposes of providing increased

services, and having regard to the location of the site which is at the highest point at the northern end of Walsh Island village, I consider that the proposed development would have a significant visual impact on the receiving environment whilst also resulting in unnecessary proliferation of masts in this area.

7.3. Residential Amenity – New Issue

- 7.3.1. The assessment carried out by the planning authority in regard to the visual impact appears to have focused specifically on the visual amenities of the surrounding area. The appeal site immediately adjoins a row of houses to the south and there is an existing dwelling immediately adjoining the site to the southeast. There is approximately a separation distance of about 25 metres between the appeal site and this dwelling. Having regard to the design and height of the proposed new development, I consider that the increased height and scale of the proposed new telecommunications structure will be visually dominant resulting in a significant negative impact on the amenities of this adjoining dwelling, as well as the closest adjoining dwellings to the south along the public road.

This issue was not considered in the planning application or in the appeal and therefore would constitute a new issue within the appeal. In this regard the Board may wish to seek the views of the relevant parties.

7.3.2. Conclusion

Having regard to the foregoing assessment, I am not satisfied that the need to construct a new telecommunications mast at this location is justified, particularly when there is an existing 24 m high mast located in close proximity to the appeal site. I therefore consider that the principle of the proposed development is not acceptable and to permit the proposed development would contravene policies DM111, ENTP-40, ENTP-43 and ENTP-44 of the Offaly County Development Plan 2021-2027.

7.4. Appropriate Assessment

- 7.4.1. Having regard to the nature and scale of the proposed development and the absence of any direct or indirect pathway between the appeal site and any European site, and in particular the separation distances to the nearest European site of the River Barrow and River Nore SAC site code 002162 which is located approx. 8.59 km to the south, I am satisfied that no appropriate assessment issues arise. Therefore I do not consider

that the proposed development would be likely to have a significant effect individually or in combination with other plans or projects on a European site.

8.0 Recommendation

8.1. Having regard to the above I recommend that permission for the proposed development is refused for the stated reason.

9.0 Reasons and Considerations

Having regard to:

- the Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities, issued by the Department of Environment and Local Government in 1996,
- the Telecommunications Antennae and Support Structures and Department of Environment, Community and Local Government Circular Letter PL07/12,
- the provisions of the Offaly County Development Plan 2021-2027, in particular policies DMS111, ENT 40, ENT 43 and ENT 44,
- the height of the proposed structure and the location of the site and its proximity to the adjoining dwellings to the southeast and south of the site,
- the presence of an established telecommunications infrastructure in the near vicinity of the site,

the Board was not satisfied that the need for the proposed development at this location has been established and it is considered that the proposed development would have a significant adverse impact on the visual amenities of the surrounding landscape and the adjoining residential properties, and would therefore, be contrary to the proper planning and sustainable development of the area.

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.

Clare Clancy
Planning Inspector
15th December 2023

10.0 Form 1 EIA Pre-screening

An Bord Pleanála Case Reference	315613-23			
Development Summary	Construction of a replacement telecommunications support structure.			
1. Does the proposed development constitute an EIA project? (that is involving construction works, demolition, or interventions in the natural surroundings)	Yes	✓		
	No			
2. If YES, does the proposed development, or any part of it, fall within a class of development set out in Part 1 or Part 2, Schedule 5 of the Planning and Development Regulations?				
	Tick	Threshold	Comment (if relevant)	Conclusion
No	✓	N/A		No EIAR or Preliminary Examination required
Yes		If YES , tick one of the following:		
		Exceeds / Is equal to / No Threshold		EIAR required
		Sub threshold		Preliminary Examination required (Issue letter to EPA if IED/ IPC/ Waste licence)
3. If Preliminary Examination is required, has Schedule 7A information been submitted?				N/A

Inspector: _____ Date: _____