



An
Bord
Pleanála

Inspector's Report ABP317163-23

Development	Construction of a 21 meter monopole mobile and broadband tower with headframe carrying telecommunications equipment, together with associated equipment and cabinets enclosed within a 2.4 meter palisade fence compound.
Location	Carrowhubbuck North and South Townlands, Enniscrone, Co. Sligo.
Planning Authority	Sligo County Council.
Planning Authority Reg. Ref.	2324.
Applicant(s)	Signal Infrastructure Limited.
Type of Application	Permission.
Planning Authority Decision	Grant permission with conditions.
Type of Appeal	Third Party
Appellant(s)	Wild Ireland Defence CLG Carrowhubbuck Residents Group.
Observer(s)	None on file.

Date of Site Inspection

18th September 2023.

Inspector

Des Johnson.

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1.0 Site Location and Description

- 1.1. The appeal site is located on the grounds of Kilglass Enniscrone United Football Club, approximately 1.2km north-east of the centre of the town. The grounds are elevated relative to the town, and coastal settlement, as well as residential development along Carrowhubbuck South to the west. Access to the grounds is gained from a surfaced road to the north-west. The football grounds provide for football pitches, floodlighting, clubhouse, carparking, fencing and hedging.
- 1.2. The appeal site is an unused corner of the grounds, in close proximity to the entrance. It is below the level of the adjoining surfaced car carpark serving the football grounds.
- 1.3. The lands surrounding the football grounds are agricultural in character. There is a windfarm development closer to the coast and to the north-west of the football grounds.
- 1.4. Settlement in the area is concentrated along the public roads, predominantly in the form of ribbon development. This is a rapidly expanding area for residential development, with many holiday homes evident.

2.0 Proposed Development

- 2.1. Construction of a 21m monopole mobile and broadband tower with headframe carrying telecommunications equipment, together with associated equipment and cabinets enclosed within a 2.4m palisade fence compound. The proposed finish would be galvanised grey. The proposed development is for an unmanned installation remotely monitored and controlled via the communications network. Construction would take place over a period of 2-4 weeks (duration of works stated to be 6 weeks in submitted Construction Management Plan).
- 2.2. The site would be accessed via the main existing entrance to Enniscrone AFC.
- 2.3. It is proposed to offer other operators space to co-locate services on this site.
- 2.4. As part of a Visual Impact Appraisal, photomontages with associated maps are included in application documents for various viewpoints within a 5km radius.

3.0 Planning Authority Decision

3.1. Decision

Grant permission subject to six conditions. In addition to conditions relating to standard matters, Condition 3 requires that, if the structure remains unused for a period of 12 months or longer, the structure and all associated containers and fencing shall be demolished and removed from the site, and the site reinstated at the operators expense. The reason for the condition is in the interests of orderly development and visual amenity.

3.2. Planning Authority Reports

3.2.1. Planning Reports

It is considered that the applicant adequately addressed the requirements of national planning guidance in relation to telecommunications infrastructure. The selection of viewpoints in the Visual Impact report is considered adequate and the conclusion that the proposed structure would achieve a balance between visual impact and the need for high-speed telecommunications services in the area is accepted. The nearest dwelling is approximately 230m to the northwest of the subject site; having regard to national guidance relating to separation distances, it is considered that the proposed development will not have a negative impact on the residential amenities of the area. Health and safety matters are addressed under other codes. There are three 3rd party submissions which have been taken into consideration. The proposed development would be consistent with County Development Plan policies to upgrade and support telecommunications networks, and is also compliant with the Enniscrone LAP. There would be no impact on any Natura 2000 site. The Irish Aviation Authority (IAA) has no requirement for obstacle lighting.

3.2.2. Other Technical Reports

Environment Section – no objection in principle subject to recommended conditions relating to the disposal of waste material, and compliance with the construction and environment management plan.

Area Engineer – no objection subject to conditions.

4.0 Planning History

PL 22/376 – permission granted for development consisting of the installation of floodlights around the perimeter of a proposed Astro Turf sports pitch, comprising six 15m high columns and 18 luminaires with all ancillary site works at the site of Kilglass Enniscrone FC.

Reg Ref: 19201 – Permission granted for development described as 20m high monopole structure including antennae, dishes, and associated ground mounted equipment cabinets, all within a 2.4m high palisade fence compound, at Enniscrone 38kV Substation opposite Frankford Close. The development was designed to accommodate at least 3 operators. The decision is dated 11.07.2019. An application for leave to appeal the decision was refused by An Bord Pleanála under Reference ABP 305064-19.

5.0 Policy and Context

5.1. National Policy

National Planning Framework

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 development for those who live and work in rural areas.

Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities. 1996.

The 1996 Guidelines are generally supportive of the development and maintenance of a high-quality telecommunications service. Visual impact is identified as among the more important considerations which must be taken into account and visual impact will vary with the general visual context of the proposed development. Great care is needed when dealing with fragile or sensitive landscapes, and with other areas designated or scheduled under planning or other legislation. In most cases the

applicant will only have limited flexibility as regards location, given the constraints arising from radio planning parameters. In terms of design, support structures 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. Sharing of facilities is to be encouraged and applicants should satisfy the authority that they have made a reasonable effort to share.

Circular Letter PL07/12, issued on 19th October 2012, revise sections of the 1996 Guidelines. The Circular Letter refers to a growing trend for Development Plans to specify minimum distances between telecommunications structures and houses and schools. This does not allow for flexibility on a case by case basis, and can make the identification of new infrastructure very difficult. Separation distances should not be specified in Development Plans. Section 2.6 of the Circular letter refers to Health and Safety Aspects and reiterates the advice of the 1996 Guidelines that planning authorities should not include monitoring arrangements as part of planning permission conditions nor determine planning applications on health grounds. Planning authorities should be primarily concerned with the appropriate location and design of telecommunications structures. Health issues are regulated by other codes and such matters should not be additionally regulated by the planning process

5.2. **Development Plan**

The Sligo County Development Plan 2017-2023 was extended to July 2024.

Section 11.2 refers to Telecommunications. Telecommunications policy may be summarised as follows:

P-TEL-1 to protect areas of significant landscape importance from the visual intrusion of large-scale telecommunications infrastructure.

P-TEL-2 ensure telecommunications infrastructure is subject to compliance with the Habitats Directive, and minimise any adverse visual impacts on the environment.

P-TEL-3 support the implementation of the National Broadband Plan for Ireland (2012)

P-TEL-5 ensure that satellite dishes do not materially affect the character and appearance of any ... rural area, and in particular Protected Structures or Architectural Conservation Areas.

Section 13.9.4 refers to development management standards for telecommunications. It states that telecommunication masts, access roads and associated power lines will be assessed with regard to siting and design, safety and the mitigation of intrusive impacts. The following standards shall apply:

- masts will not generally be permitted in designated Sensitive Rural Landscapes, Visually Vulnerable Areas, pNHAs, SPAs, SACs or adjacent to Scenic Routes;
- masts shall be designed and located so as to cause minimum impact on the landscape and, where possible, should be screened by forest plantations.
- operators should seek to co-locate their services by sharing a single mast or, if necessary, locating additional masts in cluster form.
- in the event of the discontinuance of any mast installations, the mast and associated equipment shall be removed from the site and the land restored to its original condition

The landscape to the east of the built-up area of Enniscrone is indicated as a 'Normal Rural Landscape'. This type of landscape has the capacity to absorb a wide range of new developments, subject to normal planning and development control procedures. The coastline at Enniscrone is designated as a 'Visually Vulnerable Area'.

The R297 is designated as a scenic route with protected scenic views

5.3. Natural Heritage Designations

The subject site is approximately 1.2km to the north east and inland of two European sites - Killala Bay/Moy Estuary SAC and Killala Bay/Moy Estuary SPA. The qualifying interests for these two sites are listed in Appendix A to this report. The Conservation Objectives for the two sites seek to maintain favourable conservation condition of the qualifying interests.

5.4. **EIA Screening**

5.5. Having regard to the nature and modest scale of the proposed development, its location outside a built-up urban area and the likely emissions therefrom during construction and operation, it is possible to conclude that the proposed development, by itself or in-combination with other developments, is not likely to give rise to significant environmental impacts and the requirement for submission of an EIAR and carrying out of an EIA may be set aside at a preliminary stage.

6.0 **The Appeal**

6.1. **Grounds of Appeal**

There are two third party appeals against the planning authority's decision to grant permission. They may be summarised as follows:

Carrowhubbock Residents Grouping

1. The planner's report does not address all the issues raised in the objection received from the Residents. It does not mention Enniscrone 38kV station site a few hundred metres from the appeal site; this site has planning permission for an identical mast (ref: 19201). The current proposal would be for the 4th Telco site for Enniscrone, and would result in unnecessary damage to the aesthetic amenity value of the town, including the Wild Atlantic Way and the Carrowhubbock Walk.
2. No evidence has been provided for why co-location at/near the Church Lane site has been ruled out.
3. Enniscrone is surrounded by 100s of more suitable, easily accessible sites, better suited to this industrial type infrastructure.
4. The height of the proposed mast is excessive and would dominate the landscape unnecessarily. It would be completely exposed from the south. The existence of wind turbines (2.7km away), or adjacent soccer pitch floodlights can not be used to justify the proposed development.

5. The 1996 Guidelines support the residents' appeal. There is a lot of concern in respect of potential health impacts. The proposed location is one where young people congregate on a regular basis.
6. The proposed site is close to the town boundary (200-300m). There are much more suitable sites. The proposed mast height is not consistent with effective operation.
7. Once the Enniscrone 38kV mast is built, all 5G needs in Enniscrone will be addressed.
8. The proposed site is in a visually vulnerable area. It is elevated and clearly visible from a number of scenic routes. It would be clearly visible from the R297 section of the Wild Atlantic Way, and from Carrowhubbock Walking Loop. This is contrary to section 13.9.4 of the Sligo County Development Plan.
9. No effort has been made to design, locate or screen the proposed mast in a way that minimises the impact on the landscape. A matt white/grey finish could have been proposed.
10. The Enniscrone 38kV application was based on a claim that the 21m pole at that location was sufficient to serve the town's needs for 5G. This was on a site 15-20m lower than the proposed site.
11. The application documentation is confusing in terms of the proposed location of the mast.
12. The 'visual impact appraisal' does not give a true eye impact of the proposed development. Alternative photographs are submitted showing 'true to eye' views.

Wild Ireland Defence CLG (submission by Peter Sweetman & Associates)

1. The screening for Appropriate Assessment in this case does not meet the test clarified by the CJEU and the High Court in regard to screening and the making of a decision under Article 6.3 of the Habitats Directive.
2. The legal case for screening is found in the opinion of AG Sharpson (259/11), where the possibility of a significant effect triggers the obligation to carry out

appropriate assessment. This is supported in Irish Law by Finlay Geoghegan in *Kelly v An Bord Pleanála* (2014) IEHC 400.

3. Assessment carried out under Article 6.3 of the Habitats Directive cannot have lacunae, and must contain complete, precise, and definitive findings and conclusions capable of removing all scientific doubt as to the effects of the works proposed on a protected site (CJEU Case 258/11).

6.2. Applicant Response

This may be summarised as follows:

1. The proposed development is designed to support 3G and 4G broadband communications for multiple operators. It would bring significant improvement in the provision of mobile and broadband data services to Enniscrone and surrounding areas, as well as a number of other local roads in this part of County Sligo.
2. This area can be described as having low sensitivity to accommodate changes.
3. The proposed development is designed to be in full compliance with limits set by the Guidelines of the International Commission on Non-Ionising Radiation Protection (ICNIRP). Com Reg is responsible for ensuring compliance with ICNIRP and Com Reg standards.
4. This area, in and around Enniscrone, is considered a coverage blackspot and voice and data services are limited to non-existent. There are no existing antennae support structures in this area to co-locate equipment onto, nor is there a suitable building or other structure available in the search area in which to position the proposed equipment.
5. The subject site is on the grounds of Kilglass Enniscrone United AFC, approximately 1.2km from the town of Enniscrone. It is in a rural setting outside the town. Agricultural farm holdings and holiday homes are prominent features in this area. The closest residential dwellings are approximately 250m from the subject site.

6. The Church Lane site is 1.3km distance. It is not possible to upgrade this site for future technologies and, due to surrounding buildings blocking the mobile signal, a new site location is required. Other listed sites are too far separated to provide coverage for the target area. All surrounding roads, businesses and housing would benefit from improved coverage from the proposed development.
7. The ESB monopole development was granted permission under Reference 19201 on 11.07.2019. This has not been built and permission is due to expire next year with no guarantee that the development will ever be carried out. It is not reasonable to consider co-location for a site that does not exist. As such, it is not relevant to this appeal.
8. The height of the proposed structure has been minimised and will not appear as a visually incongruous structure within the landscape. A 'visual impact appraisal was undertaken to assess changes likely to arise on available views in the area. 21 viewpoints were considered within a 5km radius. The visual impact on dwellings in the area is considered low due to the topography of the area. The subject site has low sensitivity to accommodate changes.
9. There are no credible options for co-location within the immediate area. A 'technical justification' in support of this conclusion is appended to the response submission.
10. There would be minimal impact on the protected scenic view along the R297. There is a high level of visual clutter and the proposed design is considered to offer a sympathetic solution while improving coverage levels in the area.
11. The proposed development is 1.2km from an SAC (Killala Bay/Moy Estuary SAC). A screening report is not required given the size, scale and location which is significantly separated from the Killala Bay/Moy Estuary SAC. (It is noted that the response submission refers to the suggestion that an EIA screening report should have been completed. It is noted that the appeal by Wild Ireland Defence CLG (Peter Sweetman & Associates) refers to Article 6.3 of the Habitats Directive and argues that screening for Appropriate Assessment was inadequate and did not meet the test clarified by the CJEU and the High Court in respect of the Habitats Directive).

12. The proposed development is in line with national, regional and local planning policy, actively assisting in achieving the aims and objectives of the County Development Plan and national planning guidelines.

The following documents are attached to the response submission:

- Technical Justification by Cellnex. The proposed development is designed to improve existing voice and broadband services in the area around Enniscrone United, Carrowhubbock South, Lacknasleva, Kilglass, Rosbeg, Carrownedin and homes and businesses in the area. Network operators would be able to deploy a number of different types of technologies including 2G voice services, 3G voice and data, 4G data and 5G services. There would also be a better choice for highspeed data services. A 21m monopole tower structure is required to provide adequate services. No other surrounding sites can provide the required level of coverage to the target areas.
- Construction Management Plan
- Vilicom letter declaring conformity with ICNIRP Public Exposure Guidelines
- Visual Impact Appraisal
- Maps and drawings submitted with the planning application.

6.3. **Planning Authority Response**

None on file.

6.4. **Observations**

None on file.

6.5. **Further Responses**

None on file.

7.0 **Assessment**

7.1. The proposal is for the construction of a 21m high monopole mobile and broadband tower with headframe carrying telecommunications equipment, together with

associated equipment and cabinets enclosed by a 2.4m palisade fenced compound. It is proposed to mount the antennas and dishes on the top 6 metres of the monopole; this includes the triangular headframe, mounted at a height of approximately 18m. which would carry 9 antennas (three on each side of the headframe). Access to the site is proposed using the existing entrance to the football grounds.

7.2. I submit that the proposed development should be assessed under the following headings:

- The receiving environment
- Policy issues
- Planning history
- Justification for proposed development
- Visual impact
- Access
- Other issues
- Appropriate Assessment
- Conclusion

7.3. **The receiving environment**

The appeal site is within the grounds of Kilglass Enniscrone FC. The appeal site is located on a small area of unused land, close to the vehicular entrance to the grounds. The football grounds consist of playing pitches, including floodlighting and changing rooms. There is a belt of trees planted along to north-western boundary of the football grounds screening one of the pitches. The appeal site is below the level of adjoining surfaced car parking but is elevated relative to the wider area. The lands immediately surrounding the football grounds are generally rural and agricultural in character.

The built-up area of Enniscrone is mainly concentrated close to the coast, but also extends eastwards along Carrowhubbuck South and the R297. Extensive new housing is evident, including holiday homes. The nearest housing to the appeal site

is approximately 230m to the north-west along Carrowhubbuck South. The R297 Scenic Route is to the south. The site is clearly visible from sections of Carrowhubbuck South and the R297. Public utility poles and wires cross the intervening landscape and the floodlighting at the Kilglass Enniscrone FC grounds can be clearly seen. Wind turbines (at Lackan) are visible from sections of Carrowhubbuck South.

7.4. **Policy issues**

The National Planning Framework, approved in 2018, includes a national policy objective to support and facilitate delivery of the National Broadband Plan.

The 1996 Telecommunications Antennae and Support Structures Guidelines are generally supportive of the development and maintenance of a high-quality telecommunications service. Visual impact is identified as an important consideration when assessing proposed developments, with great care needed when dealing with fragile or sensitive landscapes. The Guidelines state that in most cases there may be limited flexibility as regards location, support structures should be kept to the minimum height consistent with effective operation, and should preferably be monopole in design. Sharing of facilities is encouraged.

Circular Letter PL07/12, issued in October 2012, revised sections of the 1996 Guidelines. This states that separation distances should not be specified in Development Plans and should be considered on a case-by-case basis. The Circular Letter states that health issues relating to masts are regulated through other codes and should not be additionally regulated through the planning process.

The Sligo County Development Plan 2017-2023 is supportive of the implementation of the National Broadband Plan. The Plan recognises the importance of high-quality telecommunication infrastructure as a prerequisite for a successful economy. It is the aim of the Council 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 Plan refers to the 1996 Guidelines and encourages mobile telecommunications operators to share sites.

Shared use of existing structures will be necessary in order to avoid excessive numbers of masts.

The planning authority considers that the applicant has adequately addressed the requirements of national planning guidance. The Carrowhubbock Residents Grouping (appellants) contend that the planning authority did not take account of the extant planning permission for a telecommunications structure at the 38kV Substation at Church Lane in the town, and that no evidence has been provided to indicate why that co-location at that site has been ruled out.

7.5. Planning History

Under Reference 19201 Planning permission was granted on 11th July 2019 to ESB Telecoms Limited for a 20m high monopole telecommunications structure, including antennae, dishes, and associated equipment at Church Lane, Enniscrone. This permission is extant until July 2024.

The applicants point to the fact that this development has not been built and that permission is due to expire next year with no guarantee that the development will ever be carried out.

7.6. Justification for proposed development

The applicants submitted a technical justification of need for the proposed development. This states that the proposed development would improve local 3G and 4G services and 5G technology in the Enniscrone area, while the primary function is for infill coverage in the surrounding area where there is currently a known coverage deficit. The proposed development would allow operators to improve existing voice and broadband services in the area of Enniscrone United, Carrowhubbock North, Carrowhubbock South, Lacknasleva, Kilglass, Rosbeg, Carrownedin and homes and businesses in the area. The proposed structure would allow operators to deploy different technologies including 2G voice services, 3G voice and data, 4G data and 5G services. Two figures are submitted showing

existing coverage from telecoms structures, and coverage from telecoms structures including the proposed Enniscrone United site.

In response to the grounds of appeal, a Technical Justification report by Cellnex is submitted. This gives a list of six surrounding sites and provides reasons for discounting them. In relation to the Church Lane site, the report notes that this is the closest site to the proposed site, but it is not possible to further upgrade this existing site for future technologies and, due to the surrounding buildings blocking the mobile signal, a new site location is required.

Based on the information on the file, I submit that the need for improved coverage in the area is justified.

7.7. Visual Impact

I submit that this is a key consideration in this case. The appeal site is elevated relative to its surrounds and would be clearly visible from sections of Carrowhubbock South and the R297. The R297 is designated as a Scenic Route (part of the Wild Atlantic Way), with excellent views from sections of the R297 to the west towards the coast. The Visual Impact Appraisal submitted clearly illustrates the visual impact when viewed from the R297. The Appraisal notes the impact significance on this view as 'slight' and the impact quality as 'neutral'.

While noting that the views from the R297 towards the proposed development and the coast are available from only a section of the public road, and that there are public utility poles and wires, and floodlighting poles at the football grounds clearly visible in those views, I submit that the impact would be significant. The proposed development would also be clearly visible from residential property on Carrowhubbock South to the west of the appeal site.

7.8. Access

It is proposed to gain access to the site using the existing entrance to the football grounds. I submit that this is acceptable and that no traffic or pedestrian safety issues would be likely to arise.

7.9. Othe issues

The appellants raise the issue of health and safety concerns relating to the proposed development. This issue is addressed in Circular Letter PL07/12, issued on 19th October 2012, which states that planning applications should not be determined on health grounds. Planning authorities should be primarily concerned with the appropriate location and design of telecommunications structures. Health issues are regulated by other codes and such matters should not be additionally regulated by the planning process.

The Enniscrone Coastal Loop Walk is 2km in length and extends northwards along the coast from the pier. I submit that the proposed development would not have any significant visual impact on this walk.

Then proposed development would not have any detrimental impact on any Protected Structures, archaeological sites, or Architectural Conservation Areas..

I consider that the planning application documents clearly indicate the location of the proposed mast, notwithstanding the fact that a submitted Construction Management Plan appears to show the incorrect location. In the event of the Board deciding to grant permission, this may be clarified by way of condition.

7.10. Appropriate Assessment Screening

The subject site is approximately 1.2km to the northeast and inland of two European sites – Killala Bay/Moy Estuary SAC and Killala Bay/Moy Estuary SPA. The boundaries for these two sites overlap, and extend along the coastal strip at Enniscrone. The qualifying Interests for the two sites are listed in Appendix A to this report. The Conservation Objectives for the two sites seek to maintain favourable conservation condition of the listed Qualifying Interests. The proposed development is not directly connected with or necessary for the management of either of the two sites, or any other European sites. Killala Bay/Moy Estuary is a Ramsar site.

The Source – Pathway – Target model to screening of the proposed development can determine if there is any possibility of a significant effect on either of the European sites, having regard to their conservation objectives. The Source is the construction and subsequent operation of the proposed 21m high telecommunications mast on an out of town site, and the Targets relate to the qualifying interests and associated conservation objectives for the two European sites. Proposed construction works include the setting up of a crane compound,

limited area of concreting for the mast base, and the installation of pre-assembled sections of the tower and fittings. The duration of proposed works is 6 weeks. The completed mast would be subject to ComReg regulation. There is a separation distance of approximately 1.2km to the nearest boundary of the two European sites with no direct physical pathway between the construction site and the two European sites. The qualifying interests for the SAC are predominantly coastal related, and the qualifying interests for the SPA are waterbirds and wetlands. I submit that it is possible to conclude that, based on the Source – Pathway – Target model, that there is no possibility of the proposed development, individually or in combination with other plans or projects, having any significant effect on Killala Bay/Moy Estuary SAC or Killala Bay/Moy Estuary SPA having regard to the Conservation Objectives for both sites, or on any other European site, and that Appropriate Assessment is not required in this case.

Conclusion

I conclude that the need for an upgrade in telecommunications services in this area has been justified by the applicant. The proposed site is elevated relative to surrounding lands, which are designated as “Normal Rural Landscape” in the current Sligo County Development Plan. The proposed development would have a significant impact on views from the R297 Scenic Route (Wild Atlantic Way); these views are limited to sections of the R297, and the foreground landscape includes public utility poles and wires, and floodlights at the football grounds. There is an extant planning permission for a 20m monopole structure at the ESB site at Church Lane which is due to expire in 2024. The proposed development, individually or combined with other plans or projects, would not have any significant effect on any European designated site.

In these circumstances, the key issue in this case is the balance between the visual impact of the proposed development and the need for high-speed telecommunications services in the area.

8.0 Recommendation

8.1. I recommend that planning permission be refused.

9.0 Reasons and Considerations

It is considered that the proposed 21m telecommunications mast, by reason of its height and design, on an elevated and exposed site relative to the surrounding landscape, would be unduly prominent and obtrusive, would obstruct public views from the R 297 Scenic Route listed for protection in the current Sligo County Development Plan 2017-2023, would be seriously injurious to the visual amenities of the area and contrary to the proper planning and sustainable development of the area.

Des. Johnson
Planning Inspector

9th October 2023.

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.

Appendix A

Killala Bay/Moy Estuary SAC Qualifying Interests.

Estuaries and sandflats

Annual vegetation and drift lines

Vegetated sea cliffs

Salicornia and other annuals colonising mud and sand

Atlantic salt meadows

Embryonic shifting dunes

Shifting dunes

Fixed coastal dunes

Humid dune slacks

Narrow-mouthed Whorl Snail

Sea Lamprey

Harbour Seal

Killala Bay/Moy Estuary SPA Qualifying Interests

Ringed Plover

Golden Plover

Grey Plover

Sanderling

Dunlin

Bar-tailed Godwit

Curlew

Redshank

Wetlands.