



An
Bord
Pleanála

Inspector's Report

ABP-317796-23

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| Development | Erection of an 18m high monopole telecommunications support structure and all associated site works. |
| Location | Cloghanboy (Strain) Townland, Athlone, Co. Westmeath |
| Planning Authority | Westmeath County Council |
| Planning Authority Reg. Ref. | 2360149 |
| Applicants | Vantage Towers Limited |
| Type of Application | Permission |
| Planning Authority Decision | Refuse Permission |
| Type of Appeal | First Party |
| Appellants | Vantage Towers Limited |
| Date of Site Inspection | 16 th February 2024. |
| Inspector | Dolores McCague |

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1.0 Site Location and Description

- 1.1.1. The site is located at Cloghanboy (Strain) Townland, Athlone, Co. Westmeath at the eastern end of a strip of land which separates the slip road on the west bound lane of the Athlone Relief Road, N6 (junction 10, N55, Ballymahon Rd, interchange), from Brawney Rd. Brawney Rd is a new road which has been developed to access the development area at Lissywollen. Most of the Lissywollen area has yet to be developed, but the Regional Sports Centre is located in the vicinity of this site.
- 1.1.2. The site is close to the take off point of the slip road on the N6 and is prominently located at a gateway to the town.
- 1.1.3. There are 4 interchanges on the N6, east of the River Shannon within the built-up area of Athlone: at Creggan (J8), Garrycastle (J9), Ballymahon Rd (J10) and Coosan Rd (J 11). The road reduces from a motorway (M6) at Creggan to a national primary road N6, as far as the western end of the town west of the River Shannon. However, it is not an urban road, and a speed limit of 100km / per hour applies.

2.0 Proposed Development

- 2.1.1. The proposed development is the erection of an 18m high monopole telecommunications support structure together with antennas, dishes and associated telecommunications equipment all enclosed in security fencing.

2.2. Planning Authority Decision

2.3. Decision

- 2.3.1. The Planning Authority decision, dated 20th July 2023, was to refuse permission, for two reasons:

1 The Planning Authority considers that insufficient data has been submitted with the planning application to demonstrate need for the proposed telecommunications support structure together with antennas, dishes and associated telecommunications equipment at this location and that national and local policy on the co-location of infrastructure has been sufficiently addressed. Accordingly, the development if permitted would give rise to the unnecessary proliferation of such

infrastructure in this area, would contravene Council's policy objective CPO 10.184 and Council's policy objective CPO 16.58 of the Westmeath County Development Plan 2021-2027 which states 'co-location agreements to be provided where possible. Where new facilities are proposed applicants will be required to satisfy the Council that they have made a reasonable effort to share facilities or to locate facilities in clusters' and would therefore be contrary to the proper planning and sustainable development of the area. The development if permitted would be contrary to the proper planning and sustainable development of the area.

2 The development proposed by virtue of its siting and design on such a narrow and prominent site and in the context of existing and permitted development in the immediate area would, if permitted result in a physical scar on the landscape, would significantly detract from the visual amenities of the area, may compromise the delivery of future large-scale development permitted on this parcel of lands and would depreciate the value of properties in the vicinity. Accordingly, the development if permitted would be contrary to Council's policy objective CPO 10.184, CPO 10.185, and CPO 16.58 of the Westmeath County Development Plan 2021-2027 and would therefore be contrary to the proper planning and sustainable development of the area.

2.4. Planning Authority Reports

2.4.1. Planning Reports

The planning report recommending refusal of permission, includes:

- No details with respect to co-location. The permitted Cellnex mast is in close proximity.
- The site is regarded as being on a very prominent site approach to the centre of Athlone and into Brawny and forthcoming permitted development at Lissywollen. Views of the proposed development will give rise to a significant scar on the landscape and its siting may give rise to negative impacts on the siting and attractiveness of the delivery of development in the near future, for which permission has been granted.
- The comments of TII are noted.

- 2.4.2. Other Technical Reports
- 2.4.3. Engineering Report, 14 July 2023, no objection.
- 2.4.4. Chief Fire Officer, 1 June 2023 no objection.

2.5. **Prescribed Bodies**

- 2.5.1. TII (Bonnegar Iompair Éireann) - 23rd June 2023 - The Authority has examined the above application and considers that it is at variance with official policy in relation to control of development on/affecting national roads, as outlined in the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012), as the proposed development by itself, or by the precedent which a grant of permission for it would set, would adversely affect the operation and safety of the national road network for the following reasons:

The proposed development, because of its location where particular vigilance is required, would endanger public safety by reason of traffic hazard due to its scale and distraction of drivers.

The Authority is of the opinion that insufficient data has been submitted with the planning application to demonstrate that the proposed development will not have a detrimental impact on the capacity, safety or operational efficiency of the national road network in the vicinity of the site.

- 2.5.2. EHO - 30th June 2023 - operate within safe operation limits prescribed by international commission on non-ionizing radiation commission (ICNIRP)

2.6. **Third Party Observations**

- 2.6.1. Third party observations on the file have been read and noted.

3.0 **Planning History**

22/337 planning permission granted for 1) demolition of existing ESB substation kiosk and construction of new substation kiosk at eastern end of site; 2) construction of office building (10,137 sq m) comprising Block A (7 storeys) and Block B (9 storeys) with interconnecting link bridge between first and sixth floor levels and

outdoor terrace at sixth floor in Block A and eight floor in Block B; 3) construction of a three storey parking deck; 4) ancillary site development works. Copy of file provided.

TA25M.309513, the Board granted planning permission for 576 no. residential dwellings (285 no. houses, 291 no. apartments), crèche and associated works to the south east.

ABP-306907-20, PA Reg Ref 197260, the Board granted planning permission on foot of the planning authority's decision to refuse permission, for the construction of a 24-metre multi-user monopole carrying telecommunications equipment, together with associated equipment and cabinets enclosed within a 2.4m palisade fence compound with temporary access track. Located near the subject site to the south, at Athlone GAA Club , Ballymahon Road , Cloghanboy, Co Westmeath.

4.0 Policy Context

4.1. Development Plan

4.1.1. Westmeath County Development Plan 2021-2027 includes:

CPO 10.177 Promote and facilitate the sustainable development of a high-quality ICT network throughout the County in order to achieve balanced social and economic development, whilst protecting the amenities of urban and rural areas.

CPO 10.183 Achieve a balance between facilitating the provision of telecommunications infrastructure in the interests of social and economic progress and sustaining residential amenity and environmental quality.

CPO 10.184 Ensure that the location of telecommunications structures should minimise and / or mitigate any adverse impacts on communities, public rights of way and the built or natural environment.

CPO 10.185 Encourage co-location of antennae on existing support structures and to require documentary evidence as to the non-availability of this option in proposals for new structures. The shared use of existing structures will be required where the numbers of masts located in any single area is considered to have an excessive concentration.

CPO 10.186 Facilitate the provision of telecommunications infrastructure throughout the County in accordance with the requirements of the “Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities”.

CPO 16.58 It is a policy objective of Westmeath County Council to assess planning applications for telecommunications, having regard to the following:

- Department of the Environment and Local Government’s “Planning Guidelines for Telecommunications Antennae and Supports Structures” (1996) and Departmental Circular PSSP 07/12.
- Co-location agreements to be provided where possible. Where new facilities are proposed applicants will be required to satisfy the Council that they have made a reasonable effort to share facilities or to locate facilities in clusters.
- Visual impacts arising from proposal.

4.2. Variation No. 3 of Athlone Town Development Plan 2014-2020 (expired) - Lissywollen South Framework Plan 2018-2024, includes:

Commercial zoning applies.

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

These Guidelines set out the criteria for the assessment of telecommunications structures.

In the vicinity of larger towns and in the city suburbs operators should endeavour to locate in industrial estates or in industrially zoned land.

The sharing of installations and clustering of antennae is encouraged as co-location will reduce the visual impact on the landscape.

4.4. Circular Letter PL07/12

This Circular Letter revises elements of the 1996 Guidelines. In particular. Such as advising Planning Authorities to cease attaching time limiting conditions to telecommunications masts, except in exceptional circumstances, and advising that the lodgement of a bond or cash deposit is no longer appropriate, instead a condition

should be included stating that when the structure is no longer required it should be demolished, removed and the site reinstated at the operators' expense.

4.5. Spatial Planning and National Roads

The guidelines set out planning policy considerations relating to development affecting national roads (including motorways, national primary and national secondary roads) outside the 50/60 kmh speed limit zones for cities, towns and villages

It is important that the efficiency, capacity and safety of the national road network is maintained.

Interchanges / junctions are especially important elements of national roads infrastructure

Distracting drivers' attention is a particular concern for developments on roads which run parallel to the national road network.

4.6. Westmeath Development Contribution Scheme 2022

4.6.1. This includes: item 14

Telecommunications Mast - relates to telecommunications support structures, antennae, dish and other apparatus/equipment for communication purposes for Telephone, Radio and TV - €5,729.26 per mast.

4.7. Natural Heritage Designations

4.7.1. The River Shannon Callows SAC (000216) located c 1.5km to the southwest, is the nearest Natura site.

4.8. EIA Screening

4.8.1. Having regard to the nature and scale of the proposed development and the absence of any significant environmental sensitivity in the vicinity there is no real likelihood of significant effects on the environment arising from the proposed

development. The need for environmental impact assessment can, therefore, be excluded at preliminary examination and a screening determination is not required.

5.0 The Appeal

5.1. Grounds of Appeal

5.1.1. The first party appeal grounds include:

Reference to Sec 37(2)b)(iii) of the P&D Act, permission should be granted having regard to the regional spatial and economic strategy for the area, Guidelines under Section 28, policy directives under Section 29, etc.

A development has already been granted planning under ref 22/337 for the construction of a part 7 and part 9 storey office building providing office on the remaining lands. The proposed structure is on a section of the lands that will not conflict with the further development of the block.

The application site consists of scrubland, bounded by high-level tree planting along the western and northern boundaries, with a post and wire fence along the southern boundary parallel to the public footpath. The trees and fencing are expected to remain in place, even after the development of the proposed office building.

Access – a detailed traffic analysis was included within the planning application for the office block. By comparison the proposed structure, with up to 6 visits per annum, is negligible.

It is unusual for a construction management plan to be agreed with the local authority before any works take effect and, if granted, a condition can be included. For operation of the site a Traffic Management Plan can be put in place.

The above addresses a large part of the traffic concerns of TIA to ensure the proposal will not endanger public safety by reason of traffic hazard. Any possible hazard that may be considered associated with a visual impact would be incidental compared to the existence of the office block. A landscaping proposal is offered.

The office development, block B, is 39.8m high and block A is 31.8m high, the car park 7.5 to 9m high.

Vantage Towers have an agreement in place to relocate the equipment from the proposed 18m high structure to the roof of the office block, but there are proposals to install solar power on the roof and the possibility for additional alternative energy generators, which may limit space available. It will be a number of years to complete and due to the uncertainty and urgency to provide coverage there is a need for a dedicated communications structure.

Coverage is referred to and shown on maps, including the impact of compromised coverage, due to the proposed office block.

An assessment was undertaken of the Cellnex site (306907) with the conclusion that the Cellnex site could not secure the catchment required, the necessary quality of coverage and when the office block is developed a key section of the coverage over the Athlone bypass junction would be blocked. The impact of compromised coverage, due to the proposed office block, is shown on map in Figure 2.

Today there are three mobile network telecommunications providers in Ireland: eir Mobile, Vodafone Ireland and Three Ireland. Effectively riding on the back of these networks are MNVO's (Mobile Network Virtual Operators) including: 48, GoMo, Lycamobile, An Post Mobile, Tesco Mobile, Virgin Mobile, and Clear Mobile.

With each rollout of technology the coverage area has reduced. Following the gradual take-up of 5G services, demand is expected to grow at an exponential rate, as old mobiles and associated equipment are replaced. There is also expected to be a jump in demand for 4G and 5G services with the closure of 3G services.

Reference to market changes:

In some European countries earlier 2G and 3G networks are being closed down. The UK government has agreed with its network operators to phase out 2G and 3g mobile services by 2033, with changes in planning rules to ensure 5G services are rolled out to meet their targets and economic growth forecasts.

Changes are also taking place in the Irish market. Three Ireland announced it will switch off its 3G network by the end of 2024 and Vodafone is turning off its 3G network at the end of 2023. These changes will especially impact areas with inadequate 4G and 5G services.

The importance of benefits of these services to the Irish Economy is quoted, from an expert report.

Statistics for the Irish Market are quoted.

Policy is quoted.

Responding to the refusal reasons:

Reason no. 1:

County Development Plan CPO 10.184 to upgrade Vodafone installations will not secure the necessary target coverage. The Cellnex site cannot meet the target area requirements. Vantage has a sharing facility and the Monopole is designed to accommodate another user, thereby meeting the policy objective.

CPO 16.5 – the existing structures have been considered. The proposed structure is available for another user.

Masts and rooftop installations are now commonplace and recognized as critical for the economy and to meet the demand by business and the general public. The technology is still growing, and new demands must be catered for if Irish business is to grow and compete.

Visual impact – landscaping to hide the compound. Taking into consideration the existing streetlamps, poles, signage and floodlights, the proposed structure will assimilate.

The office building permitted is almost 40m high. The office building would, depending on the angle of view, act as a backdrop, hide it or tower above it.

Reason no. 2:

It is unfair to say it would be a scar on the landscape, especially when the office block, twice the height, is considered. It does not conflict with any designated area, heritage site, protected structure or scenic view. By its nature it will to be seen.

Landscaping is proposed, and, together with existing trees, will result in a greatly reduced impact, particularly from the housing estates to the north.

It will not impact the future development of the site. There is no evidence that it would depreciate property values.

They refer to PL26.247800 and PL02.243341, also PL02.236307 and PL02.216361.

A landscape plan is provided.

A Vodafone Radio Engineering Site Justification Report is provided. It includes:

Figure 3 which shows 5G coverage levels from the proposed mast identifying the target area for 5G coverage and the area of compromised coverage due to the proposed office block. Figure 4 shows 5G coverage levels from WH_2823 (possible co-location) (Cellnet) showing a much larger area of compromised coverage due to the proposed office block.

6.0 Assessment

- 6.1.1. I consider that the main issues which arise in relation to this appeal are, appropriate assessment, refusal reason number 1 and refusal reason number 2 and the following assessment is dealt with under those headings.

6.2. Appropriate Assessment

- 6.2.1. Having regard to the nature and scale of the proposed development, I am satisfied that 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.

6.3. Refusal Reason Number 1

- 6.3.1. The first refusal reason refers to policy and co-location, the basic premise being that need has not been established.
- 6.3.2. The grounds of appeal provides coverage maps. A 'Vodafone Radio Engineering Site Justification Report' is attached to the grounds.
- 6.3.3. The grounds refers to the transition to 5G. With each rollout of technology, the coverage area has reduced. From gradual take-up of 5G services, demand is expected to grow at an exponential rate as old mobiles and associated equipment are replaced. There is also expected to be a jump in demand for 4G and 5G services with the closure of 3G services.
- 6.3.4. I accept that the technological change referred to will require transmission structures at closer intervals.
- 6.3.5. The grounds identifies a target area for 5G coverage, in figure 6 'Vodafone 5G coverage map', where the initial target area is identified as a blackspot for coverage.

- 6.3.6. The target area, also shown in figure 8, comprises a mainly residential area, and sections of the N55, to the north-west. The proposed mast, labelled 'WH001', will provide an acceptable indoor service to this area. An agreement is in place with the owner of the lands, to relocate the equipment from the proposed 18m high structure to the roof of the office block, but proposals to install solar power on the roof and the possibility for additional alternative energy generators, may limit space available. As it will be a number of years to completion and due to the uncertainty and urgency to provide coverage, there is a need for a dedicated communications structure.
- 6.3.7. The telecommunications structure permitted under ABP-306907-20, (PA Reg Ref 197260) is referred to as the 'Cellnex tower' or 'WH_2823'. It is stated that this will not provide the required coverage, and further, that the proposed office block, when built, will compromise the coverage from that mast. This is illustrated in figure 12 of the grounds and in figure 4 of the Vodafone Radio Engineering Site Justification Report.
- 6.3.8. Although figure 4 of the Vodafone Radio Engineering Site Justification Report shows a large area impacted by the proposed office block, the underlying map appears to show similar coverage levels to those depicted in figure 3 for WH_2823.
- 6.3.9. It appears therefore that the required coverage for the target area could be provided from the existing mast WH_2823, pending the office block development. Subsequent to the office block development, which will compromise the coverage (block it) the required coverage could be provided utilising the roof of the building. There would however be an interval, when coverage for providers would be diminished, when the office block neared completion.
- 6.3.10. I note from the coverage maps provided that the proposed development would extend coverage eastwards, providing coverage in excess of that provided by WH_2823. The area served includes land and the N6 road. Most of the land is currently undeveloped. It seems likely that a service from the roof of the office building could also provide coverage for this area, in advance of the development of the lands.
- 6.3.11. I am not convinced by the arguments presented in the grounds regarding the need for the proposed development.

6.4. Refusal Reason Number 2

Visual Impact

- 6.4.1. Reason for refusal number 2 refers to the visual impact of the proposed development. The grounds of appeal states that taking into consideration the existing streetlamps, poles, signage and floodlights, the proposed structure will assimilate, and proposes landscaping to hide the compound. It further states that the office building permitted is almost 40m high and would, depending on the angle of view, act as a backdrop, hide it or tower above it. A landscape plan is attached to the grounds.
- 6.4.2. No visual impact assessment was submitted with the application or appeal. A visual impact assessment was submitted with the application, referred to as the office buildings, (PA Reg Ref) 22/337, a copy of which is attached to this file. That shows the prominence of the site relative to the National primary road and is indicative of the likely prominence of the proposed development. The site is prominently located at a gateway to the town.
- 6.4.3. The planning authority was satisfied to permit tall office buildings, as proposed under PA Reg Ref 22/337, at this prominent location, to announce arrival in Athlone. A tall monopole is deemed an eyesore, at the take off point of the slip road. The proposed development would be a very prominent feature in the landscape. Perhaps not unreasonably the planning authority does not want to accord a monopole landmark status by having it occupy this prominent location and presenting as a gateway to the town.
- 6.4.4. TII made a submission to the planning authority recommending refusal, because the proposed development would endanger public safety by reason of traffic hazard due to its scale and distraction of drivers at a location where particular vigilance is required.
- 6.4.5. The grounds of appeal refers to this concern, stating that it would have been appropriate to seek further information. It states that these concerns have been addressed in the grounds of appeal. There is no reference to the potential distraction of drivers in the grounds of appeal.

6.4.6. The site is close to the N6 at the slip road on the west bound lane, junction 10, the interchange with the N55, Ballymahon Rd. The N6 has a speed limit of 100km / per hour. Any distraction of drivers at this location would be of concern. No attempt has been made to address this issue.

Compromise the development of the lands.

6.4.7. The planning authority reasoning that the delivery of future large-scale development permitted on this parcel of lands would be compromised and that the value of properties in the vicinity would depreciate, is responded to in the grounds of appeal which states that there is no evidence that the value of property would depreciate. I accept that argument.

6.4.8. The grounds states that the planning authority concerns regarding impact on the future development of these lands is unfounded since 'the landowner for the proposed monopole is the same as the owner for the office development site', referring also to the potential for locating the antennae on the roof of the office building at some future time.

6.4.9. The permitted development on this site is not only an office building, it comprises:

1) demolition of existing ESB substation kiosk and construction of new substation kiosk at eastern end of site;

2) construction of office building (10,137 sq m) comprising Block A (7 storeys) and Block B (9 storeys) with interconnecting link bridge between first and sixth floor levels and outdoor terrace at sixth floor in Block A and eight floor in Block B;

3) construction of a three storey parking deck; and

4) ancillary site development works.

6.4.10. The proposed location of the monopole and associated equipment is at the location where the construction of new substation kiosk is permitted as part of the overall development under PA Reg Ref 22/337, at the eastern end of site.

6.4.11. Condition no 1 of the permission requires that 'the development shall be carried out strictly in accordance with the plans and details received by the Planning Authority on the 22nd June 2022 except for any alterations of modifications specified below'.

6.4.12. The proposed development appears to be incompatible with the implementation of item 1 of the permitted development and would therefore compromise the permitted development of the land.

7.0 Recommendation

7.1.1. In accordance with the foregoing I recommend that the planning application be refused for the following reason and considerations.

8.0 Reasons and Considerations

1 Having regard to the coverage data presented with the application and appeal the Board is not satisfied of the need for the proposed telecommunications support structure together with antennas, or that alternative methods of providing the necessary coverage have been adequately explored, accordingly the proposed development would give rise to unnecessary proliferation of such infrastructure, would contravene policy objectives CPO 10.184 and CPO 16.58 as set out in the Westmeath County Development Plan 2021-2027, and would be contrary to the proper planning and sustainable development of the area.

2 The site is prominently located at a gateway to the town where it is considered that the proposed development would detract from the visual amenities 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.

Planning Inspector

4th March 2024

Appendices

Appendix 1 Photographs

Appendix 2 Westmeath County Development Plan 2021-2027, extracts

Appendix 3 Lissywollen South Framework Plan 2018-2024, extracts

Appendix 4 Spatial Planning and National Roads, extracts

Appendix 5 Westmeath Development Contribution Scheme 2022, extracts

Appendix 6 - Form 1

EIA Pre-Screening

[EIAR not submitted]

| | | | |
|---|---|----------------------------|-----------------------------|
| An Bord Pleanála Case Reference | 317796 | | |
| Proposed Development Summary | Erection of an 18m high monopole telecommunications support structure and all associated site works | | |
| Development Address | Cloghanboy (Strain) Townland, Athlone, Co. Westmeath | | |
| 1. Does the proposed development come within the definition of a 'project' for the purposes of EIA? (that is involving construction works, demolition, or interventions in the natural surroundings) | Yes | / | |
| | No | No further action required | |
| 2. Is the proposed development of a class specified in Part 1 or Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) and does it equal or exceed any relevant quantity, area or limit where specified for that class? | | | |
| Yes | | Class..... | EIA Mandatory EIAR required |
| No | / | | Proceed to Q.3 |

3. Is the proposed development of a class specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) but does not equal or exceed a relevant quantity, area or other limit specified [sub-threshold development]?

| | | Threshold | Comment (if relevant) | Conclusion |
|------------|---|----------------------|----------------------------------|---|
| No | / | N/A | | No EIAR or Preliminary Examination required |
| Yes | | Class/Threshold..... | | Proceed to Q.4 |

4. Has Schedule 7A information been submitted?

| | | |
|------------|---|---|
| No | / | Preliminary Examination required |
| Yes | | Screening Determination required |

Inspector: _____

Date: _____