



An
Bord
Pleanála

Inspector's Report

ABP-318691-23

Development	Telecommunications street works solution & ground cabinet
Location	Orwell Road, Templeogue, Co. Dublin.
Planning Authority	South Dublin County Council.
Planning Authority Reg. Ref.	S25423/15.
Applicant(s)	Signal Infrastructure Limited.
Type of Application	Section 254 Licence.
Planning Authority Decision	Refuse.
Type of Appeal	First Party.
Appellant(s)	Signal Infrastructure Limited
Observer(s)	None.
Date of Site Inspection	4 February 2024.
Inspector	Stephen Rhys Thomas

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1.0 Site Location and Description

- 1.1. The site is located in a wide grass margin along Orwell Road, Templeogue, halfway between the junction of Glendown Road and Orwell Park Heights. The Orwell Shopping Centre is located to the south of the site and a large expanse of public open space is to the north. The infrastructure is already in place and the slimline pole is noticeably taller than the surrounding lamp standards. The Orwell Shopping centre is a part single and part two storey building constructed in the late twentieth century. At each corner of the two storey flat roofed element of the building are located large drum antennae and a freestanding repeater dish together with roof mounted plant compound associated with same. The Rossmore Road to the east of the site has recently been altered to include segregated bicycle lanes, raised tables at bus stops, textured speed ramps and other pedestrian facility improvements.

2.0 Proposed Development

- 2.1. The applicant has applied for a licence to maintain an existing 15-metre-high monopole structure comprising a street pole and antenna, and associated ground cabinet. The period of licence sought is for five years, from June 2023 to June 2028.
- The development proposal is to retain in place a 15m freestanding galvanised pole with a diameter of 360mm, internal cables, proposed 300mm diameter dish, two GPS domes and internal antennae. The ground mounted cabinet sits on an 800mm by 1900mm concrete plinth, the cabinet is currently installed beside the pole and painted grey.

3.0 Planning Authority Decision

3.1. Decision

- 3.1.1. The PA decided to refuse the licence application for the following reasons:
1. Given the siting of the subject telecommunications infrastructure in relation to the approved SDCC Part 8 Active Travel Scheme (Wellington Lane Walking and Cycling Scheme), the Planning Authority is not satisfied that the proposal has had regard to Section 254(5) of the Planning and Development Act 2000, as amended, where it

outlines the criteria to which the Planning Authority shall have regard, including S254(5)(a) the proper planning and sustainable development of the area and (b) any relevant provisions of the development plan, or a local area plan.

The location of the structure next to a public footpath, which would be subject to substantial works and widening to enable the Part 8 Active Travel Scheme in the immediate to near future, would possibly necessitate the delay or circumnavigation of the structure, thereby creating an obstacle in the footpath/cycleway. This would have a negative impact on the safe movement of both pedestrians and cyclists and jeopardising a key infrastructure project which is provided for under current local policy.

The location of the subject streetpole solution and ground cabinet, as built, would thus impede the delivery of the Wellington Lane Walking and Cycling Scheme Part 8, and as such, would be contrary to the provisions of SM2 Objective 4 and SM2 Objective 8 of the South Dublin County Development Plan 2022-2028. A licence for the proposed development cannot, therefore, be permitted by the Planning Authority in the interest of property planning and sustainable development.

2. Having regard to the prominent location of the application site in the public realm, the lack of screening opportunities and the scale of the proposed infrastructure in relation to the site and surrounding local centre area, it is considered that the subject structure represents an unharmonious feature that detracts from the visual amenity and character of the area. The proposal is therefore considered to be contrary to the South Dublin County Development Plan 2022-2028 and the proper planning and sustainable development of the area.

3.2. Planning Authority Reports

3.2.1. Planning Reports

The subject site is located along the road and as such is not subject to a zoning objective, the adjacent land use zoning is "LC".

Section 12.11.2 of the Development Plan sets out requirements that applicants shall demonstrate in the consideration of such proposals, as follows:

No Planning Statement has been provided detailing how the proposal is compliant with the relevant local, regional, and national policy. Section 7.5.2 Cycle South Dublin of the CDP and, more specifically, SM2 Objective 4, sets out requirements for implementation. The location of the subject street pole solution and ground cabinet, as built, would impede the delivery of the Wellington Lane Walking and Cycling Scheme Part 8.

The Applicant has not provided a map showing the location of all existing telecommunications infrastructure within a 2km radius of the subject site.

No Visual Impact Assessment has been provided by the Applicant.

The purpose and significance of the subject development has not been clearly outlined by the Applicant.

3.2.2. Other Technical Reports

Parks – no objections. (partial report embedded in Planner's Report)

Roads – refusal recommended.

EHO – no objections.

3.3. **Prescribed Bodies**

None.

3.4. **Third Party Observations**

None.

4.0 **Planning History**

4.1. Site:

S25419/03 - Orwell Road, Templeogue, Co. Dublin (Subject Pole – Initial licence)
Telecommunications street works solution. September 2020 – Grant Licence under Section 254 for a period of three years.

4.2. Relevant sites in the area:

Orwell Road is subject to the Wellington Lane Walking and Cycling Scheme Part 8, which was approved by South Dublin County Council at the 12th of December 2022 Council meeting.

5.0 Policy Context

5.1. Development Plan

5.1.1. South Dublin County Development Plan 2022-2028

The subject site is located along the road and as such is not subject to a zoning objective, the adjacent land use zoning is 'LC' - 'To Protect, improve, and provide for the future development of Local Centres', under the South Dublin County Council Development Plan 2022-2028. The use class 'Public Services' is 'Permitted In Principle'.

Policy IE5: Information and Communications Technology (ICT)

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

IE5 Objective 1: To promote and facilitate the provision of appropriate telecommunications infrastructure, including broadband connectivity and other innovative and advancing technologies within the County in a non-intrusive manner.

IE5 Objective 3: To permit telecommunications antennae and support infrastructure throughout the County, subject to high quality design, the protection of sensitive landscapes and visual amenity.

IE5 Objective 4: To discourage a proliferation of telecommunication masts in the County and promote and facilitate the sharing of facilities.

IE5 Objective 5: To ensure that above ground utility boxes are sensitively located and finished to reduce their visual impact, designing out anti-social behaviour and promoting soft planting around existing and new ones where feasible.

IE5 Objective 6: To require the identification of adjacent Public Rights of Way and established walking routes by applicants prior to any new telecommunication developments and to prohibit telecommunications developments that impinge

thereon or on recreational amenities, public access to the countryside or the natural environment.

IE5 Objective 7: Ensure that applications made in relation to the provision of overground telecommunications infrastructure, including planning applications and Section 254 licence applications, take into consideration and demonstrate compliance with the 'Guidance on the Potential Location of Overground Telecommunications Infrastructure on Public Roads' (2015).

Section 12.11.2 Information and Communications Technology

Section 254 Licences: A Section 254 licence is required from a planning authority to place on, under, over or along a public road the following items or equipment:

a vending machine;

a town or landscape map for indicating directions or places;

a hoarding, fence or scaffold;

an advertisement structure;

a cable, wire or pipeline, overground electronic communications infrastructure and any associated physical infrastructure; a telephone kiosk or pedestal;

any other appliance, apparatus or structure, which may be prescribed as requiring a licence under this section, on, under, over or along a public road save in accordance with a licence granted by a planning authority under this section.

The Planning and Development Act, 2000 (as amended) states that: 'In considering an application for a licence under this section a planning authority, or the Board on appeal, shall have regard to

- (a) the proper planning and sustainable development of the area,
- (b) any relevant provisions of the development plan, or a local area plan,
- (c) the number and location of existing appliances, apparatuses or structures on, under, over or along the public road, and
- (d) the convenience and safety of road users including pedestrians'.

Items and equipment placed on, under, over or along a public road – such as street furniture and overground telecommunications infrastructure – have the potential to

significantly impact on the quality of the environment within a given area. This includes development works regulated through Section 254 licencing requirements.

In assessing applications under Section 254 of the Planning and Development Acts, the Planning Authority, must have regard to the relevant provisions of the Development Plan and any local area plan in place. Careful consideration should be given especially to Chapter 5 of this Plan 'Quality Design and Healthy Placemaking', in particular the sections dealing with 'The Delivery of Sustainable Neighbourhoods', 'The plan approach' and the eight principles which must be applied to new developments in the County.

Applications made under the Planning and Development Act, 2000 (as amended) in relation to the provision of overground telecommunications infrastructure, including planning applications and Section 254 licence applications, must take into consideration and demonstrate compliance with the 'Guidance on the Potential Location of Overground Telecommunications Infrastructure on Public Roads' (2015).

5.2. National Guidelines

Planning and Development Act 2000, as amended. The development is considered under Section 254(1)(ee) of the Planning and Development Act 2000 as amended.

DoHELG Circular Letter PL 11/2020. This circular provided clarification in relation to the planning exemptions applicable to telecommunications works undertaken by statutory undertakers authorised to provide telecommunications services. It advises Planning Authorities that:

- Section 254 of the Act outlines the provisions in relation to the licensing of appliances and cables etc on public roads. Where development of a type specified in section 254(1) of the Act is proposed to be carried out on a public road, approval for the works is required from a Planning Authority by means of the obtaining of a section 254 licence.
- A Section 254 Licence is required for overground electronic communications infrastructure and its associated works, and that such works are exempt from planning permission.

- The exemptions for telecommunications infrastructure along public roads do not apply:
 - (a) where the proposed development is in sensitive areas where there is a requirement for Appropriate Assessment.
 - (b) where the proposed development would endanger public safety by reason of traffic hazard or obstruction of road users.

Section 254(5) of the Act outlines the criteria to which the Planning Authority shall have regard in assessing such proposals:

- a) the proper planning and sustainable development of the area,
- b) any relevant provisions of the development plan, or a local area plan,
- c) the number and location of existing appliances, apparatuses or structures on, under, over or along the public road, and
- d) the convenience and safety of road users including pedestrians.

National Broadband Plan, DCENR, 2012. Sets out a strategy to deliver high speed broadband across the State.

Circular Letter PL07/12 – The circular updates the guidance document and specifically refers to temporary permissions, removal of separation distances from houses and schools, bonds and contributions, planning considerations related to location and design and health and safety matters, and the establishment of a register / database.

Telecommunications Antennae and Support Structures, Guidelines for Planning Authorities, DoE, 1996. Provide guidance on, amongst other things, siting of masts. This includes, in city suburbs, to co-locate telecommunications where possible and to locate new telecommunication masts in industrial or in industrially zoned land or commercial or retail areas. The guidance states that only as a last resort, if these alternatives are not available, should free-standing masts be located in a residential area or beside schools. Further, if such a location should become necessary, sites already developed for utilities should be considered and masts and antennae should be designed and adapted for the specific location, with the support structure be kept to the minimum height consistent with effective operation.

5.3. Natural Heritage Designations

- 5.3.1. The site is not situated within any European Sites. There are no designated European Sites in close proximity to the site.

5.4. EIA Screening

- 5.4.1. The proposed development is not listed in either Part 1 or Part 2 of Schedule 5, Planning and Development Regulations 2001 (as amended), which sets out the types and thresholds of development that requires a mandatory EIA. The proposal has also been assessed against the criteria outlined in Schedule 7 of the Planning and Development Regulations 2001 (as amended), and the provisions of Article 109, (3) of the Regulations.
- 5.4.2. Under the provisions of Article 109, (3) of the Regulations, it is noted that the site is not located within a European site, is not designated for the protection of the landscape or of natural or cultural heritage and the proposed development is not likely to have a significant effect on any European Site.
- 5.4.3. The proposed development is minor in nature and scale and will not require any significant ground works or construction methods. I have concluded that, by reason of the nature, scale and location of the subject site, the proposed development would not be likely to have significant effects on the environment and that after a pre-screening exercise an environmental impact assessment report for the proposed development was not necessary in this case. (See Pre-Screening Form, Appendix 1).

6.0 The Appeal

6.1. Grounds of Appeal

The grounds of appeal can be summarised as follows:

- The background to the site is outlined with reference to the three year licence issued under S25419/03 September 2020 and the conditions therein. It is

stated that with reference to guideline compliance, maps of existing telecoms infrastructure in the vicinity, and visual impact, all of this information was submitted in 2020 and no material changes in circumstances have occurred since.

- Impact on the Active Travel Scheme ATS –the pole and cabinet were in place before plans for the ATS, the ATS should have taken into account the position of the pole/cabinet and designed accordingly. A slight change in the design of the ATS could accommodate the pole and cabinet.
- Visual Amenity and Streetscape – it should be noted that the previous licence application raised no issues about visual amenity, matters have not changed. In visual terms the street pole is acceptable, and this has been confirmed by numerous similar proposals where the Inspector raised no issues.

6.2. Planning Authority Response

- 6.2.1. The planning authority states that a Part V and contribution conditions should be attached if relevant to this appeal.

7.0 Assessment

7.1. Introduction

7.2. According to the application documentation, the proposed development is for the installation of an 15m freestanding galvanised pole with a diameter of 360mm, with internal cables, a 300mm diameter dish and internal antennae. Together with a ground mounted cabinet beside the pole and be painted grey. The infrastructure is already in place and this licence application is to retain its use for a further five years.

7.2.1. The proposed development is brought forward under section 254(1) of the Planning and Development Act 2000 (as amended). In their consideration of the development, under section 254(5) of the Act, the Board is required to have regard to:

- a. the proper planning and sustainable development of the area,
- b. any relevant provisions of the development plan, or a local area plan,
- c. the number and location of existing appliances, apparatuses or structures on, under, over or along the public road, and
- d. the convenience and safety of road users including pedestrians.

7.2.2. Having regard to these requirements, local and national planning policy, the application details, all other documentation on file and my inspection of the site, I consider that the main issues for this appeal relate to:

- Proper and Sustainable Planning and the Development Plan
- Co-location
- Road Safety

7.2.3. Proper and Sustainable Planning and the Development Plan

7.2.4. Introduction - Section 254(5)(a) of the 2000 Act the Board is required to have regard to the proper planning and sustainable development of the area of which visual amenity is part. In addition, the Board are required to have regard any relevant provisions of the development plan, or a local area plan, section 254(5)(a) refers. I have combined both these topics within this section of my report.

7.2.5. The South Dublin County Development Plan 2022-2028 sets out the overall strategy and vision for the proper planning and sustainable development of the county over

the 6 year plan period and has been prepared in accordance with Part II, Chapter I of the Planning and Development Act 2000 (as amended). Appendix 1 of the Written Statement contains a Statement prepared in accordance with Section 28 (1A) of the Planning and Development Act 2000 (as amended) demonstrating how the Planning Authority in preparing the Development Plan has implemented the policies and objectives set out in Ministerial Guidelines issued under Section 28 of the Act. With reference to the Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities (1996), Chapter 11, Section 11.4 - sets out the Council's policies on Telecommunications and implements the relevant policies and objectives of these Guidelines.

- 7.2.6. The development plan includes Policy IE5: Information and Communications Technology (ICT) and IE5 Objective 7 specifically refers to Section 254 licence applications. Chapter 12 of the development plan focuses on implementation and monitoring and section 12.11.2 Information and Communications Technology, and states that in the assessment of Section 254 licences specific regard should be had to Chapter 5 of the Plan 'Quality Design and Healthy Placemaking'. In very broad terms chapter 5 of the plan seeks to ensure that new development contributes in a positive manner to the character and setting of an area.
- 7.2.7. The subject site is located along a road that is not subject to a specific zoning, under the South Dublin County Council Development Plan 2022-2028. The area in which the site is located, has the character and attributes of being along side a road.
- 7.2.8. I note that the planning authority have concerns about the visual impact of the proposal and refused permission because of the impact upon the visual amenity and character of the area. The applicant explains that the pole and cabinet have been in place for three years and the issue of visual amenity was not raised at the time that the first Section 254 licence was applied for. The grounds of appeal are accompanied by the drawings, visual impact imagery and computer generated images that were submitted with the initial licence application. The applicant goes on to cite other licence applications and appeals where Board Inspectors took the view that this type of infrastructure has no adverse impacts on the character of an area. It is the applicant's view that the pole and cabinet as they stand do not visually impact upon the character of the area and the licence for a further five years should issue.

- 7.2.9. The documentation submitted by the applicant clearly shows the pole and cabinet in the context of the surrounding area, the drawings and images are accurate in that regard. In fact, the pole and cabinet are in place and its impact or not on the area can be readily observed. The Orwell Shopping Centre dates from the emergence of this low density residential area, a church and school are also located in the vicinity as part of this local centre. The character of the area is defined by large scale open spaces, wide roads, mature and semi mature grouped tree planting. The overall area is well maintained and attractive for this kind of development. As the area was developed in the 1980s, infrastructure is below ground and the only upstanding elements in this suburban landscape are trees, signage, traffic signals and lamp standards. The lamp standards are slim line and of a scale to match the context of the area, they are not tall structures. The street pole is different to the surrounding street furniture, it is taller, at 15 metres in height, and it has a wider girth at 300mm. From my observations of the site, the street pole is an unusual and out of place feature in the area and noticeable from various vantage points.
- 7.2.10. The applicant points out that the street pole and cabinet have already been granted a licence and no issue was made about visual amenity at that time. The chief executives order with regard to the initial application is on the file, condition 2 refers to the duration of permission to allow for a review in terms of impacts, the merits and feasibility of alternative solutions. There are two points to consider in relation to the initial licence application, it was made under the previous development plan and condition 2 allows for review, though visual impact is not specifically mentioned here. In any case, I am satisfied that a reassessment of the impacts of the proposal can and should take place, a new development plan exists, with new policies and objectives and therefore matters have changed. I share the concerns of the planning authority and I do not see how the street pole and cabinet support Chapter 5 of the Plan in terms of 'Quality Design and Healthy Placemaking'. For this reason, I am not satisfied that an additional street pole structure of the design and scale proposed is appropriate at this location where only lamp standards, traffic signals and limited street signage are the norm.

7.3. Co-location

- 7.3.1. In accordance with section 254(5)(c) of the 2000 Act, the Board is required to have regard to the number and location of existing appliances, apparatuses or structures

on, under, over or along the public road. The planning authority have highlighted that the applicant failed to submit material to support their application with regards to co-location opportunities. The applicant notes this observation by the planning authority and explains that all relevant information was submitted with the initial licence application in 2020 and there has been no material change in circumstances since then. To assist the Board, the applicant has submitted the original Comreg map (dated 28/01/2020) with the current appeal and this shows the location of existing Vodafone, Eir and H3Gi infrastructure within a 2 kilometre radius of the site, drawing number DN_3303-100 refers. This map shows a limited search ring radius within which the following are recorded: Meteor_3303, Vodafone_DN265 and Three_DU0574. The applicant has not submitted any new material to identify any improvements or gaps in coverage for the area. On the day of my site visit I noticed a number of large drum antennae and associated plant and equipment located on the roof of the Orwell Shopping Centre, some 30 metres from the site and these may relate to Meteor_3303, Vodafone_DN265 and Three_DU0574 identified on the Comreg map from 2020.

- 7.3.2. I am not satisfied that the applicant has included the most up to date information with regards to co-location opportunities and coverage blackspots. Based upon my observations I suggest that opportunities for co-location could exist and should be examined in greater detail or determined with certainty that coverage is already adequate in the area and the removal of the current street pole would or would not impact upon this. I am not satisfied that it is either appropriate or sustainable to position two such forms of telecoms infrastructure so close together without exploring all opportunities for co-location or a more suitable site altogether if in fact there is a coverage deficit. Permission should be refused for the licence based upon the lack of up to date and relevant information with respect section 254(5)(c) of the 2000 Act.

7.4. Road Safety

- 7.4.1. In accordance with section 254(5)(d) of the 2000 Act, the Board is required to have regard to the convenience and safety of road users including pedestrians. The planning authority acknowledge that road safety and convenience are an issue and have refused permission on that basis. Specifically, the imposition of the current infrastructure would impede the implementation of a Part 8 Active Travel Scheme,

the Wellington Lane Walking and Cycling Scheme. The applicant disagrees and considers that minor design changes can accommodate both proposals and in any case the street pole and cabinet where there first.

- 7.4.2. The full details with regard to the Part 8 Active Travel Scheme (Wellington Lane Walking and Cycling Scheme) are not on file except for an excerpt of a drawing in the Planner's Report, Council Roads Report and the applicant's grounds of appeal. I note that improvements to roads are well under way in the area and the Rossmore Road to the east has undergone significant changes to assist with more sustainable forms of transport, including segregated bicycle lanes, raised tables at bus stops, textured speed ramps and other pedestrian facility improvements. The existing street pole and cabinet are not insignificant features alongside the road, I have already highlighted their visual impact. Likewise, the imposition of the street pole and cabinet would be a significant obstacle to completing positive public realm and transport improvements in the area and minor design changes are unlikely to solve this issue. The planning authority state that the street pole and cabinet lie in the path of a proposed cycle lane and permission should be refused. The street pole and cabinet are already in place and that is acknowledged, however, its lifespan was for three years and subject to review, things have changed, its presence is seen as a barrier to improvements in the area.
- 7.4.3. I am not satisfied that the street pole and cabinet contribute to the convenience and safety of road users including pedestrians. The planning authority granted an initial licence for a period of three years. That time has now elapsed and subject to the detailed review undertaken by the planning authority they have decided that the street pole and cabinet would impede a project designed to improve and contribute to active travel in the county, I agree that permission for the licence should be refused on that basis.

8.0 Recommendation

- 8.1. I recommend that a licence be refused for the proposed development.

9.0 Reasons and Considerations

1. Having regard to the government's guidelines on Telecommunications Antennae and Support Structures, Guidelines for Planning Authorities, DoE, 1996, the policies and objectives of the South Dublin County Development Plan 2022 - 2028, the location of the proposed development within an urban area and where existing telecommunications structures are located less than 2 kilometres from the site, it is considered that insufficient technical justification and up to date evidence has been provided in respect of alternative sites, to support the location of the development. IE5 Objective 4 of the South County Development Plan 2022 – 2028 seeks to discourage a proliferation of telecommunication masts in the County and promote and facilitate the sharing of facilities. It is considered, therefore, that the proposed development would be contrary to government guidelines, to County Development Plan policy and to the proper planning and sustainable development of the area.
2. The site of the development it is proposed to retain for a further five years is located adjacent to a road, on a wide grass verge where lamp standards are positioned at regular intervals. It is considered that the proposed development would constitute an oversized and thus visually obtrusive feature in an area where similar street furniture features are limited and logically spaced apart. The proposed development would have an adverse visual impact on the surroundings and character of the area and conflict with IE5 Objective 1, that seeks to promote and facilitate the provision of appropriate telecommunications infrastructure, including broadband connectivity and other innovative and advancing technologies within the County in a non-intrusive manner and consequently not align with Chapter 5 of the South Dublin County Development Plan 2022-2028 that's seeks to ensure and promote quality design and healthy placemaking. The proposed development would, thereby, be contrary to the proper planning and sustainable development of the area.
3. The site is located within the South Dublin County Council Part 8 Active Travel Scheme (Wellington Lane Walking and Cycling Scheme), the Board is not satisfied that the proposal to retain in situ the existing street pole and

cabinet would be in accordance with section 254(5)(d) of the Planning and Development Act 2000 as amended, the Board considered that the development would militate against the convenience and safety of road users including pedestrians in terms of planned infrastructure to improve and facilitate more sustainable forms of transport.

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.

Stephen Rhys Thomas
Senior Planning Inspector

6 February 2024

Appendix 1 - Form 1

EIA Pre-Screening

[EIAR not submitted]

An Bord Pleanála Case Reference	ABP-318691-23		
Proposed Development Summary	Telecommunications street works solution & ground cabinet		
Development Address	Orwell Road, Templeogue, Co. Dublin		
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	Y
		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			EIA Mandatory EIAR required
No	N		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		Not within a class.	Not within a class. No EIAR or Preliminary Examination required
Yes		N/A	Not within a class. Proceed to Q.4

4. Has Schedule 7A information been submitted?

No		Preliminary Examination required
Yes		Screening Determination required

Inspector: _____ **Date:** _____