



An  
Bord  
Pleanála

## Inspector's Report

**ABP-318857-24**

<b>Development</b>	Erection of an 18m high telecommunications monopole
<b>Location</b>	Clonmel Commercials GAA Club, Western Road, Clonmel, Co. Tipperary
<b>Planning Authority</b>	Tipperary County Council
<b>Planning Authority Reg. Ref.</b>	2360827
<b>Applicant(s)</b>	Vantage Towers Limited
<b>Type of Application</b>	Permission
<b>Planning Authority Decision</b>	Refusal for 3 no. reasons
<b>Type of Appeal</b>	First Party
<b>Appellant(s)</b>	Vantage Towers Limited
<b>Observer(s)</b>	Clíodhna Breen, Seán Ó Ciardha & Karen Mhic Gearailt, Pat Neill and Mairéad Hogan
<b>Date of Site Inspection</b>	27 <sup>th</sup> March 2024
<b>Inspector</b>	Bernard Dee

## **1.0 Site Location and Description**

- 1.1. The appeal site is located in the town centre of Clonmel within the grounds of Clonmel Commercials GAA club on the Western Road, Clonmel, Co. Tipperary. The site of the proposed mast is to the east of the main playing pitch on the sports grounds. It is set behind a hurling wall to the south of the appeal site and to the west of a two storey sports facility building. The site is accessed from Western Road to the north but on the day of the site inspection access to the appeal site was not possible as the gates to the grounds were locked.
- 1.2. The lands within the immediate vicinity of the site are in multiple uses. There are educational, health care, sporting, residential and retail uses in the vicinity of the site. Western Road lies to the north of the appeal site while Cantwell Street is to the west of the GAA grounds and Albert Street to the south. There is an Aldi immediately to the east of the site and residential areas further east.

## **2.0 Proposed Development**

- 2.1. The development will consist of construction of a monopole mast 18m in height excluding an undimensioned lightning finial on top of the mast. The width of the monopole is not indicated on the drawings but appears to be less than 1m. Two sets of operators equipment would be mounted at the top of the mast, 6 no. antennae in total. Vodafone is named as one of the operators and the second set of antennae is for an as yet unnamed operator.
- 2.2. It is also proposed to provide several ground equipment cabinets and a 2.4m high palisade boundary fence.
- 2.3. The appeal site is stated to be 0.004ha in area and the red line boundary dimensions (6m x 6m) roughly equate with the stated application site area.

### 3.0 Planning Authority Decision

#### 3.1. Decision

Permission for the proposed development was refused on 11<sup>th</sup> December 2023 for 3 no. reasons.

1. The proposal is for an 18-metre-high telecommunications mast on lands zoned for amenity land use under the Clonmel and Environs Development Plan (CEDP) 2013, as varied. Policy INF 11 of the CEDP 2013, as varied, states that the Council will facilitate proposals for telecommunications masts, antennae and ancillary equipment, where it can be established that the maximum telecommunication coverage is achieved with the minimal impact on the surrounding area save in the following locations;

***In close proximity to schools, churches, crèches, community buildings, other public and amenity/conservation areas and residential areas.***

The site is located in close proximity to a number of schools, community buildings and private residences. The proposed development would therefore contravene a stated objective of the Clonmel and Environs Development Plan (Policy INF 11) and would, therefore, be contrary to the proper planning and sustainable development of the area.

2. Having regard to the Telecommunications Antennae and Support Structures Guidelines for Planning Authorities (July 1996), which require that “**only as a last resort ...should free-standing masts be located in a residential area or beside schools**”, and the planning histories for the existing and permitted masts in the general vicinity of the subject site, it is considered that the applicant has not demonstrated that the application site is a “last resort”. It is further considered that the proposed development would lead to a proliferation of telecommunications structures where an opportunity for co-location exists in the immediate area on permitted masts and would seriously injure the visual amenities of the area. The proposed development would, therefore, be contrary to the above-mentioned guidelines and the proper planning and sustainable development of the area.
3. Having regard to the highly visible context of the proposed 18-metre-high freestanding structure on amenity zoned lands in an urban setting, the proposed development would seriously injure the visual amenity of the receiving environment and would have an unacceptable impact on the residential amenity of neighbouring residential properties. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

## 3.2. Planning Authority Reports

### 3.2.1. Planning Reports

The Planner's Report notes Circular Letter PL 07/12 issued by the Minister for the Environment, Community and Local Government on 19<sup>th</sup> October 2012 in relation to telecommunications masts and the prohibition on limiting the life span of planning permissions granted for said masts. The publication titled 'Environment and Local Government Guidelines for Planning Authorities on Telecommunications Antennae and Support Structures' (1996) is also noted in the Planner's Report with reference to attempting to minimise visual impact of masts and to limit their location in proximity to residential areas or schools to cases where no alternative locations are available.

The Planner's Report makes the following points:

- An Bord Pleanála (ABP-306724-20/19601311) refused permission for a 20 metre high lattice mast at this location having regard to the Guidelines, the visually prominent site location and to the existing and permitted telecommunications infrastructure in the town.
- The proposed mast is located in close proximity to schools, churches, crèches, community buildings, other public and amenity/conservation areas and residential areas contrary to Government Guidance on the location of telecommunications infrastructure.
- The Planning Authority does not support in principle the location of a telecommunications mast at this location as same is not considered to comply with Policy INF 11 (Telecommunications) of the Clonmel and Environs Development Plan 2013, as varied.

[Inspector's Note: The above referenced Plan has been superseded by the Clonmel LAP 2024-2030 which came into effect on 25<sup>th</sup> March 2024 and Objective 5M of the LAP is equivalent to Policy INF 11 cited by the Planner in his report – 'Support and facilitate the provision of telecommunications infrastructure in Clonmel, subject to safety and amenity requirements'].

- The applicant has discounted the potential of co-locating antenna on other structures in the area based on topographical constraints and technical deficiencies with the existing infrastructure. The topographical constraints are noted with respect to a concurrent application for a mast on the Cashel Road (23/60738).
- Having regard to the mast permitted on the Heywood Road under Ref. 19600785, there remains a live permission for a mast at a location approximately 450m north of the current site. Having regard to the above I am not satisfied that the applicant has demonstrated that the current site is a “last resort” as is required under the National Guidelines.
- Notwithstanding the argument presented by the applicant about this site being a site of last resort, having regard to the planning history on site and the guidance offered in the Clonmel and Environs Town Development Plan 2013 [now Clonmel LAP 2024-2030] with respect to the location of telecommunications infrastructure, the Planning Authority considers that the proposed development is not in accordance with National or local planning policy.
- Notwithstanding the changes to the height and form of the mast compared to the previous proposal on the appeal site, there are still concerns that the mast proposed will be overly visible from the surroundings residential properties and schools which overlook and back on to the GAA grounds. As such, the Planning Authority considers that the provision of a mast at this location will have an adverse impact on the visual character of the receiving urban environment.
- The Planner’s Report did not deem that either AA or EIA was required in relation to the proposed telecommunications mast.

### 3.2.2. Other Technical Reports

- District engineer – report dated the 20th of November 2023 noted that the proposal will not impact on sightlines, public footpath or surface water issues.

### 3.2.3. Prescribed Bodies

- Irish Aviation Authority – report dated the 31st of October 2023 noted that there is no requirement for obstacle lighting at this location.

### 3.2.4. Observations

- Observations were received from 9 no parties during the determination of this application, 4 no. of which are Observers to this appeal.

## 4.0 Planning History

### 4.1. On the Appeal Site

- Ref. ABP-306724-20 (19601311) - permission sought for construction of a 20m high telecommunications support structure carrying antennas and transmission dishes, with associated ground level equipment units and security fencing. Application refused on appeal by the Board following a first party appeal against Tipperary County Councils decision to refuse permission. The refusal reason dated 27<sup>th</sup> July 2020 reads as follows:

*Having regard to: (a) the guidelines relating to Telecommunications Antennae and Support Structures which were issued by the Department of the Environment and Local Government to planning authorities in July, 1996, (b) the highly visible context of the 24 metres freestanding structure within amenity grounds in an urban setting and (c) the planning histories for the existing and permitted masts in the general vicinity of the subject site,*

*it is considered that the proposed development would lead to a proliferation of telecommunications structures where an opportunity for co-location exists in the immediate area on permitted masts and would seriously injure the visual amenities of the area. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.*

- There are multiple planning applications in the GAA grounds but as they relate to the development of the sporting facilities at the club, these cases are not relevant to the current appeal.

#### 4.2. In the Vicinity of the Site

- Ref. 23/60738 is cited in the Planner's Report and relates to an application by Vantage Towers Limited for the erection of a 24m high monopole structure together with antennas, dishes and associated telecommunications equipment, and safety bollards at Sidney Bourke, Burgagery-Lands West, Cashel Road, Clonmel, Co. Tipperary, E91 DC96 – approximately 1.2km NE of the current appeal site. Permission was granted on 4<sup>th</sup> January 2024 subject to 4 no. conditions. This Planning Authority decision was not appealed to the Board.
- Ref. 19600785 is cited in the Planner's Report and relates to an application by Vantage Towers Limited for the erection of 24m monopole to support telecommunications antennae for use by Three and other operators, which together with the installation of dishes and ground based equipment cabinets will provide 2G, 3G and 4G mobile electronic communication services from the installation at Clonmel Fire Station , Heywood Road, Cooleens, Clonmel, Co. Tipperary – approximately 450m north of the current appeal site. Permission was granted on 28<sup>th</sup> November 2019 subject to 4 no. conditions. This Planning Authority decision was not appealed to the Board.
- Ref. 19600816 is cited in the First Party appeal submission and refers to an application by Three Ltd. for the construction of a 24m high telecommunications support structure carrying antennas and transmission dishes, with associated equipment units and security fencing at Poppyfields Retail Park, Ballingarrane South, Clonmel, Co. Tipperary – approximately 1.75km west of the current appeal site. Permission was granted on 16<sup>th</sup> October 2019 subject to 4 no. conditions. This Planning Authority decision was not appealed to the Board.

## 5.0 Policy and Context

### 5.1. National Planning Guidance Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities, Department of the Environment, July 1996 as amended by Circular letter PL 07/12.

The aim of the “Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities, 1996” is to offer general guidance on planning issues so that the environmental impact is minimised, and a consistent approach is adopted by the various planning authorities. Section 4.3 of the Guidelines states with respect to Visual Impact: Some masts will remain quite noticeable in spite of the best precautions. The following considerations may need to be taken into account:

- Along major roads or tourist routes, or viewed from traditional walking routes, masts may be visible but yet are not terminating views. In such cases it might be decided that the impact is not seriously detrimental
- Similarly, along such routes, views of the mast may be intermittent and incidental, in that for most of the time viewers may not be facing the mast. In these circumstances, while the mast may be visible or noticeable, it may not intrude overly on the general view or prospect.
- There will be local factors which have to be taken into account in determining the extent to which an object is noticeable or intrusive – intermediate objects (buildings or trees), topography, the scale of the object in the wider landscape, the multiplicity of other objects in the wider panorama, the position of the object with respect to the skyline, weather and lighting conditions, etc.

Circular Letter: PL 07/12 made revisions to the Guidelines.

The Circular included the following:

Planning authorities should be primarily concerned with the appropriate location and design of telecommunications structures and do not have competence for health and safety matters in respect of telecommunications infrastructure. These are regulated by other codes and such matters should not additionally be regulated by the planning process. (Section 2.6). Emissions from telecommunication masts are governed by International Radiation Protection Association (IRPA) Guidelines (Jan 1988) or the equivalent European Pre-standard 50166-2. As emission levels are governed by a



separate legislative code, potential health impacts do not form part of planning assessment or planning conditions as stipulated in the Guidelines for Planning Authorities on Telecommunications Antennae and Support Structures (1996) as amended by Circular letter PL 07/12.

## 5.2. Development Plan

The Tipperary County Development Plan 2022-2028 is the statutory Development Plan for the area within which the appeal site is located.

### Volume One: Written Statement

#### 6.8 Digital Connectivity and Innovation

The Council recognises that there is a balance between facilitating the provision of mobile telecommunications infrastructure, and the need to protect residential, visual amenity and the natural and built environment. When considering proposals for telecommunications infrastructure, the Council will have regard to Telecommunications Antennae and Support Structure: Guidelines for Planning Authorities, DEHLG, 1996 (and any review thereof) and will seek to work proactively with the telecommunication industry during the development and deployment phase.

#### 6.10 – Planning Policy

6 - 6 Facilitate the sustainable development of telecommunications and digital connectivity infrastructure in line with Harnessing Digital, The Digital Ireland Framework (GoH, 2022) and in accordance with Telecommunications Antennae and Support Structure: Guidelines for Planning Authorities, (DEHLG, 1996), where it can be established that there will be no significant adverse impact on the surrounding areas and the receiving environment.

Planning Objective 6 - K (a) Support the delivery of the National Broadband Plan and the Tipperary Digital Strategy 2018 – 2023 (and any review thereof), enable high-speed broadband and digital connectivity services to all businesses and householders in Tipperary, and to support innovation in the digital economy. (b) To support and enable enterprise and remote working opportunities, thereby strengthening settlements as places to live, and work through the ‘Smart Town’ and ‘Town Centre First’ concepts.

## Volume 3: Development Management Standards

5.6 Satellite Dishes & Telecommunications Apparatus Satellite dishes and telecommunications apparatus can affect the character and appearance of historic buildings and important townscapes. Satellite dishes are not normally acceptable on a Protected Structure, on the front of structures within PRAs or town centre areas or the front or side of a building within an ACA save for exceptional circumstances.

### Clonmel Local Area Plan 2024-2030

The Clonmel LAP 2024-2030 was adopted on 25th March 2024 and references in the appeal documentation to the Clonmel and Environs Development Plan 2013 (as extended) should be disregarded by the Board in their assessment of this appeal, including its reference in the reasons for refusal issued by the Planning Authority.

There are no Protected Structures in the vicinity of the appeal site and the site is not located in an Architectural Conservation Area.

### 5.6 Digital Connectivity and Telecommunications

In line with policy 6-6 of the TCDP, the Council will facilitate the development of telecommunications and digital connectivity infrastructure, where it can be demonstrated that there will be no significant adverse impact on the surrounding areas, the receiving environment, the character and built heritage of the town.

Objective 5M - Support and facilitate the provision of telecommunications infrastructure in Clonmel, subject to safety and amenity requirements.

## 9.0 Land Use Zoning Framework

### Table 14 – Land Use Objectives

The appeal site is in an area zoned for 'Open Space and Recreation: Preserve and provide for open space, sports and recreational amenities' - Preserve and provide for general open space and open space associated with sporting and recreational amenities and services. Commercial services e.g. food and retail services shall be directly associated with and directly related to on-site sports and recreation facilities.

## Table 15 – Zoning Matrix

Telecommunications infrastructure is not a class of development contained in the zoning matrix which implies that each case will be decided on its own merits.

### 5.3. Natural Heritage Designations

The following natural heritage designations are located <15km from the appeal site:

- Lower River Suir SAC 002137 – approximately 270m from appeal site.
- Nier Valley SAC 000668 – approximately 9.7km from appeal site.
- Comeragh Mountains SAC 01952 – approximately 11km from appeal site.

### 5.4. EIA Screening

Having regard to the limited nature and scale of the proposed development and the absence of any significant environmental sensitivity in the vicinity/ the absence of any connectivity to any sensitive location, 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.

## 6.0 The Appeal

### 6.1. The relevant planning grounds of the First Party appeal are, in summary, as follows:

- The proposed mast is located in proximity to houses, community facilities and schools but regard must be had to the fact that the proposed location of the monopole is within an urban area which requires the coverage which the proposed telecommunication facility can provide.
- A balance is required between the needs of social and economic progress and sustaining the amenity of residential and community areas.
- The proposed site is a location of last resort as no other sites, despite extensive searches in the area, can provide the necessary level of coverage to serve Clonmel town.

- The location of the proposed monopole has been carefully chosen within this built up area to minimise any visual impacts on areas containing houses, community facilities and schools, and the monopole location will permit the structure to be assimilated into the existing streetscape – see submitted survey of alternative locations and photomontages for information.
- The appeal site is surrounded by vertical poles such as net supports and other poles supporting floodlights associated with the sporting use of the GAA club ground which reach a height of 15m. The proposed monopole will constitute another vertical element within this context and the location is also partly screened by an existing building to the east of the appeal site and a tall wall used for ball practice to the south.
- Studies have shown that telecommunications service in Clonmel is below the required standard for a town of such a population level and economic activity and the proposed monopole is essential in order to raise the levels of coverage in Clonmel.
- The provision of a monopole at this location would be in compliance with Project 2040, the National Planning Framework and the National Development Plan 2018-2027.

## 6.2. Planning Authority Response

- The Planning Authority has not responded to this appeal.

## 6.3. Observations

Four Observations have been received in relation to this appeal – Clíodhna Breen, Seán Ó Ciardha & Karen Mhic Gearailt, Pat Neill and Mairéad Hogan. Collectively and in summary in order to avoid repetition, the following points are raised in these Observations:

- The proposed monopole is located within 700m of the grounds of **Scoil Mhuire na nAingeal** and will be visible from school buildings which are 300m away as the crow flies.
- The monopole is in breach of Development Plan standards which has a presumption against locating telecommunications structures in close proximity to residential areas, schools or community facilities and heritage sites.

- Of the seven schools in Clonmel the proposed monopole will impact on three of these schools in the vicinity of the proposed location for the monopole.
- The amenity value of the GAA grounds for the schools will be undermined by the proposed development as there is no conclusive proof regarding the safety of the radiation emissions associated with telecommunications facilities.
- The area is already well serviced by telecommunications facilities – Poppyfields, Heywood Road and Clonmel Rugby Club – another telecommunications facility is not needed in Clonmel.
- There is a previous refusal from the Board for a proposed 20m high telecommunications mast at the appeal site which cited the sensitivity of the proposed location and surrounding area as not being suitable for such a facility.
- **Gaelscoil Chluain Meala** primary school has 262 no. pupils and is located approximately 100m from the appeal site.
- The Chairperson of the **Albert Street Residents Association** points out that the appeal site is surrounded by schools, creche, before/after school clubs, other training and educational facilities, medical and dental practices and residential areas.
- Clonmel is already well served by the existing telecommunications infrastructure and the location proposed is highly inappropriate for the development proposed.
- The Principal of **St. Mary's Parochial School** asks the Board to note that the proposed monopole is directly across the road from the school which, given the health concerns attached to telecommunications equipment, could affect the enrolment of pupils at the school and hence the future viability of the school.
- The proposed monopole will affect the setting of the school which is a protected structure and this would be contrary to Development Plan policies which aim to protect the heritage of Clonmel.

## 7.0 Assessment

Having examined all the application and appeal documentation on file, and having regard to relevant local and national policy and guidance, I consider that the main issues in this appeal are those raised in the grounds of appeal and Observations and I am satisfied that no other substantive issues arise.

The main issues to consider therefore are as follows:

- Principle and justification of development.
- Human health.
- Visual impact.
- AA Screening.

### 7.1. Principle and Justification of Development

7.1.1. The proposed telecommunications monopole is not a type of development included in the is zoning matrix for 'Open Space and Recreation' zoned lands in the Clonmel LAP 2024-2030 and therefore the proposed mast is open to assessment on its own merits and is not a use specifically excluded by the zoning objective for the area.

7.1.2. In terms of justification for the location of the mast at this location I note that the 'Radio Engineering Site Justification' report (Appendix 1 of the First Party appeal submission) prepared by Vodafone provides a technical justification for the location of the mast and demonstrates the improved coverage that will result should permission be forthcoming for the proposed monopole. I see no reason to dispute the findings of this report.

7.1.3. I note section 4.3 of the Guidelines which state: *Only as a last resort should free-standing masts be located within or in the immediate surrounds of smaller towns or villages. If such location should become necessary, sites already developed for utilities should be considered and masts and antennae should be designed and adapted for the specific location. The support structure should be kept to the minimum height consistent with effective operation...Only as a last resort and if the alternatives suggested in the previous paragraph are either unavailable or unsuitable should free-standing masts be located in a residential area or beside schools. If such a location should become necessary, sites already developed for utilities should be*

*considered and masts and antennae should be designed and adapted for the specific location. The support structure should be kept to the minimum height consistent with effective operation and should be monopole (or poles) rather than a latticed tripod or square structure.*

7.1.4. In principle therefore, there is no blanket ban on telecommunications structures at this location and a proposed monopole at this location can be decided on its own merits and needs to be the criteria of being a location of last resort to warrant a grant of permission in this instance.

## 7.2. Human Health

7.2.1. The Observations submitted to the Board make the point that the proposed development will negatively impact on human health by virtue of its location near homes, community facilities and several schools.

7.2.2. 'Telecommunications Antennae and Support Structures Guidelines for Planning Authorities' (1996) (as amended by Circular letter PL 07/12) is the current guidance in relation to the emissions from telecommunications infrastructure in Ireland. The Guidance recognises that there is concern amongst the public in relation to the potential health impacts of these structures but makes the point that International Commission on Non-Ionising Radiation Protection reported that radiation from telecommunication infrastructure is substantially below the guideline set by the International Radiation Protection Association. Additionally, telecoms operators must satisfy ComReg, the statutory authority in these matters, that their equipment and processes meet the approved international standard to protect public health.

7.2.3. The Telecoms Guidelines make the point that the WHO has carried out studies of the effects of radiation emitted by telecoms masts on human and animal biology and concluded that no effects were attributable to this source (see Appendix II 'Health and Safety Aspects' of the National Guidelines).

7.2.4. Having regard to the foregoing I conclude the proposed development should not be refused for reasons related to emissions associated with the proposed telecommunications facility affecting human health.

### 7.3. Visual Impact

- 7.3.1. The First Party submits that the location of the proposed monopole is one of last resort, there being no other sites available which satisfy locational criteria of a technical and policy nature. In addition, the First Party submits that an 18m monopole will be readily assimilated into the streetscape at this location.
- 7.3.2. The context within which it is proposed to construct this 18m monopole (reduced by 2m in height from the previously refused lattice mast at the same location)) is a GAA Club grounds which has buildings, training areas, car park and playing pitches. The GAA grounds are located in an urban area and consequently the areas bounding the grounds are comprised of residential zones and medical, educational and training facilities.
- 7.3.3. The presence of a two storey building immediately east of the proposed monopole will provide a certain level of screening to the lower section of the monopole when viewed from Western Road looking SW from the road. Also, looking west from the cul de sac road to the east of the GAA grounds, the intervening building should partially screen the proposed monopole from public realm views.
- 7.3.4. However, the monopole would still be highly visible from Western Road to the north and intermittently visible from Albert Street to the south and Cantwell Street to the west of the appeal site which is largely screened from these two streets in the form of an approximately 2m high stone boundary wall. However, the proposed monopole represents an intrusive feature in the urban landscape when viewed from the north and is a discordant object within a sports grounds context.
- 7.3.5. Arguments that the monopole would visually blend in with existing vertical elements in the GAA grounds, such as net support poles and poles with floodlights affixed to them, are I believe without substance and do not align with the impressions from my site visit. I would strongly disagree with the First Party opinion that the monopole would be easily assimilated into the streetscape at its proposed location.
- 7.3.6. The photomontages submitted by the First Party, in my opinion, only confirm that the proposed monopole as depicted is highly visible and visually obtrusive in the streetscape at this location.



7.3.7. Having regard to the above, I conclude that the proposed monopole, by virtue of its design and height, would seriously injure the visual amenity of the area and that the monopole is therefore not acceptable at this location.

7.3.8. The Board should also note that there are several live permissions for the erection of monopoles within or close to Clonmel town as detailed in the planning history section above and I do not accept that the proposed appeal site is a site of last resort.

#### 7.4. AA Screening

Having regard to the relatively minor development proposed within an existing urban area and the distance from the nearest European site, 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.

### 8.0 Recommendation

I recommend that planning permission be refused for the reasons and considerations set out below.

### 9.0 Reasons and Considerations

Having regard to:

- a) the guidelines relating to Telecommunications Antennae and Support Structures which were issued by the Department of the Environment and Local Government to planning authorities in July 1996;
- b) the location of the appeal site in an area zoned for 'Open Space and Recreation' in the Clonmel LAP 2024-2030 where it is an objective to 'Preserve and provide for open space, sports and recreational amenities', and also to the residential areas, community facilities and schools in close proximity to the appeal site;
- c) the highly visible context of the 18 metres freestanding structure within an amenity zone within an urban area; and
- d) the planning histories for the existing and permitted masts in the general vicinity of the subject site;

it is considered that the proposed development would lead to a proliferation of telecommunications structures where an opportunity for co-location may exist in the immediate area on permitted masts and would seriously injure the visual amenities of the area. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

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

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**Bernard Dee**  
**Planning Inspector**

**28<sup>th</sup> March 2024**

**Appendix 1 - Form 1**  
**EIA Pre-Screening**  
**[EIAR not submitted]**

<b>An Bord Pleanála Case Reference</b>	<b>ABP-318857-24</b>		
<b>Proposed Development Summary</b>	Erection of an 18m high telecommunications monopole		
<b>Development Address</b>	Clonmel Commercials GAA Club, Western Road, Clonmel, Co. Tipperary		
<b>1. Does the proposed development come within the definition of a 'project' for the purposes of EIA?</b> (that is involving construction works, demolition, or interventions in the natural surroundings)		<b>Yes</b>	
		<b>No</b>	✓
<b>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?</b>			
<b>Yes</b>			EIA Mandatory EIAR required
<b>No</b>			Proceed to Q.3
<b>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]?</b>			
		<b>Threshold</b>	<b>Comment (if relevant)</b>
<b>No</b>		N/A	No EIAR or Preliminary Examination required
<b>Yes</b>			Proceed to Q.4

**4. Has Schedule 7A information been submitted?**

<b>No</b>		<b>Preliminary Examination required</b>
<b>Yes</b>		<b>Screening Determination required</b>

**Inspector:** \_\_\_\_\_  
**Bernard Dee**

**Date: 28<sup>th</sup> March 2024**