



An  
Bord  
Pleanála

## Inspector's Report ABP319085-24

### Development

21 metre monopole carrying telecommunications and broadband equipment, associated equipment and cabinets within 2.4 metre palisade fence compound.

### Location

Thomas Davis GAA Club, Kiltipper Road, Tallaght, Dublin.

### Planning Authority

South Dublin County Council.

### Planning Authority Reg. Ref.

SD23A/0092.

### Applicant(s)

On Tower Ireland Limited.

### Type of Application

Permission.

### Planning Authority Decision

Refuse permission.

### Type of Appeal

First Party

### Appellant(s)

On Tower Ireland Limited.

### Observer(s)

None.

### Date of Site Inspection

06/07/24.

### Inspector

Anthony Abbott King.



## **1.0 Site Location and Description**

- 1.1. The development site is located within the grounds of Thomas Davis GAA Club on the Kiltipper Road, Tallaght, Dublin - on lands on the south side of the Kiltipper Road.
- 1.2. The Thomas Davis GAA Club comprises a landholding to the north side and south side of the Kiltipper Road. The main club house is to the north east of the subject site on the north side of the Kiltipper Road.
- 1.3. The site is elongated in its configuration (providing for an access strip from a hard surfaced car park to the proposed location of the mono-pole) located off the Kiltipper Road and separated from the Kiltipper Road by a hard surface car parking area attached to a recreational area of the sports grounds.
- 1.4. The site of the proposed mono-pole and site compound is situated adjacent to a floodlit hard-surfaced enclosed 'Astro Pitch' located to the immediate west. There is a suburban contemporary housing estate at "Greenway Drive" located to the west of the floodlit high-fenced pitch, which is elevated above the level of the 'Astro Pitch'.
- 1.5. The immediate proposed location of the mono-pole and site compound are presently a green field location to the east of the subject 'Astro Pitch' and to the south of the surface car park.
- 1.6. The landscape from viewing points to the south toward the south-east and north-east comprises uninterrupted open fields comprising part of the Dodder River Valley.

## **2.0 Proposed Development**

- 2.1. 21 metre monopole carrying telecommunications and broadband equipment, associated equipment and cabinets within 2.4 metre palisade fence compound.



### 3.0 Planning Authority Decision

#### 3.1. Decision

Refuse permission for the following reason:

- (1) In the South Dublin County Development Plan 2022-2028, Policy IE5 Objective 3 states: To permit telecommunications antennae and support infrastructure throughout the County, subject to high quality design, the protection of sensitive landscapes and visual amenity. Policy NCBH8 relates to the Dodder River Valley and aims to Protect and enhance the visual, recreational, environmental, ecological, geological and amenity value of the Dodder Valley, as a key element of the County's Green Infrastructure network. NCBH\* objective 1 aims to: restrict development within areas designated with Zoning Objective 'HA-DV' (To protect and enhance the outstanding character and amenity of the Dodder Valley) and ensure that new development: (a) does not significantly negatively impact on cultural heritage assets, on sensitive habitats, species, and ecosystem services; (b) is related to the area's amenity potential; (c) is designed and sited to minimise environmental and visual impacts; and (d) enhances the County's green infrastructure network. Having regard to: (i) the above policies (ii) the 'HA-DV' zoning objective of the South Dublin County Development Plan (2022-2028), which aims; 'To protect and enhance the outstanding character and amenity of the Dodder Valley', (iii) the landscape character of the area, the proposed development would significantly compromise this sensitive landscape and contravene the zoning objective and these policies. Thus the proposed development would contravene the proper planning and sustainable development of the area.
- (2) Having regard to the prominent location of the application site, the proposed development would be visually obtrusive and result in an incongruous feature that would detract from the visual amenity and sensitive character of the surrounding area. Thus the proposed development would contravene policy



objectives; IE5 Objective 3, and NCBH\* Objective 1 of the South Dublin County Development Plan 2022-2028 and would be contrary to the proper planning and sustainable development of the area.

### **3.2. Planning Authority Reports**

#### **3.2.1. Planning Reports**

The decision of the CEO of South Dublin County Council reflects the recommendation of the planning case officer.

#### **3.2.2. Other Technical Reports**

- The Roads Department initially requested additional information *inter alia* in the matter of the turning circle of the access road. Additional information was received on the 19<sup>th</sup> October, 2023, which included revised drawings clarifying the location and dimensions of the turning circle at the entrance to the site which includes a swept path analysis illustrating how service vehicles can safely access and egress the compound in a forward direction. The planning authority was satisfied with the information provided.
- The public realm requested additional information initially having concerns with the lack of information provided including existing vegetation within the subject site. The public realm section recommended the submission of an Arboricultural Impact Assessment (AIA). Additional information was received on the 19<sup>th</sup> October, 2023, including Arboricultural Impact Assessment (AIA). The planning authority was satisfied with the information provided. Public Realm and Parks section of the local authority had no objection subject to recommended conditions.

### **4.0 Planning History**

The following planning history is relevant:

Under SD03A/0912 planning permission was granted in 2004 for the construction of an all-weather playing pitch, providing 6 no. 21 metre high flood lighting poles and 3



metre perimeter fencing subject to 3 conditions. The conditions relate to the Lux levels of the flood lighting and planting to the southern perimeter.

## 5.0 Policy and Context

### 5.1. Development Plan

The local policy framework is provided by the South Dublin County Development Plan 2022-2028. The relevant policies and objectives in the development plan relate to the functional area of South Dublin County Council (SDCC) and are set-out below:

- Zoning

Table 12.1 (Land-Use Zoning Objectives) & Table 12.4 (Zoning Objective 'HA-DV') are relevant. The land-use zoning objective is 'HA-DV' (Map 9): *'To protect and enhance the outstanding natural character and amenity of the Dodder Valley'*.

*'Public Services'* are listed as an open for consideration use in Table 12.14

It is noted that the adjoining lands adjacent to the north and west accommodating the car park and floodlit pitch, respectively, are zoned 'OS': *'To preserve and provide for open space and recreational amenities'*.

- Other relevant development plan policies and objectives

Chapter 11 (Infrastructure & Environmental Services)

Policy IE5 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.

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

Chapter 3 (Natural, Cultural & Built Assets)



- Policy NCBH8 protects the 'Dodder River Valley'. It aims to protect and enhance the visual, recreational, environmental, ecological, geological and amenity value of the Dodder Valley, as a key element of the County's Green Infrastructure network.
- Policy NCBH\* Objective 1 specifically aims to restrict development within areas designated with Zoning Objective 'HA-DV' (To protect and enhance the outstanding natural character and amenity of the Dodder Valley). This policy is in place *inter alia* to ensure that new development:
  - (a) does not significantly negatively impact on cultural heritage assets, on sensitive habitats, species, and ecosystem services;
  - (b) is related to the area's amenity potential;
  - (c) is designed and sited to minimise environmental and visual impacts; and;
  - (d) enhances the County's green infrastructure network.

## National Policy

- National Planning Framework – Project Ireland 2040

**Objective 24** (Addressing Connectivity) – 'Support and facilitate delivery of the National Broadband Plan as a means of developing further opportunities for enterprise, employment, education, innovation and skills development for those who live and work in rural areas.'

**Objective 48** (Communications) – 'In co-operation with relevant Departments in Northern Ireland, develop a stable, innovative and secure digital communications and services infrastructure on an all-island basis.'

- Telecommunications Antennae and Support Structures (Guidelines for Planning Authorities, Department of the Environment, July 1996).

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.*
- DoECLG Circular Letter PL07/12

The Circular was issued to Planning Authorities in 2012 and updated some of the sections of the above Guidelines including ceasing the practice of limiting the life of the permission by attaching a planning condition. It also reiterates the advice in the 1996 Guidelines that planning authorities should not determine planning applications on health grounds and states:

*'Planning authorities should be primarily concerned with the appropriate location and design of telecommunications structures and do not have competence for health and safety matters in respect of telecommunications infrastructure. These are regulated by other codes and such matters should not be additionally regulated by the planning process'.*

## **5.2. EIA Screening**

- 5.3. The proposed development is a project for the purposes of the Environmental Impact Assessment Directive. However, the proposed development does not fall within a class of development set out in Part 1 or Part 2 of Schedule 5 of the Planning and Development Regulations, 2001, as amended, and therefore no preliminary



examination, screening for environmental impact assessment, or environmental impact assessment is required.

## **6.0 The Appeal**

### **6.1. Grounds of Appeal**

The grounds of appeal, prepared by David Counihan, Indigo, 4Site House, Raheen Business Park, Limerick on behalf of the applicant, are summarised below:

- The appellant applied for planning permission under Section 37 of the Planning and Development Act 2000 as amended for the development proposal. The proposed development is required to replace an existing wooden pole and associated equipment compound in a prominent location at the entrance to the Club grounds and residential development and would be located on a new site to the south west of the grounds on disused scrubland positioned away from the road. The new location is considered to be the least intrusive location within the sports grounds in terms of visual impacts on local residents.
- The new site will provide the mobile operators with a purpose built secure compound with separated access and parking area during operations and maintenance visits. The design of the monopole has been revised to be a slim line single user monopole structure with equipment vertically aligned to reduce the bulk on the upper part of the support structure.
- A decision to refuse planning permission was made by the planning authority dated 30<sup>th</sup> January, 2024 following further information and clarification of further information requests.
- On Tower Ireland Limited is a company of Cellnex, which is a European Telecommunications Infrastructure provider providing services *inter alia* to support Irish mobile providers. The appellant manages an existing portfolio of 1,150 sites in Ireland. The appellant plans to add new developments to support the ongoing requirements of the telecommunication industry and to facilitate broadband in current “black spot” areas. The roll-out of



telecommunications infrastructure is a significant and fundamental pillar in the Governments telecommunications policy.

- The proposed development represents an investment commitment by the appellant to provide space to the operators “Three Ireland” , which forms part of their respective telecommunications network in the area providing service to the local community. The appellant will offer other operators’ space to co-locate services on this site.
- The replacement site at Thomas Davis GAA Club, Kiltipper Road, Tallaght facilitates the upgrade and expansion of the network to widen geographic coverage of high speed internet and data services for customers. The operator “Three” is currently hosted on an existing 13m wooden pole with associated equipment and equipment compound located on the north side of the club grounds off the Kiltipper Road. This site cannot be upgraded.
- The appellant and the operator “Three” have identified the requirement for an infrastructure upgrade. A new site is required in the Kiltipper area, as outlined in the submitted in the Technical justification, planning application and further information responses in order to maintain and improve existing voice and broadband services in the area of Kiltipper Woods, Ellensborough, Friarstown, Kiltipper Park, the Kiltipper road, Bohernabreena road and homes and businesses in the area.
- The proposed structure will allow network operators to deploy a number of different types of technologies in particular 4G data and 5G services. In addition to coverage enhancement in the target area.
- The proposed development is in accordance with Telecommunications Antennae and Support Structures-Guidelines for Planning Authorities (1996). The Guidelines acknowledge that there is limited flexibility as regards location, given the constraints arising from radio planning parameters”(Section 4.2) and that some masts will remain quite noticeable in spite of the best precautions. The Guidelines provide criteria in relation to views.
- A Landscape Character Assessment and Visual Impact Assessment (VIA) was undertaken by ACP Landscape Architect consultants. A revised photomontage has also been produced to demonstrate the impact of the



revised structure in the local area following the redesign of the structure as part of a further information request. The conclusion of the VIA is that the proposed tower would affect most of the assessed receptors to some degree. However, the amenity walks and area (Dodder riparian corridor) would be largely unaffected.

- The protected views from the northeast would be unaffected while there would be some slight and partial visibility in proximity of protected views to the south. The most affected change would be experienced intermittently across short sections of the study area along Kiltipper Road in the north and local roads to the south of the study area. The magnitude of change would be low-to-high for landscape and visual receptors with low to high sensitivity.
- The appellant claims that mitigation through planting is possible reducing the amount of visual change arising from the cumulative impacts of the compound and monopole on the receiving environment. The planting would knit the development into the landscape. It is possible to mitigate some of the negative visual impact through planting that would both conceal the compound in the long term and in part the associated site infrastructure (monopole) in the medium term. It is claimed that only the upper portion of the monopole would be visible from close and distant ranges across the study area.
- The recommended planting strategy acts to retain as much existing scrubland vegetation as possible while planting native species blending with the local landscape and contributing to the sylvan character in the longer term. The planting would increase the green infrastructure potential of the proposed site.
- The design team will consider the following: retain as much scrub as possible from the grounds surrounding the compound; plant mixed native hedgerow around the compound and along the access track to a height of 3m for screening purposes blending with tree line to the north east in the longer term; plant small-medium height native trees (consider hawthorn, holly, hazel, birch, mountain ash) along the eastern and southern edge of the proposed site to continue the existing tree belt along the eastern edge and consolidate sylvan character.



- The planting *inter alia* of native trees would reduce the impact of the monopole in views from the west as trees would provide a backdrop to the pole and in the longer term absorb it into the sylvan environment. It would also screen the monopole from the south and east where the proposed site is currently relatively open for more sensitive landscape and visual receptors.
- The appellant is willing to undertake a planting scheme in accordance with mitigation measures subject to planning approval. Should the Board consider the development permissible a landscape plan can be included as a condition.
- The appellant claims the predicted visual effects after mitigation would range from imperceptible to moderate for visual amenity and landscape character. Where the effects are moderate this is due to the sensitivity of the receptor.
- The South Dublin County Development Plan 2022-2028 Policy IE Objective 3 (Telecommunications Infrastructure) to permit telecommunications antennae and support infrastructure throughout the County subject to high quality design, the protection of sensitive landscapes and visual amenity. Policy NCBH8 relates to the Dodder River Valley and aims to protect and enhance the visual, recreational, environmental ecological, geological and amenity value of the Dodder Valley, as a key element of the County's Green Infrastructure network. The appellant claims that mitigation measures can abate impacts on the sensitive environment of the Dodder Valley.
- Impacts to the local area are mainly attributable to visual impacts to the residential amenities of nearby residences. There are currently 6 no. 21 metre high flood lighting poles surrounding the Astro Pitch and there are also several pylons and other utilities occupying the urban skyline. However it is accepted that the width of the monopole support structure is more prominent and the equipment will be readily visible in the local area. It is claimed this must be balanced by the location of the site situated amongst tall pole type supporting structures of similar height and design.
- The appellants have installed successfully several similar structures with in sports grounds in recent years in both urban and rural contexts on the basis that clustering telecommunications poles amongst existing floodlighting



contains the impact of a new structure in an area where a site or site upgrade is required.

- The site is justified on technical grounds as there are there are no existing telecommunications sites in the area to co-locate equipment into, nor is there a suitable and acquirable alternative site that meets the coverage objectives of the operator networks.

## **6.2. Applicant Response**

- N/A first party appeal.

## **6.3. Planning Authority Response**

- The planning authority confirms its decision. The issues raised in the appeal have been covered in the chief executives order.

## **6.4. Observations**

None.

## **7.0 Assessment**

- 7.1. The following assessment covers the points made in the appeal submission, the reasons for refusal and is a consideration of the proposed development for the provision of a 21 metre monopole carrying telecommunications and broadband equipment, associated equipment and cabinets within 2.4 metre palisade fence compound (8.25m x 8.25m = 68 sqm). It is noted there are no new substantive matters for consideration.

### Proposed development

- 7.2. The proposed development is required to replace an existing wooden pole and associated equipment compound in a prominent location at the entrance to the Thomas Davis GAA Club, Kiltipper Road, Tallaght grounds (north side of the Club grounds) and would be located on a new site to the south west of the Club grounds on disused scrubland positioned away from the road. The applicant claims the



replacement site facilitates the upgrade and expansion of the network to widen geographic coverage of high speed internet and data services for customers.

- 7.3. The operator “Three” is currently hosted on an existing 13m wooden pole with associated equipment and equipment compound located on the north side of the club grounds off the Kiltipper Road. The applicant claimed the existing site cannot be upgraded. The planning authority accepted the requirement for replacement infrastructure. However, the planning authority disputed the scale and location.
- 7.4. In response to additional information received by the planning authority on the 19<sup>th</sup> October, 2023, *inter alia* the following was clarified: The use of a 21m mono-pole was selected by the applicant to provide the best coverage for each co-locating network. The height of the mono-pole would allow each mobile operator, including the designated operator “Three Ireland” to maintain vertical separation (dedicated location of their antenna, equipment and dishes on the telecommunications tower) between each potential operator mitigating interference. The proposed structure will allow network operators to deploy a number of different types of technologies including 4G data and 5G services.

#### Reasons for refusal

- 7.5. The substantive refusal grounds are the visual impact of the proposal on the receiving environment given the sensitive and prominent site location within the River Dodder Valley. The planning authority refused the application for two reasons principally on the grounds of the visual impacts on the surrounding area given the sensitive landscape location evidenced by the zoning. Zoning Objective ‘HA-DV’ (To protect and enhance the outstanding character and amenity of the Dodder Valley).
- 7.6. The cited grounds of refusal policy objectives are Policy IE5 Objective 3, which states: *To permit telecommunications antennae and support infrastructure throughout the County, subject to high quality design, the protection of sensitive landscapes and visual amenity.* And Policy NCBH8, which protects the ‘Dodder River Valley’, including NCBH\* Objective 1 of the South Dublin County Development Plan 2022-2028. This policy *inter alia* restricts development within areas designated with Zoning Objective ‘HA-DV’ (To protect and enhance the outstanding character and amenity of the Dodder Valley) such as the applicant site. The planning authority



required additional information and clarification of additional information responses before refusing the development.

### Zoning

- 7.7. It is noted that the planning authority considered the proposed development under the use class 'public services' , which is an 'open for consideration use' under the county development plan zoning matrix for lands zoned "HA-DV", subject to compliance with overall development plan policy and objectives. Furthermore 'public services' uses will be subject to acceptable landscape impact assessment. It is further noted that the applicant has submitted by way of clarification of additional information response - a Landscape Character Assessment and Visual Assessment Report undertaken by ACP Landscape Architects consultants.

### Additional information and clarification of additional information

- 7.8. The substantive matter motivating additional information and the clarification of additional information related to the appropriate nature of the site, which the planning authority assessed to be a highly visible location within a sensitive zoning. The potential provision by the applicant of an alternative site was requested. The planning authority requested the applicant to conduct an assessment of alternative locations within the larger landholding.
- 7.9. A clarification of additional information request *inter alia* again required a site selection assessment that could demonstrate that the submitted location is the most feasible noting a planning authority preference for existing hardstanding areas, less sensitive zoning and areas of less prominence. However, the applicant reiterated the appropriateness of the originally submitted site.
- 7.10. The applicant in their responses to clarification of additional information (21/12/23) stated that in consultation with the site providers, namely the 'Thomas Davis GAA Club Trustees', they had again reviewed site options within the grounds of the sports club. The Trustees rejected the option to install the telecommunications installation within their sports facilities i.e. within the "Astro Pitch" or the associated car park; the additional information response stated that to facilitate the installation of the mono-pole and associated compound (8m x 8m) within the car park would require *inter alia* the removal of 10 car parking spaces.



- 7.11. It is noted that locating the compound and mono-pole within the purpose built “Astro Pitch” is not feasible. Furthermore, the applicant noted that the relocation of the installation site within the recreation development area would bring the proposal closer to the residential housing (Greenway Drive) to the west of the sports club facilities.

#### Site selection

- 7.12. The applicant respectfully submitted to the planning authority that the original site is the only site within the club grounds that both the applicant and Club can agree terms and conditions.
- 7.13. The planning authority’s opinion is that the proposed site is chosen by reason of the limited impact it would have on the operations of the sport’s club rather than an optimum location in terms of minimisation of visual impacts with a sensitive landscape location. The planning authority note that the north side of Kiltipper Road may provide an acceptable alternative location.
- 7.14. The planning authority by way of additional information and clarification sought an alternative site. The applicant response supported the merits of the site as originally submitted to the planning authority given land owner consent constraints, which is now the subject of this appeal. The clarification response included a Landscape Character Assessment and a Visual Impact Assessment undertaken by ACP Landscape Architect consultants.
- 7.15. The appellant states that the new location is considered to be the least intrusive location within the sports grounds in terms of visual impacts on local residents.
- 7.16. I consider that this assessment relates to the merits / de-merits of the subject applicant site. I respectfully inform the Board that a theoretical alternative site is not part of this appeal assessment. The applicant site comprises a green field area comprising scrub land with tree cover adjacent to a developed recreational area comprising a fenced floodlit hard surface pitch “ Astro Pitch” and an associated hard surface car park area.

#### Visual and environmental impacts and mitigation

- 7.17. The appellant states that the proposal presents the mobile operators with a purpose built secure compound with separated access and parking area during operations



and maintenance visits. The design of the monopole has been revised to be a slim line single user monopole structure with equipment vertically aligned to reduce the bulk on the upper part of the support structure. Furthermore, the appellant claims that new planting would knit the development into the landscape. It is claimed it is possible to mitigate some of the negative visual impact through planting that would both conceal the compound in the long term and in part the associated site infrastructure (monopole) in the medium term.

- 7.18. The appellant design team propose to plant mixed native hedgerow around the compound and along the access track to a height of 3m for screening purposes blending with tree line to the north east in the longer term; plant small-medium height native trees (consider hawthorn, holly, hazel, birch, mountain ash) along the eastern and southern edge of the proposed site to continue the existing tree belt along the eastern edge and consolidate sylvan character.
- 7.19. The zoning objectives in the hinterland do not provide for a transition area rather they guillotine the land use between the identified site and the developed recreational area to the immediate west. The proposed site of the monopole and compound is located within the 'HA-DV' zoning provided by the South Dublin County Development Plan 2022-2028, which seeks to protect and enhance the outstanding natural character and amenity of the Dodder Valley. The adjoining lands adjacent to the north and west accommodating the car park and floodlit pitch, respectively, are zoned 'OS': *'To preserve and provide for open space and recreational amenities'*.
- 7.20. In the matter of the immediate visual impact on the receiving site and hinterland, It is considered that the proposed development would be located in a transition area between the existing car park and floodlit 'Astro Pitch' and the extensive greenbelt that comprises part of the Dodder Valley principally to the south. I note under SD03A/0912 planning permission was granted for the construction of an all-weather playing pitch, providing 6 no. 21 metre high flood lighting poles and 3 metre perimeter fencing. I further note the proposal to plant in the vicinity of the compound to mitigate both the visual impacts of the compound and in part the monopole.
- 7.21. In the matter of localised and more distant views from observation points in the broader hinterland, a revised photomontage was submitted as part of the clarification



of additional information response to contextualise and demonstrate the visual impact of the proposed redesigned structure (with the removal of headframe).

- 7.22. The appellant has provided a photographic inventory of views from a number of observation points (VP1-VP13) dated 05/12/23) as part of the clarification of additional information response. A Visual Impact Assessment received on the 02/01/24 is independently assessed by ACP Landscape Architects. The zone of visibility is approximately 1 Km in radius. Although there may be visibility beyond the 1 km radius that would be negligible to slight and intermittent.
- 7.23. The visual and landscape character impact assessment acknowledges the receiving environment as a 'medium to high' sensitivity landscape designation adjoining a 'high' sensitivity designation to the south. The area to the north of the site is identified as urban with no sensitivity designation. The revised photomontage was requested and provided to ACP Architects before their site visit and visual assessment.
- 7.24. The applicant states that short sections of the study area along Kiltipper Road in the north and local roads to the south would be most affected by visual change. I have studied the visual impact assessment provided. I am satisfied that the proposed development would as stated have a magnitude impact range from imperceptible to moderate after mitigation for visual amenity and landscape character. The cumulative effect of the monopole and compound would be reduced as a result of the recommended planting, which would screen the compound in the longer term. However, the upper portion of the monopole would be visible from close and distant ranges.
- 7.25. Telecommunication Antennae and Support Structure Guidelines 1996 *inter alia* state:  
*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.*
- 7.26. The applicant by way of clarification of additional information agreed to remove other potential operator support equipment from the proposal (removal of headframe) which would limit it to a single operator site. The supporting equipment (including



antennae) facilitating the operator "Three Ireland" would be restricted to an area between 21m and 15m at the top of the mono-pole. I consider that the restriction of support equipment to the apex of the mono-pole would reduce visual impact in terms of vertical clutter.

- 7.27. Furthermore, I consider that the visual impact of the proposed monopole, which is 21 metres in height with vertically aligned antennae and associated compound would in part be mitigated by the cumulative vertical objects in the immediate vicinity (the dynamic of co-location with the existing recreational infrastructure is illustrated in VP7), in specific the floodlight stands (21m high), and the cumulative horizontal development lines adjacent, specifically the boundary treatment to the enclosed hard surfaced pitch, which is enclosed by a high boundary (3m high) perimeter metal fence.
- 7.28. It is considered that proposal on the applicant site adjacent to the floodlit "Astro Pitch" and surface car parking represents a co-location of infrastructure. I further consider that the site location would cluster visually obtrusive development within an area to the south of the Kiltipper Road adjoining the pre-existing recreational development area containing vertical light standards and highly visible boundary enclosure. On balance the proposed development location subject to a bespoke planting response, which would mitigate visual impacts in the immediate surroundings at the lower compound level, would be acceptable as an effective location on technical grounds with efficient access (to the site from the Kiltipper Road via the associated hard surface car park) for the operator within the zone of operational deficiency identified.
- 7.29. I note that the visibility of the mono-pole from the residential properties in "Greenway Drive" would be prominent to the east of the housing development, which would now incorporate within view the mono-pole and antennae within the network of flood light stands between the housing development and the mono-pole compound (VP11). However, I do not consider that the visual change warrants a refusal of planning permission on residential and visual amenity grounds.
- 7.30. Finally, in the matter of visual and environment impact, I consider that the proposed development as clarified and amended by way of additional information and clarification of additional information would be designed and sited to minimise



environmental and visual impacts in accordance with Policy NCBH8 (Dodder River Valley) Objective 1.

#### Other considerations

- 7.31. Circular Letter PL 07/12 (*Telecommunications Antennae and Support Structures Guidelines*) states that 'attaching a condition to a permission for telecommunication masts and antennae which limit their life to a set temporary period should cease' except in exceptional circumstances. Therefore, as no exceptional circumstance is highlighted, no temporal condition is justified.

#### Conclusion

- 7.32. On balance it is considered the site location adjacent to the floodlit "Astro Pitch" and associated surface car parking area and the bespoke planting response would mitigate visual impacts in the immediate surroundings, would cluster visually obtrusive development within a an area to the south of the Kiltipper Road adjoining the pre-existing recreational development area containing tall vertical light standards and highly visible boundary enclosure and, would provide technical effectiveness and efficient access (to the site from the Kiltipper Road via the associated hard surface car park) for the operator within the zone of operational deficiency identified.

#### **Appropriate Assessment Screening**

The proposed development is located within the River Dodder Valley approximately 200 metres to that water course to the south east. The river is separated from the proposed development site by a buffer of agricultural fields, scrub habitat and riparian woodland. There are no watercourses linking the proposed development site and the River Dodder.

Having regard to the nature and scale of the development, the proposed development comprises a telecommunications mono pole (21m) and associated modest scale compound (approximately 70 sqm.), it is possible to screen out the requirement for the submission of an NIS.

It is noted that the planning authority required AA screening as part of an additional information request (Item 6). The planning authority was satisfied with the information provided in the response by Roughan & O'Donovan Consulting Engineers, which examined the details of the proposed development and the



relevant European sites and concluded that the proposed development either individually or in combination with other plans or projects, in view of best scientific knowledge, are not likely to give rise to impacts which would constitute significant effects.

## **8.0 Recommendation**

- 8.1. I recommend a grant of permission subject to condition having regard to the reasons and considerations below.

## **9.0 Reasons and Considerations**

Having regard to -

- (a) National Planning Framework – Project Ireland 2040
- (b) The Telecommunications Antennae and Support Structures -Guidelines for Planning Authorities, issued by the Department of Environment and Local Government in 1996
- (c) The Telecommunications Antennae and Support Structures -Guidelines for Planning Authorities, issued by the Department of Environment and Local Government Circular Letter PL07/12
- (d) The objectives of the South Dublin County Development Plan 2022-2028
- (e) The nature, scale and location of the proposed telecommunications structure

It is considered that the proposal adjacent to the floodlit ‘Astro Pitch’ and surface car parking area represents a co-location of infrastructure. On balance the proposed development, subject to compliance with the conditions set out below, would achieve the objectives set out in national policy and the South Dublin County Development Plan 2022-2028 given: the bespoke planting response, which would mitigate visual impacts in the immediate surroundings at the lower compound level; the effectiveness on technical grounds and accessibility of the chosen location, which would provide efficient access (to the site from the Kiltipper Road via the associated



hard surface car park) for the operator within the zone of operational deficiency identified and; the cluster dynamic of visually obtrusive development within a an area to the south of the Kiltipper Road adjoining a pre-existing recreational development area containing vertical light stands and highly visible boundary enclosure.

## 10.0 Conditions

1.	<p>The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, as amended by the further plans and particulars submitted on the 19th day of October 2023 and by the further plans and particulars received by the planning authority on the 2nd day of January, 2024, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the development shall be carried out and completed in accordance with the agreed particulars.</p> <p>Reason: In the interest of clarity.</p>
2.	<p>Surface water drainage arrangements shall comply with the requirements of the planning authority for such services and works.</p> <p><b>Reason:</b> In the interest of public health.</p>
3.	<p>The recommendations contained within the submitted Arboricultural Survey and Report, (Arboricultutal Assessment prepared by Gary Doherty) dated 16/10/2023, shall be implemented in full by the applicant.</p> <p><b>Reason:</b> In the interest of biodiversity and visual amenity.</p>

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.



A. Abbott King

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Anthony Abbott King  
Planning Inspector

9th September 2024