

Inspector's Report ABP-319912-24

Development Installation of 18m dual operator pole,

ground based cabinets and associated

site works.

Location Maryborough Hill/Lissadell,

Maryborough, Cork

Planning Authority Cork City Council

Planning Authority Reg. Ref. T22019

Applicant(s) Emerald Tower Ltd.

Type of Application Section 254 Licence

Planning Authority Decision Refuse

Type of Appeal First Party

Appellant(s) Emerald Tower Ltd.

Observer(s) None

Date of Site Inspection 19th February 2025

Inspector Bernadette Quinn

1.0 Site Location and Description

1.1. The appeal site is located on a green area adjacent to a footpath on Maryborough Hill to the north of the junction of Maryborough Hill and an access road to a residential development 'Lissadell'. The immediate vicinity of the site contains existing streetlights, directional signage, lights associated with a pedestrian crossing, ESB cabinets and below ground covered vaults. There is a pedestrian crossing on Maryborough Hill adjacent to the footpath in front of the location of the proposed pole. The closest residential properties are located approximately 35m to the south, 40m to the north and 90m to the east. Douglas Golf Course is situated on the opposite side of Maryborough Hill.

2.0 **Proposed Development**

- 2.1. A licence under section 254(1) of the Planning and Development Act 2000, as amended, was sought from Cork City Council for the installation of a 18m dual operator pole with a diameter of 406mm, two ground based equipment cabinets with a height of 1.65m, and all associated site development works for wireless data and broadband services.
- 2.2. The application was accompanied by a planning statement and photomontage report.
- 2.3. Following a request by the planning authority for further information the proposed pole was reduced to a height of 15m and the cabinets increased to a height of 1.9m.

3.0 Planning Authority Decision

3.1. **Decision**

3.1.1. On 07th May 2024 the Planning Authority refused to grant a licence for one reason as follows:

The proposed development, by reason of its location, height, and associated equipment, would be visually prominent and would seriously detract from the character and visual amenities of the area.

3.2. Planning Authority Reports

3.2.1. Planning Reports

The planning officer's report reflects the decision to refuse to grant the licence and can be summarised as follows:

- It is not considered that the proposed development complies with the planning policy and objectives for the area, and with those aspects as outlined in 254(5) a-d of the Planning and Development Act.
- Having regard to the size and location of the telecommunications monopole and the proliferation of associated equipment, it is considered that the proposed structure would be visually prominent and would seriously detract from the proper planning and sustainable development of the area.
- The PA has serious concerns with the visual impact of the telecommunications structure by reason of the height proposed. Further information is required to show a significant reduction in the proposed monopole height along with the internalisation of the proposed equipment currently proposed to be externally mounted on the monopole.
- Having regard to the location and number of accompanying cabinet services there are significant concerns in terms of the impact on the visual amenity of the area and suitability to be successfully assimilated into the existing environment at this location. Further information is required showing the relocation of the accompanying cabinet services underground, or their reduction in scale and relocation of same to a less visually prominent location; and the omission of the second cabinet and / or any associated works associated with a potential second operator on site.

Following receipt of further information, the planning officers report can be summarised as follows:

- The applicant has submitted details of a reduced monopole height of 15m and a justification report for the proposed height. The cabinets and associated attached equipment remain as originally proposed.
- There are concerns in relation to the visual impact due to the height and prominent location of the telecommunication structure. There is little in the

- way of screening in the immediate location given that the site is relatively flat, grassed area with some trees located at the boundary of the grassed area.
- The site of the monopole is a very prominent site at the entrance to a
 residential development, directly adjacent to a pedestrian crossing and it is
 considered that the proposed development would seriously detract from the
 visual amenities of the area and should therefore be refused.
- No information has been submitted to substantiate that the relocation of the
 cabinets underground would not be feasible. No second cabinet is proposed
 to be constructed as applied for even though no second/dual operator is in
 pace to use this equipment and no proposals to scale down the cabinets have
 been included.
- The PA has serious concerns about the visual impact of the proposed cabinets at this prominent location which would seriously detract from the visual amenities of the area.
- The need for a second cabinet has not been justified, should a second operator be in need of same an application should be submitted at that stage to reduce non-essential equipment to reduce street clutter.
- Having regard to the height and location of the telecommunications monopole
 and associated equipment, it is considered that the proposed structure would
 be visually prominent and would seriously detract from the visual amenities of
 the area and would not be in accordance with the proper planning and
 development of the area and the application should be refused.

3.2.2. Other Technical Reports

Transport Division: No objection subject to conditions.

3.3. Prescribed Bodies

None received.

3.4. Third Party Observations

None received.

4.0 Planning History

None on file.

5.0 Policy Context

5.1. National and Regional Guidance

- 5.1.1. The National Planning Framework 'Project Ireland 2040' contains the following relevant objectives:
 - National Policy Objective 24: Support and facilitate delivery of the National Broadband Plan as a means of developing further opportunities for enterprise, employment, education, innovation, and skills development for those who live and work in rural areas.
 - National Policy Objective 48: Supports the development of a stable, innovative and secure digital communications and services infrastructure on an all-island basis.
- 5.1.2. The National Development Plan 2018-2027 recognises that access to quality high speed broadband is essential for today's economy and society.
- 5.1.3. The National Broadband Plan 2020 is the Government's initiative to improve digital connectivity by delivering high speed broadband services to all premises in Ireland, through investment by commercial enterprises coupled with intervention by the State in those parts of the country where private companies have no plans to invest.

The Regional Spatial & Economic Strategy for the Southern Region 2040 in Section 6.2 recognises that telecommunications infrastructure is essential to ensure digital connectivity and sets out Regional Policy Objectives to support digital connectivity.

The Telecommunication Antennae and Support Structures: Guidelines for Planning Authorities 1996 (the 1996 Guidelines) provide general guidance on planning issues so that the environmental impact is minimised, and a consistent approach is adopted by the various planning authorities. These guidelines were revised by Circular Letter PL 07/12, dated 19th October 2012, which revises Sections 2.2. to 2.7 of the

Guidelines. The Circular was issued in the context of the rollout of the next generation of broadband (4G). Revisions include:

- Cease attaching time limiting conditions to telecommunications masts, except in exceptional circumstances;
- Avoid inclusion in development plans of minimum separation distances between masts and schools and houses;
- Omit conditions on planning permission requiring security in the form of a bond/cash deposit;
- Reiterates advice not to include monitoring arrangements on health and safety or to determine planning applications on health grounds.

5.1.4. Circular Letter PL 03/2018

This circular provides a revision to Chapter 2 of the Development Contribution, Guidelines for Planning Authorities, 2013 and specifically states that the wavier provided in the Development Contribution, Guidelines for Planning Authorities, 2013 should apply not only to the provision of broadband services but also to mobile services.

5.2. Development Plan

- 5.2.1. The Cork City Development Plan 2022-2028 is the statutory development plan for the area. The subject site is zoned ZO 01 Sustainable Residential Neighbourhoods, with the stated objective to protect and provide for residential uses and amenities, local services and community, institutional, educational and civic uses.
- 5.2.2. Chapter 9 refers to Environmental Infrastructure. Section 9.23 relates to ICT and outlines support for the rollout of the National Broadband Plan and the enhancement of international fibre communications links. Section 9.26 states: An efficient telecommunications system is important in the development of the economy. Cork City Council will have regard to the guidelines issued by the Department of the Environment, Heritage and Local Government, 'Planning Guidelines for Telecommunications Antennae and Support Structures' (1996) and Circular Letter PL 07/12. The assessment of individual proposals will be governed by the guidelines and the controls scheduled in the Development Management section of this plan.

5.2.3. Chapter 11 outlines Development Management considerations with section 11.256 referring to Telecoms Structures, stating: 'The assessment of any application for telecommunications antennae and support structures shall have regard to the following: Telecommunications Antennae and Support Structures, Guidelines for Planning Authorities, DECLG, 1996 and Circular Letter PI 07/12 published by the DECLG in 2012: The co-location of existing structures is encouraged and the construction of any new antennae or structure will only be considered when colocation is not a feasible option. Any proposal for a new structure or antennae should detail the requirements for the infrastructure and if so, why co-location is not feasible; In identifying a suitable location for telecommunications structures consideration shall be given to the potential visual impact of the development and any sensitivities in the area in which the structure is proposed to be located. A Visual Impact Assessment of the development, including photomontages, may be required, depending on the nature of the development proposed; Telecommunications Structures on visually sensitive elevated lands will only be considered where technical or coverage requirements mean the infrastructure is essential.'

5.3. Natural Heritage Designations

5.3.1. The subject site is not located within any designated site. The nearest designated site is Cork Harbour Special Protection Area (SPA) (Site Code 004030) which is located approximately 1km northeast of the subject site. This area is also designated as the Douglas River Estuary proposed Natural Heritage Area (pNHA).

5.4. **EIA Screening**

5.4.1. The proposed development is not a class for the purposes of EIA as per the classes of development set out in Schedule 5 of the Planning and Development Regulations, 2001, as amended. No mandatory requirement for EIA therefore arises and there is also no requirement for a screening determination. Refer to Form 1 in Appendix 1 of this report.

6.0 The Appeal

6.1. Grounds of Appeal

6.1.1. A first party appeal has been received on behalf of Emerald Tower Limited. The grounds of appeal can be summarised as follows:

Technical Justification

Eir require a site at this location and within a confined search area. Current sites in the area for Eir do not provide adequate service for good indoor high speed mobile broadband. Three images submitted to support the location – Eir search ring CK_2947, existing indoor coverage without CK_2947 and predicted new indoor coverage with CK_2947.

Site Selection and Design

- Existing telecoms infrastructure sites in the area were considered and found to be significantly outside the search ring and would not meet Eir's coverage objective.
- The applicants first choice is co-location which is already done at the nearest
 2 out of 3 telecoms structures.
- There are no suitable existing structures in the search area to co-locate Eir's equipment. The location has been selected on the basis that it is the optimum location in the search area and it is a last resort having followed the sequential approach set out in the 1996 Guidelines. The height is the lowest possible to 'see' over surrounding high trees and built form in the area and for two operators to share the same pole.
- The site is located at the edge of the footpath and adjacent to a grass verge, close to a bus stop and close to several existing utility cabinets and electricity telegraph poles with overhead lines. There is excellent tree screening which minimises visual impact.
- A ComReg site finder map shows an absence of existing telecommunications sites in this area and along Maryborough Hill, hence why a site is required here.

- Cabinets will be coloured fir green to blend with surrounding vegetation.
- Design is slimline, unfussy to minimise any negative visual impacts and pole designed to blend in with existing street infrastructure
- In response to Cork City Councils further information request the height was reduced height of 15m which is the absolute minimum height required for two operators and it was agreed to install the second cabinet at such time as a second operator is confirmed. The pole which will be coloured grey and will assimilate with the typical sky colour in Ireland and surrounding street infrastructure or an alternative colour can be requested by condition.
- Images are submitted to provide evidence of the extent of obstruction that would undermine the signal at 12m height.
- It is considered that the proposal would not seriously impact the visual or residential amenity of the area nor would it inform an obtrusive feature within the surrounding area.
- The proposal strikes a good balance between environmental impact and operational considerations. The proposal is sensitively sited away from existing dwellings whilst ensure the highest level of coverage to customers.
- The proposal will provide new and improved high speed broadband and data services, initially for eir Mobile and a second operator on a single structure and would not be discordant with the local environment and therefore not visually obtrusive.
- The nearest dwelling to the proposed site is over 35m away and Douglas Golf Club to the west of the site.
- The photomontage included with the appeal sets out the potential visual impact on the environment which is not considered significant or detrimental.
- The proposal is to be set back from the roadside, on a bending road and will
 not be visible for long stretches on approach from either direction thereby
 significantly reducing potential impact.

- Existing mature trees are between 10-12m in height which will screen the proposal and a height of 15m is required to ensure the signal will not be disrupted.
- The proposal is consistent with other vertical infrastructure similar in height in the area.
- Large scale residential developments have been permitted in the vicinity of the site and the proposal will be required to support additional permitted and planned increase in population in the area.
- The site is not within any intervention areas for wireless broadband upgrades under the National Broadband Plan and service is reliant on existing service providers such as the appellant.
- The proposal is suitably distanced from any heritage, landscape and ecological sensitive designated areas.
- A visual assessment carried out in accordance with the guidelines for Landscape and Visual Impact Assessment 2013 finds no significant visual effects on nearby sensitive receptors and the proposal will therefore not result in any significant negative visual amenity impacts.
- The proposal for improved digital connectivity supports the goals of the National Planning Framework, the Regional Spatial and Economic Strategy, the National Broadband Plan and the Cork City Development Plan 2022-2028 and complies with Telecommunications Antenna and Support Structures Guidelines for Planning Authorities (1996)

6.2. Planning Authority Response

None received.

6.3. Observations

None received.

7.0 Assessment

- 7.1. The proposed development is brought forward under Section 254(1) of the Planning and Development Act, 2000 (as amended). In their consideration of the application for a licence 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 provision 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. I have examined the file and the planning history, considered national, regional and local policies and guidance, the submission of the appellant and inspected the site. I have assessed the proposed development and I consider that the mains issues in this appeal are as follows:
 - Principle of Development
 - Visual Impact
 - Other Matters

7.3. Principle of Development

7.3.1. The subject site is located in an area of green space adjacent to the public footpath and has the zoning objective ZO1 – Sustainable Residential Neighbourhoods with the objective to "protect and provide for residential uses and amenities, local services and community, institutional, educational and civic uses." The development plan states that the central objective of this zoning is the 'protection of residential uses and residential amenity' and that development in this zone 'should generally respect the character and scale of the neighbourhood in which it is situated' and that development which does not support the primary objective will be resisted.

Telecommunications structures are not specifically listed as a use that is acceptable on ZO 1 lands however paragraph ZO 1.4 of the development plan states that other uses that contribute to sustainable residential neighbourhoods are acceptable in principle.

- 7.3.2. The importance of a high-speed wireless data and broadband network is recognised in Chapter 9 of the development plan which acknowledges that an efficient telecommunications system is important in the development of the economy and is infrastructure which contributes to sustainable residential neighbourhoods. The development plan states that any application for telecommunications antennae and support structures shall have regard to the 1996 Guidelines and 2012 Circular Letter. In this regard I note that the appeal includes details in relation to existing structures in the vicinity of the site, a detailed justification for the proposed location of the structures having followed the sequential approach and has included details in relation to sharing of the proposed facilities in accordance with the 1996 Guidelines.
- 7.3.3. Accordingly, I am satisfied that the proposed development is acceptable in principle at this location, subject to consideration of its impact on the visual amenity and character of the area, and an assessment of impact on road users.

7.4. Visual Impact

- 7.4.1. The planning authority's reason for refusal states that by reason of its location, height, and associated equipment, the proposal would be visually prominent and would seriously detract from the character and visual amenities of the area.
- 7.4.2. The subject site is not located within an area designated in the development plan as a visually sensitive area or a high value landscape. However, it is located within an established residential area, on a site that is open to and visible in views from a number of existing residential properties within the Lissadell housing estate and on Maryborough Hill on approach from the north and south. The appellant has submitted a technical justification for the proposed overall height of the structure at 15 metres (which, following a request by the Planning Authority for further information, is a reduction in the height from a previous proposal at 18m) and submits that this is the minimum height consistent with operational objectives and for dual operator capacity.
- 7.4.3. The appeal included Visual Impact Assessment (VIA) and a Photomontage Report comprising three no. viewpoints, which include views from the north and south on Maryborough Road and a view from the east in Lissadell. The VIA finds that the level of effect will be moderate to low and that no significant effect will result from the

- three viewpoints analysed at locations to the north and south on Maryborough Hill and to the east in Lissadell.
- 7.4.4. Section 4.3 of the 1996 Guidelines states that sites close to existing residential areas are particularly sensitive from a visual and residential amenity perspective and I note the residential development and properties in the vicinity of the site with the closest properties located approximately 35m to the southeast and approximately 40m to the northeast. I note that there are no built heritage assets (Protected Structures, NIAH structures, or Architectural Conservation Areas) and the site is not within a landscape designated as sensitive and there are no designated scenic routes or views to be protected. Two ground cabinets with a height of 1.65m were initially proposed in the planning application and the height increased to 1.9m in the further information response. The site is an area of green space adjacent to the back of the footpath. The immediate vicinity of the site contains existing streetlights, directional signage, lights relating to a pedestrian crossing, ESB cabinets and below ground covered vaults. There are a number of mature trees in the vicinity of the site and there is a semi-mature hedgerow to the north of the appeal site along the boundary to the green area.
- 7.4.5. Whilst I acknowledge that the proposed monopole at 15m in height would be higher and more visible than existing structures in the area, including overhead powerlines, street lighting, road signage and pedestrian crossing lights etc, I note the location of the site and surrounding area is generally flat, the design of the pole, which is slimline with a diameter of 406mm has a relatively limited footprint, and the limited scale of the associated equipment, along with the presence of existing street furniture, trees and hedgerows. Having visited the site and reviewed the documents submitted with the application and appeal I consider the proposal is likely to result in a potential visual impact, however I do not consider that the proposal would be so visually impactful as to injure the visual amenities and character of the area. In my opinion the proposal would not would be visually prominent, will read as a normal element of the suburban environment, and would not seriously detract from the character and visual amenities of the area and therefore I do not agree with the planning authority's reason for refusing the licence.
- 7.4.6. I note that the planning authority raised concerns in relation to associated equipment and the applicant submitted that the design and dimensions submitted are the

minimum required to accommodate dual operators and that it is not feasible to internalise the equipment in to the pole as it would enlarge the pole increasing its visual impact on the streetscape. It was also not considered feasible to underground the equipment due to the existing services at the site. I have no objection to the proposed cabinets, which being of a utilitarian character and ancillary to the main telecommunications structure, present no additional visual amenity concerns at this location. The applicant's further information submission included drawings which provided for two cabinets with an increased height of 1.9m from the initially proposed height of 1.65m. I note that no justification was submitted for this increase in height and the appeal report outlines dimensions of cabinets on page 10 stating that cabinets have a proposed height of 1.65m. I consider it appropriate that if the Board decides to grant the licence that the hight of the two ground cabinets shall be a maximum height of 1.65m and that a condition should be attached in this regard.

7.4.7. I note that there is an absence of tall structures or buildings within this suburban area and there are no industrial estates in the vicinity of the appeal site. I am satisfied that the appellant has demonstrated that alternative sites have been considered and has demonstrated sufficient justification for the choice of the subject site within a residential area and that the applicant has demonstrated that co-location of equipment on other existing telecommunications structures in the wider area is not available.

7.5. Other Matters

- 7.5.1. I note that the proposed development includes future capacity for co-location by another operator within both the 15m high monopole and the second future operator cabinet. The applicant has stated no objection to a condition that the second cabinet will not be installed until such times as a second operator is confirmed. I consider such a condition is reasonable and consistent with the proper planning and sustainable development of the area and if the Board decides to grant a licence I consider this matter can be addressed by way of a condition.
- 7.5.2. I consider that a limit on the duration of the licence is appropriate if the Board decides to grant the licence and that a period of five years is appropriate in accordance with established norms.

7.5.3. I note that the local authority Transportation Division raised no objections to the proposal and I am satisfied that the proposal is acceptable with regard to the convenience and safety of road users including pedestrians.

8.0 AA Screening

- 8.1. I have considered the proposed development in light of the requirements of S177U the Planning and Development Act 2000 as amended.
- 8.2. The subject site is not located within or adjacent to any European Site. The proposed development is located within a residential area and comprises an 15m high dual operator pole, ground based cabinets and associated site works.
- 8.3. Having considered the nature, scale and location of the proposed development I am satisfied that it can be eliminated from further assessment because it could not have any appreciable effect on a European Site. The reason for this conclusion is as follows: the nature and scale of the development proposed; its location in a serviced urban area, its distance from European Sites and the urban nature of intervening habitats, and the absence of ecological pathways to any European Site.
- 8.4. I consider that the proposed development would not be likely to have a significant effect individually, or in-combination with other plans and projects, on a European Site and appropriate assessment is therefore not required.

9.0 Recommendation

9.1. It is my recommendation to the Board that the appeal is allowed under Section 254(6)(b) of the Planning and Development Act 2000, as amended, and that directions shall be given to the planning authority to Grant the licence, subject to conditions, for the reasons and considerations set out below.

10.0 Reasons and Considerations

Having regard to the Telecommunications Antennae and Support Structures

Guidelines 1996 as revised by Circular Letter PL 07/12, and Section 9.26 and 11.256

of the Cork City Development Plan 2022 – 2028, it is considered that, subject to
conditions, the proposal would contribute to the roll out of broadband services in

accordance with national, regional, and local objectives. Having regard to the scale and design of the development and its distance from existing residential properties, the proposed development would not cause adverse impacts on the visual amenities or character of the area. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

11.0 Conditions

1. 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 received by the planning authority on the 16th 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 the commencement of development and the development shall be carried out and completed in accordance with the agreed particulars.

Reason: In the interests of clarity.

- 2. The developer shall provide and make available at reasonable terms, the proposed support structure for the provision of mobile telecommunications antenna of third party licenced telecommunications operators.
 - Reason: In the interest of avoidance of multiplicity of telecommunications structures in the area, in the interest of visual amenity and proper planning and sustainable development.
- 3. The operator outdoor cabinets shall be a maximum height of 1.65 metres. Reason: In the interests of clarity.
- 4. A second equipment cabinet and any ancillary equipment for a second future operator shall not be installed on site until such times as a second operator is first confirmed. The Planning Authority shall be notified in writing of the confirmation of a second operator four weeks before the installation of the second equipment cabinet and any ancillary equipment.

Reason: In the interests of clarity and to cater for the proper planning and sustainable development of the area.

5. This licence shall apply for a period of five years from the date of this order. The telecommunications structure and related ancillary structures shall then be removed unless, prior to the end of the period, a licence shall have been granted for a further period. In the event of the telecommunications structure and ancillary structures hereby permitted becoming obslolete or ceasing to operate for a period of 6 months, the structure shall be removed and the site shall be re-instated. Details regarding the removal of the structures and reinstatement of the site shall be submitted to, and agreed in writing within 3 months of the structures ceasing to operate, and the site shall be reinstated in accordance with the agreed details at the operator's expense. , the planning authority prior to the

Reason: In the interest of the visual amenities of the area.

6. The telecommunications pole shall be a galvanised grey and the ancillary cabinets shall be a dark fir green unless otherwise agreed in writing with the planning authority prior to the commencement of development.

Reason: In the interest of the visual amenities of the area.

7. The proposed cabinets and pole shall be maintained regularly and shall be kept graffiti free.

Reason: In the interests of the visual amenities of the area.

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

Bernadet	te Quinn
Planning	Inspector

16th April 2025

Form 1

EIA Pre-Screening

An Bo	ord Plea	nála	ABP-319912-24		
Case	Referer	ice			
Propo Devel Sumn	opment	:	Installation of 18m dual operator pole, groun and associated site works.	d base	ed cabinets
Development Address		Address	Maryborough Hill/Lissadell, Maryborough, C	ork	
1. Does the proposed dev 'project' for the purpos			relopment come within the definition of a es of EIA?	Yes	X
			tion works, demolition, or interventions in	No	
the natural surroundings)					
			pment of a CLASS specified in Part 1 or Pant Regulations 2001 (as amended)?	art 2, S	chedule 5,
		State the Class here. Proceed to Q		ceed to Q3.	
Yes					
No	Х			Tic	k if relevant.
110				No	further action
					uired
3. Does the proposed development equal or exceed any relevant THRESHOLD set out in the relevant Class?					
		State the	relevant threshold here for the Class of	EIA	Mandatory
Yes		developm	ent.	EIA	R required
No	Х			Pro	ceed to Q4
.10					

4. Is the proposed development below the relevant threshold for the Class of development [sub-threshold development]?			
		State the relevant threshold here for the Class of	Preliminary
Yes		development and indicate the size of the development relative to the threshold.	examination required (Form 2)
			. ,

5. Has Schedule 7A information been submitted?		
No	x	Pre-screening determination conclusion remains as above (Q1 to Q4)
Yes		Screening Determination required

Inspector:	Date	<u>.</u>
opooto		