



An  
Bord  
Pleanála

## Inspector's Report

### ABP-320289-24

#### Development

The development consists of retention of a 24m telecommunications support structure (previously granted permission under An Bord Pleanála Ref ABP-305998-19) and 6m extension (granted permission under Kilkenny County Council Ref. 22727) to give an overall height of 30m together with antennas, dishes, equipment cabinets, fencing and all associated site works.

#### Location

Dicksboro GAA, Kilcreen, Kilkenny.

#### Planning Authority

Kilkenny County Council

#### Planning Authority Reg. Ref.

2460209

#### Applicant(s)

Signal Infrastructure Ltd.

#### Type of Application

Retention Permission.

#### Planning Authority Decision

Refuse

#### Type of Appeal

First Party

#### Appellant(s)

Signal Infrastructure Limited.

**Observer(s)**

None.

**Date of Site Inspection**

7<sup>th</sup> October 2024

**Inspector**

Jennifer McQuaid

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## **1.0 Site Location and Description**

- 1.1. The site is located within the grounds of Dicksboro GAA Club, which is located approximately 1.5km to the west of Kilkenny City Centre. Grassland Fertilizer Yard (Serveso site) is located approximately 300metres north of the site.
- 1.2. The site consists of a car parking area, two GAA pitches, floodlights, ball nets, a clubhouse building, a hurling wall and a scoreboard within the grounds. The subject site (telecom mast) is located in the southwestern corner of the site. There is a tree line along the site boundary at this location.

## **2.0 Proposed Development**

- 2.1. The retention development will consist of:
  - retention permission for an overall height of 30 metres for a telecommunication support structure together with antennas, dishes, equipment cabinets, fencing and all associated site development works.

## **3.0 Planning Authority Decision**

### **3.1. Decision**

The Planning Authority refused permission for 1 reason:

1. Having regard to the policies and objectives of the Kilkenny City and County Development Plan 2021-2027, the Loughmacask Masterplan 2023 as approved by the Council in June 2023 and the intention to align the City and County Development Plan with the Loughmacask Masterplan, the proposed indefinite retention for a 30m high multi-user lattice telecommunications support structure with a Delta Headframe carrying antennas, dishes and associated equipment is considered premature pending a development plan designation for the long term roll out of Phase 2 Urban Residential neighbourhoods in the Loughmacask area. The proposed development, by virtue of its industrial nature and the prominence of its attachments would in time potentially be visually inappropriate in the area and would accordingly

affect residential amenity and property values and would be contrary to the long-term planning and sustainable development of the area.

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

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

The Planning Report discusses the following:

- Retention permission granted under 19658 for 5 years. The applicant is seeking to retain the telecom mast indefinitely.
- The site is zoned open space with Strategic Reserve to the South and under the Loughmacask Masterplan the area to the south will be zoned as phase 2 Residential lands. A variation to include the Masterplan in the Development Plan is proposed for adoption in October 2024. Therefore, the indefinite retention of the structure would be premature pending a decision on the future development of the lands in the Loughmacask Neighbourhood. It is recognised that the telecom mast will be very close to residential areas in time. Refusal recommended on this reason.

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

- Environment: No response.

### **3.3. Prescribed Bodies**

- HAS: No response.

### **3.4. Third Party Observations**

- Three: (Letter of Observation). The site currently provides coverage to existing customers living, customers visiting and travelling in the area. Failure to retain this structure will result in a negative future impact on network subscribers enjoying future technologies.
- EIR: (Letter of Observation). The site allows EIR to provide coverage to customers in the area. The site will enable EIR to enhance the services for

EIR mobile customers as part of the commitment to facilitate all communities' access to excellent telecommunication services.

## 4.0 Planning History

**22727:** Permission granted to extend the existing 24 metre multi-user lattice support by 6 metres to 30metres with a Delta Headframe carrying antennas, dishes, associated equipment, ground-based equipment cabinets, fencing and all associated site development works.

**19658:** Permission granted to construct 24 metre multi-user lattice telecommunications support structure and all associated site works. Temporary 5-year condition applied.

**ABP-305998-19:** (PA reference: 19658) appeal condition 2 for financial contributions. It was considered that the proposed development constitutes a development for communications purposes which fulfils the requirements set out in the Development Contributions Scheme and that the terms of the scheme have not been properly applied.

### **Adjacent site:**

**22319:** Permission granted for 8 no. floodlights and associated works.

**12210:** Permission granted for extension to the front and rear of the existing clubhouse and associated works.

**10237:** Permission granted for erection of a hurling wall and associated works.

**05328:** Permission granted for floodlighting.

**02937:** Permission granted for the renovation of an existing game room into an exercise room.

**9660:** Permission granted for an extension to clubhouse.

## 5.0 Policy Context

### 5.1. Development Plan

**Kilkenny City and County Development Plan Volume 2, 2021-2027.**

The site is zoned as Amenity/Green Links/Biodiversity conservation/Open Space/Recreation. The objective is to allow for green links and biodiversity conservation and to preserve, provide and improve recreational open space. Public Service Installations are open for consideration.

The site to the south, southwest and east are zoned as Strategic Reserve. These areas will provide for the expansion of the city beyond the period of the Plan (post 2027). Following substantial progress being made in the development of the Breaghagh and Loughmacask neighbourhoods, appropriate planning framework documents will be prepared for some of the areas of Strategic Reserve as required in the longer term.

The objective is to conserve and protect Strategic Reserve land from interference from non-agricultural uses. To prevent premature development of agricultural land adjacent to development areas. Permitted uses include public service installations.

**Section 10.4** relates to Telecommunications. The Council will support and facilitate the provision of advanced communication networks and services to the extent required to contribute to national, regional and local competitiveness and attract inward investment. The Council will also encourage the further co-ordinated and focused development and extension of telecommunications infrastructure including broadband connectivity in the county, as a means of improving economic competitiveness.

**Section 10.4.1.2** relates to Broadband. It is recognised that some of County Kilkenny's towns suffer from broadband deficiencies, which are detrimental to their economic growth. The Council will work towards remedying this, through facilitating the implementation of the National Broadband Plan.

**Section 10.4.1.4** relates to Telecommunications Antennae.

**Objective 10I** To support and facilitate the delivery of high-capacity information Communication Technology Infrastructure, broadband connectivity and digital broadcasting, throughout the County, in order to ensure economic competitiveness for the enterprise and commercial sectors and in enabling more flexible work practices e.g. Remote working subject to other relevant policies and objectives of the Plan.

**Objective 10J** To set up and maintain a register of approved telecommunications structures which will provide a useful input to the assessment of future telecommunications developments and would also be useful from the point of view of maximising the potential for future mast sharing and co-location.

Telecommunications Antennae Development Management Requirements are noted in Section 10.4.1.4. It is the policy of the Council to have regard to the following:

- a) The visual impact of the proposed equipment and access infrastructure on the natural or built environment, particularly in areas of heritage value.
- b) The potential for co-location of equipment on existing masts; and
- c) Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities and Circular Letter PL07/12.

The Council will discourage proposals for telecommunications masts, antennae and ancillary equipment in areas in close proximity to residential areas, save in exceptional circumstances where it can be established that there would be no negative impact on the surrounding area and that no other location can be identified which would provide adequate telecommunication cover.

### **Masterplan for Loughmacask**

The subject site is part of the proposed Masterplan for Loughmacask. The Masterplan was drafted in June 2023. A variation to the city development plan is pending. No variation on date of writing this report.

The Masterplan is a distinctive and new residential City Quarter, physically and culturally connected to the historic City of Kilkenny and its surrounding landscape.

The Vision for the area is that Loughmacask will be an exemplar and plan-led new residential quarter of Kilkenny City, characterised by sustainable mobility connecting people to high quality housing, local facilities and amenities and the city centre and set within a distinctive landscape and historic city context.

In the Masterplan the site is zoned as Amenity, Open Space & Recreation. The lands to the south and southwest of the site will be zoned as Phase 2 Residential from Open Space and Strategic Reserve. And lands to the northeast of Dicksboro GAA have been partially changed to Open Space/Recreation to provide additional recreational amenities which could work in tandem with existing GAA grounds.



The open space networks at Loughmacask will be informed by the existing features such as Lough Macask, Dicksboro GAA grounds, the Seveso designation at Grasslands, the community playing field at the Fr. McGrath Centre and the River Breaghagh Valley. There is potential for expansion of Dicksboro GAA with additional playing field, multi-use games area and playground.

## **5.2. National Policy**

### **Telecommunications Antennae and Support Structures Guidelines for Planning Authorities, 1996.**

These guidelines, and subsequent Circular Letter PL07/12, are relevant to applications for telecommunications structures.

Section 2.2 Temporary Permissions state:

“Mobile telephony, with associated ground-based antennae and support structures, will remain a key feature of telecommunications infrastructure for the foreseeable future. Moreover, the roll-out of NGB will tend to increase the importance of the infrastructure.

Planning Authorities are therefore advised that from the date of this Circular Letter, attaching a condition to a permission for telecommunications masts and antennae which limit their life to a set temporary period should cease. Where a renewal of a previously temporary permission is being considered, the Planning Authority should determine the application on its merits with no time limit being attached to the permission.

Only in exceptional circumstances where particular site or environmental conditions apply, should a permission issue with conditions limiting their life”.

## **5.3. Natural Heritage Designations**

The site is not located in a designated Natura 2000 site. The nearest site is located approximately 1.3km to the east:

- River Barrow and River Nore SAC (Site code: 002162) and SPA (Site code: 004233)

The closest heritage area is Lough Macask pNHA located approximately 650metres to the north.

#### **5.4. EIA Screening**

The proposal relates to the retention of a 30-metre lattice telecommunication structure for indefinite lifetime and having regard to the limited nature and scale of the development, it is considered that the site does not fall within the classes listed in Part 1 or Part 2 of Schedule 5 of the Planning and Development Regulations, 2001 (as amended). The need for environmental impact assessment can, therefore, be excluded at preliminary examination and a screening determination is not required. Refer to Appendix 1.

### **6.0 The Appeal**

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

The grounds of appeal are submitted from the applicant. The concerns raised are:

- Planning history – under planning reference 19/658 granted temporary permission until 7<sup>th</sup> November 2019. Under planning reference 22/727, temporary permission granted for a retention of the 24m high mast and 6 metre extension to the mast. The conditions attached related back to the original permission and a temporary 5 years was still applicable and this meant only 18 months remained on the valid permission.

Circular PL07/12 advises that Planning Authorities should cease to attach a condition to a permission for telecommunication masts and antennae which limit their life to a set temporary period. Where a renewal of a previously temporary permission is being considered, the Planning Authority should determine the application on its merits with no time limit being attached to the permission.

- Three Ireland have carried out a comprehensive search of the targeted area for alternative locations for a new mast. The applicant has provided a list of 9 other locations which were considered but are too low or too far away from the coverage area required. The subject site meets the coverage and capacity

requirement for the network as well as minimising the visual impact to the area.

- Currently two operators are on this mast and are able to provide excellent indoor voice and broadband services in the area. The 30m high tower ensures the network operators are above the surrounding topographical clutter, thereby extending the reach of the communications technologies.
- Removal of the site would create coverage gaps, negatively impacting signal strength and quality, and hindering economic activities in rural areas. Coverage maps submitted.
- The existing 30m structure is situated in the southwestern corner of Dicksboro GAA Club. To the western and southern boundaries of the club semi-mature trees provide screening of the proposal to a degree. In addition, existing vertical infrastructure items within close proximity to the site such as floodlights and netting at Dicksboro GAA can help in absorbing the proposed extension into the landscape.
- The structure has provision for three operators to co-locate on the lattice structure. The design of the structure is:
  - Coloured in galvanised (CL 3093W) finished and will assimilate with the typical sky colour in Ireland.
  - Lattice type structure is most suitable for the rural area as you can see through it.
  - The “head frame” will allow multiple operators and will help prevent proliferation of additional structures being required in the area in future.
  - The height will allow “Line of Sight” for a great distance to transmit wireless data and will enable local coverage of multiple operators.
  - Height and design allow for co-location.
- It is considered that the appearance of the existing upgraded structure would not seriously affect the visual or residential amenity for the area, nor would it form an obtrusive feature within the surrounding area.

## **6.2. Applicant Response**

- As Above

## **6.3. Planning Authority Response**

The Planning Authority have made the following comments:

- The concerns relate solely to visual impact. The mast is unsightly nature of 30m high structure with a Delta head with several antennae and dishes and is unsuitable for an urban area and would in the long run severely impact the amenity and desirability of the area which has been identified for urban development in the Loughmacask Masterplan. The presence of the structure may impact the desirability and success of the proposed new neighbourhood rollout in this particular area, which is of overriding public interest.
- The previous permissions were deliberately tied to the parent permission in order to provide an opportunity for review of the location and nature of this structure.
- It is noted that planning reference 22727 was tied to the parent permission and was not appealed to An Bord Pleanála and therefore deemed acceptable by the applicant.
- It is the view of the Planning Authority that other existing third-party structures in the area may facilitate antennae and associated dishes with far fewer visual impacts and that there is no requirement to retain a telecommunications support structure at this location indefinitely.

## **6.4. Observations**

- None

## **6.5. Further Responses**

- None

## **7.0 Assessment**

7.1. Having examined the application details and all other documentation on file, including all of the submissions received in relation to the appeal, and inspected the site, and having regard to relevant local/regional/national policies and guidance, I consider that the main issue in this appeal are as follows:

- Principle of Development
- Visual Impact
- Appropriate Assessment

### **7.2. Principle of Development**

7.3. The subject site is zoned as Amenity/Green Links/Biodiversity conservation/Open Space/Recreation as per CDP. The objective is to allow for green links and biodiversity conservation and to preserve, provide and improve recreational open space. Public Service Installations are open for consideration.

7.4. The proposal was refused permission as it is the intention of the Council to align the CDP with the Loughmacask Masterplan (not a statutory document to date), and the proposal is considered premature pending the variation of the CDP to include the Masterplan. The Planning Authority consider that the proposal would in time potentially be visually inappropriate in the area and would accordingly affect residential amenity and property values.

7.5. In 2023, under planning reference 22727, permission was granted to extend the existing 24 metre multi-user lattice (granted under planning reference 19658) by 6 metres to 30metres and the permission was linked with the previous conditions of planning reference 19658. This in turn meant that planning permission would expire in December 2024.

7.6. The grounds of appeal highlight Circular PL07/12 which advises that Planning Authorities should cease to attach a condition to a permission for telecommunication masts and antennae which limit their life to a set temporary period. The temporary permission condition was as a result of the potential impact due to Loughmacask Masterplan which is direct defiance on the Circular PL07/12.

- 7.7. The grounds of appeal also submitted a comprehensive search of the targeted area carried out by Three Ireland and indicate that no viable site options were identified that could be shared or upgraded to provide the necessary coverage and capacity required. The site holds two operators are on the mast, which provide coverage to the area, if the site were removed it would create coverage gaps.
- 7.8. I will assess the proposed development under the current CDP. The site is zoned as Amenity/Green Links/Biodiversity conservation/Open Space/Recreation in the current CDP. Telecom masts are open for consideration under public service installations. I consider the subject telecom mast is acceptable in principle subject to justification and visual impact.
- 7.9. The Planning Authority refused permission based on a future pending development plan designation of Phase 2 urban residential neighbourhoods in the Loughmacask area to the south of the subject site and did not consider the current zoning on site. Having reviewed the Masterplan, the document has no statutory basis and has yet to be adopted into the CDP by a variation. The issues raised in relation to any future housing development is speculative and not an issue in the current zoning of the site.
- 7.10. The applicant has submitted a detailed justification along with coverage maps indicating where coverage is provided and where coverage would be lost if the site was discontinued. The site currently has two operators and complies with section 4.5 Sharing Facilities and Clustering of the telecoms guidelines. I am satisfied that the subject site provides the necessary coverage required in the area and has done so for the past 5 years. Therefore, in accordance with the current zoning on site and the justification submitted by the applicant, I consider that the proposed development is acceptable in principle at this location.
- 7.11. In addition, I note Circular PL07/12 which advises Planning Authorities not to limit the lifespan of a telecoms structure unless there are particular site or environmental conditions. In regard to subject site, I do not believe there are any particular site or environmental conditions which warrant a temporary permission on this site. The site is zoned as open for consideration and therefore a temporary condition should not have been applied in the previous planning permission as Circular PL07/12 was in place at the time of decision for both previous planning permissions on site.

7.12. Having regard to the zoning in the current CDP and Objective 10I which supports and facilitates the delivery of high-capacity information communication technology Infrastructure, broadband connectivity and digital broadcasting throughout the County. And having regard to Circular PL07/12 Telecommunications Antennae and Support Structures Guidelines, I consider the proposed development is acceptable and no lifespan limit shall be applied to the development.

**7.13. Visual Impact**

7.14. The proposed development is located to the west of Kilkenny City and within the Dicksboro GAA grounds. The site comprises of playing fields, floodlights, clubhouse etc. The site to the south, east and west is rural in nature with agricultural fields. To the north lies Grassland Fertilizer Yard (Serveso site). The nearest dwelling is located at c.200metres to the south. There are no protected views or scenic routes in the vicinity of the site.

7.15. The grounds of appeal state that the existing 30m structure is situated in the southwestern corner of Dicksboro GAA Club. To the western and southern boundaries of the club semi-mature trees provide screening of the proposal to a degree. In addition, existing vertical infrastructure items within close proximity to the site such as floodlights and netting at Dicksboro GAA can help in absorbing the proposed extension into the landscape.

7.16. I have carried out a site visit and viewed the telecom structure in situ, the structure is located to the southwestern corner of Dicksboro GAA grounds. The site itself is surrounded by existing floodlights (8no. in total) at 18 metre in height. And mature trees are located to the south and southwestern boundary of the site. It is in my opinion, that the telecom mast is viewed in association with the existing floodlights and cannot be considered as a standalone feature on the landscape. In addition, the subject site is not a protected designated landscape and nor are any protected views or scenic routes in close proximity to the site.

7.17. The applicant has submitted a landscape assessment with 10 number viewpoints in the vicinity of the subject site. The assessment demonstrated that there are no significant visual effects for 4 of the viewpoints and 6 viewpoints have a “negligible” impact. Having reviewed the landscape assessment and photomontages, I am satisfied that there will be no significant visual impact on the surrounding area.

Therefore, I consider that the telecom mast does not and will not detract from the visual amenity of the area.

- 7.18. I note the Planning Authorities concern in relation to the future zoning of the lands to the south of the subject site as potential phase 2 residential and that they consider by virtue of its industrial nature and the prominence of its attachments would in time potentially be visually inappropriate in the area and would accordingly affect residential amenity and property values. However, I consider the telecoms mast will be viewed in association with the existing floodlights at Dicksboro GAA and as such blend into the existing landscape given the nature of the development and surrounding developments. I also consider that if and when the site to the south and southwest is developed, it will be the responsibility of the developer to provide adequate screening and an appropriate design layout in order to avoid any potential visual impact from the proposed residential units to the telecoms structure.
- 7.19. Having regard to the location of the subject site within Dicksboro GAA grounds and the presence of floodlights, in addition to the location of the subject site devoid from a protected area and not in the vicinity of a protected view or scenic location, I do not consider, that the telecoms structure will have a negative visual impact on the surrounding area.

## **8.0 AA Screening**

- 8.1. Having regard to the development for the retention of a 30-metre telecommunication structure for indefinite timeline. The proposal does not require a connection to public water/sewer, surface water runoff will be minimal given the limited size of the hardstand area. The nearest European Site is River Barrow and River Nore SAC (Site code: 002162) and SPA (Site code: 004233) located approximately 1.3km to the east of the subject site. It is considered that no Appropriate Assessment issues arise as the proposed development would not be likely to have a significant impact individually or in combination with other plans or projects on a European Site.

## **9.0 Recommendation**

I recommend that retention permission should be granted, subject to conditions, as set out below.



## 10.0 Reasons and Considerations

Having regard to the zoning of the subject site and the provisions of the Kilkenny City and County Development Plan 2021-2027, Volume 2 City, the location of the site at an existing GAA sports grounds, and having regard to Telecommunications Antennae and Support Structures Guidelines, Circular PL07/12. It is considered that the retention development, subject to compliance with conditions as set out below, is in accordance with the zoning Amenity/Green Links/Biodiversity conservation/Open Space/Recreation and the objectives for the area. The retention 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 7<sup>th</sup> day of May 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.

**Reason: In the interest of clarity.**

2. The transmitter power output, antenna type and mounting configuration shall be in accordance with the details submitted with this application and, notwithstanding the provisions of the Planning and Development Regulations 2001, and any statutory provision amending or replacing them, shall not be altered without a prior grant of planning permission.

**Reason: To clarify the nature and extent of the permitted development to**

**which this permission relates and to facilitate a full assessment of any future alteration.**

3. A low intensity fixed red obstacle light shall be fitted as close to the top of the mast as practicable and shall be visible from all angles in azimuth. Details of this light, its location and period of operation shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

**Reason: In the interest of public safety.**

4. In the event of the telecommunications structure and ancillary structures hereby permitted ceasing to operate for a period of 6 months, the structures shall be removed, and the site shall be reinstated within 6 months of their removal. Details regarding the removal of the structures and the reinstatement of the site shall be submitted to, and agreed in writing, within 1 month of the structures ceasing to operate, and the site shall be reinstated in accordance with the agreed details at the operator's expense.

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

5. No advertisement or advertisement structure shall be erected or displayed on the proposed structure or its appendages or within the curtilage of the site without a prior grant of planning permission.

**Reason: In the interest 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.

---

Jennifer McQuaid  
Planning Inspector

4<sup>th</sup> December 2024

## Appendix 1 - Form 1

### EIA Pre-Screening

[EIAR not submitted]

<b>An Bord Pleanála Case Reference</b>	<b>ABP-320289-24</b>		
<b>Proposed Development Summary</b>	Retention permission for 30-metre-high telecommunication structures together with antennas, dishes, equipment cabinets, fencing and all associated site works.		
<b>Development Address</b>	Dicksboro GAA, Kilcreen, Kilkenny.		
<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>	X
		<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>			
Yes			
No	X		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>
No	X	N/A	No EIAR or Preliminary Examination required
Yes			

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

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

**Inspector:** \_\_\_\_\_ **Date:** \_\_\_\_\_