



An
Bord
Pleanála

Inspector's Report ABP-320726-24

Development	The construction of telecommunications infrastructure comprised of a 21 metre monopole and associated equipment and all associated site works; the removal of an existing telecommunications rooftop support structure and replacement of existing operators equipment.
Location	Eir Exchange, Barrack Lane, Granard, Co. Longford.
Planning Authority	Longford County Council
Planning Authority Reg. Ref.	2460129
Applicants	Towercom Ltd.
Type of Application	Permission.
Planning Authority Decision	Refuse Permission.
Type of Appeal	First Party
Appellants	Towercom Ltd.
Observers	Friends of the Irish Environment
Date of Site Inspection	25 th October 2024
Inspector	Dolores McCague

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1.0 Site Location and Description

- 1.1.1. The subject site is at the Eircom Exchange Barrack Lane, Granard, Co. Longford, located in the centre of Granard town. The site is located along Barrack Lane, which extends north from Main Street. A single storey building, with a monopole telecommunications mast, set behind a dwarf wall and a security fence, occupies the site.
- 1.1.2. A small public car park is being developed to the south. Residential development adjoins to the east.
- 1.1.3. There are two existing masts along Barrack Lane, one at the Garda Station which is located at the junction of Barrack Lane / Main Street, 130m south east of the site, and the other, a 21m lattice structure, is located 190m north-west of the site.
- 1.1.4. Four industrial units are located at the top (north-western end) of Barrack Lane.
- 1.1.5. Barrack Lane is located immediately adjoining the town centre and is an area in transition. Some land in the vicinity is currently underutilised.
- 1.1.6. The site is given as 0.013Ha.

2.0 Proposed Development

- 2.1.1. The proposed development comprises the construction of telecommunications infrastructure comprised of a 21 metre monopole (22.5 metre overall structure height to top of lightning finials) carrying antennas, dishes and associated equipment, together with new ground level equipment cabinets, new fencing, temporary construction access and all associated site works. The proposal also includes the removal of an existing telecommunications rooftop support structure and replacement of existing operators equipment.

3.0 Planning Authority Decision

3.1. Decision

- 3.1.1. The Planning Authority decided to refuse permission two reasons:

- 1 The Planning Authority is not satisfied that the proposed development complies with '*Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities*' published by the DOE in 1996 in relation to the investigation of more suitable alternative sites for the proposed structure and the scope for the sharing of installations. A site adjacent to the proposed location already offer scope for co-location and therefore should be considered as a suitable aerial/ mast to locate proposed antennae/ dish structures. In light of this the development would, therefore, add to the existing proliferation of such structures at this elevated rural location and be contrary to proper planning and development.
- 2 The application is contrary to policy CPO5.176 of the County Development Plan 2021-2027, which requires documentation evidence as to the non-availability of co-location on existing structure, and requires co-location where the number of masts located in any single area is considered to have an excessive concentration, as such the development, if permitted, would be detrimental to the visual amenity of the town, through the unnecessary construction of a 22m (total height) mast which could co-locate on existing structures in the vicinity, and would be contrary to the proper planning and sustainable development of the area.

3.2. Planning Authority Reports

3.2.1. The planning report includes:

- Refers to section 5.5.3 of the CDP.
- Refers to an observation from Cellnex, the owner of a 21m telecommunications support structure 190m to the north west, stating that there is space available for co-location and that the installation has recently connected to the fibre network and so is future proofed for new technologies as necessary.

3.2.2. Other Technical Reports

3.2.3. Roads Design, 3rd July 2024 – no comment.

3.2.4. HSE, 3rd July 2024 – no comments.

3.2.5. Granard Municipal District Engineer 15th July 2024 – conditions:

Re. temporary opening in the boundary wall and palisade fence at the upper end of the existing road frontage, approximately behind the ESB transformer sub-station, and recommends that a condition be included in any proposed grant of permission, requiring the developer to close up and reinstate this ‘temporary opening’ within 12 months or less of the commencement of the works.

Re. maintenance of the public road.

3.3. Third Party Observations

- 3.3.1. Observation on behalf of Cellnex includes that the installation has recently connected to the fibre network and that they can accommodate additional telecommunications operator’s equipment.

4.0 Planning History

312528 Planning Authority Reg. Ref. 2195 - the Board refused planning permission, on foot of the PA’s decision to refuse, for the following reasons:

Having regard to:

(a) The Guidelines relating to Telecommunications Antennae and Support Structures which were issued by the Department of the Environment and Local Government to planning authorities in July, 1996,

(b) The highly visible context of the existing 21 metre freestanding structure within 200m of the subject site and

(c) The close proximity of the proposed structure to another existing mast south of the site along Barrack Lane:

It is considered that the proposed development does not comply with national guidelines as the applicant has failed to demonstrate sufficiently the subject site was a last and only location in Granard which could serve to enhance existing coverage in the area. In addition, the board considered that the application is contrary to local

policy CPO5.176, which requires documentation evidence as to the non-availability of co-location on existing structures, and requires co-location where the number of masts located in any single area is considered to have an excessive concentration, The board further considered the proposal to be contrary to I policy CPO5.174, which requires orderly development of telecommunications infrastructure and the board was not satisfied that the applicant had demonstrated that the necessary fibre connectivity could not be facilitated to existing infrastructure located in proximity to the subject site. The proposal was considered to represent a haphazard and piecemeal approach to providing the required coverage in the area to the detriment of the visual amenities of the town, and to be contrary to the proper planning and sustainable development of the area.

303507 PA Register Reference Number 1820 to erect 17 no. terraced and semi-detached houses on existing foundations of previously approved planning reference 04/1384. Development to consist of 8 no. 2 bed, 5 no. 3 bed and 4 no. 4 bed houses, private car parking, landscaping, entrance onto existing service road, footpaths, public lighting, connection to existing public sewer, surface water, watermain and utility services and all ancillary works. Significant further information / revised plans have been furnished to the planning authority in respect of this proposed development

The site is part of a larger development area to the rear of Granard Main Street that is zoned “commercial and residential” in the Longford County Development Plan 2015-2021. The proposed development, by reason of its inadequate open space and car parking provision within the site or in the immediate vicinity, would conflict with the provisions of the Development Plan in relation to open space provision and car parking and with the standards recommended in the “Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns and Villages)” issued by the Department of the Environment, Heritage and Local Government in May 2009. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

5.0 Policy Context

5.1. Development Plan

- 5.1.1. Longford County Development Plan 2021-2027 is the operative plan relevant provisions include:

The subject site is zoned residential. To provide for residential development and protect and improve residential amenity.

Within this zoning category the improved quality of existing residential areas will be the Council's priority.

5.9 Information and Communication Infrastructure

The provision of a high-quality competitive information and communications telecommunications (ICT) service is essential in order to promote industrial and commercial development, and to enhance social inclusion and mobility. There is a reliance on the provision of such services for industrial, commercial, tourism and social development and the expansion of ICT infrastructure is key to meeting the needs of the County's population and a digital economy. This is addressed further in Chapter: Economic Development Strategy. ICT investment is essential for furthering the social and economic development of County Longford. The provision of an efficient broadband service is critical in the development of a knowledge-based economy, and as such the need to build new infrastructure to provide increased capacity in order to raise the quality of coverage and to meet the demand for services is recognised. As witnessed during the restrictions arising from the COVID-19 pandemic, the availability of high-quality ICT infrastructure, particularly broadband, is a vital feature of modern business and enterprise. The pandemic provided a unique opportunity to evaluate the infrastructural capabilities of remote working at a mass-level through demands on internet connectivity and appropriate channels of communication and highlighted the importance of high-quality ICT infrastructure.

5.9.1 Telecommunications Infrastructure - Fast, reliable and cost-effective telecommunications can encourage economic development in an area and can enhance quality of life in a number of areas by offering new choices in education,

entertainment and communications. There are a number of mobile voice and data service providers operating across the county including Vodafone, O2, Three and Meteor. The Council will have regard to planning guidelines provided by the DoEHLG 'Telecommunications Antennae and Support Structures, Guidelines for Planning Authorities' in assessing proposals for telecommunications infrastructure and support structures. The Planning Authority will work with the telecommunications providers to facilitate the development of infrastructure that respects the recognised values of the natural and built heritage and will seek to encourage the co-location of masts and antennae on existing structures within the county.

Policies:

CPO 5.174 - Promote orderly development of telecommunications infrastructure throughout the county in accordance with the requirements of the following: - 'Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities' (1996), except where they conflict with Circular Letter PL 07/12 which shall take precedence, and any subsequent guidelines. - 'Guidance on the potential location of overground telecommunications infrastructure on public roads', (Dept of Communications, Energy & Natural Resources, 2015).

CPO 5.175 - Ensure that the location of telecommunications structures should minimise and /or mitigate any adverse impacts on communities, public rights of way and the built or natural environment.

CPO 5.176 - Encourage co-location of antennae on existing support structures and require documentary evidence as to the non-availability of this option in proposals for new structures. The shared use of existing structures will be required where the numbers of masts located in any single area is considered to have an excessive concentration.

5.2. National Planning Policy

5.3. Project 2040 National Planning Framework

This includes:

There are several objectives aimed at supporting broadband rollout.

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.

5.4. National Development Plan 2018-2027

This includes:

The government recognises that access to quality high speed broadband is essential for today's economy and society.

5.5. Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities, Department of the Environment, July 1996.

This includes:

The aim of the guidelines 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 states with respect to Visual Impact:

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.

Only as a last resort and if the alternatives suggested in the previous paragraph are either unavailable or unsuitable should free-standing masts be located in a residential area or beside schools. If such a location should become necessary, sites already developed for utilities should be considered and masts and antennae should be designed and adapted for the specific location. The support structure should be kept to the minimum height consistent with effective operation and should be monopole (or poles) rather than a latticed tripod or square structure.

Section 4.5 Sharing Facilities and Clustering Sharing of installations (antennae support structures) will normally reduce the visual impact on the landscape. The

potential for concluding sharing agreements is greatest in the case of new structures when foreseeable technical requirements can be included at the design stage. All applicants will be encouraged to share and will have to satisfy the authority that they have made a reasonable effort to share. Where the sharing of masts or towers occurs each operator may want separate buildings/cabinets. The matter of sharing is probably best dealt with in pre-planning discussions. Where it is not possible to share a support structure the applicant should, where possible, be encouraged to share a site or to site adjacently so that masts and antennae may be clustered. On hill tops clustering may not offer any improvement from the point of view of visual intrusion but in urban or suburban areas use of the same structure or building by competing operators will almost always improve the situation. Support structures used by emergency or other essential services are not suitable for sharing with public mobile telephone services.

5.2.5 Circular Letter: PL 07/12 Telecommunications Antennae and Support Structures Guidelines

- 5.6. This updates the guidance document. Such as advising Planning Authorities to cease attaching time limiting conditions to telecommunications masts, except in exceptional circumstances.

5.7. Natural Heritage Designations

- 5.7.1. The nearest Natura site is Lough Kinale and Derragh Lough SPA (Site Code 004061) located 4.7km straight line distance to the east.

5.8. EIA Screening

- 5.8.1. The proposed development is not of a class of development in Schedule 5, Parts 1 and 2. EIA screening is not required. Appendix 1 refers.

6.0 The Appeal

6.1. Grounds of Appeal

- 6.1.1. This is a first party appeal by Towercom against the decision to refuse. The grounds include:

Established utilities and telecommunications location.

- 6.1.2. In reason no. 1 the PA is not satisfied that the proposed development complies with the Telecommunications Antennae and Support Structures Guidelines in relation to the investigation of more suitable alternative sites and scope for sharing existing, and proliferation. They submit that the subject site being an 'existing telecommunications site' to be replaced, situated within an established utilities site and with a history of telecommunications use should be considered in that context. The utilities setting, industrial zoning under the Longford County Development Plan 2021-2027 and recognition as an 'existing telecommunications site' is of particular relevance. There has been telecommunications infrastructure on the site for over 25 years, however the rooftop support structure cannot meet current or future demand. The rooftop pole is unsuitable for additional equipment to utilise, given the support structure's relatively low height and limited structural capabilities.
- 6.1.3. The Telecommunications Antennae and Support Structures Guidelines and Circular Letter PL07/12, which updated certain section of the guidelines, both place significant emphasis on the importance of co-location and new telecommunications structures being used by more than one operator. The current proposal for a replacement telecommunications site is to accommodate new equipment for the existing operator (Vodafone) and the potential co-location of additional operators. Circular PL07/12 acknowledges that 'mobile telephony, with associated ground-based antennae and support structures, will remain a key feature of telecommunications infrastructure for the foreseeable future.'
- 6.1.4. The proposed support structure will ensure the site is suitable for both current and future loading should additional telecommunications operators including smaller broadband operators wish to co-locate on the structure. It is considered that the development, at the established utilities location, to expand and enhance voice, data

and mobile broadband service is in accordance with the Telecommunications Antennae and Support Structures Guidelines and Circular Letter PL07/12.

Longford County Development Plan 2015-2021-2027

- 6.1.5. In reason no. 2 the PA makes reference to CPO5.176 of the Longford County Development Plan 2021-2027, which states as a policy objective to:

Encourage co-location of antennae on existing support structures and to require documentary evidence as to the non-availability of this option in proposals for new structures. The shared use of existing structures will be required where the numbers of masts located in any single area is considered to have an excessive concentration.

- 6.1.6. They wish to highlight that the subject site is an existing telecommunications site, identifiable on the ComReg siteviewer website, with an existing telecommunications installation. The support pole is unsuitable for additional equipment. Vodafone (or other potential operators), would not be able to install a full configuration of technologies and capabilities on this structure.
- 6.1.7. Towercom Ltd manage an existing mast portfolio in Ireland and facilitate co-location of multi-operator infrastructure to a wide range of clients. This reduces the demand proliferation of telecommunications structures throughout the country.
- 6.1.8. Towercom and Vodafone in their site selection and infrastructure development aim to provide their customers with a high quality, high speed network that can meet both current and future demand. Telecommunications infrastructure has an established presence at this specific site location and where necessary improvements are to be made it would only follow that those improvements would take place within the existing site compound.
- 6.1.9. The subject site is not a new telecommunications site. An established telecommunications structure is in place since 1998. Vodafone wish to upgrade the site to provide advanced 4G and new 5G technologies to compliment the Self-Sustaining Growth objective in the County Development Plan. Vodafone Ltd have demonstrated in their Site Justification Report that they have demand for the proposed structure at this specific location.
- 6.1.10. They would negotiate with site providers if other sites were suitable.

6.1.11. The existing lattice tower at the nearby Granard Garda Station accommodates communications equipment for 1) the emergency services at the top of the tower, 2) an area reserved below for future equipment, 3) Eir equipment located at lower levels. As a result space and height available is limited and would not offer the same level of service as the proposed 21m monopole.

6.1.12. The other nearby 21m lattice tower (Cellnex) to the northwest, appears to have space available for further operators at height of between 15m and 17m, which would not offer the same level of service as the proposed 21m monopole.

6.1.13. The proposal meets a number of aims of policies:

Locating within an Eir Exchange, established utilities, zoned industrial;

Established telecommunications site;

Replaces an existing support structure;

Minimises any adverse impacts on communities by locating adjoining the exchange building;

Clustering with other telecommunication infrastructure in the Barrack Lane locality;

Revised monopole design (taking into consideration previous refusal for 20m lattice tower 312528);

Revised location within the Exchange further from residential area of Tromra Road and Dennistown Park (taking into consideration previous refusal for 20m lattice tower 312528).

6.1.14. They consider that it achieves the balance between facilitating the delivery of improved telecommunication infrastructure and the protection of the built and natural environment.

Visual impact of the proposed telecommunications installation:

6.1.15. In reason no. 2 the PA considers that 'the proposed development if permitted, would be detrimental to the visual amenity of the town, through the unnecessary construction of a 22m (total height) mast'. Having regard to the characteristics of the site and surrounding area, the supporting documents including revised location, monopole design and grounds of appeal, they consider that the magnitude of impact on the visual amenities of the area would be acceptable.

- 6.1.16. The structure is located adjoining the Exchange building in the northwest corner of the property, furthest from the residential area of Tromra Road and Dennistown Park.
- 6.1.17. Photomontages demonstrating the visual impact of the proposed development were submitted and are again enclosed. Barrack Lane provides access to an industrial/commercial locality (Harp Business Park) and currently a large derelict / vacant building, with newly permitted discount foodstore close to the subject site.
- 6.1.18. Quoting from the guidelines:

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.

- 6.1.19. The inspector's report on 312528 found that:

'there will be no material or visual impact on scenic, heritage or cultural views or the landscape features of the historical core as a result of the proposal. The architectural features are located on the western part of the town a considerable distance from the site and the views from same are blocked by buildings'.

- 6.1.20. Quoting from the guidelines, which at 4.5 states:

Sharing of installations (antennae support structures) will normally reduce the visual impact on the landscape.. and - where it is not possible to share a support structure the applicant should, where possible, be encouraged to share a site or to site adjacently so that masts and antennae may be clustered.

This location could reasonably be considered as clustering.

There are no ACAs, Protected Structures or Recorded monuments in the vicinity.

The location is capable of absorbing the visual impact and would not terminate views leaving or on approach to Granard.

Most views in the wider area are precluded or intermittent due to distance and screening.

The proposal has been re-designed to a monopole; and relocated closer to the building and further from dwellings. The site has capacity to accommodate the structure.

Telecommunications infrastructure is a familiar part of the skyline, without unduly affecting visual impact. The height is to accommodate additional equipment and meet the technical requirements of the operators.

The photomontages demonstrate that the proposed development would not be visually obtrusive and the visual impact would be acceptable.

Compliance with ICNIRP (International Commission on Non-Ionising Radiation Protection):

- 6.1.21. The telecommunications operators have stringent health and safety policies. Vodafone have provided an ICNIRP compliance statement to accompany this application.
- 6.1.22. The circular letter states that monitoring arrangements should not be included as part of planning conditions.

Conclusion:

- 6.1.23. The proposed development would be in accordance with the proper planning and sustainable development of the area.

Attachments include:

- 6.1.24. Radion Engineering Site Justification.
- 6.1.25. This includes: The upgrade will give additional benefits in allowing us to connect surrounding Vodafone sites to our new National fibre ring within the exchange. The new structure provides increased structural capacity for Vodafone to install radio link dishes to allow backhaul transmission capacity from these surrounding sites to be aggregated back to this high-capacity fibre Point of Collection. Vodafone does not have this fibre availability on the Cellnex alternative site in town. Customers on these adjacent sites will experience an increase in their mobile broadband speeds because of this upgrade.

The following show the benefits of proposed upgrade.

Existing structure with omni antenna.

Existing stayed pole with omni antenna and radio link

Comparison of omni antenna and directional sector antenna.

Existing 2G/3G coverage levels.

2G and 3G coverage levels from proposed upgrade by Towercom. There is an increase of 'Very Good' coverage to the area. The increase in 'Good' coverage extends to the surrounding area and overlaps with coverage from nearby sites allowing a great continuity of service for customers in the area.

Existing 4G coverage levels.

4G coverage levels from proposed upgrade. The proposed upgrade will significantly improve 4G and future 5G coverage giving good and very good coverage levels to the town and the surrounding area.

Granard Exchange is a proposed Point of Collection (PoC) on Vodafone's national Fibre network. The POC allows aggregation of surrounding sites via radio link transmission network directly to a high-capacity fibre access point in the exchange. This fibre connectivity allows Vodafone to provide enhanced 4G and new 5G service on sites connected to this network. The proposed sites to be connected are shown. The existing pole has limited structural capacity preventing upgrade to antenna that support newer 4G and 5G services. Stayed pole and building height is 10.2m, increased height of Towercom support structure of 21m allows improved coverage and the ability to achieve line of sight with more surrounding sites for the installation of Site to Site radio link dishes and direct connection onto the fibre network located within the exchange.

Comparison between omni and directional sector antenna:

Existing 2G and 3G coverage levels

2G and 3G coverage levels from Proposed upgrade

Existing 4G coverage levels

4G coverage levels from Proposed upgrade

Aggregation of surrounding sites via radio link to Fibre PoC in Exchange.

6.2. Observations

- 6.2.1. An observation has been made on behalf of Friends of the Irish Environment. It includes:
- 6.2.2. The location has been pre-determined by a commercial arrangement between Towercom and Eircom, and not primarily as to whether there is an actual technical justification for the mast in the particular location. There therefore cannot be any assessment of alternative locations or the sharing of existing structures which are key requirements of national and local planning policy.
- 6.2.3. They note the planning history and the inspector's report on 312528 which they quote:

I do not accept the applicant's justification for another mast at this location is reasonable. There is no technical evidence submitted to support the applicant's contention that the operators cannot be served by existing masts in close proximity to the site. It would appear, the operators are haphazardly applying for planning permission for new communications structures without due consultation between the providers to share and co-locate in accordance with the Ministerial Guidelines. The Telecommunications Guidelines state that only as a last resort should masts be located within or in the immediate surrounds of smaller towns or villages, or in a residential area or beside schools. If such a location should become necessary, sites already developed for utilities should be considered. I accept this is an Eircom exchange site, a new modern lattice structure should only be considered on this site when it has been demonstrated that co-location and provision of required coverage is not possible on the newly constructed lattice structure less than 200 metres from the site.

In my opinion, another mast within such a confined area represents a concentration of telecommunication masts that will be detrimental to the visual amenities in the town, given the cluster impact of such towers on the urban landscape. Whilst I accept the site and the immediate area do not possess great townscape qualities, the area has development potential, and a cluster of masts could potentially impact negatively on the visual qualities of the area.

- 6.2.4. They refer to the pattern of appeals which they state are engaged in by Towercom in relation to the Eir Exchange portfolio. The observer's client and others should not have to make submissions on such appeals. The Board's resources should not be wasted having to deal with them. In the specific circumstances of this appeal they invite the Board to exercise its powers pursuant to Section 138(a)(i) of the Act, to dismiss the appeal.
- 6.2.5. The County Longford Development Plan objective CPO 5.174 seeks to:
- Promote orderly development of telecommunications infrastructure throughout the county in accordance with the requirements of the following: -
- ‘Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities’ (1996), except where they conflict with Circular Letter PL 07/12 which shall take precedence, and any subsequent guidelines.
- 6.2.6. There has been no assessment of alternative sites or sharing, and therefore non-compliance with the Guidelines, and material contravention of objective CPO 5.174.
- 6.2.7. They consider the Council's decision invalid, having failed to identify the material contravention. The Board's jurisdiction should have been constrained under Section 37(2)(b) of the Act, but is not.
- 6.2.8. If the Board is not dismissing the appeal they request that EIA screening be carried out and Schedule 7 information requested.
- 6.2.9. This is one of a large number of similar applications by Towercom for the development of masts at Eir Exchange sites across the state, the great majority of which are unsuitable as they are located in built up areas.

7.0 Assessment

- 7.1.1. I consider that the main issues which arise in relation to this appeal are appropriate assessment, the principle of the development, refusal reasons, visual amenity and other issues and the following assessment is addressed under those headings.

7.2. Appropriate Assessment

- 7.2.1. Having regard to the nature and scale of the proposed development, I am satisfied that no appropriate assessment issues arise and it is not considered that the

proposed development would be likely to have a significant effect individually or in combination with other plans or projects on a European site.

7.3. Principle of the Development

- 7.3.1. The site is zoned residential: to provide for residential development and protect and improve residential amenity. This zoning is intended primarily for established housing development but may include a range of other uses particularly those that have the potential to improve the residential amenity of residential communities such as schools, crèches, small shops, doctor's surgeries, small scale residential, playing fields, etc. Within this zoning category the improved quality of existing residential areas will be the Council's priority.
- 7.3.2. The existence of the Eircom Exchange is not reflected in the zoning.
- 7.3.3. Development of the kind proposed is not specifically excluded by the zoning. The guidelines advise that residential areas should be considered only as a last resort for free-standing masts and that if such a location should become necessary, sites already developed for utilities should be considered.

7.4. Refusal Reasons

7.5. Reason Number 1

- 7.5.1. Reason Number 1 refers to non-compliance with the guidelines 'Telecommunications Antennae and Support Structures' in relation to the investigation of more suitable alternative sites for the proposed structure and the scope for the sharing of installations.
- 7.5.2. The applicant points out that the current proposal is for a replacement telecommunications site to accommodate new equipment for the existing operator (Vodafone) and the potential co-location of additional operators. They distinguish their proposal from new development.
- 7.5.3. In relation to the investigation of more suitable alternative sites and the scope for the sharing of installations, the appellant states that the locations on alternative support structures are less suitable than their proposal. They also point out that they will be able to offer co-location to other operators.

- 7.5.4. The observation on behalf of Friends of the Irish Environment points out that the location has been pre-determined by a commercial arrangement between Towercom and Eircom, and not primarily as to whether there is an actual technical justification for the mast in the particular location, and there cannot therefore be any assessment of alternative locations or the sharing of existing structures, which are key requirements of national and local planning policy.
- 7.5.5. In my opinion the applicant / appellant has not supported their application / appeal with evidence that the sharing of an existing installation would not satisfy their requirements to provide for improved service. Neither have they addressed the advice in the guidelines that residential areas should be considered only as a last resort for free-standing masts. In my opinion reason no. 1 is justified.
- 7.6. Reason Number 2
- 7.6.1. Reason Number 2 refers to non-compliance with policy CPO5.176 of the County Development Plan 2021-2027. This policy objective encourages co-location of antennae on existing support structures and require documentary evidence as to the non-availability of this option in proposals for new structures. It also states that the shared use of existing structures will be required where the numbers of masts located in any single area is considered to have an excessive concentration.
- 7.6.2. This is the second application / appeal on this site in recent years. In the previous case, 312528, Towercom on behalf of the appellant Eircom made the point that fibre network was not available at the alternative mentioned site (Cellnex) which was an important factor for them. This is repeated in the Radion Engineering Site Justification in the subject appeal.
- 7.6.3. It is worth noting that Cellnex made an observation to the planning authority, in the present case, which includes that the installation has recently connected to the fibre network and that they can accommodate additional telecommunications operator's equipment.
- 7.6.4. In my opinion regarding the objective which encourages co-location of antennae on existing support structures and requires documentary evidence as to the non-availability, the applicants have not supported their application / appeal with evidence that the sharing of an existing installation would not satisfy their requirements to provide for improved service. In my opinion reason no. 1 is justified.

7.7. Visual Impact

- 7.7.1. In support of their appeal the applicants state that it replaces an existing support structure; minimises any adverse impacts on communities by locating adjoining the exchange building; achieves clustering with other telecommunication infrastructure in the Barrack Lane locality; that the revised monopole design (taking into consideration previous refusal for 20m lattice tower 312528); and the revised location within the Exchange is further from residential area of Tromra Road and Dennistown Park (taking into consideration previous refusal for 20m lattice tower 312528).
- 7.7.2. The Telecommunications Antennae and Support Structures guidelines advocate clustering / sharing by competing operators in urban or suburban areas, to reduce the visual impact.
- 7.7.3. The subject site is beside the town centre in an area which is in transition; where underutilised land is currently being developed. The area is close to and visible from the town's main street and is elevated relative to the main street spine. This is a location in which the proposed development would be highly visible. The proposed development would be viewed in the context of two existing telecommunications structures in the same visual envelop but not in a manner which could be viewed as clustering.
- 7.7.4. In my opinion visual impact is a reason to refuse permission.

7.8. Other Issues

- 7.8.1. The observer states that the Board's jurisdiction should have been constrained under section 37(2) (b) of the Act (Planning and Development Act, 2000 as amended), and that the appeal should be dismissed. Section 37(2) (b) refers to a situation where a planning authority has decided to refuse permission on the grounds that a proposed development materially contravenes the development plan, and the procedure which the Board must follow, if minded to grant permission. The planning authority have not determined that the proposed development would materially contravene the development plan and the Board is not constrained by section 37(2) (b).

- 7.8.2. I do not consider that the proposed development materially contravenes the development plan.
- 7.8.3. Section 138 of the Act empowers the Board under certain circumstances, to dismiss an appeal. Those circumstances do not exist in this case.

8.0 Recommendation

- 8.1.1. In accordance with the foregoing I recommend that the planning application be refused for the following reasons and considerations.

9.0 Reasons and Considerations

1 Having regard to the information presented with the application and appeal the Board is not satisfied of the need for the proposed telecommunications support structure together with antennas, or that this proposal for a free-standing mast could be considered a last resort. The proposed development would give rise to unnecessary proliferation of such infrastructure, would contravene policy objectives CPO 5.176 as set out in the Longford County Development Plan 2021-2027, and the guidance set out in the Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities, and would be contrary to the proper planning and sustainable development of the area.

2 The site is prominently located beside the centre of the town of Granard, a self sustaining growth town, and the second town of the county, where the proposed development, taken with the existing telecommunications support structures and antennas, would seriously detract from 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.

Planning Inspector

10 December 2024

Appendix 1 - Form 1

EIA Pre-Screening

[EIAR not submitted]

An Bord Pleanála Case Reference	320726		
Proposed Development Summary	The construction of telecommunications infrastructure comprised of a 21 metre monopole (22.5 metre overall structure height to top of lightning finials) carrying antennas, dishes and associated equipment, together with new ground level equipment cabinets, new fencing, temporary construction access and all associated site works. The proposal also includes the removal of an existing telecommunications rooftop support structure and replacement of existing operators equipment		
Development Address	Eircom Exchange Barrack Lane, Granard, Co. Longford		
1. Does the proposed development come within the definition of a 'project' for the purposes of EIA? (that is involving construction works, demolition, or interventions in the natural surroundings)		Yes	/
		No	No further action required
2. Is the proposed development of a class specified in Part 1 or Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) and does it equal or exceed any relevant quantity, area or limit where specified for that class?			
Yes		Class.....	EIA Mandatory EIAR required
No	/		Proceed to Q.3
3. Is the proposed development of a class specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) but does not equal or exceed a relevant quantity, area or other limit specified [sub-threshold development]?			
	Threshold	Comment (if relevant)	Conclusion

No	/	N/A		No EIAR or Preliminary Examination required
Yes		Class/Threshold.....		Proceed to Q.4

4. Has Schedule 7A information been submitted?				
No	/		Preliminary Examination required	
Yes			Screening Determination required	

Inspector: _____ **Date:** _____

Form 2

EIA Preliminary Examination

Bord Pleanála Case	320726
Development Summary	The construction of telecommunications infrastructure comprised of a 21 metre monopole (22.5 metre overall structure height to top of lightning finials) carrying antennas, dishes and associated equipment, together with new ground level equipment cabinets, new fencing, temporary construction access and all associated site works. The proposal also includes the removal of an existing telecommunications rooftop support structure and replacement of existing operators equipment.
Examination	

	Yes / No / Uncertain	
1. Is the size or nature of the proposed development exceptional in the context of the existing environment?	No	
2. Will the development result in the production of any significant waste, or result in significant emissions or pollutants?	No	
3. Is the proposed development located on, in, adjoining or have the potential to impact on an ecologically sensitive site or location*?	No	
4. Does the proposed development have the potential to affect other significant environmental sensitivities in the area?	No	
Conclusion		
Based on a preliminary examination of the nature, size or location of the development, is there a real likelihood of significant effects on the environment?		
There is no real likelihood of significant effects on the environment	EIAR not required	Yes
There is significant and realistic doubt in regard to the likelihood of significant effects on the environment	Screening Determination required	No
	Sch 7A info submitted?	<input type="checkbox"/> No
There is a real likelihood of significant effects on the environment	EIAR is required	No

Inspector: _____

Date: _____