



An
Coimisiún
Pleanála

Inspector's Report ABP-320797-24

Development	Erection of 24m monopole structure to support 9 telecommunications antennae, installation of dishes, new ground-based equipment cabinet in fenced compound area and ancillary works.
Location	Tramore AFC, Corbally Lower, Tramore
Planning Authority	Waterford City and County Council
Planning Authority Reg. Ref.	24142
Applicant(s)	Shared Access Limited
Type of Application	Permission
Planning Authority Decision	Refuse Permission
Type of Appeal	First Party
Appellant(s)	Shared Access Ltd.
Observer(s)	None
Date of Site Inspection	5 th September 2025
Inspector	Suzanne Kehely

Contents

1.0 Site Location and Description	4
2.0 Proposed Development	4
3.0 Planning Authority Decision	5
3.1. Decision	5
3.2. Planning Authority Reports	5
3.3. Other Technical Reports	6
3.4. File referred to archaeological division given the proximity to an archaeological monument. WA026-060. No report.	6
3.5. Prescribed Bodies	6
3.6. Third Party Observations	6
4.0 Planning History	6
5.0 Policy Context	6
5.1. National Planning Policy	6
5.2. Waterford City and County Development Plan 2022-2028	8
5.3. Natural Heritage Designations	11
6.0 EIA Screening	11
7.0 Water Framework Directive	11
8.0 The Appeal	12
8.1. Grounds of Appeal	12
8.2. Planning Authority Response	13
8.3. Observations	13
8.4. Further Responses	13
9.0 Assessment	13

10.0	AA Screening.....	17
11.0	Recommendation	18
12.0	Reasons and Considerations.....	18
Appendix 1 – Form 1: EIA Pre-Screening		

1.0 Site Location and Description

- 1.1. The site of 48 sq.m. is located in a suburban area to the north of Tramore town and within its settlement area. It is situated within the grounds of Tramore AFC which fronts onto the R675 (Waterford Road) which is the main approach route from Waterford City to Tramore before turning west toward Ballyvole Head along the coast. The R675 corridor in the immediate vicinity is moderately elevated above the town and Tramore Backstrand/Bay to the south and east and is more low lying relative to land rising to the west in the direction of the Racecourse. The site is in the vicinity of the former railway route along which a row of railway cottages backed onto and remain in situ to the southwest of the site. The area is characterised by a mix of light industrial/commercial uses and low-density housing.
- 1.2. The football grounds include a car park and clubhouse to the front and playing pitches and a practice area to the rear as viewed from the road. The pitches are flood lit with multiple pole mounted fixtures. The development site is in the corner of the grounds beside a fenced-off training pitch and alongside the boundary with GAA pitches, a garage business and residential property (cottages). The garage business has flood lighting along the boundary with the site.

2.0 Proposed Development

- 2.1. Permission is sought for development as follows:
 - A 24m monopole structure to support 9 no. telecommunications antennae together with the installation of dishes at 3 different heights stepped down from the top. The width as scaled from drawings is 1m.
 - The proposed fenced compound is 7.58m x 6.365m and includes 2.4m high palisade fencing, cabling, a concrete base compound area, ground-based equipment cabinets, PDBs and all associated site works.
 - It is for THREE services and also designed for multiple users – 3 in total.
 - The description refers to an access track, but the drawings show this to be existing. There is a short distance in the order of 1m between the compound access and the concrete bases.
- 2.2. Documentation submitted includes:

- Letter of consent for development from Tramore AFC.
- Technical Justification Report.
- Planning statement with appended ICNIRP and EU RED compliance statement from Three operator.

3.0 Planning Authority Decision

3.1. Decision

- 3.1.1. By Order dated 22nd August 2024, the Planning Authority issued notification of its decision to refuse permission for the stated reason:

Having regard to the “Telecommunications Antennae and Support Structure: Guidelines for Planning Authorities,” issued by the Department of Environment and Local Government (1996) and the prominent location, scale and height of the structure in close proximity to existing houses, it is considered that a 24m high monopole would represent a **significant and visually discordant feature in the landscape on a main approach to Tramore (R675) adjacent to a designated scenic route and would seriously injure the visual amenities of the area** . The proposed development would be contrary to policy objectives L02 and L04 if the Waterford City and County Development Plan 2022-2028 in relation to sensitive landscapes, seascapes, scenic routes and protected views and would be contrary to the Ministerial Guidance, negatively impacting on the visual amenities of the area and would not therefore be in accordance with the proper planning and sustainable development of the area.

3.2. Planning Authority Reports

- 3.2.1. **Planning Reports:** The report of 21st August 2024 refers to visual impact as an important consideration. In this context the site is noted to be in the most sensitive of landscape areas and that due to the height of the mast, it would be visible from Tramore Bay and the Back Strand area in the surrounding local area. This would be

a discordant feature and not acceptable and therefore contrary to objectives L02 and L04.

3.3. Other Technical Reports

3.4. File referred to archaeological division given the proximity to an archaeological monument. WA026-060. No report.

3.5. Prescribed Bodies

No Reports.

3.6. Third Party Observations

None.

4.0 Planning History

4.1. The site

- The planning report sets out the planning history for the football grounds which relates to a number of permissions for ancillary development such as a spectator stand, two storey extension to clubhouse, poles and protective netting and notably 8 x 16m flood lights.

5.0 Policy Context

5.1. National Planning Policy

5.1.1. Project Ireland 2040 - National Planning Framework:

- NPO62 In co-operation with relevant Departments in Northern Ireland, develop a stable, innovative and secure digital communications and services infrastructure on an all-island basis.

5.1.2. **Telecommunications Antennae and Support Structure: Guidelines for Planning Authorities**, issued by the Department of Environment and Local Government (1996)

- These guidelines set out current national planning policy and criteria for the assessment of telecommunications structures. Guidance is provided on site selection, minimising adverse impact, sharing and clustering of facilities and development control.
- The Guidelines are generally supportive of the development and maintenance of a high-quality telecommunications service. In section 4.3 it is stated that the visual impact is among the more important considerations. It is also acknowledged that in most cases the applicant will only have limited flexibility as regards location, given the constraints arising from transmission parameters. Only as a last resort and if the alternatives are either unavailable or unsuitable should free-standing masts be located in a residential area or beside schools or the immediate surrounds of smaller towns and villages. If such location should become necessary, sites already developed for utilities should be considered and masts and antenna should be designed and adopted for this specific location. The support structures 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. The sharing of installations and clustering of antenna is encouraged as co-location will reduce the visual impact on the landscape (Section 4.5).

5.1.3. **Circular Letter PL07/12 This Circular Letter revises elements of the 1996 Guidelines.** These advise in particular:

- only attaching time limiting conditions to telecommunications masts in exceptional circumstances. Section 2.2
- against including separation distances from housing and schools as they can inadvertently have a major impact on the roll out of a viable and effective telecommunications network. Section 2.3
- the lodgement of a bond or cash deposit is no longer appropriate and instead advises that a condition be included stating that when the structure is no longer

required it should be demolished, removed and the site reinstated at the operators' expense. Section 2.4

- against monitoring arrangements as part of planning permission conditions or determining planning applications on health grounds. Primary concern should be with the appropriate location and design of telecommunications structures as planning authorities do not have competence for health and safety matters in respect of telecommunications infrastructure. These are regulated by other codes and such matters should not be additionally regulated by the planning process. Section 2.6

5.1.4. National Broadband Plan, 2020, - an initiative by the Irish Government aimed at delivering high speed broadband services to all premises in Ireland

5.2. Waterford City and County Development Plan 2022-2028

5.2.1. The site is located in Tramore which is a Class A Large Urban Town south of Waterford City in the Settlement Hierarchy. Tramore forms part of the Strategic economic Corridor within the Waterford Metropolitan Area (Ref: Core Strategy Maps in Volume 4.)

Zoning: The site is zoned OS where it is an objective 'to preserve and provide for open space and recreational amenities.' (Volume 4)

5.2.2. **Amenity: Site specific in Combined Settlement and Zoning Map:** The road fronting the site is part of a proposed Active Travel and or public transport route'

5.2.3. **Landscape Character and visual amenity:** The site is along a designated **scenic route** which is the main route between Tramore and Waterford. The site is within a settlement area in the wider setting of a **sensitive landscape area** (See Map A8.1 Appendix 8 includes a Landscape and Seascape Character Assessment). The main intention is to ensure that the character of the views and prospects that can be obtained from these routes are preserved. Key objectives:

- **L02 -Protecting our Landscape and Seascape:** We will protect the landscape and natural assets of the County by ensuring that proposed developments do not detrimentally impact on the character, integrity, distinctiveness or scenic value of their area and ensuring that such proposals are not unduly visually obtrusive in

the landscape, in particular, in or adjacent to the uplands, along river corridors, coastal or other distinctive landscape character units

- **L-03 Landscape and Seascape Character Assessment:** We will assess all proposals for development outside of our settlements in terms of the 2020 Landscape and Seascape Character Assessment (Appendix 8) and the associated sensitivity of the particular location. We will require a Landscape and Visual Impact Assessment (LVIA) for proposed developments with the potential to impact on significant landscape features within the City and County. Proposals for **significant development** (e.g. renewable energy projects, **telecommunications** and other infrastructure and the extractive industry) **shall** be accompanied by a LVIA which includes Zones of Theoretical Visibility (ZTV) which indicate the landscape impact zone within which the proposed development may be seen. There will be a presumption against developments which are located on elevated and exposed sites and where the landscape cannot accommodate such development with reasonable and appropriate mitigation
- **L-04 Scenic Routes and Protected Views:** We will protect the scenic routes and specified protected views identified in our Landscape Character Assessment (Appendix 8), including views to and from the sea, rivers, landscape features, mountains, landmark structures and urban settlements from inappropriate development that by virtue of design, scale, character or cumulative impact would block or detract from such views

5.2.4. **Telecommunications:** Chapter 1 includes digital connectivity as a key measure to achieve the overall vision of growth and development of the City and County. The role of digital connectivity is identified in chapter 4 in terms of the economy Tourism and education. ECON02 (strengthen Employment locations ECON 22 Sustainable Tourism and most specifically in chapter 6 which sets out policy for telecommunications. In Section 6.7 the CDP acknowledges that ‘Digital technologies are increasingly critical in the day-to-day operations of businesses and households and in improving access to public services across our more rural areas. It is anticipated that the National Broadband Plan will address the lack of high-speed connectivity in rural areas. The Council will continue to support and facilitate operators to improve speed and service across Waterford in line with national policy.’

- **Objective UTL 16 ICT/ Communications:** We will work in collaboration with service providers to deliver a more enhanced connectivity service experience in a way that protects our footway and road surfaces and delivers the economic and community benefits of technology. We will facilitate the continued provision of communication networks, smart infrastructure, broadband and appropriate telecommunications infrastructure and services, subject to environmental considerations, in order to contribute to economic growth, development, resilience and competitiveness. In considering proposals for such infrastructure and associated equipment, the following will be taken into account:
 - The installation of the smallest suitable equipment to meet the technological requirements,
 - Solutions to deliver shared telecommunication physical infrastructure in new development to facilitate multiple service providers at a non-exclusive basis and at economically sustainable cost to service providers and end users,
 - Concealing or disguising masts, antennas, equipment housing and cable runs through design or camouflage techniques; or
 - A description of the siting and design options explored and the reason for the chosen solution, details of the design, including height, materials and all components of the proposals,
 - A landscaping and screen planting plan (if appropriate),
 - An assessment of the cumulative effects of the development in combination with existing equipment in the area; and a visual impact assessment (if relevant).
 - Proposed development will be required to have regard to the “Telecommunications Antennae and Support Structures - Guidelines for Planning Authorities, 1996 and Circular Letter PL07/12” issued by the Department of the Environment Heritage and Local Government and to any subsequent amendments as may be issued.

5.3. Natural Heritage Designations

- 5.3.1. The site is located approximately 420m from Tramore Dunes and Backstrand SAC (Site Code 000671) and Tramore Back Strand SPA (Site Code 004027).

6.0 EIA Screening

- 6.1. 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 (or Part V of the 1994 Roads Regulations). 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 report.

7.0 Water Framework Directive

- 7.1. The site is an urban serviced site. There is no watercourse on site. The underlying Groundwater body is Dunmore East (EU Code IE_SE_G_057) and has 'Good' status. The nearest surface waterbody is Tramore Backstrand (EU code IE_SE_120_0000) which has a 'High' Status. There is no likely pathway due to the nature and limited scale of the development at this location and good construction practice.
- 7.2. Having assessed the proposed development and considered the objectives as set out in Article 4 of the Water Framework Directive which seek to protect and, where necessary, restore surface & ground water waterbodies in order to reach good status (meaning both good chemical and good ecological status), and to prevent deterioration and having further considered the nature, scale and location of the project, I consider that the proposal can be eliminated from further assessment because there is no conceivable risk to any surface and/or groundwater water bodies either qualitatively or quantitatively.

- 7.3. The reason for this conclusion is as follows:

- the scale and infill nature of the proposal in an urban serviced area

I conclude that on the basis of objective information, that the proposed development will not result in a risk of deterioration on any water body (rivers, lakes,

groundwaters, transitional and coastal) either qualitatively or quantitatively or on a temporary or permanent basis or otherwise jeopardise any water body in reaching its WFD objectives and consequently can be excluded from further assessment.

8.0 The Appeal

8.1. Grounds of Appeal

- The proposal is vital to the technical requirements of Three, the lead operator to provide network coverage for a range of telecommunications technologies within Tramore and the surrounding rural areas.
- The site is one of a patchwork of sites which when combined, will provide a stable quality of network coverage.
- The site is in a high demand area given its mixed uses.
- The applicant has considered alternatives, and the proposed site is optimal in terms of maximising coverage while having minimum impact to the surrounding area.
- Accordingly, the appellant has demonstrated the need for the installation in the technical report (not attached to appeal documentation) which was prepared by a network planner and demographical maps gaps in network coverage
- Development plan policy supports the roll out of such improvement in digital connectivity.
- Development plan policy also supports connectivity in tourism infrastructure policies.
- This site is in an established urban context. The proposal would not be visually discordant as the landscape and seascape character assessment identifies the Tramore settlement area as having the least degree of sensitivity which has the capacity to absorb development.

8.2. Planning Authority Response

No further comment

8.3. Observations

None

8.4. Further Responses

None

9.0 Assessment

9.1. Issues

- 9.1.1. This appeal is against a decision to refuse permission for a telecommunications support structure and ancillary attachments, structures and works. Having regard to the submissions on file and the site and its environs as inspected, I consider the key issues are principle of development and visual impact.

9.2. Principle of development

- 9.2.1. The Waterford City and County Development Plan (CDP) policy as supported by national policy as cited in section 5 of this report supports the enhancement of digital connectivity as part of the economic and social development of towns and villages and outlying rural area. The applicant has demonstrated in maps with an accompanying description of service that there are gaps in the coverage in terms of quality and range. It is further illustrated how the subject site has the capacity to improve the services to the surrounding area and to those travelling along the regional route. No existing structures are stated to be available to the proposed operator, although, I note from the application details that the monopole is 1m wide and is intended for 3 operators which is in accordance with Ministerial guidance, (section 1.2 of Telecommunications Antennae and Support Structure: Guidelines for Planning Authorities, 1996, refers to co-location). However, while I accept that the provision of a mast structure at this location would enhance coverage and potentially reduce pressure for additional sites for others, I note that the CDP Objective UTL 16

ICT requires consideration of visual impact and visual impact assessment where appropriate. In the context of the Landscape policy in chapter 10 wherein the strategic objective is to 'protect sensitive landscape and seascapes which contribute to the distinctiveness of Waterford as a place' and in the context of the provisions of the 1996 Ministerial guidance as updated by circular, as cited; to consider visual amenities, this is a highly relevant consideration. Section 4.3 of these Guidelines states, 'The visual impact is among the more important considerations which have to be taken into account in arriving at a decision on a particular application.... Whatever the general visual context, great care will have to be taken when dealing with fragile or sensitive landscapes.' I do not consider that the siting of the development in a landscape area classed as 'most sensitive' has been sufficiently justified in this case. This is addressed in more detail below.

9.3. Visual Impact

- 9.3.1. The planning authority has decided to refuse planning permission on grounds of the 24m high structure being a visually discordant feature in the landscape given its location and setting along the main approach to Tramore and being in a sensitive landscape character area as designated in the Waterford City and County Development Plan. Its proximity to housing at 55m is also noted. Also, while noting the location in an open space where utilities are 'open for consideration' and the existing urban context with floodlighting, it is considered by the planning authority that the height relative to the existing flood lighting structures and visual prominence as viewed from sensitive locations such as Tramore Bay and the Backstrand area, that it is not acceptable by reference to objectives L02 and L04 which seek to protect such sensitive areas and related views.
- 9.3.2. The applicant makes the case that the immediate environs are urban and in the context of the 30km scenic route which incorporates urban landscape pockets that the proposed development as a utility in such a local context of mixed uses and extensive lighting poles, is not unduly discordant in either the local urban environs or proportionately does not detract from the experience of the 30km scenic route traversing different landscape characters.
- 9.3.3. Accordingly, in view of the above positions there is a fundamental dispute as to the sensitivity of the site and the perception of a 1m wide 24m high structure with

antennae relative to slender 16m high light poles. From my reading of the Waterford City and County Development Plan and notably Appendix 8 which includes a Landscape Character Assessment, the site is clearly in a sensitive context notwithstanding its urban location.

- 9.3.4. In terms of landscape classification for the site and its environs, I have examined two maps in Appendix 8. In the first Map A8.2, 'Landscape Character Units', I note that the site is within the Settlement Area of Tramore Environs (7B), although in close proximity to the Coastal unit named as Tramore Bay (1B). However, for the purposes of development management, the CDP Landscape Character Assessment has developed a classification based on the capacity to absorb development, accordingly the landscape sensitivity map in the appendix plots a more refined classification system so as to assist in the appraisal of visual impact of proposed development and prevent a disproportionate impact on the community and wider environs. In Map A8.3 'Landscape Sensitivity', the site falls within a 'Most Sensitive' area which notably includes a significant portion of the settlement town environs of Tramore. In Table A8.3 the site is in 1B 'Tramore Bay' as part of coastal area which is described as a very distinctive feature with low capacity to absorb new development with significant alterations to the character over an extended area.
- 9.3.5. Accordingly, in view of the sensitivity I concur with the planning authority approach to applying visibility criteria in Objective L02 which specifically seeks to protect the landscape and natural assets of the County by ensuring that the new development does not detrimentally impact on the character integrity or distinctiveness or scenic value of the area and ensuring that such developments are not unduly visually obtrusive in the landscape, in particular, in or adjacent to the uplands, along coastal areas or other distinctive landscape character units. Objective L04 is more focussed and seeks to protect scenic routes as designated in Appendix 8 of the Development Plan and is also I concur relevant given the location of site. It is alongside a scenic route as designated along the predominantly coastal R675 route from Ballyvoyle Head to Tramore and north to Waterford City from where coastal views can be enjoyed.
- 9.3.6. It is quite evident in my judgement that based on the dimensions of the 24m high structure and bulk of attachments at a height relative to the 16m pole mounted lights and as evident in Computer Generated Images submitted with the application that

the proposed development will be a conspicuous feature in the immediately surrounding lower lying terrain. I refer in particular to images in Figures 2 , 2.1, 4 and 4.1 from viewpoints 1 and 2 which illustrate visibility from similar levels at each end of the playing grounds. Given the expansive flat terrain of the playing fields extending close to the estuary, distant views in the wider sensitive setting are also likely. I do not consider the applicant has sufficiently demonstrated the visual compatibility of the proposal in this wider context. In this type of case there is an onus on the applicant to provide information to measure the degree of impact by itself and in order to balance against other considerations. Appendix 8 states that the onus should be on the applicant for permission to develop in the environs of a scenic route, to demonstrate that there will be no obstruction or degradation of the views towards visually vulnerable features nor significant alterations to the appearance or character of sensitive areas. The guidance for a sensitivity appraisal is such that

‘to be considered for permission, development in or in the environs of these areas must be shown not to impinge in any significant way upon its character, integrity or uniformity when viewed from the surroundings. Particular attention should be given to the preservation of the character and distinctiveness of these areas as viewed from scenic routes.’

- 9.3.7. While the applicant relies on the urban context and some viewpoints in the immediate environs, I do not consider the applicant has demonstrably illustrated the degree of visual impact in the wider environs which includes extensive stretches of a ‘most sensitive’ landscape type such as views from Tramore Bay or the Backstrand area. I note that the appeal grounds refer to Computer Generated Images, but no additional images have been included further to those submitted with the application. Significantly in my view, the application has not been accompanied by a Landscape Visual Impact Assessment (LVIA), nor does it plot the Zone of Theoretical Visibility despite CDP requirements. Such are, I consider, key indicators in measuring the level of impact on landscape character and are reasonable and appropriate requirements. In the absence of supporting measurable information, it is difficult to conclude that the overall landscape character would not be adversely altered. Taking a precautionary approach which I consider reasonable in light of the objectives, a likely adverse impact is grounds for refusal. Furthermore, on a procedural note, Objective L03 specifically requires particular information given the significant nature

of telecommunications infrastructure in landscape character impact assessment. This objective states applications for such 'significant' development, 'shall be accompanied by a LVIA which includes Zones of Theoretical Visibility (ZTV) which indicate the landscape impact zone within which the proposed development may be seen. There will be a presumption against developments which are located on elevated and exposed sites and where the landscape cannot accommodate such development with reasonable and appropriate mitigation'. In the absence of such information and a robust sensitivity appraisal I consider the Commission is restricted in granting permission.

9.4. Conclusion

- 9.4.1. In view of the forgoing, I am not satisfied that the proposal by reason of siting and height would not adversely intrude on views from the R675 and from the wider coastal area within a sensitive landscape and would not seriously injure the visual amenities, scenic qualities and character of the area. Permission in this instance would therefore be contrary to the landscape strategy and policy objectives as contained in Waterford City and County Development Plan and specifically objectives L02, L03 and L04 which seek to manage such significant development in sensitive areas so as to protect the landscape character and associated views. On this basis I consider that the decision of Waterford City and County Council should be generally upheld.

10.0 Appropriate Assessment Screening

- 10.1. I have considered the development in light of the requirements S177U of the Planning and Development Act 2000 as amended. The subject site is located in a serviced urban area approximately 420m from Tramore Dunes and Backstrand SAC (Site Code 000671) and Tramore Back Strand SPA (site Code 004027). The development description is contained in Section 2 of this report. I note no AA issues arose in the Planning Authority screening assessment. I note a ground water duct exists which traverses the site and is outside the concrete base. There were no drainage ditches evident within or proximity to the appeal site. I am satisfied that there is no apparent surface water link between the appeal site, and any European site close the site. Nor does the nature of development have requirements for

connections to the public sewer network to have any significant effect on water quality.

10.2. Having considered the nature, scale, and location of the project, I am satisfied that it can be eliminated from further assessment because there is no conceivable risk to any European Site. The reason for this conclusion is as follows:

- The relatively modest scale of the proposed residential development, which would connect to the public piped water services,
- The separation distance from the nearest European site and the lack of direct hydrological or ecological connectivity to any Natura 2000 site.

10.3. The AA screening exercise conducted by the Planning Authority which concluded that either alone or in combination with other plans or projects, there would be no likely significant effects on any European sites.

10.4. I conclude that on the basis of objective information, the proposed development would not have a significant effect on any European site either alone or in combination with other plans or projects. Likely significant effects are excluded and, therefore, Appropriate Assessment (Stage 2) under Section 177V of the Planning and Development Act 2000 (as amended) is not required.

11.0 Recommendation

I recommend that permission be refused for the proposed development based on the following reasons and considerations

12.0 Reasons and Considerations

Having regard to the nature and scale of the proposed development prominently sited in an expansive open and coastal setting and in a landscape area classified as 'Most Sensitive' and its location along the R675 scenic route corridor, as designated in the Waterford City and County Development Plan 2022-2028, it is considered that the proposed development is likely, by itself and cumulatively with the existing floodlight mounting structures to be visually prominent and constitute an incongruous feature that would seriously injure the visual amenities and landscape character of this sensitive area. Having regard to the landscape strategy in Chapter

10 and requirements of objectives L02, L03 and L04 in relation to managing telecommunication proposals in such sensitive locations, as contained in the Waterford City and County Development Plan 2022- 2028 and to national policy and guidance in Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities, 1996 and associated Circular Letter PL07/12 and to the supporting documentation for the proposed development on file, it is not considered this level of intrusion in this location is sufficiently justified. The proposed development would, therefore, not be in accordance with the proper planning and sustainable development of the area.

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

Suzanne Kehely
Senior Planning Inspector

28th October 2025

Form 1 - EIA Pre-Screening

Case Reference	
Proposed Development Summary	Erection of 24m monopole telecommunications structure ancillary antennae/ dishes, ground-based equipment cabinet and ancillary works.
Development Address	Tramore AFC, Corbally Lower, Tramore
	In all cases check box /or leave blank
1. Does the proposed development come within the definition of a 'project' for the purposes of EIA? (For the purposes of the Directive, "Project" means: - The execution of construction works or of other installations or schemes, - Other interventions in the natural surroundings and landscape including those involving the extraction of mineral resources)	<input checked="" type="checkbox"/> Yes, it is a 'Project'. Proceed to Q2. <input type="checkbox"/> No, No further action required.
2. Is the proposed development of a CLASS specified in Part 1, Schedule 5 of the Planning and Development Regulations 2001 (as amended)?	
<input type="checkbox"/> Yes, it is a Class specified in Part 1. EIA is mandatory. No Screening required. EIAR to be requested. Discuss with ADP.	State the Class here
<input checked="" type="checkbox"/> No, it is not a Class specified in Part 1. Proceed to Q3	
3. Is the proposed development of a CLASS specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) OR a prescribed type of proposed road development under Article 8 of Roads Regulations 1994, AND does it meet/exceed the thresholds?	
<input checked="" type="checkbox"/> No, the development is not of a Class Specified in Part 2, Schedule 5 or a prescribed type of proposed road development under Article 8 of the Roads Regulations, 1994. No Screening required.	Note: While the description includes 'access track' no such works are proposed in the drawings which relates to a 48sqm site for a gated and fenced compound.
<input type="checkbox"/> Yes, the proposed development is of a Class and meets/exceeds the threshold.	State the Class and state the relevant threshold

EIA is Mandatory. No Screening Required	
<input type="checkbox"/> Yes, the proposed development is of a Class but is sub-threshold. Preliminary examination required. (Form 2) OR If Schedule 7A information submitted proceed to Q4. (Form 3 Required)	State the Class and state the relevant threshold

4. Has Schedule 7A information been submitted AND is the development a Class of Development for the purposes of the EIA Directive (as identified in Q3)?	
Yes <input type="checkbox"/>	Screening Determination required (Complete Form 3)
No <input checked="" type="checkbox"/>	Pre-screening determination conclusion remains as above (Q1 to Q3)

Inspector: _____ **Date:** _____