



An  
Bord  
Pleanála

## Inspector's Report

### ABP-322203-25

<b>Development</b>	Installation of a 15m monopole and associated cabinets.
<b>Location</b>	Tramore Library car park, Tramore, Co. Waterford
<b>Planning Authority</b>	Waterford County Council
<b>Planning Authority Reg. Ref.</b>	24/232
<b>Applicant(s)</b>	Emerald Tower Limited
<b>Type of Application</b>	S.254 Licence
<b>Planning Authority Decision</b>	Refuse
<b>Type of Appeal</b>	First Party
<b>Appellant(s)</b>	Emerald Tower Limited
<b>Observer(s)</b>	None
<b>Date of Site Inspection</b>	22 <sup>nd</sup> of November 2025
<b>Inspector</b>	Karen Hamilton

# Contents

1.0 Site Location and Description .....	4
2.0 Proposed Development .....	4
3.0 Planning Authority Decision .....	4
3.1. Decision .....	4
3.2. Planning Authority Reports .....	4
3.3. Prescribed Bodies .....	6
3.4. Third Party Observations .....	6
4.0 Planning History .....	6
5.0 Legislative Context .....	6
5.1. Planning and Development Act, 2000 .....	6
6.0 Policy Context .....	7
6.1. National Policy .....	7
6.2. Regional Policy .....	9
6.3. Waterford City & County Development Plan 2022-2028 (CCDP) .....	9
6.4. Natural Heritage Designations .....	12
7.0 Environmental Impact Assessment (EIA) Screening .....	12
8.0 The Appeal .....	12
8.1. Grounds of Appeal .....	12
8.2. Planning Authority Response .....	17
8.3. Observations .....	17
9.0 Assessment .....	17
9.1. Compliance with Section 254 Criteria .....	17
9.2. Conclusion .....	22

10.0	Appropriate Assessment (AA) Screening .....	23
11.0	Water Framework Directive (WFD) Screening.....	23
12.0	Recommendation .....	23
13.0	Reasons and Considerations.....	23
14.0	Conditions .....	24
15.0	Appendix 1 - EIA Pre-Screening – Form 1 .....	26

## **1.0 Site Location and Description**

- 1.1. The site is located within the town centre of Tramore, Co. Waterford. It is a small site at the edge of a public carpark, c. 650m south of Tramore main street and beside the Garda Station (south) and to the rear of Tramore Library (northwest). There is a public road adjacent to the site which provides access to a town centre carpark, recently upgraded by Waterford County Council as part of public realm works.

## **2.0 Proposed Development**

- 2.1. The proposed development comprises of:
- Installation of a 15m dual operator pole, associated equipment, together with ground-based equipment cabinets and all associated development works.

## **3.0 Planning Authority Decision**

### **3.1. Decision**

Decision to refuse permission for one reason stated below:

Having regard to the 'Telecommunications Antennae & Support Structures Guidelines for Planning Authorities,' issued by the Department of Environment and Local Government in 1996, and the prominent location, scale and height of the proposed structure at this town centre location, it is considered that a 15 meter high pole would represent a significant and visually discordant feature in the urban landscape within the designated Town Core of Tramore, and would seriously injure the visual amenities of the area. It is considered that the proposed development would be contrary to Ministerial Guidance, negatively impacting the visual amenities of the area and would therefore be contrary to the proposer planning and sustainable development of the area.

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

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

The report of the planner reflects the above decision to refuse permission and refers to the following:

- The preplanning meetings are noted with ownership of lands, concern regarding visual impact etc discussed.
- The lands are owned by Waterford City & County Council who have not given consent for the installation of telecommunications equipment.
- The application as accompanied by a range of supporting information including a Visual Impact Assessment.
- The location of the site, and mast, beside the Tramore Garada station and on lands which where the subject pf Part 8 Urban realm works are noted.
- The Roads Engineers verbally confirmed no objection to the proposal.
- The site is located in close proximity to the Architectural Conservation Area (ACA) to the east.
- The Architects Section verbally raised objection to the visual impact of the proposal at this town centre location.
- The proposal is c. 35m from a dwelling.
- Refusal is recommended having regard to the negative impact on the amenities of the ACA. There are concerns regarding Viewpoint No. 4 at the car park in the nearby supermarket.

### 3.2.2. Other Technical Reports

No reports on file, only stated as verbal discussions in the planner's report.

- Architects Section: The planners report notes verbal concerns with the visual impact
- Roads Department: The planners report notes verbal confirmation no objection to the proposal.

### 3.2.3. Conditions

Not relevant.

### **3.3. Prescribed Bodies**

None received.

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

None received.

## **4.0 Planning History**

No relevant planning history on the site.

The report of the area planner notes a Part VIII application (P8 01/18) for public realm works, on an adjoining site, overlapping this site.

## **5.0 Legislative Context**

### **5.1. Planning and Development Act, 2000**

Section 254(1)(ee) of the Planning & Development Act, 2000 (as amended), states that a person shall not erect, construct, place or maintain overground electronic communications infrastructure and any associated physical infrastructure on, under, over or along a public road save in accordance with a licence under this section.

Section 254(6)(a) states that any person may appeal to the Board in relation to the granting, refusing, withdrawing, or continuing of a licence.

Section 254(5) states that, in considering an application for a licence, the planning authority, or the Board on appeal, shall have regard to:

- (a) The proper planning and sustainable development of the area,
- (b) Any relevant provisions of the development plan, or a local area plan,
- (c) The number and location of existing appliances, apparatuses, or structures on, under, over or along the public road, and,
- (d) The convenience and safety of road users, including pedestrians.

## 6.0 Policy Context

### 6.1. National Policy

*Telecommunications Antennae & Support Structures Guidelines for Planning Authorities, 1996*

- The Guidelines have the status of ministerial guidelines as per section 28 PDA 2000 and, as such, the Board has a duty to “have regard” to them.
- The Guidelines reference the location of masts in upland/mountainous areas, within or in the immediate vicinity of smaller towns or villages and in the vicinity of larger towns and in city suburbs. In terms of visual impact, justification for locating free standing masts within the city suburbs, towns, and villages is required.
- Section 4.3 includes: “*Only as a last resort should **freestanding masts** be located within or in 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 antennae should be designed and adapted for the specific location.*”
- Care should be given when dealing with sensitive landscapes and other designated areas. Proximity to listed buildings should be avoided.

*Circular Letter PL 07/12, DoECLG 2012.*

- This includes further advice on the issue of health and safety and reiterates that this is regulated by other codes and is not a matter for the planning process.

*Architectural Heritage Protection Guidelines for Planning Authorities (2011)*

Section 3.11: Management of Architectural Conservation Areas.

- Consideration given to the management of infrastructural developments.
- Large scale infrastructural development adjacent to an ACA may have an impact on the character.

### *Climate Action Plan (CAP) 2025*

- CAP 2025 to be read in conjunction with CAP 2024, the relevant part being Section 11.2.4.
- Section 10.1.8: Digital Transformation. The CAP supports the national digital transformation framework and recognises the importance of this transformation to achieve Ireland's climate targets.
- The transition towards green and digital societies is highlighted throughout the CAP 2025, as an overarching aim to achieve decarbonisation and net zero commitments.
- Section 15 of the Climate and Low Carbon Development Act 2015 as amended (the Climate Act), obliges the Board to make all decisions in a manner that is consistent with the current CAP.

### *Harnessing Digital. The Digital Ireland Framework.*

- Section 2.1: Enable the physical telecommunication infrastructure and services delivering digital connectivity in line with the National Broadband plan.

### *National Planning Framework 'Project Ireland 2040'*

- First Revision (April 2025)
- National Policy Objective 31: Support and facilitate delivery of the National Broadband Plan as a means of developing further opportunities for enterprise, employment, education, innovation, and skills development for those who live and work in rural areas.
- National Policy Objective 62: 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.



### *National Development Plan 2021-2030*

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

### *National Broadband Plan 2020*

- The National Broadband Plan (NBP) is the Government's initiative to improve digital connectivity by delivering high speed broadband services to all premises in Ireland, through investment by commercial enterprises coupled with intervention by the State in those parts of the country where private companies have no plans to invest

## **6.2. Regional Policy**

### *Regional Spatial & Economic Strategy for the Southern Region 2040*

- Section 4.7: Guiding principles for enterprise include the availability of different types of infrastructure including telecommunications.
- Section 6.2: Telecommunications infrastructure is essential to ensure digital connectivity.

## **6.3. Waterford City & County Development Plan 2022-2028 (CCDP)**

This combined City and County Development Plan (CCDP) is the overarching plan for policy and guidance on telecommunications infrastructure. A review of the Tramore Local Area Plan 2023-2029 was undertaken in 2023; no Local Area Plan has been finalised. The following policies from the CCDP are relevant in the determination of this appeal:

### **6.3.1. Land Use Zoning (Volume 4 of the CCDP)**

The site is located in the centre of Tramore town on lands zoned as Town Centre: TC, where it is an objective to 'Provide for the development and enhancement of town core uses including retail, residential, commercial, civic and other

### **6.3.2. Settlement Hierarchy**

- Tramore is a Tier 2 settlement: District/ Suburban Centre

### 6.3.3. Telecommunications Infrastructure

#### Chapter 6: Utilities Infrastructure, Energy & Communication

##### **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.

#### 6.3.4. Chapter 11: Heritage

##### **Policy Objective BH 05 Architectural Conservation Area**

It is the policy of the Council to:

- Achieve the preservation of the special character of places, areas, groups of structures setting out Architectural Conservation Areas (ACA).
- Protect the special heritage values, unique characteristics and distinctive features, such as shopfronts within the ACA from inappropriate development which would detract from the special character of the ACA.
- Prohibit the demolition of historic structures that positively contributes to the distinctive character of the ACA.
- Encourage the undergrounding of overhead services and the removal of redundant wiring/cables within an ACA and to assess all further cable installations against its likely impact on the character of the ACA as the cumulative impact of wiring can have a negative impact on the character of ACAs.
- Provide guidelines on appropriate development to retain its distinctive character; and protect elements of the streetscape such as rubble stone boundary walls, planting schemes and street furniture such as paving, post boxes, historic bollards, basement grills, street signage/plaques, etc. which make a positive contribution to the built heritage.
- Retain or sensitively reintegrate any surviving items of historic street furniture and finishes such as granite kerbing and paving that contribute to the character of an ACA.

##### Volume 2: Development Management Standards

- Section 10.0: Architectural Conservation Areas (ACA's)
- Table 11.2: Utility is open for consideration in the Town Centre zoning

#### **6.4. Natural Heritage Designations**

- Tramore Dunes and Backstrand SAC and Tramore Backstrand SPA is located c. 1.5 km to the east of the site.

### **7.0 Environmental Impact Assessment (EIA) Screening**

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

### **8.0 The Appeal**

#### **8.1. Grounds of Appeal**

The grounds of appeal are submitted from the applicant in relation to the refusal from the planning authority (PA).

The issues raised are summarised below:

##### **8.1.1. Technical Justification**

- Eir currently provides indoor coverage from the top of the Grand Hotel.
- The current site is being developed, and Eir must move from this location.
- The proposal is to allow sufficient indoor coverage.

##### **8.1.2. Site Selection and Discounted Options**

- 6 sites have been selected for investigation as alternative sites.
- One of these sites includes the current Eir site at the Grand Central Hotel.
- There is currently a lattice type telecommunication infrastructure on the Garda site. There is no capacity to locate on this structure.
- The Tramore ESB site is located too far away and there is not sufficient coverage.

- There is also another telecommunications structure on the Tramore ESB site which is at capacity and cannot accommodate other operators.
- The Tramore Streetworks site is not an appropriate location to provide coverage.
- The Tramore FC site is not an appropriate location to provide coverage.
- Eir would prefer to co-locate on a structure although this is not possible.
- The proposed development has been chosen as a last resort

#### 8.1.3. Design

- The design has been chosen to be streamline, unfussy and minimise any negative impacts
- The height of the pole at 15m is the lowest it can possibly be to provide coverage.
- The design of the structure will blend in with the existing street furniture

#### 8.1.4. Heritage, Ecology and Landscape

- The site is adjacent to the Tramore ACA.
- The grounds of appeal have been accompanied by an Architectural Heritage Report which indicates the proposal will have no impact on the Tramore ACA.

#### 8.1.5. Updated Visual Impact Assessment

- A visual impact assessment accompanied the S.254 licence application to the PA and included an assessment from 4 viewpoints.
- An updated VIA accompanied the applicants appeal statement which increased the scope of the VIA and includes an analysis of an additional 6 viewpoints.
- The VIA now includes an analysis of 10 viewpoints as summarised below:

Viewpoint	Location	Impact
VP1	East of the entrance to Tramore Garda Station and c. 60m away from the car park for the Garda station	Medium Sensitivity Medium Magnitude

		No significant effect
VP2	Market Street to the east of the site (within the ACA). Evidence of street pole and other vertical structures. Visible by road users.	Medium Sensitivity Medium Magnitude No significant effect
VP3	To the rear of SuperValu carpark South of the site (within the ACA). The existing buildings carpark are visible. Telecom pole is visible but landscape character unchanged.	Medium Sensitivity Medium Magnitude No significant effect
VP4	SuperValu Carpark to the west of the site c. 70m from the site facing east. There are views of existing buildings, street furniture and floodlights adjoining the site.	Medium Sensitivity Medium Magnitude No significant effect
VP5	Summerhill Road, Tamore. Within the ACA with the buildings on the NIAH, a protected structure (Holy Cross Church). The existing telecommunications structure can be seen in the views.	High sensitivity (ACA) Negligible Magnitude No significant effect
VP6	Summerhill Road, Tramore. Also, within the ACA with some of the building on the NIAH. The current telecommunications mast is visible.	High sensitivity (ACA) Medium Magnitude No significant effect
VP7	Lower Branch Road, Tramore on the northeast fringe of the ACA, within the scenic route and neighbouring NIAH buildings. Views are broken up by mature trees and other key landscape features.	High sensitivity (ACA) Negligible Magnitude No significant effect
VP8	Hotel Square, Tramore proximity to several NIAH listed properties and being within the ACA. View of the existing telecommunications structures above buildings.	High sensitivity (ACA) Negligible Magnitude No significant effect

VP9	Tramore Main Street within the ACA and near NIAH listed buildings.	High sensitivity (ACA) Negligible Magnitude No significant effect
VP10	Christ Church, Tramore. Within an ACA, scenic Route and in proximity to NIAH listed buildings and RPS. Taken from the gates of protestant Church	High sensitivity (ACA) Negligible Magnitude No significant effect

#### 8.1.6. Relevant Planning Policy and Guidance

- National Planning Framework includes 10 goals including digital connectivity. This can help to alleviate social isolation and support economic development.
- RSES for the Southern Region acknowledges the dispersed settlement pattern and seeks to improve communications by the advancing a high-capacity ICT system.
- Waterford City and County Development Plan 2022-2028 (CCDP) supports an enhanced connectivity service. The proposal will contribute to the communications infrastructure. It is contended by the applicant that the proposal is in accordance with the national '*Telecommunications Antennae and Support Structure Guidelines for Planning Authorities*', co-location is not available and there will be no negative visual impact.

#### 8.1.7. Visual Impact Assessment (VIA)

- VIA has been updated to include an analysis of additional 6 view.
- The planners report reference the ACA, although not in the reason for refusal therefore an Architectural Impact Assessment (AIA) has been submitted with the appeal statement.
- Extracts of the AIA quoted in the text to indicate the proposed development would not be visible from or have a negative impact on the ACA.

#### 8.1.8. Conclusion

- The applicant has outlined the site selection process, the need for the proposal and the proposed design.

- The additional photomontages show no significant impact on the ACA.
- The decommissioning of the structure from the Grand Hotel which lead to a noticeable gap in the delivery of services in the area.

#### 8.1.9. Architectural Impact Assessment

- This assessment has been undertaken by an archaeology and cultural heritage expert.
- A historical background of the site has been undertaken. No records of significance are recorded on the subject site.
- The site is close to the ACA and is excluded from the designated area
- The character of Tramore ACA relates to the seaside town which is a hillslope overlooking the Bay and terraces of two storey dwellings.
- There are seven vistas' settings within the ACA.
- There are 22 protected structures and 163 NIAH sites within the Tramore ACA with the most prominent being the Grand Hotel and the Church of the Holy Cross.
- The apparatus and design of the pole is such that it is significantly less visually intrusive than the existing mast in the area. The black colour will reduce the visibility of the mast.
- The photomontages are used to assess the potential impact on the ACA.
- The proposed development will not be visible from the Branch Road approach to the town centre due to trees, obscured by the existing mast from the Church of the Holy Cross and by existing buildings from the Little Market Street. The mast will be visible from shorter range views . There will be intermittent, or incidental views form other locations although the mast will not intrude overly on any general views

#### 8.1.10. Plans and Particulars

- Site location, layout and elevations submitted with the applicants appeal documentation.

#### 8.1.11. Photomontage



- The grounds of appeal are accompanied by a Visual Impact Assessment which includes those viewpoints surveyed for the initial application and additional long-range views. As discussed in Section 8.1.5.

## **8.2. Planning Authority Response**

The Planning authority responded to state that there was verbal communication with the Architect's section who raised concern. The reason for refusal was restated.

## **8.3. Observations**

None received.

## **9.0 Assessment**

Having regard to the above and having inspected the site and reviewed all documents on file, the following is my assessment of this case. Issues to be considered in the assessment of this case are as follows:

- Compliance with Section 254 Criteria

## **9.1. Compliance with Section 254 Criteria**

### **9.1.1. Introduction**

- 9.1.2. The subject site is located within the town centre of Tramore, adjacent to the library and Garda Station. The site is located along the edge of a public carpark, recently upgraded by the Council as a Part VIII project for enhanced urban realm. The report of the area planner notes that the Council have not given permission to the applicant for the proposed telecommunication structure. I note the area planner report also note that following verbal confirmation the Roads Engineer had no objection to the proposal. Concern was raised by the Architect's Department in relation to the visual impact, further detailed below. I am not aware of any requirement to have consent from the PA for submitting a s254 application and I do not consider the Commission is not precluded from assessing the appeal. I also note that any grant from the Commission does not entitle the applicant to undertake works without permission

from the landowner. Therefore, any agreement to undertake the works on public lands is a separate matter for the Council.

9.1.3. In considering an application for a licence under this section a planning authority, or the Board (Commission) on appeal, shall have regard to the items listed under subsection 254 (5);

- a) The proper planning and sustainable development of the area,
- b) Any relevant provisions of the development plan, or local area plan,
- c) The number and location of existing appliances, apparatuses, or structures on, under, over or along the public road.
- d) The convenience and safety of road users, including pedestrians.

I have addressed each of these requirements separately below.

9.1.4. **The proper planning and sustainable development of the area,**

9.1.5. The site is located along the edge of a public carpark on lands zoned for town centre in the Waterford City and County Development Plan 2022-2028. Table 11.2 of Volume 2 of the CCDP list the use type 'utility' is open for consideration in the Town Centre zoning. The principle of locating telecommunications infrastructure on the site is acceptable in principle.

9.1.6. The PA refused permission for the s.254 licence having regard to the national guidance 'Telecommunications Antennae and Support Structures: Guidelines for Planning Authorities', the location of the site on a prominent location of the town centre and considered it would represent a significant and visually discordant features in the urban landscape. This is further details below, although the Commission will note my analysis and conclusion that there is no significant negative visual impact from the proposed development.

9.1.7. Therefore, having regard to the characteristics of the proposed works, along the edge of a public carpark in an urban setting, it is not considered the proposal will have a negative impact on the surrounding area and is in keeping with the proper planning and sustainable development of the area.

9.1.8. **Any relevant provisions of the development plan, or local area plan,**

- 9.1.9. The applicant's submission refers to the National, Regional and Local policy which supports the roll out of telecommunications infrastructure as the country implements the digital transformation network. I note the CAP further highlights the need for green and digital societies as an overarching aim to achieve decarbonisation and net zero commitments. The Waterford County Development Plan 2022-2028, including Section 9.1, states that the Council is committed to supporting climate action targets. Section 15 of the Climate and Low Carbon Development Act 2015 as amended (the Climate Act), obliges the Board to make all decisions in a manner that is consistent with the current CAP. Support for digital connectivity and the associated infrastructure, like the proposed development, can ensure the wider communities have access to services to support remote working and enhanced economic development.
- 9.1.10. Policy Objective UTL 16 of the Waterford CCDP requires proposals to have regard to the Telecommunications Antennae and Support Structures; Guidelines for Planning Authorities (DEHLG 1996); (the Guidelines) and requires the Council to have regard to these. The Guidelines places high quality telecommunications services at the forefront of support for the economy, personal connection and protection of the environment and requires that in larger towns, cities and smaller towns and villages, the location should be necessary, and masts and antennae should be designed and adapted for the specific location.
- 9.1.11. Tramore is designed as a Tier 2 settlement (District/ Suburban Centre) in the settlement strategy for the County and can therefore be categorised as a larger town. Section 4.3 of the Guidelines states: *"In the vicinity of larger towns and in city suburbs operators should endeavour to locate in industrial estates or in industrially zoned land"*. Other possibilities should also be explored, including some commercial or retail areas (e.g. rooftop locations, locating "disguised" masts), existing ESB substations and preference is given to the use tall buildings or other existing structures over a new independent support structure. It also includes that only as a last resort and if the suggested alternatives (possibilities) are either unavailable or unsuitable should free-standing masts be located in a residential area or beside schools. In that event, existing utility sites should be considered, and specific design solutions should be employed including that the support structure should be kept to a

minimum height consistent with effective operation and should be monopole (or poles) rather than a latticed tripod or square structure.

- 9.1.12. The applicant's submission notes the existing location of the Eir infrastructure on top of the Grand Hotel. Having regard to the redevelopment of the site, the applicant states that a new location is now necessary. The applicant's submission has provided an overview of six sites considered for relocation and/or development of the telecommunication infrastructure. The current lattice mast at the Garda Station was discounted as there is no capacity left for colocation, as was the mast at the Tramore ESB station. Three other sites (between 1.3km and 2km) were also discounted due to the absence of sufficient coverage. Having regard to the applicants site selection process, which investigated co-location and location of other sites, I consider the applicant has provided reasonable examination of alternative sites, as required in Section 4.3 of the Guidelines. I also note the absence of expanses of industrial estates or industrial zoned lands within the settlement of Tramore, and I consider the analyses of utility sites and other zoned lands uses sufficient to satisfy the requirement in the Guidelines. Taking all these factors into consideration, I consider the justification for the proposed development within Tramore town centre complies with the requirements of the Guidelines as a last resort for locating within the larger towns and investigating possibilities for co-locating on other utility sites.
- 9.1.13. The site is located adjacent to an Architectural Conservation Area (ACA) of Tramore and whilst the PA reason for refusal, or the report of the area planner, does not specifically reference the impact on any built heritage it references the visual impact on the urban landscape and the visual amenities of the area. The applicants appeal submission includes additional visual analysis and photomontages illustrations from 10 viewpoints, an additional 6 from the original submissions. I note these mostly reflect the views from the adjoining ACA and other long-range views on approach to the town centre. I have had regard to these and from site inspection I note they reflect the location of the site within the town centre of Tramore. These additional photomontage illustrations have been integrated into an Architectural Impact Assessment (AIA), submitted with the grounds of appeal.
- 9.1.14. Policy Objective BH 05 (ACA) and Volume 2: Development Management Standard, Section 10.0: ACA, of the CCDP include the parameters for development which may impact the character and setting of ACAs. The policy and guidance in the

development plan requires that any development would not detract from the special character of any ACA or protected structure. I note the AIA refers to the street patterns of Tramore, to location of the 22 protected structures in the town, in particular the Church of the Holy Cross and the Grand Hotel and concludes that the proposed telecommunication infrastructure will not have a negative visual impact on the character or setting of these buildings. The photomontage illustrations are integrated into the AIA analyses which also concludes the proposed development will have not negative visual impact on the ACA.

- 9.1.15. I have had regard to the design of the proposed development and the location within the urban setting, and I note the surrounding area is reflective of a normal urban setting with street lighting etc. Tramore town rises steeply from the coast towards the site, with views across the town from the site. There are floodlights associated with the carparking at the Garda station and an existing lattice telecommunication mast, adjoining the site, both of which affect the character of the surrounding area, which I consider is urban in nature.
- 9.1.16. The proposed development includes a monopole type structure, similar in design to the streetlights and floodlighting in the vicinity of the site. I consider this design appropriate at this location. The site is located outside the ACA although adjacent to the boundaries. I have had regard to the applicant's photomontage illustrations submitted which I consider adequate illustrate the proposal within the urban setting, including the built heritage and I do not consider the proposal would have a negative visual impact on the character and setting of the ACA, any protected structure or the general urban landscape of Tramore. Therefore, I am satisfied that the proposed development complies with the guidance in Policy Objective UTL 16 and Policy Objective BH 05 of the CCDP 2022-2028.
- 9.1.17. In concluding the proposed development complies with the policies of the development plan, and in considering the applicant have submitted sufficient justification for locating at this site, it is my opinion that the proposal would not be contrary to the national guidelines Telecommunications Antennae and Support Structures; Guidelines for Planning Authorities, and I recommend a grant of permission.

9.1.18. **The number and location of existing appliances, apparatuses, or structures on, under, over or along the public road.**

9.1.19. The Tramore Garda Station is centrally located in the town centre of Tramore and has a typical urban setting. Aside from the standard public lighting poles along the main roads, there is a tall flagpole connected with the Garda Station, and a further standalone lattice telecommunication structure visible from the site.

9.1.20. The applicant's technical justification for a new structure includes an analysis or co-location on the adjoining telecommunications infrastructure and it was concluded that this structure is at capacity. The report of the area planner, whilst noting visual impacts, did not raised concern with regard the overconcentration of current infrastructure. Whilst the current structures will be visible from the surrounding area, I do not consider the cumulative effect will lead to an over dominance of other structures in the vicinity.

9.1.21. **The convenience and safety of road users, including pedestrians.**

9.1.22. The proposed pole and associated boxed infrastructure will be set back from the public footpath, adjacent to the wall. It is not considered the location of the infrastructure will cause any hazard to either pedestrians or road users. The area planners report notes verbal confirmation with the Roads Engineer that the had no objection to the proposal.

## 9.2. **Conclusion**

9.2.1. Regarding the applicant's justification for locating a telecommunications structure at this location, I note the applicants assessment of alternative sites, the justification for locating within the town centre and the photomontage illustrations and I am satisfied there is sufficient justification the proposed development within the town centre complies with the requirements of the Guidelines as a last resort for locating within a large town. In terms of the visual impact of the proposal on Tramore town and the built heritage of Tramore, I am satisfied the applicants photomontage documentation adequately illustrates the impact of the telecommunication mast within the setting. Having regard to the recent upgraded public realm, the location of the site at the upper end of the town, and the contemporary design of the pole, beside the garda

station and the floodlights, I am satisfied the proposal will not have a significant negative visual impact on the surrounding area and will therefore be in compliance with the Telecommunications Antennae & Support Structures Guidelines for Planning Authorities and the policies of the development , in particular Policy Objective UTL 16 and BH 05.

## **10.0 Appropriate Assessment (AA) Screening**

- 10.1. Having regard to the modest nature and scale of the proposed development, its location in an urban area, connection to existing services and absence of connectivity to European sites, it is concluded that no Appropriate Assessment issues arise as the proposed development would not be likely to have a significant effect individually or in combination with other plans or projects on a European site.

## **11.0 Water Framework Directive (WFD) Screening**

- 11.1. Having regard to the modest nature and scale of the proposed development, it is concluded 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.

## **12.0 Recommendation**

- 12.1. I recommend that permission is granted for the proposed licence in accordance with the following reasons and considerations.

## **13.0 Reasons and Considerations**

Having regard to:

- a) The provisions of section 254 of the Planning and Development Act, 2000, as amended,

- b) the applicant's justification for telecommunications infrastructure on this site and the strategic and locational advantage for delivering digital connectivity for the town of Tramore, a designated Tier 2 settlement (District/ Suburban) for County Waterford;
- c) the government's guidelines on Telecommunications Antennae and Support Structures; Guidelines for Planning Authorities (DEHLG 1996),
- d) the policies and objectives of the Waterford City and County Development Plan 2022-2028 specifically Policy Objective UTL 16 and Policy Objective BH 05 and the overall design of the infrastructure and its minimal impact as demonstrated in the submitted photomontages; and

it is considered that the proposed development would not have a significant negative visual impact on the urban setting of Tramore or the character and setting of any Architectural Conservation Area or Protected Structure and would be in keeping with the proper planning and sustainable development of the area.

## 14.0 Conditions

1.	<p>The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, as amended by the further plans and particulars submitted, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the development shall be carried out and completed in accordance with the agreed particulars.</p> <p>Reason: In the interest of clarity.</p>
2.	<p>No advertisement or advertisement structure shall be erected or displayed on the proposed structure or within the curtilage of the site without a prior grant of planning permission.</p> <p>Reason: In the interest of the visual amenity of the area.</p>



3.	<p>Details of the proposed colour scheme for the pole, antennas, equipment containers shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.</p> <p>Reason: In the interest of the visual amenity of the area.</p>
4.	<p>In the event of the telecommunications structure and ancillary structures hereby permitted ceasing to operate for a period of 3 months, the structures shall be removed, and the site shall be reinstated within 3 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 3 months of the structures ceasing to operate, and the site shall be reinstated in accordance with the agreed details at the operators expense.</p> <p>Reason: In the interest of the visual amenities of the area</p>

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

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Karen Hamilton  
Assistant Director of Planning

05<sup>th</sup> of January 2026

## 15.0 Appendix 1 - EIA Pre-Screening – Form 1

<b>An Bord Pleanála</b> <b>Case Reference</b>	<b>ABP-322203-25</b>		
<b>Proposed Development</b> <b>Summary</b>	15m telecommunications pole and associated works		
<b>Development Address</b>	Tramore Library, Tramore, Co. Waterford		
<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>	<b>X</b>
		<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)?</b>			
<b>Yes</b>			Proceed to Q3.
<b>No</b>	<b>X</b>		
<b>3. Does the proposed development equal or exceed any relevant THRESHOLD set out in the relevant Class?</b>			
<b>Yes</b>			EIA Mandatory EIAR required
<b>No</b>	<b>X</b>		Proceed to Q4
<b>4. Is the proposed development below the relevant threshold for the Class of development [sub-threshold development]?</b>			

<b>Yes</b>			Preliminary examination required (Form 2)
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<b>5. Has Schedule 7A information been submitted?</b>		
<b>No</b>	<b>X</b>	<b>Screening determination remains as above (Q1 to Q4)</b>
<b>Yes</b>		<b>Screening Determination required</b>

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