



An
Coimisiún
Pleanála

Inspector's Report ABP-322720-25

Development	Amendments to F21A/0708 (ABP Ref. 313836-22). Erection of signage with all associated site works.
Location	Lands at Turvey Avenue, Donabate, County Dublin
Planning Authority	Fingal County Council
Planning Authority Reg. Ref.	F25A/0238E
Applicant(s)	Aldi Stores Ireland (Limited)
Type of Application	Permission
Planning Authority Decision	Refuse
Type of Appeal	First Party
Appellant(s)	Aldi Stores Ireland (Limited)
Observer(s)	None
Date of Site Inspection	5 th September 2025
Inspector	Emma Gosnell

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1.0 Site Location and Description

- 1.1. The appeal site is located on the southern side of Turvey Avenue in the south-west environs of Donabate, Co. Dublin. There is a single storey Aldi grocery store under construction on the site which previously formed part of a Church of Ireland institutional 'Glebe' landbank. The site also comes within the Architectural Conservation Area (ACA) associated with Newbridge House Demense and The Square.
- 1.2. The c. 0.66ha site is bounded to the immediate east by an undeveloped field, to the west by a large, detached 19th century residential property ('Former Glebe House/ The Old Vicarage' Protected Structure RPS No. 863) set on landscaped grounds and, to the south by the rear gardens of a number of detached residential properties fronting Newbridge Avenue.
- 1.3. The Turvey Drive and Turvey Grove residential estates are located opposite the site on the north side of Turvey Avenue. St. Patrick's Church of Ireland Church and graveyard (Protected Structure RPS No. 508 and Recorded Monuments RMP Ref. DU0012-005001 - DU0012-005004) is located c. 60m to the south-east of the appeal site whilst Newbridge House and Demesne (Protected Structure RPS No. 494) is located c. 750m to its west. There is also a further Protected Structure located to the immediate north-east of the appeal site (19th century vernacular house RPS No. 798).
- 1.4. The site's north-western boundary comprises of a mature trees, hedging and a low stone boundary wall and there is a single-storey ESB substation under construction in this corner of the site. The northern boundary of the site to Turvey Avenue is delineated by temporary metal fencing and there is also a bus stop located along this frontage.

2.0 Proposed Development

- 2.1. The proposed development comprises of amendments to permission granted under P.A. Ref. F21A/0708 (ABP Ref. 313836-22). The development will consist of the erection of a single internally illuminated double sided totem sign (2 metres in width and 3.42 metres in height above ground level) located adjacent to the southwest of the permitted entrance to the site at Turvey Avenue.
- 2.2. The sign comprises of 2 no. areas of signage – the upper sign which consists of a multi-coloured Aldi logo and a smaller lower sign with details of the store's opening

hours. The total signage area extends to 9.32 sqm and the sign is sited adjacent to the roadside and facing oncoming traffic (travelling westbound) on Turvey Avenue.

3.0 Planning Authority Decision

3.1. Decision

Permission refused on 12/05/2025 for 2 no. reasons:

1. The proposed totem sign, by reason of its scale, design, and use of standard corporate branding, would be visually obtrusive and inappropriate within the context of the Architectural Conservation Area (ACA). The proposed development would be incongruous with the surrounding pattern of development, and it would detract from the character and visual amenity of the area. The proposed totem sign fails to comply with the provisions of the Fingal Development Plan 2023–2029, specifically Objective DMSO10, Objective DMSO188, and Table 14.25 – Guidance for Signage on Protected Structures or within ACAs. To permit the proposed development would be harmful to the amenities of the area and be contrary to the proper planning and sustainable development of the area.
2. The proposed signage would materially contravene Condition No. 4 of An Bord Pleanála's permission (Ref. ABP-313836-22 / FCC Ref. F21A/0708), which restricted signage to solid steel lettering affixed directly to the building façade and entrance, and explicitly prohibited the erection of other advertisement structures within the curtilage of the site. The proposed development would therefore set an undesirable precedent for similar forms of inappropriate signage within ACAs and would be contrary to the proper planning and sustainable development of the area.

3.2. Planning Authority Reports

3.2.1. Planning Reports

1 no. planning report (dated 12/05/2025) formed the basis of the planning authority's (PA) assessment.

The report sets out the relevant planning history, policy context, issues raised in internal departmental reports, and undertakes a planning assessment, EIA Screening and AA Screening. Key points of note raised in the report are as follows:

- *Principle of Development* – principle of retail development on zoned lands has been established under P.A. Ref. F21A/0708 (ABP-313836-22) and proposal now seeks amendments to same.
- *Impact on ACA/ Visual Amenity* – the Aldi supermarket site is located within an ACA and situated between 2 no. protected structures (RPS No's 508 and 863) which are oriented towards, and have a visual relationship with, each other. On account of this architectural and visual sensitivity, and as determined in the PA report on P.A. Ref. F21A/0708 (ABP-313836-22), an external, freestanding totem-style sign (as per that proposed) is not appropriate at this location and does not adhere to FDP guidance on signage in ACAs on account of its scale, design and use of standard corporate branding. The proposal is considered to be visually obtrusive and the PA are concerned that it would detract from the character and visual amenity of the ACA. **A refusal of permission is recommended on this basis.**
- *Compliance Issues* - The application documentation submitted in respect of P.A. Ref. F21A/0708 stated that no totem signage would be erected in the grounds of the store and committed to keeping signage in the grounds to a minimum. Condition No. 4 attached to the grant under ABP-313836-22 determined the extent of permissible signage (Aldi corporate brand signage that was adapted to provide for muted tones and high quality materiality (solid steel lettering) in order to respect the sensitive heritage/ conservation context of the site) and required that no other advertisement structure was to be erected within the curtilage of the building without a subsequent grant of permission. The elevation drawings submitted in respect of the current application show signage affixed to the supermarket building which does not reflect the nature, extent and materiality of the signage permitted under Condition No. 4 attached to ABP-313836-22. **A refusal of permission is recommended on this basis.**
- *Access* – the proposed signage is not located within the required/ permitted visibility splays and does not impact on the proposed access to the site.

The planning report concluded by recommending permission be refused for 2 no. reasons (as detailed in Section 3.1 of this report).

3.2.2. Other Technical Reports

Transportation Planning Section (25/05/2025) – no objection to proposal.

Conservation Officer (23/05/2025) – recommends refusal on basis of unacceptability of a totem sign and normal corporate branding at this location and proposal's non-compliance with the signage permitted under Condition No. 4(a) attached to ABP-313836-22 and the FDP policy guidance on signage within ACAs.

3.3. Prescribed Bodies

No submissions received.

3.4. Third Party Observations

2 no. submissions received from neighbouring property owners at PA stage raised the following issues:

- Proposal is not compliant with Condition No. 4 attached to ABP-313836-22 in terms of the proposed totem sign and the signage on the north elevation.
- Proposal is an unacceptable deviation from the nature and extent of the signage as permitted.
- Proposed totem sign is unnecessary given its proximity to the store and would significantly impact on the ACA.
- The current proposal is the third such amendment application and these are eroding the provisions of the original permission as granted.
- Proposal should be refused permission in light of the aforementioned issues.

4.0 Planning History

4.1. Appeal Site

P.A. Ref. F25A/0196E – Application for amendment of Condition 2 (trading and delivery hours) attached to Reg. Ref. F21A/0708 (ABP Ref. 313836-22) to allow

trading between 8am – 10pm Monday to Saturday (previously 8am – 9pm) and 9am – 9pm on Sundays (previously 9am – 7pm), and deliveries between 7am – 11pm (previously 8am – 9pm), granted permission on 05/06/2025 subject to conditions.

P.A. Ref. F24A/0877E – Application for amendments to Reg. Ref. F21A/0708 (ABP Ref. 313836-22), incl. the relocation of a plant area enclosure at roof level, the erection of an ESB substation (c. 23.5sq.m) to the side of the main building, and all associated works, including minor changes to site landscaping, granted permission on 25/02/2025 subject to conditions including:

“4. external finishes shall accord with the details submitted with the planning application unless otherwise agreed in writing with the Planning Authority prior to commencement of development. REASON: In the interest of visual amenity”.

P.A. Ref. F21A/0708 & ABP-313836-22 – Application for a single storey retail development consisting of 1 no. retail supermarket of 1,320 sq.m net floorspace (1,835 sq.m) (including ancillary off-licence) and additional associated storage, staff facilities, plant room, loading bay, signage, 80 no. car parking spaces at surface level and 16 no. bicycle parking spaces at surface level, landscaping, boundary treatments and all associated site and engineering works necessary to facilitate the development, including moving of proposed bus stop on Turvey Avenue, granted permission on appeal subject to revised conditions, including:

“4. (a) Signage shall comprise the store name in solid steel lettering affixed directly to the building’s façade and at the entrance to the site in accordance with the Architectural Design Statement and elevations received by the Planning Authority on the 28th day of April 2022. Details of signage shall be submitted to and agreed in writing with the Planning Authority prior to the commencement of development.

(b) No advertisement or advertisement structure (other than that permitted under Condition 4(a) above) shall be erected or displayed on the building or DRS Unit or within the curtilage of the site, in such a manner as to be visible from outside the building, unless authorised by a further grant of planning permission.

Reason: To ensure that advertising signs are kept to a minimum and designed to respect the location of the site within an Architectural Conservation Area.”

P.A. Ref. F20A/0630 – Application for 4 no. two storey detached five-bedroom houses with vehicular and pedestrian access from Turvey Avenue, associated surface car parking, landscaping, boundary treatment and all associated site and engineering works necessary to facilitate the development, refused permission on 04/09/2018 for 2 no. reasons: 1. Inefficient use of zoned and serviced land and a key town centre site; 2. Design, scale and prominence would negatively impact on ACA and the established building line formed by the Old Vicarage dwelling to the west.

P.A. Ref. F19A/0128 (larger site which incorporated the appeal site) – Application for a residential and community development consisting of 10 no. two storey split-level, detached dwelling houses; 1 no. single storey detached community hub (395sqm) with an ancillary caretaker's accommodation (1 bed residential unit 45sqm) and 2 no. vehicular and pedestrian access points onto Turvey Avenue, associated surface car parking, landscaping, boundary treatment and all associated site and engineering works necessary to facilitate the development on a site of 1.06 ha (2.63 acres), granted permission on 06/01/2020 subject to conditions. [Permission has not been implemented].

P.A. Ref. F18A/0403 – Application for 4 no. two storey detached five-bedroom houses with vehicular and pedestrian access from Turvey Avenue, associated surface car parking, landscaping, boundary treatment and all associated site and engineering works necessary to facilitate the development, refused permission on 04/09/2018 for 2 no. reasons: 1. Inefficient use of zoned and serviced land and a key town centre site; 2. Design, scale and prominence would negatively impact on ACA and the established building line formed by the Old Vicarage dwelling to the west.

4.2. Planning Precedents Cited by the Appellant

The following precedent cases are referred to by the applicant with some relating to other planning authorities.

P.A. Ref. F14A/0210 – Application for a petrol filling station and related works incl. a 6 m. high monolith company sign (illuminated) to replace the existing sign, corporate signs and insignia at Hearse Road, Donabate granted permission on 14/10/2024 subject to conditions [site is located adjoining but not within the Newbridge House Demense and The Square ACA].

P.A. Ref. FW19A/0179/ ABP Ref. PL06F.306453 – Application for a double fronted totem sign with a total advertisement area of 16.6 sq m (front and back) and a 21 m high security light at Mountview Shopping Centre, Mountview Road/Fortlawn Avenue, Blanchardstown, Dublin 15 granted permission on 24/03/2020 on appeal subject to conditions [site is not located in an ACA].

P.A. Ref. 19/699/ ABP Ref. 308582-20 – Application for construction of a single storey discount food store including off-licence use and associated site works at Jervis Street, Ardee, Co. Louth granted permission on 11/05/2021 on appeal subject to conditions [site is not located within an ACA but it bounds the attendant grounds of a Protected Structure (1930's house)].

5.0 Policy Context

5.1. National Policy

Retail Planning Guidelines for Planning Authorities (2012) – Section 5.2.6 (Urban Framework Approach)

Architectural Heritage Protection: Guidelines for Planning Authorities (2011)

Retail Design Manual (2012) – Design Quality & Public Realm

5.2. Development Plan

The Fingal Development Plan (FDP) 2023-2029 applies.

Zoning

The site is zoned 'TC – Town and District Centre' with the objective to 'Protect and enhance the special physical and social character of town and district centres and provide and/ or improve urban facilities'. Retail supermarkets (<2,500sq.m GFA) are a use class which is Permitted in Principle under the TC zoning.

The stated vision for this zoning objective is, inter alia, to develop and consolidate these centres with an appropriate mix of commercial, recreational, cultural, leisure and residential uses, and to enhance and develop the urban fabric of these centres in accordance with the principles of urban design, conservation and sustainable development.

Heritage

The site is also located within a 'highly sensitive', 'coastal' landscape character area.

The site is located within the Newbridge House Demesne and The Square ACA.

There are numerous Protected Structures in the immediate vicinity of the site:

- Former Glebe House/ The Old Vicarage' (Protected Structure RPS No. 863)
- St. Patrick's Church of Ireland Church and graveyard (Protected Structure RPS No. 508)
- Newbridge House and Demesne (Protected Structure RPS No. 494)
- 2-storey 3-bay 19th century Vernacular House (Protected Structure No. 798)

Signage

Objective DMSO10 - Corporate Logos, Lighting, Design and Colour:

Ensure that corporate logos, lighting, designs and colours are not used at the expense of the streetscape.

Objective DMSO12 - Evaluation of Signage Proposals:

Evaluate signage proposals in relation to the surroundings and features of the buildings and structures on which signs are to be displayed, the number and size of signs in the area (both existing and proposed) and the potential for the creation of undesirable visual clutter.

Objective DMSO15 – Billboard and Large Advertising Structures:

Resist new billboard and other large advertising structures and displays.

Section 14.19.3.3 (Architectural Conservation Areas)

Table 14.24 (Direction for Proposed Development within Architectural Conservation Areas) - Alterations and New Build & Public Realm Works

Section 14.19.3.5 (Signage on Protected Structures or within ACA)

Table 14.25 (Guidance on Signage on Protected Structures or within ACAs) – Design & Positioning of Signage/ Corporate Signage/ Totem and Monolith Signs

Objective DMSO188 - Signage on a Protected Structure:

All planning applications for signage on a Protected Structure or within an Architectural Conservation Area shall have regard to the Guidelines outlined in Table 14.25.

Objective DMSO229 – Impacts on Archaeological and Architectural Heritage:

Ensure that proposals for large scale developments and infrastructure projects consider the impacts on the archaeological and architectural heritage and seek to avoid them. The extent, scale, density, route, services and signage for such projects should be sited at a distance from Protected Structures and Recorded Monuments, avoid affecting the special character of Architectural Conservation Areas, remain outside the boundaries of historic designed landscapes, and not interrupt specifically designed vistas. Where this is not possible the visual and physical impact must be minimised through appropriate mitigation measures such as high-quality design, that goes beyond regulatory and engineering requirements.

6.0 Natural Heritage Designations

The appeal site is not located within or adjoining any designated site.

The nearest European Sites in close proximity to the appeal site are as follows:

- c. 1km from Malahide Estuary SPA (Site Code 004025)
- c. 1km from Malahide Estuary SAC (Site Code 000205)
- c. 1.3km from Rogerstown Estuary (Site Code SPA 004015)
- c. 1.3km from Rogerstown Estuary SAC (Site Code 000208)
- c. 2.8km from North-West Irish Sea SPA (Site Code 004236)
- c. 5.6km from Rockabill to Dalkey Island SAC (Site Code 003000)

The nearest Natural Heritage Areas in close proximity to the appeal site are as follows:

- c. 1km from Malahide Estuary pNHA (Site Code 000205)
- c. 1.3km from Rogerstown Estuary pNHA (Site Code 000208)
- c. 3.2km from Portraine Shore pNHA (Site Code 001215).

7.0 EIA Screening

The proposed development has been subject to preliminary examination for environmental impact assessment (refer to Form 1 and Form 2 in Appendix 1 of this report). Having regard to the characteristics and location of the proposed development and the types and characteristics of potential impacts, it is considered that there is no real likelihood of significant effects on the environment. The proposed development,

therefore, does not trigger a requirement for environmental impact assessment screening and an EIAR is not required.

8.0 Water Framework Directive Screening

- 8.1. I have 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 (refer to form in Appendix 2 for details).

9.0 The Appeal

9.1. Grounds of Appeal

A first party appeal submission was received (06/06/2025) and seeks to address the PA's reasons for refusal. The grounds of appeal can be summarised as follows:

Design

- A reduced scale of signage is provided to mitigate potential impacts on the ACA
- Sign's palette and finish is designed to harmonise with the stonework finish on the store's north elevation and with the stone boundary wall on Turvey Avenue.

Response to Refusal Reason No. 1 (Impact on ACA)

- Design of corporate signage is non-standard/ bespoke response to site context
- Proposed totem sign is appropriately scaled in response to location in an ACA
- Height of sign is lower and it is narrower than a standard Aldi totem entrance sign
- Style and scale of totem sign proposed has been successfully implemented at the Aldi store on Grey Abbey Road in Kildare Town
- Sign is not comparable to height/ scale of petrol station totem sign

- Siting of sign (boundary wall backdrop with proposed soft landscaping and visual screening provided by existing trees to the west) will help mitigate and absorb its visual impact on/ visibility within the streetscape
- Location of sign will limit its visual impact and impact on neighbouring properties - sign will only be visible on approach to the site from the east (via Turvey Avenue) and it will not be visible from the west
- Colour of sign identifies and will help urban legibility & wayfinding to the Aldi store
- Colour of sign will add to the permitted colour palette and will enliven streetscape
- Sign will not be illuminated overnight outside of store opening hours and the appellant is willing to accept a condition in this regard
- The sign complements permitted signage/ signage subject to compliance submissions
- Wording of policy guidance in Table 14.25 allows for a consideration of non-typical totem signs and the proposal should be assessed on its merits on this basis
- Proposal is compliant with FDP Table 14.25 and Objectives DMSO10 & DMSO188.

Refusal Reason No. 2 (Contravention of Condition No. 4 of ABP-313836-22)

- A compliance submission in respect of Condition No. 4 was submitted to PA on 20/05/2025 and their response is awaited.
- Wording of Condition No. 4 explicitly states that no further advertisement structures shall be erected in the curtilage of the site unless authorised by a further grant of permission. The PA did not adequately consider this provision in their assessment.
- If permitted by the Commission, the grant of permission for the proposed amendments (totem sign) would supersede Condition No. 4 of ABP-313836-22.
- There is precedent for the Commission making a decision that supersedes a condition (re: signage) attached to a previous grant of permission on the same site.

Signage Precedents

The grounds of appeal include details of totem signage proposals that have been permitted at other Aldi stores at Jervis Street, Ardee (6.4m high totem sign within ACA)

under P.A. Ref. 19/699 and ABP Ref. 308582-20 and, at Grey Abbey Road in Kildare (no reg. ref. details provided for same).

Details of a Board decision (PL06F.306453) which overturned a FCC decision to refuse permission for a double-fronted totem sign at Mountview Shopping Centre, Blanchardstown (where one of the refusal reasons centred on the proposal being in contravention of a condition on a previous grant of permission on the site) are also provided as part of the grounds of appeal.

Revised Signage Proposal

The grounds of appeal are accompanied by an alternate signage proposal (architectural drawing dated May 2025) in which the height of the proposed sign is reduced by 500mm from 3.42m to 2.92m and its colour palette amended from multi-coloured to mono-chrome/ grey (laser cut lettering in stainless steel in an aluminium case together with subtle backlighting to tie in with character of the permitted store signage).

Other Enclosures

The grounds of appeal are accompanied by a copy of the PA's decision notification and planning report.

9.2. Planning Authority Response

Response received 30/06/2025 states that the PA have no comments to make in respect of the appeal and seeks that the Commission uphold their decision to refuse permission. If their decision is overturned by the Commission, they seek that, where relevant, conditions relating to the payment of a Section 48 Development Contribution, a bond/ cash security, tree bond and a payment in lieu to compensate for a shortfall in play facilities be applied.

9.3. Prescribed Bodies

Development Applications Unit

Response dated 28/07/2025 states that the Department of Housing, Local Government and Heritage's Development Applications Unit (DAU) concurs with the PA's rationale and reasons for recommending a refusal, namely the:

- Characteristics and sensitivities associated with this site
- Setting an unfavourable precedent re: signage within ACA/ protected structures
- Development management policy on signage in ACA's/ near Protected Structures
- Site planning history

The contents of the DAU's observation has been taken into account in the assessment of the proposal set out under Section 10 of this report.

9.4. Further Responses

First Party

A further response received 20/08/2025 in respect to the submission by the DAU states the following:

Characteristics and sensitivities associated with this site

- Sign is non-standard in terms of its design, height and width and has been designed to respond appropriately to its context (as detailed in Section 9.1)
- Significant separation distance exists between the Protected Structures themselves and also between the sign and the Protected Structures
- A belt of mature trees separates the Aldi store from Glebe House (RPS No. 863) with no clear line of sight between the site and this Protected Structure
- Significant intervening distance, landscape topography and intervening trees/ boundary walls ensures sign will not impact on St. Patrick's Church of Ireland (RPS No. 508) as there is no line of sight between the sign and this Protected Structure
- Protected Structure (RPS No. 798) is setback from Turvey Avenue and has no line of sight to the sign on account of its blank western gable, setback from the footpath and the intervening boundary screening provided by its neighbouring property (to the west). This structure also fronts onto busy public road & is excluded from ACA
- Granting of permission for an Aldi store at this location (and the ongoing construction of same) has altered the setting of the ACA at this location and the site's relationship with the aforementioned Protected Structures

- Conservation letter provided sets out how the grant of permission for the Aldi store at this location (which permitted the removal and setback of the masonry boundary wall fronting Turvey Avenue etc.) has eroded the visual link/ relationship between the Church of Ireland Church and the Vicarage (Glebe House) and has diminished the sensitivity of the site providing for a new/ altered site context
- The location of sign directly adjoining a public road, and in an exposed urban environment at the northern edge of ACA, reflects a lower level of ACA sensitivity
- Signage associated with 'TC – Town and District Centre' zoning should be anticipated in such locations
- The signage has only a minor perceived impact on the setting of the Protected Structures and the ACA.

Setting an Unfavourable Precedent

- Proposal will not set an unfavourable precedent within ACA/ proximate to Protected Structures on account of its physical separation from same/ intervening features
- Entrance sign is non-standard in its design and materiality and responds appropriately to its context and would therefore act as a favourable precedent for commercial totem signage within ACAs or areas of heritage significance
- Precedent exists for totem signage within and adjacent to ACAs and heritage assets. A much larger (c. 5m high) totem sign exists c. 200m south-east on Hearse Road on a site (petrol station) which borders the ACA and is an example of commercial uses/ signage on town centre zoned lands forming part of the setting and character of the ACA. This sign was not amended to respond to its heritage context (P.A. Ref. F14A/0210) as the PA did not raise an issue with its scale or height and this decision of the PA has set a precedent for signage on TC lands
- Large scale totem signage was also permitted by ACP at an Aldi store in Ardee, Louth (under ABP-308852-20) with a comparable 2.5m high totem sign being permitted at an Aldi store in Cashel, Co. Tipperary (no P.A. ref. provided) which is adjacent to upstanding walls associated with a NIAH listed structure. Photos of these signs are provided in the body of the submission

- Conservation letter notes that proposed totem signage facing oncoming traffic is a common ancillary element of this type of retail development
- The height, scale and palette of colours has been reduced and refined to minimise visual impact on area and to comply with FDP policy on such development.

Development Management Policy

- The Commission's attention is drawn to the contents of the grounds of appeal in this regard.

Planning History

- Condition No. 4 attached to previous grant of permission on site (ABP-313836-22) related to signage at the site
- The wording of part (b) of this condition makes provision for additional and amended signage where this is granted by a further permission and, on this basis, it would not preclude the Commission from granting permission for totem sign
- The proposal should be assessed on its merits and not constrained by the parent permission or by the conditions attached to same
- A compliance submission in respect to Condition No. 4 on ABP-313836-22 has recently been accepted by the PA. Drawings of same are provided with the response
- The permitted compliance drawings show the extent of Aldi signage on the store (north) elevation and the low stone wall at the vehicular entrance fronting Turvey Avenue. Whilst the elevation/ street elevation drawings provided do not include any explanatory details on the colour or materiality of this signage, the appellant's response (received 20/08/2025) states that this signage comprises of 'projecting steel lettering' whilst the Conservation letter provided states that the store elevation signage proposals approved by way of compliance consisted of 'stainless steel lettering/logo'.

The response is accompanied by:

- Copy of correspondence from ACP dated 31/07/2025
- Copy of DAU submission dated 28/07/2025

- Revised elevational drawings (dated February 2025) – corresponding with the compliance submission made in respect to Condition No. 4 on ABP-313836-22
- A booklet of 3D views/ photomontages (undated and with a title that erroneously refers to '10 Booterstown Avenue, Blackrock') – illustrates 3 no. existing and proposed views of the totem sign (as applied for) taken from Turvey Avenue (from east of site; from west of site; from directly in front of the site)
- Conservation letter (dated 19/08/2025) responding to the DAU's submission – outlines how principle of retail development on site has been established by parent permission and how this and the ongoing build-out of the retail store has diminished the sensitivity of the location, eroded the visual relationship between adjacent Protected Structures (church and vicarage) and provided a new built context for the assessment of the proposal. The letter also comments on relevant precedents and the proposal's compliance with FDP policy as detailed in the preceding sections. It concludes by noting that the amended signage proposal put forward as part of the grounds of appeal offers 'further mitigation of the potential impacts of the signage at this location'.

Planning Authority

A further response received 15/08/2025 reiterates the PA have no comments to make in respect of the appeal and seeks that the Commission uphold their decision to refuse permission. In the event that their decision is overturned by the Commission they seek that, where relevant, conditions relating to the payment of a Section 48 Development Contribution, a bond/ cash security, tree bond and a payment in lieu to compensate for a shortfall in play facilities be applied.

10.0 Assessment

As part of the grounds of appeal, the appellant has submitted revised plans and particulars (which I will refer to as the 'amended appeal scheme') in an attempt to address the PA's reasons for refusing planning permission for the 'application scheme as originally lodged'. The amendments put forward are detailed in Section 9.1 of this report.

It is noted that the amended plans submitted with the appeal introduce no new elements or issues which may be of concern to third parties in the context of the proposed development and, on this basis, I do not consider the changes proposed to the signage to be material. Accordingly, I consider both the application scheme as originally lodged and the amended appeal scheme accompanying the appeal as part of my assessment below.

Having examined the application details and all other documentation on file, including all of the submissions received in relation to the appeal, the report(s) of the local authority, having inspected the site and having regard to the relevant local/ regional/ national policies and guidance, I consider that the substantive issues in this appeal to be considered are as follows:

- Principle of Development
- Visual Impact
- Compliance with Condition
- Traffic Safety/ Access

10.1. Principle of Development

- 10.1.1. The principle of retail development on the application site has already been established under P.A. Ref. F21A/0708 (ABP-313836-22) and the proposal now seeks amendments to same.
- 10.1.2. The appeal site is zoned 'TC – Town Centre' with the objective 'Protect and enhance the special physical and social character of town and district centres and provide and/or improve urban facilities'. The proposal is for signage ancillary to an Aldi supermarket with such retail stores being permitted in principle under the site's zoning.
- 10.1.3. Therefore, while the development of these lands is acceptable in principle, as evidenced by the town centre zoning and planning history of the site, this is subject to the detailed considerations below.

10.2. Visual Impact

- 10.2.1. The PA consider that the proposed freestanding corporate totem sign, by reason of its scale, form and design, would give rise to visual incongruity and obtrusion within the ACA and would detract from the character and visual amenity of an area which is both

visually and architecturally sensitive on account of the existence of a number of Protected Structures (which have a visual relationship with each other). On this basis, they determine that it is non-compliant with FDP policy guidance on signage within ACAs (as cited by the PA's Conservation Officer (in their report dated 23/05/2025)) and specifically with Objective DMSO10, Objective DMSO188 and Table 14.25 of the FDP. A refusal of permission was recommended on this basis (Reason No. 1).

- 10.2.2. The submission received from the DAU (dated 28/07/2025) states that the Department concurs with the PA's rationale and refusal reasoning as it relates to the characteristics and sensitivities associated with this site; concerns re: the setting of an unfavourable signage precedent within an ACA and proximate to Protected Structures; non-compliance with development management policy on signage in ACA's and near Protected Structures; and, the specifics of the site's planning (compliance) history.
- 10.2.3. The grounds of appeal provide a rebuttal of the PA refusal reasoning (as ratified by the DAU) on the basis that the proposal does not constitute a standard/ typical corporate Aldi totem sign, with examples of such bespoke signage being previously accepted by PA's/ the Commission on other sensitive Aldi sites in Ardee, Cashel and Kildare. It is argued that the proposed sign is non-standard in terms of its form, height and width and has been designed to respond appropriately to its heritage context, location within an ACA and to its proximity to a number of Protected Structures whilst also enlivening the streetscape. In respect to the PA's view that the proposal would negatively impact on the character of, and visual relationship between, the nearby Protected Structures, the appellant highlights the significant separation distance and intervening features between same which break the line of sight and significantly mitigate the proposal's impact. They also seek to draw the Commission's attention to the erosion in this visual link/ relationship that has arisen from the grant of permission under ABP-313836-22, to the related alteration in the character of the area and, related diminution in the sensitivity of the site context.

Application Scheme as Originally Lodged

- 10.2.4. I note that in respect to totem signs, Table 14.25 (Guidance for Signage on Protected Structures or within ACAs) provides that due to the overly large size of this type of signage it is not acceptable within an ACA or within the curtilage of a Protected Structure.

- 10.2.5. I do not believe that the form or height (i.e. internally illuminated double sided totem sign (comprised of 2 no. elements) of 2m in width and 3.42m in height) of the proposed totem sign would give rise to a negative visual impact on the character of the area, on the character and setting of the ACA or, on the Protected Structures of St. Patrick's Church of Ireland Church (RPS No. 508), the Old Vicarage (RPS No. 863) or the 19th century vernacular house (RPS No. 798) or to visual clutter. This is on account of the siting of the proposed sign on a busy urban road, adjoining an existing bus stop and, next to a single-storey flat roofed substation building of a similar height in a corner of the site with significant existing and proposed soft landscaping. It is my opinion that these features would cumulatively act to significantly mitigate the visibility and visual impact of the sign when viewed from the streetscape within the ACA and also from the Protected Structures.
- 10.2.6. However, having considered the materiality and colour palette of the proposed sign (i.e. dark blue background with a lighter blue and white emblem all set within a yellow surround), I am of the opinion that such a multi-coloured totem sign would be jarring and visually incongruous against the muted natural tones provided by soft landscaping, existing trees and the permitted stone walls and store elevations – with these characteristics being an important component of the character of the ACA at this location (as acknowledged in the Conservation letter provided with the further first party response received 20/08/2025). I specifically draw the Commission's attention to the submitted photomontages which illustrate how the multi-coloured sign is at odds with, and fails to harmonise with, the stainless steel corporate signs on the stone boundary wall and storefront elevation as permitted by the compliance submission recently made in respect of Condition No. 4 on ABP-313836-22 (as provided by the appellant in their grounds of appeal).
- 10.2.7. Therefore, whilst I accept that the totem sign would be screened from view from the west and from the immediately neighbouring Protected Structure (Glebe House), the sign would be highly visible and prominent on approach to the site from the east along Turvey Avenue on account of its multi-coloured palette, with the potential to unacceptably detract from the character and appearance of the ACA. On this basis, I consider that the 'application scheme as originally lodged' would warrant a refusal of permission.

Amended Appeal Scheme

- 10.2.8. As per my comments above on the initial application proposal, I do not consider that the form or height of the totem sign proposed under the amended appeal scheme would give rise to a negative visual impact on the character of the area or on the ACA or Protected Structures for the reasons previously outlined. However, I do note that the downward revision proposed to the sign's height (by 500mm to 2.92m) under the amended appeal scheme would bring it more directly in line with the height (c. 2.85m) of the flat roof of the permitted c. 23.5 sq.m substation building located to its west which would help to further mitigate its visual impact.
- 10.2.9. Having considered the amended appeal scheme's proposal for a revised stainless steel materiality and mono-chrome muted colour palette (as per drawing No. PA 516 submitted with the grounds of appeal), I am of the view that it is comparatively more discreet and sensitively designed and would successfully harmonise with the character of the wall and elevational signage recently shown to have been permitted by compliance. In light of the foregoing, I am also satisfied that the modifications proposed to its colour, its scale and design of corporate branding would address my concerns in respect to the proposal detracting from the visual amenity and heritage/architectural character of the area. In light of these considerations, I also determine the amended appeal scheme (which provides for a non-standard totem sign and corporate branding which is more bespoke to the site context) to be acceptable and compliant with Objective DMSO10, Objective DMSO188, and Table 14.25 of the Fingal Development Plan which seek to, inter alia, ensure that corporate logos (designs and colours) are not used at the expense of the streetscape, ACAs or Protected Structures and that all planning applications for signage within an Architectural Conservation Area have regard to the Guidelines outlined in Table 14.25.
- 10.2.10. Furthermore, whilst I note that the sign is proposed to be internally illuminated and, as such, will be visible at night against its dark background on the approach to the east, I consider that the visual impact of its illumination will be fleeting and is acceptable given the sign's proximity to the Aldi store which will also be internally illuminated during store opening hours and which features extensive glazing on its northern elevation (and to a lesser extent) eastern elevation. The proposed signage lighting is acceptable on this basis. Notwithstanding, in the interest of visual amenity, where the Commission are minded to grant permission, I consider that it would be

appropriate to attach a condition to ensure that the totem sign is not left illuminated outside of store opening hours.

10.3. Compliance with Condition

- 10.3.1. The PA's refusal reason no. 2 concerns the proposal giving rise to a material contravention of *Condition No. 4 (b) attached to the parent permission (ABP-313836-22) which states that "No advertisement or advertisement structure (other than that permitted under Condition 4(a) above) shall be erected or displayed on the building or DRS Unit or within the curtilage of the site, in such a manner as to be visible from outside the building, unless authorised by a further grant of planning permission"*. The reasoning provided by the PA specifically states that this condition *"restricted signage to solid steel lettering affixed directly to the building façade and entrance, and explicitly prohibited the erection of other advertisement structures within the curtilage of the site"*.
- 10.3.2. The PA's Conservation Officer (in their report dated 23/05/2025) recommended a refusal of permission, citing the proposal's non-compliance with the signage permitted under Condition No. 4(a) attached to ABP-313836-22 in their reasoning for same.
- 10.3.3. The appellant contends that the wording of Condition No. 4 allows for revised signage proposals where same are authorised by a further grant of permission and that the PA failed to take account of this proviso in their assessment of the proposal. They also note that in the event that the Commission grant permission for the amendment proposal, this grant would supersede Condition No. 4 of ABP-313836-22 as was the case for recent amendment applications (which related to opening hours and roof level plant) in respect of the same parent permission (details in Section 4.1 of this report).
- 10.3.4. Having reviewed the planning history which relates to the appeal site together with the wording of Condition No. 4 attached to ABP-313836-22, I note that part (a) related specifically to the nature, extent and siting of signage proposed under P.A. Ref. F21A/0708 & ABP-313836-22 and, I am satisfied that the wording of part (b) of the condition explicitly allows for the erection or display of additional advertisements and advertisement structures where these are authorised by a further grant of permission (i.e. by the PA or the Commission) and does not prohibit or preclude an applicant from applying for same. For this reason, I do not agree with the PA's refusal reason no. 2.

- 10.3.5. Notwithstanding the inherent flexibility in the wording of Condition No. 4, I note that the Architectural Design Statement submitted in respect to the parent permission provided that, because of the site's location within an ACA, signage on the building and in its grounds would be kept to a minimum with no totem signage being proposed and the store name instead being displayed on the building's façade and site entrance. On this basis, I am cognisant that the reasoning for the Commission's application of the condition in the first instance was to "*ensure that advertising signs are kept to a minimum and designed to respect the location of the site within and Architectural Conservation Area*" and this has informed my assessment of the proposal under Section 9.2 of this report.
- 10.3.6. Furthermore, given that Condition No. 4 relates to the totality of the signage on the site as permitted under ABP-313836-22 (which did not include a totem sign), I do not agree with the appellant's view that, where the Commission are minded to grant permission for the proposal, a grant of permission in respect of the totem signage (as per the statutory notices) would supersede this condition and it is also my view that the condition would continue to apply to the overall development.
- 10.3.7. The PA's planning report also states that the elevation drawings submitted in respect of the current application show signage affixed to the supermarket building which does not reflect the nature, extent and materiality of the signage permitted under Condition No. 4 attached to ABP-313836-22. I note that the appellant states that this matter has been addressed as part of the revised wall/ elevation signage proposals that have been recently approved by the PA by way of the compliance process. However, there is no evidence on file to substantiate this statement. Notwithstanding, I do not consider that this matter would preclude me from making a decision on the current appeal having regard to the detail available on the nature and extent of signage that was deemed acceptable to the PA and Commission under the parent permission.

10.4. **Traffic Safety/ Access**

- 10.4.1. Notwithstanding its roadside location on the right side of the vehicular access to the site off Turvey Avenue, I note that the PA's Transportation Planning Section (in their report dated 25/05/2025) cited no objection to proposal on the grounds that the proposed totem sign is not located within the required/ permitted visibility splays and does not impact on the proposed access to the site. Having considered the information

on file, I am also satisfied that the proposal would not give rise to any access/ traffic safety issues for the same reasons.

11.0 AA Screening

11.1. In accordance with Section 177U of the Planning and Development Act 2000 (as amended) and on the basis of the information considered in this AA screening, I conclude that the proposed development individually or in combination with other plans or projects would not be likely to give rise to significant effects on European Sites, specifically Malahide Estuary SPA (Site Code 004025), Malahide Estuary SAC (Site Code 000205), Rogerstown Estuary (Site Code SPA 004015), Rogerstown Estuary SAC (Site Code 000208), North-West Irish Sea SPA (Site Code 004236) and Rockabill to Dalkey Island SAC (Site Code 003000), in view of these sites' Conservation Objectives, and Appropriate Assessment (and submission of an NIS) is not therefore required.

11.2. This determination is based on:

- The relatively minor nature of the development.
- The location-distance from the nearest European Site and lack of connections.
- Taking into account the appropriate assessment screening undertaken by the PA.

11.3. I conclude that, on the basis of objective information, the proposed development would not have a likely significant effect on any European Site, either alone or in combination with other plans or projects.

11.4. Likely significant effects are excluded and therefore Appropriate Assessment (Stage 2) (under Section 177V of the Planning and Development Act 2000) is not required.

12.0 Recommendation

I recommend a GRANT of permission subject to the following conditions.

13.0 Reasons and Considerations

Having regard to the zoning of the site, ‘TC – Town and District Centre’ with the objective ‘Protect and enhance the special physical and social character of town and district centres and provide and/or improve urban facilities’, to the site’s planning history and, also to the planning policies, objectives and development standards of the Fingal Development Plan 2023-2029, the nature, scale and design of the proposed development relative to adjoining dwellings, Protected Structures and Newbridge House Demense and The Square Architectural Character Area and to the existing pattern of development in the wider area, it is considered that subject to compliance with the conditions set out below, the proposed development is an acceptable form of development at this location, would not seriously injure the amenities of adjoining properties, and would therefore, be in accordance 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 received by An Bord Pleanála on the 06th June 2025 and 20th August 2025, 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>
	<p>The totem signage hereby permitted shall only be illuminated during the permitted hours of trading (between 0800 and 2200 hours Mondays to Saturdays and between 0900 and 2100 hours on Sundays and bank holidays) and should not be illuminated outside these hours.</p> <p>Reason: In the interest of visual amenity.</p>
3.	<p>Apart from any departures specifically authorised by this permission, the development shall comply with the conditions of the parent permission [Register</p>

	<p>Reference ABP-313836-22 as subsequently amended by P.A. Ref. F24A/0877E and P.A. Ref. F25A/0196E] unless the conditions set out hereunder specify otherwise. This permission shall expire on the same date as the parent permission.</p> <p>Reason: In the interest of clarity and to ensure that the overall development is carried out in accordance with the previous permission.</p>
4.	<p>The developer shall pay to the planning authority a financial contribution in respect of public infrastructure and facilities benefiting development in the area of the planning authority that is provided or intended to be provided by or on behalf of the authority in accordance with the terms of the Development Contribution Scheme made under section 48 of the Planning and Development Act 2000, as amended. The contribution shall be paid prior to commencement of development or in such phased payments as the planning authority may facilitate and shall be subject to any applicable indexation provisions of the Scheme at the time of payment. Details of the application of the terms of the Scheme shall be agreed between the planning authority and the developer or, in default of such agreement, the matter shall be referred to An Bord Pleanála to determine the proper application of the terms of the Scheme.</p> <p>Reason: It is a requirement of the Planning and Development Act 2000, as amended, that a condition requiring a contribution in accordance with the Development Contribution Scheme made under section 48 of the Act be applied to the permission.</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.

Emma Gosnell

Planning Inspector

11th September 2025

Appendix 1

Form 1 - EIA Pre-Screening

Case Reference	ABP-322720-25
Proposed Development Summary	Amendments to F21A/0708 (ABP Ref. 313836-22). Erection of signage with all associated site works.
Development Address	Lands at Turvey Avenue, Donabate, Co. Dublin
	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.	
<input 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 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.	
<input type="checkbox"/> Yes, the proposed development is of a Class and meets/exceeds the threshold. EIA is Mandatory. No Screening Required	
<input checked="" 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)	Part 2, Class 10(b)(iv) - Urban development – 10 hectares (built-up area). Site is c. 0.66ha.

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: _____

Form 2 - EIA Preliminary Examination

Case Reference	ABP-322720-25
Proposed Development Summary	Amendments to F21A/0708 (ABP Ref. 313836-22). Erection of signage with all associated site works.
Development Address	Lands at Turvey Avenue, Donabate, Co. Dublin
This preliminary examination should be read with, and in the light of, the rest of the Inspector's Report attached herewith.	

<p>Characteristics of proposed development</p> <p>(In particular, the size, design, cumulation with existing/ proposed development, nature of demolition works, use of natural resources, production of waste, pollution and nuisance, risk of accidents/disasters and to human health).</p>	<p>The development is for signage and related works and it comes forward as a standalone project, and it does not involve the use of substantial natural resources, or give rise to significant risk of pollution or nuisance. The development, by virtue of its type, does not pose a risk of major accident and/or disaster, or is vulnerable to climate change. It presents no risks to human health.</p>
<p>Location of development</p> <p>(The environmental sensitivity of geographical areas likely to be affected by the development in particular existing and approved land use, abundance/capacity of natural resources, absorption capacity of natural environment e.g. wetland, coastal zones, nature reserves, European sites, densely populated areas, landscapes, sites of historic, cultural or archaeological significance).</p>	<p>The development is situated on a brownfield site (retail store under construction) located on Turvey Avenue, Donabate, Co. Dublin.</p> <p>The nearest watercourse, the Turvey River is located c. 700m to the south of the site. This waterbody provides a very indirect hydrological link to Broadmeadow Estuary, Malahide Bay and to the North-West Irish Sea. However, it is considered that there is no pathway from the appeal site to this river as per Section 10 of the Inspector's Report (AA Screening).</p> <p>The development is removed from sensitive natural habitats, dense centres of population and designated sites identified significance in the County Development Plan.</p> <p>The site's located within the Newbridge House Demense and The Square ACA and within a sensitive, coastal landscape character area is dealt with as part of the Planning Assessment in the main body of the Inspector's Report.</p>
<p>Types and characteristics of potential impacts</p> <p>(Likely significant effects on environmental parameters, magnitude and spatial extent, nature of impact, transboundary, intensity and complexity, duration, cumulative effects and opportunities for mitigation).</p>	<p>Having regard to the nature of the proposed development, its location removed from sensitive habitats/ features; likely limited magnitude and spatial extent of effects; and, absence of in combination effects, there is no potential for significant effects on the environmental factors listed in section 171A of the Act.</p>
<p>Conclusion</p>	
<p>Likelihood of Significant Effects</p>	<p>Conclusion in respect of EIA</p>

There is no real likelihood of significant effects on the environment.	EIA is not required.
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Inspector: _____ Date: _____

DP/ADP: _____ Date: _____

(only where Schedule 7A information or EIAR required)

Appendix 2 – AA Screening Determination

Screening the need for Appropriate Assessment: Screening Determination (Stage 1, Article 6(3) of Habitats Directive)

I have considered the proposal for the erection of signage and works at Turvey Avenue, Donabate, Co. Dublin in light of the requirements S177U of the Planning and Development Act 2000 as amended.

The subject site is located:

- c. 1km from Malahide Estuary SPA (Site Code 004025)
- c. 1km from Malahide Estuary SAC (Site Code 000205)
- c. 1.3km from Rogerstown Estuary (Site Code SPA 004015)
- c. 1.3km from Rogerstown Estuary SAC (Site Code 000208)
- c. 2.8km from North-West Irish Sea SPA (Site Code 004236)
- c. 5.6km from Rockabill to Dalkey Island SAC (Site Code 003000)

No nature conservation concerns were raised in the planning appeal.

Having considered the nature, scale and location of the project, I am satisfied that it can be eliminated from further assessment because it could not have any effect on a European Site.

The reason for this conclusion is as follows:

- Small scale nature of works/ development
- Location-distance from nearest European site and lack of connections
- Taking into account screening report/determination by PA

I conclude, on the basis of objective information, that the proposed development would not have a likely 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 (under Section 177V of the Planning and Development Act 2000) is not required.

Appendix 3

Screening the need for Water Framework Directive Assessment Determination

The appeal site is located at Turvey Avenue, Donabate, Co. Dublin.

The nearest watercourse, the Turvey River is located c. 700m to the south of the site. This waterbody provides a very indirect hydrological link to Broadmeadow Estuary, Malahide Bay and to the North-West Irish Sea.

The proposal is for the erection of signage and related works – see Section 2.0 of Inspector's Report for further details.

No water deterioration concerns were raised in the planning appeal.

I have assessed the proposal for permission (described above) on this brownfield site at Donabate, Co. Dublin and have considered the objectives as set out in Article 4 of the Water Framework Directive which seek to protect and, where necessary, restore surface and ground water waterbodies in order to reach good status (meaning both good chemical and good ecological status), and to prevent deterioration.

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 surface and/or groundwater water bodies either qualitatively or quantitatively.

The reason for this conclusion is as follows:

- The de-minimus small scale nature and scale of the proposal.
- The location-distance from nearest water bodies and/ or lack of hydrological connections.

Conclusion

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.