



Development	Construction of telecommunication structures
Location	Block A2 - Claremont, Howth Road, Howth, Dublin 13, D13 VEY6
Planning Authority	Fingal County Council
Planning Authority Reg. Ref.	F25A/1112E
Applicant(s)	Independent Site Management Limited
Type of Application	Permission
Planning Authority Decision	Refuse Permission
Type of Appeal	First Party Normal Planning Appeal
Appellant(s)	Independent Site Management Limited
Observer(s)	None
Date of Site Inspection	25/05/26
Inspector	Darragh Ryan

1.0 Site Location and Description

- 1.1. The subject site is located at Block A2 – Claremont, Howth Road, Howth. The site is the rooftop of this Block. Claremont is an apartment complex, mixed use development comprising four blocks with part-basement, lower ground, and up to seven storeys of apartments resulting in 8 storeys over basement levels. The site is on the approach into Howth village and opposite Howth Castle. The development accommodates 512 residential units alongside retail, restaurant/café uses, and a creche. The complex is located in a predominantly residential area with convenient access to local amenities, including shops, schools, and public transport links.

2.0 Proposed Development

- 2.1. The proposed installation comprises 18 telecommunication antennas, six dishes, three equipment cabinets, and all associated infrastructure on the building's rooftop. This installation is designed to provide high-speed wireless data and broadband services, supporting all three of Ireland's primary mobile operators: Eircom (T/A Eir), Three Ireland, and Vodafone Ireland. The intention is to significantly enhance the local voice and wireless network infrastructure, ensuring improved service delivery for both residents and businesses within the Howth area.

3.0 Planning Authority Decision

3.1. Fingal County Council issued a Decision to refuse permission

It is considered that the proposed development given the proliferation of telecommunication infrastructure proposed would be unduly dominant having regard to the height of the building and its prominence and location on the Howth Rod and approach into and out of Howth village.

Objective IU053 of the Fingal Development Plan 2023 – 2029 seeks to ensure a high quality design of masts, towers, antennae and other such telecommunications infrastructure in the interests of visual amenity and the protection of sensitive landscapes in the County; and it is considered the proposal would give rise to a significant negative visual impact upon this highly sensitive coastal landscape of exceptional value. It is considered that the proposed telecommunication structures on various locations of the rooftop would be

detrimental to the visual amenities of the area, contrary to objectives DMS0224, GINH058 and GINH059 of the Fingal Development Plan 2023 – 2029 and as such contrary to the proper planning and sustainable development of the area.

3.2. Planning Authority Reports

- 3.2.1. The overall site borders the Howth Castle Architectural Conservation Area (ACA) and Howth Historic Core ACA. ACA designation places a level of protection on the exterior of buildings which positively contribute to the character of the area. Block A2 is visible from the grounds of St. Marys Church and in the framed view northwards from the entrance of the church gates which is a protected view. The Claremont development, in particular Block A is very prominent in the approach into Howth village and the cul-de-sac leading up to St. Mary's Church.
- 3.2.2. There is significant concern in relation to the visual impact of the proposal would have upon the visual amenity of the area. Objective IU 053 of the FDP 2023 – 2029 seeks to “ensure a high-quality design of masts, towers, antennae and other such telecommunications infrastructurein the county”. It is considered the proposed development would be unduly dominant having regard to the open nature of the site, the height of the building and its prominence in the approach into and out of the village of Howth.
- 3.2.3. A refusal of permission was recommended based on the above.
- 3.2.4. Other Technical Reports
- Transportation Department – no objection to the proposal
 - Conservation Officer - In the Conservation Office's report on SHD/009/19 it was expressly asked that no additional plant, antenna or other structures are to be added to the roofs from what is shown on the submitted drawings. The current proposal seeks add 18 antenna which is a considerable number of additional elements and places them directly against the south and north elevations of Block A2 in the most visually prominent locations. The chosen viewpoints submitted do not necessary demonstrate fully how impactful the addition of the antenna will be on the surrounding environment, including the protected structure of St. Mary's Church,

the entry and exit route to it and Howth Castle and potential views from the new amenity area of the reclaimed land to the west of the West Pier, permitted under F21A/0368. There is a direct visual impact on St. Mary's Church. It is not appropriate for the height of Block A2 to be increased further by the addition of plant onto it. The placement of antenna directly onto the front building line of the main elevation breaks the uniformity of the cohesive design of the Claremont development and diminishes the architectural quality of the scheme. The Conservation Office does not deem the current proposal appropriate or acceptable.

3.3. **Prescribed Bodies**

None

3.4. **Third Party Observations**

None

4.0 **Planning History**

4.1.1. SHD/009/19 (ABP-306102-19)

Permission was granted for the provision of a mixed-use scheme to complement and enhance the existing mix of uses in the village centre containing 512 residential units, creche, commercial units, café.

Condition no 14

No additional development shall take place above roof parapet level, including lift motor enclosures, air handling equipment, storage tanks, ducts or other external plant, telecommunication aerials, antennas or equipment, unless authorised by a further grant of planning permission.

5.0 **Policy Context**

5.1. **Fingal County Development Plan 2023 – 2029**

- Objective IU048 - High-quality ICT Network and Appropriate Telecommunications Infrastructure

Promote and facilitate the provision of a high-quality ICT network and appropriate telecommunications infrastructure in accordance with the Fingal Digital Strategy 2020-23 (and any subsequent plan), and to support broadband connectivity and other innovative and advancing technologies within the County, whilst protecting the amenities of urban and rural areas

- Objective IU053 - High-quality Design of Telecommunications Infrastructure Ensure a high-quality design of masts, towers, antennae and other such telecommunications infrastructure in the interests of visual amenity and the protection of sensitive landscapes in the County'.

- Objective DMS0222 - Co-Location of Antennae

Requires the co-location of antennae on existing support structures and where this is not feasible require documentary evidence as to the non-availability of this option in proposals for new structures.

- Objective DMS0223 - Location of Telecommunications Based Services

Encourage the location of telecommunications-based services at appropriate locations within the County, subject to environmental considerations and avoid the location of structures in fragile landscapes, in nature conservation areas, in highly sensitive landscapes and where views are to be preserved.

- Objective DMS0224 - Applications for Telecommunications Structures

Require the following information with respect to telecommunications structures at application stage:

- Demonstrate compliance with Telecommunications Antennae and Support Structures - Guidelines for Planning Authorities issued by the Department of the Environment 1996 and Circular Letter PL 07/12 issued by the Department of the Environment and Local Government (as may be amended), and to other publications and material as may be relevant in the circumstances; D
- Demonstrate the significance of the proposed development as part of a national telecommunications network;
- Indicate on a map, the location of all existing telecommunications structures within a 2 km radius of the proposed site, stating reasons why (if not

proposed) it is not feasible to share existing facilities having regard to the Code of Practice on Sharing of Radio Sites issued by the Commission for Communications Regulations.

- The degree to which the proposal will impact on the amenities of occupiers of nearby properties, or the amenities of the area (e.g. visual impacts of masts and associated equipment cabinets, security fencing treatment etc.) and the potential for mitigating visual impacts including low and mid-level landscape screening, tree-type masts being provided where appropriate, colouring or painting of masts and antennae, and considered access arrangements.
- Ensure that when such licences are sought nearby property owners and occupiers are made aware of the application prior to Fingal County Council or An Bord Pleanála agreeing the licence
- Objective DMS0228 - Design of New Utility Structures

Require new utility structures such as electricity substations and telecommunication equipment cabinets to be of a high quality design and to be maintained to a high standard by the relevant service provider

- Policy GINHP25 - Preservation of Landscape Types

Ensure the preservation of the uniqueness of a landscape character type by having regard to the character, value and sensitivity of a landscape when determining a planning application.

- Objective GINH058 - Sensitive Areas

Resist development such as houses, forestry, masts, extractive operations, landfills, caravan parks, and campsites, and large agricultural/horticulture units which would interfere with the character of highly sensitive areas or with a view or prospect of special amenity value, which it is necessary to preserve.

- Objective GINH059 - Development and Sensitive Areas

Ensure that new development does not impinge in any significant way on the character, integrity and distinctiveness of highly sensitive areas and does not detract from the scenic value of the area.

New development in highly sensitive areas shall not be permitted if it:

- Causes unacceptable visual harm.
- Introduces incongruous landscape elements.
- Causes the disturbance or loss of (i) landscape elements that contribute to local distinctiveness, (ii) historic elements that contribute significantly to landscape character and quality such as field or road patterns, (iii) vegetation which is a characteristic of that landscape type and (iv) the visual condition of landscape elements.

5.2. Relevant National or Regional Policy / Ministerial Guidelines

5.2.1. National Policy Objective 24 - support and facilitate delivery of the National Broadband Plan.

5.2.2. Regional, Spatial and Economic Strategy for the Northern and Western Regional Assembly (RSES):

The weakness/absence of high-quality telecommunications infrastructure is identified as being an important issue for the region (see page 232 RSES).

5.2.3. 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.

5.2.4. Telecommunications Antennae and Support Structures, Guidelines for Planning Authorities, 1996 (Department of the Environment and Local Government):

The Guidelines provide relevant technical information in relation to installations and offer guidance on planning issues so that environmental impact is minimised and a consistent approach is adopted by Planning Authorities. Visual impact is noted as among the most important considerations in assessing applications for telecommunications structures but the Guidelines also note that generally, applicants

have limited locational flexibility, given the constraints arising from radio planning parameters. The Guidelines place an emphasis on the principle of co-location.

Section 4.3 'Visual Impact', provides that, *'only as a last resort should free-standing masts be located within or in the immediate surrounds of smaller towns or 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. The support structure should be kept to the minimum height consistent with effective operation'*. Section 4.3 also states, *'only as a last resort, and if the alternatives are either unavailable or unsuitable, should free-standing masts be located in a residential area or beside schools. If such a location should become necessary, sites already developed for utilities should be considered and masts and antennae should be designed and adapted for the specific location. The support structures should be kept to the minimum height consistent with effective operation and should be monopole (or poles) rather than a latticed tripod or square structure'*.

Section 4.3 also notes that some masts will remain quite noticeable in spite of the best precautions and that the following considerations may need to be taken into account, specifically, whether a mast terminates a view; whether views of the mast are intermittent and incidental, and the presence of intermediate objects in the wider panorama (buildings, trees etc).

5.2.5. Circular Letter PL 03/2018

Circular Letter PL 03/2018, dated 3rd July 2018 provides a revision to Chapter 2 of the Development Contribution, Guidelines for Planning Authorities, 2013, and specifically states that the waiver provided in the Development Contribution, Guidelines for Planning Authorities, 2013 should apply not only to the provision of broadband services but also to mobile services.

5.2.4 Circular Letter PL 07/12

Circular Letter PL 07/12, dated 19th October 2012, sets out to revise Sections 2.2. to 2.7 of the 1996 Guidelines. The Circular was issued in the context of the rollout of the next generation of broadband (4G). It advises Planning Authorities to:

- Cease attaching time limiting conditions to telecommunications masts, except in exceptional circumstances;
- Avoid inclusion in development plans of minimum separation distances between masts and schools and houses;
- Omit conditions on planning permission requiring security in the form of a bond/cash deposit;
- Reiterates advice not to include monitoring arrangements on health and safety or to determine planning applications on health grounds;
- Future development contribution schemes to include waivers for broadband infrastructure provision

5.3. Natural Heritage Designations

- Baldoyle Bay Special Area of Conservation (SAC 000199)
- North West Irish Sea Special Protection Area (004236)

6.0 EIA Screening

- 6.1. The proposed development does not fall within a class of development set out in Part 1 or Part 2 of Schedule 5 of the Planning and Development Regulations, 2001, (as amended), and therefore is not subject to EIA requirements.

7.0 The Appeal

7.1. Grounds of Appeal

This is a first party appeal against the decision of Fingal County Council to refuse permission for the erection of 18 communications antennae at a rooftop location.

- The applicant has set out a justification for the development. The operators Three Ireland limited, Eircom Limited and Vodafone Ireland limited have each provided additional technical justification including reference to coverage maps. The proposed site is to provide coverage to a significant area where there would be high demand for wireless communications services for residents and businesses in this area. The proposal is designed to address significant gaps in mobile coverage in Howth and surrounding areas.
- The proposal as set out is in accordance with Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities (1996). Alternative locations were examined as potential alternative sites to the development. This was submitted as part of a Discounted Structures Assessment and evaluated existing telecommunication structures and potential sites within the search area. This assessment considered established masts, rooftop locations and other suitable tall structures. No alternative sites were viable due to structural limitations, lack of available space, technical infeasibility, insufficient elevation and inadequate coverage potential.
- Regarding visual impact, a level of visual impact can be expected given the height of the building. While the antenna will be visual from public and private perspective it is not considered that they will be dominant or overly intrusive from the views of residents. A degree of visual impact is inevitable owing to the height of the structures. It is not always possible to find and secure a site which meets the preferred locational requirements of the regulatory system and therefore as the guidelines allow there are occasions where development within a residential area may be permissible. The site adjoins an ACA and is near a protected structure but does not involve works to any protected structure nor does it alter or obscure protected views. The equipment is read against an existing modern building and

does not compete with or diminish the architectural character of Howth Castle, St Mary's Church or other nearby protected structures.

7.2. **Planning Authority Response**

The Planning Authority issued a response to the appeal on the 25th of March 2026 as follows:

The PA remain of the opinion that the proposed development by reason of the excessive amount of telecommunication infrastructure proposed on a rooftop location in a highly sensitive landscape in a prominent location given the height of the building, will give rise to a detrimental negative impact upon the visual

7.3. **Observations**

Department of Housing, Local Government & Heritage

The proposed development borders Howth Castle Architectural Consideration Area and Howth Historic Core Architectural Conservation Area. The proposal is also in the vicinity of a number of protected structures.

The Department concurs with recommendations of the Planning Authority and Conservation Officer.

8.0 **Assessment**

8.1. Having examined the application details and all other documentation on file, including the appeal, and having inspected the site and having regard to the relevant national and local policy guidance, I consider the main issues in relation to this appeal are as follows:

- Principle of Development/ Need for the structure – Co-location
- Visual Impact
- Appropriate Assessment

8.2. Principle of Development/ Need for the structure – Co-location

While not raised as a ground of appeal, the appropriateness of the site's location is a key consideration in assessing the visual impact and overall acceptability of the development. The applicant has provided substantial justification for the provision of the telecommunications infrastructure, citing compliance with both local and national policy.

- 8.2.1. The proposed development consists of 18 shrouded antennas and six transmission dishes, equipment cabinets mounted on the rooftop of Block A2 - Claremont, Howth Road, Howth, Dublin 13. The highest point of the existing building is 28.25m, with the antennas increasing the overall height by 2.950m. The majority of the equipment is located to the rear (North) of Block A2 with only one of the three operators positioned at the front of the property. The equipment cabinets and link dishes are also situated to the rear of Block A2. These structures, dispersed across the roof, serve three different telecommunications operators. All antennas are shrouded and finished in a neutral colour to mitigate visual intrusion. The Planning Authority refused permission on the basis of visual amenity concerns, citing conflict with Policy Objective IU053 of the Fingal Development Plan 2023 – 2029 .
- 8.2.2. The applicant has submitted a site justification form, supported by coverage mapping, demonstrating a need for the infrastructure. The area targeted for coverage includes the residential neighbourhoods within Howth, extending westwards towards Sutton, as well as nearby businesses. Radio engineers' coverage maps indicate that current area surrounding the site has "poor" outdoor mobile coverage.
- 8.2.3. The site is zoned for "TC" – Town Centre under the Fingal Development Plan 2023 - 2029, with a zoning objective that allows for associated support services. Under this framework, public utility infrastructure, including telecommunications, is "open for consideration," provided it is appropriately scaled and sited. The principle of a telecommunications installation at this location is generally acceptable.
- 8.2.4. National policy on telecommunications infrastructure, as outlined in the Department of the Environment (DoE) guidelines, addresses key issues such as site selection, visual impact, and co-location. Relevant provisions in the Fingal County Development Plan include

8.2.5. Objective IU048 - High-quality ICT Network and Appropriate Telecommunications Infrastructure

Promote and facilitate the provision of a high-quality ICT network and appropriate telecommunications infrastructure in accordance with the Fingal Digital Strategy 2020-23 (and any subsequent plan), and to support broadband connectivity and other innovative and advancing technologies within the County, whilst protecting the amenities of urban and rural areas

8.2.6. Objective IU053 - High-quality Design of Telecommunications Infrastructure Ensure a high-quality design of masts, towers, antennae and other such telecommunications infrastructure in the interests of visual amenity and the protection of sensitive landscapes in the County'.

8.2.7. Objective DMS0222 - Co-Location of Antennae

Requires the co-location of antennae on existing support structures and where this is not feasible require documentary evidence as to the non-availability of this option in proposals for new structures

8.2.8. The applicant has undertaken a comprehensive site selection process in accordance with national guidance. Alternative sites within the designated search ring were considered but deemed unsuitable due to distance or insufficient building height. The Telecommunications Antennae and Support Structures Guidelines (1996) recommend that free-standing masts should only be deployed in residential areas as a last resort, where no alternative sites exist. In this case, the development involves rooftop-mounted antennas rather than a stand-alone mast. Furthermore, the existing installation accommodates multiple operators, thereby aligning with national and local policy objectives that promote co-location.

8.2.9. With respect to residential amenity, there are no statutory separation distances between telecommunications structures and residential or educational buildings. The DoECLG Circular Letter PL07/12 advises against rigid separation distances, as such restrictions may unduly limit the availability of suitable sites and undermine network functionality. The flexible approach advocated in national guidance supports the view that the proposed development is appropriately sited.

8.2.10. The principle of providing telecommunications infrastructure at this location is in accordance with both national and local policy objectives. The applicant has provided sufficient justification for the development in terms of network coverage requirements, site selection, and compliance with co-location policies. On balance, the site is considered appropriate for telecommunications infrastructure, contributing to essential network improvements while aligning with Policy Objective IU048 and Objective DMS 0222 and national guidelines.

8.3. Visual Impact

Fingal Council refused the application on the basis that the proposed development would be unduly dominant having regard to the height of the building and its prominence and location on the Howth Rod and approach into and out of Howth village. I note the report on file from the Conservation Officer of Fingal County Council which states:

The chosen viewpoints submitted do not necessary demonstrate fully how impactful the addition of the antenna will be on the surrounding environment, including the protected structure of St. Mary's Church, the entry and exit route to it and Howth Castle and potential views from the new amenity area of the reclaimed land to the west of the West Pier, permitted under F21A/0368. There is a direct visual impact on St. Mary's Church. It is not appropriate for the height of Block A2 to be increased further by the addition of plant onto it. The placement of antenna directly onto the front building line of the main elevation breaks the uniformity of the cohesive design of the Claremont development and diminishes the architectural quality of the scheme.

8.3.1. The applicant submits that while the antenna will be visual from public and private perspective it is not considered that they will be dominant or overly intrusive from the views of residents. A degree of visual impact is inevitable owing to the height of the structures. It is not always possible to find and secure a site which meets the preferred locational requirements of the regulatory system and therefore as the guidelines allow there are occasions where development within a residential area may be permissible. The site adjoins an ACA and is near a protected structure but does not involve works to any protected structure nor does it alter or obscure protected views. The equipment is read against an existing modern building and

does not compete with or diminish the architectural character of Howth Castle, St Mary's Church or other nearby protected structures.

- 8.3.2. Objective IU053 of the Fingal Development Plan 2023 – 2029 seeks to ensure a high quality design of masts, towers, antennae and other such telecommunications infrastructure in the interests of visual amenity and the protection of sensitive landscapes in the County. The planning authority considered the proposal contravened the proposal in this regard.
- 8.3.3. The development consists of shrouded antennae finished in a neutral colour, designed to minimise contrast with the building and mitigate visual impact. While the increased height of 2.992m alters the overall roof profile, design measures have been incorporated to reduce its prominence. The stated most notable visual impact as indicated by the Conservation Officer is Howth Castle and St Mary's Church. The applicant has further stated that the design is a balance between achieving maximising site coverage and visual impact, in this regard only 3 antennas are located on the front elevation facing Howth Road with the remainder located to the rear of Block 2.
- 8.3.4. I note the submission of photomontages as part of the application. The submission of the Department of Heritage did not consider the photomontages as provided to be comprehensive in detail. The visual impact assessment and photomontages provide an assessment of impact from the viewpoint of 8 different locations, with 3 viewpoints taken from the Howth Road and one viewpoint taken from St Mary's Church. I note that the antennas will be most prominent from view point 1 & 3 on Howth Road, which are within 200m from the site. The greater the distance from the site the visual impact will be negligible.

Regarding protected Structures and Architectural Conservation Areas, the site is not located within an any ACA or in the curtilage of any Protected Structures. However, the site borders Howth Castle Conservation Area and Howth Historic Core ACA.

The Planning Office cited 6 Protected Structures in the vicinity of the site as follows:

- RPS No 556 Howth Castle – 314m south of the site
- RPS No 557 Church (in ruins) Grounds of Howth Castle – 314m south of the site
- RPS No 558 Station Masters House, Harbour Road Howth
- RPS No 559 Howth Station Harbour Road Howth – 570m

- RPS no 594 St Mary's Church - 100m south of the site
- RPS No 595 Howth Harbour

No photomontages have been provided from within the building curtilage for any protected structure.

Regarding visual impact, I do not agree with the assessment of the conservation officer or planning office with regard to levels of impact. The construction of an 8 storey buildings along Howth Road is a significant intervention that has been through the planning process and has had an independent scrutiny around visual impact. On the basis of scale the additional antennas are not in my view significant. The impact on views has already occurred from the perspective of the Protected Structures. The nearest Protected Structure is St Mary Church and it is noted the entrance gate view northwards is a Protected View, however there is an extensive tree line between the Church and Howth Road. Having visited the site, I consider the view to be already interrupted by the view of a 28.25m tall building. I do not consider the additional antenna would detract significantly from the existing situation.

- 8.3.5. The development will be intermittently visible from several locations including Protected Structures within the surrounding area. However, it does not terminate any key views and is partially screened within a broader urban context. Importantly, the site is not located within an Architectural Conservation Area (ACA). The existing building is part of a mixed used development within an urban environment that has already been heavily modified, and as such, the rooftop infrastructure does not appear unduly intrusive or dominant within the landscape.
- 8.3.6. The use of shrouds in a neutral colour scheme aids in integrating the structures into the building's architectural profile. While the surrounding area is primarily residential, the ground floor uses of adjacent buildings are mixed-use development incorporating commercial, office, gym, and residential elements. While the telecommunications equipment is visible atop the building, it does not significantly detract from the residential amenity of the area and aligns with the broader urban character of the site.
- 8.3.7. Although the development results in a moderate visual impact, measures have been implemented to mitigate this effect. The consistent approach to the design and

finish of the equipment, particularly the shrouding, aligns with the upper storey of the building. National and local policy recognise telecommunications infrastructure as a critical public utility that supports both residential and business needs. The applicant has provided a detailed justification for the necessity of the infrastructure and has pursued a logical co-location strategy, minimising the need for additional standalone structures elsewhere.

8.3.8. While the development is visible, this impact must be considered in balance with:

- The demonstrated need for telecommunications infrastructure in the area.
- The zoning designation, which permits such infrastructure in principle.
- The design approach taken to reduce visual impact.

Having regard to the above considerations, I am satisfied that the visual impact of the development is not of such significance as to warrant refusal of planning permission. The proposal aligns with national and local policy objectives, and while some visual intrusion occurs, it is moderate and appropriately mitigated within the existing built environment. Overall, I consider the proposal is in keeping with Objective IU053 and Objective DMS0222 - Co-Location of Antennae of the Fingal Development Plan 2023 – 2029. I am satisfied that the visual impact is not so significant or harmful that it would warrant refusal of planning permission in this instance.

9.0 AA Screening

I have considered the proposed installation of communications antenna in light of the requirements S177U of the Planning and Development Act 2000 as amended. The subject site is located in a well-serviced suburban settlement c. 150m from the closest European site at Baldoyle Bay Special Area of Conservation (SAC 000199) and North West Irish Sea Special Protection Area (004236).

The proposed development comprises the installation of communications antenna to existing mixed use building and associated site development works as described in Section 2.0 of this report. 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:

- The limited scale and nature of works
- The location of the site within an established, serviced urban environment
- Lack of connections to nearest European sites

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.

10.0 Water Framework Directive

I have assessed the proposed development, on an established residential site 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. No water deterioration concerns were raised in the planning application or appeal.

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.

11.0 Recommendation

Having regard to the above, I recommend that permission be GRANTED for the proposed development, subject to conditions, for the reasons and considerations set out below.

12.0 Reasons and Considerations

It is considered that, subject to compliance with the conditions set out below, the proposed development is in accordance with the guidelines relating to telecommunications antennae and support structures which were issued by the Department of the Environment and Local Government to planning authorities in July, 1996, DoECLG Circular Letter PL07/12, Objective IU053 and Objective DMS0222 of the Fingal County Development Plan 2023 to 2029. It is considered that the development would not seriously, or disproportionately, injure the amenities of the area or of property in the vicinity, or detract to an undue degree from the visual amenities of the area and would, therefore, be in accordance with the proper planning and sustainable development of the area.

13.0 Conditions

1. The development shall be carried out and completed in accordance with the plans and particulars lodged with the application received by the planning authority on the 1st day of December 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.

Reason: In the interest of clarity.

2. In the event of the proposed structures becoming obsolete and being decommissioned, the developers shall, at their own expense remove the telecommunications structures and associated equipment.

Reason: In the interest of orderly development.

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

Reason: To clarify the nature and extent of permitted development to which this permission relates and to facilitate a full assessment of any future alterations.

5. The developer shall provide and make available on reasonable terms the proposed support structure for the provision of mobile telecommunications antenna of third party licenced telecommunications operators.

Reason: In the interest of avoidance of multiplicity of telecommunications structures in the area, in the interest of visual amenity and the proper planning and sustainable development of the area.

6. Details of a colour scheme for the shrouds and any ancillary structures hereby permitted shall be submitted to, and agreed in writing with the planning authority, prior to the commencement of development, and the agreed colour scheme shall be applied to the mast and any ancillary structures upon erection.

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

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

Darragh Ryan

Planning Inspector

18th of June 2026

Appendix 1: Form 1 EIA Pre-Screening

Case Reference	500870- DF-26
Proposed Development Summary	Construction of communication antenna
Development Address	Block A2 - Claremont, Howth Road, Howth, Dublin 13, D13 VEY6
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?	<input checked="" type="checkbox"/> Yes, it is a 'Project'. Proceed to Q.2.
	<input type="checkbox"/> No, No further action required.
(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)	
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	State the Class here

be requested. Discuss with
ADP.

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?

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.

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

No

Pre-screening determination conclusion remains as above (Q1 to Q3)

Inspector: _____

Date: _____