



An
Coimisiún
Pleanála

Inspector's Report

PL-501448-MO-26

Development	Erect a 30m high telecommunications lattice tower with antennas, dishes and associated equipment attached, and with equipment cabinets at ground level within a fenced compound together with construction of a culvert and extension to an existing access track.
Location	Gortbunacullin (TD), Srah, Co. Mayo.
Planning Authority	Mayo County Council.
Planning Authority Reg. Ref.	25460.
Applicant(s)	APW UK WIP Limited t/a Icon Tower.
Type of Application	Permission.
Planning Authority Decision	Grant Permission + Conditions.
Type of Appeal	Third Party Normal Planning Appeal.
Appellant(s)	Gortbunacullin.
Observer(s)	None.

Date of Site Inspection

20th August 2026

Inspector

C. Daly.

1.0 Site Location and Description

1.1. The subject site, of area 0.015ha., on part of the lower edges of the slopes of the Party Mountains, consists of some undulating grass covered ground and an elevated grass area where a telecoms tower is proposed. There is an existing agricultural gate entrance adjacent to the site and a stream adjacent to the south-east. The rural site adjoining sloping land and uplands agricultural land is accessed via a laneway which is c.1.9km west of the R300 regional road. The site is c.2.25km from Lough Mask which is to the south-east.

1.2. The mainly open grass landscape surrounding the site includes some scattered one-off dwellings to the south and east. The nearest dwelling is c.360m to the south-east and the next nearest is c.420m to the south. The bulk of the dwellings in the vicinity are located over 550m to the east, south-east and north-east in the townland of Gortbunacullin. The site is c.15.6km south-east of the urban edge of Westport and is c.17.8km from the southern built up edge of Castlebar town.

2.0 Proposed Development

2.1. The proposed development, in summary, consists of the following:

- Erect a 30 metre high telecommunications lattice tower with antennas, dishes and associated equipment attached.
- Equipment cabinets at ground level within a fenced compound.
- Construction of a culvert and extension to an existing access track.

3.0 Planning Authority Decision

3.1. Decision

3.1.1. Mayo County Council initially decided to request further information in relation to the submitted technical justification as it related to the analysis of existing sites and the structural limitations of Lough Mask Water Treatment Plant site and whether it can be assumed that this site would no longer be required if permission was granted.

3.1.2. Following F.I. the P.A. decided to grant permission subject to 9 no. conditions. Notable conditions include:

- Condition no. 2 states that the existing transmission infrastructure at Lough Mask Water Treatment site shall be decommissioned and removed off-site once this site is operational.
- Condition no. 3 states that the structure shall be capable of facilitating other operators regarding co-location.
- Condition no. 6 states that any future proposals for lighting shall be submitted for agreement.

3.2.Planning Authority Reports

- 3.2.1. The initial Planner's Report assessment noted the issue of co-location and the need for the development to be of particular relevance. It had concerns in relation to the justification submitted for the proposed development and its description of the discounted sites. It noted the distance from the nearest houses such that it considered there to be no adverse visual and residential amenity impacts. It noted the limited traffic that would be generated such that it considered there would be no adverse impacts in this regard.
- 3.2.2. The second Planner's Report in relation to the information received which was deemed significant noted the F.I. response. This noted that the existing Lough Mask Water Treatment Plant would be decommissioned when the proposed development is constructed and operational. It noted the updated technical justification which included the height limitations of the Lough Mask site, that the new site would enable the possibility of multi operator use and improved coverage for the Tourmakeady area for Three. It noted that it also outlined the poor coverage experienced by other operators in this area. It concluded by recommending that permission be granted subject to 9 no. condition.
- 3.2.3. Other Technical Reports
- None.

3.3.Prescribed Bodies

- Not applicable.

3.4.Third Party Observations

Two no. third party observations were received which can be summarised as follows:

- There would be adverse effects in relation to visual and residential amenities.
- The Lough Mask scenic route would be negatively impacted.
- The proposed development generally fails to comply with Development Plan policy.
- There is an absence of technical justification in the application, flaws in the justification and an excessive concentration of masts in the area.
- It has not been demonstrated that improved services for Tourmakeady would result with no clear line of sight.
- Impact on local habitats and the absence of Appropriate Assessment are major omissions.
- There is no EIA screening.
- There would be access and road safety issues and impacts on rights of way.
- Negative impact on tourism and walking routes.
- Health risks in relation to risks to humans and animals.
- Surface water runoff would negatively impact the surroundings.
- Negative impacts on local archaeology.
- There is an absence of information in relation to electrical power for the site.
- A full visual impact assessment including photomontages is required.
- A detailed co-location and alternatives analysis is required.
- There should be a technical justification for the mast height and siting.
- There should be enhanced screening, landscaping and design mitigation.

4.0 Planning History

Subject Site

None.

Wider Area

211194 Permission refused by the P.A. and refused on appeal (ABP-313137-22) at Gortfree, Tourmakeady, a site c.3.3km to the south, to erect a 30m lattice telecommunications support structure together with antennae, dishes and associated telecommunications equipment all enclosed in security fencing with a proposed access track.

ABP reason for refusal: Noting the location adjacent to commercial forestry and along a designated scenic route with designated views, notwithstanding the technical justification, the Board is not satisfied that it would not result in an obtrusive and incongruous form of development that would seriously injure the visual amenity of the area.

5.0 Policy Context

5.1. Mayo County Development Plan 2022-2028 (the CDP)

Volume 1

Chapter 2 – Core and Settlement Strategy

Section 2.3 Strategic Aims

Infrastructural Development - To protect, improve and provide water, wastewater, surface water and flood alleviation services throughout the county, and to facilitate the provision of high-quality information communication technology, broadband, telecommunication information and electricity network required to support and enhance the key aims of best place to live, work, visit and invest.

Chapter 7 – Infrastructure

Section 7.1 Strategic Aim

The strategic aim of this chapter is to protect, improve and provide water, wastewater, surface water and flood alleviation services throughout the county, and to facilitate the provision of high-quality information communication technology, broadband, telecommunication information and electricity network required to

support and enhance the key aims of best place to live, work, visit and invest and facilitate the transition to a low carbon and climate resilient society.

Section 7.4.4.4 Telecommunications

Mayo County Council recognises the essential need for high quality communications and information technology networks in assuring the competitiveness of the county's economy and increasing the quality of life of its people. The Council also recognises the need to balance the requirement to facilitate mobile telecommunications infrastructure in the county to address existing coverage blackspots and the need to protect residential, visual amenity, the natural environment and built environment. In considering proposals for telecommunications infrastructure, the Council will have regard to the Department of the Environment, Heritage and Local Government's "Telecommunications Antennae and Support Structures, Guidelines for Planning Authorities" 1996 and Circular Letter PL07/12 'Telecommunication Antennae and Support Structures' and any amendments thereof.

Telecommunications Policies

Policy INP 19 To support the delivery of telecommunication infrastructure in the county, having regard to the Government Guidelines 'Telecommunications Antennae and Support Structures- Guidelines for Planning Authorities' 1996 (DoEHLG), the 'Guidance on the potential location of overground telecommunications infrastructure on public roads', (Dept of Communications, Energy & Natural Resources, 2015) and Circular Letter PL 07/12 (as updated) and where it can be demonstrated that the development will not have significant adverse impacts on communities, public rights of way and on the built or natural environment, including the integrity of the Natura 2000 network.

Policy INP 20 To promote Mayo as a sustainable international destination for ICT infrastructures such as data centres and associated economic activities, at appropriate locations.

Telecommunications Objectives

Objective INO 32 To maximise and widely promote connectivity of Mayo based on building on existing ICT infrastructure and sub-sea fibre optic cables where possible.

Objective INO 33 *To encourage the location of any telecommunications structure, have regard to the Landscape Appraisal of County Mayo, and where possible, advise on a less intrusive location in areas where they are unlikely to intrude on the setting of, or views of/from national monuments or protected structures.*

Objective INO 34 *To maintain and update the council's register of approved ducting and telecommunication structures in the county, to assist in the assessment of future telecommunication developments. The Council will encourage co-location of antennae on existing support structures and require documentary evidence as to the non-availability of this option in proposals for new structures. The shared use of existing structures will be required where the numbers of masts located in any single area is considered to have an excessive concentration.*

INO 35 *To work with statutory undertakers to make the most efficient use of infrastructure in the delivery of broadband in the county, particularly encouraging the use of existing telecommunications ducting where it is available.*

Objective INO 36 *To actively engage with telecommunication service providers to help identify, improve and/or eliminate mobile phone signal blackspots within the county, including an examination of the feasibility and suitability of council owned lands/assets.*

Chapter 10 – Natural Environment

Policy NEP 14 *To protect, enhance and contribute to the physical, visual and scenic character of County Mayo and to preserve its unique landscape character.*

Objective NEO 25 *To consider applications for development, along Mayo's' Scenic routes, that can demonstrate a clear need to locate in the area concerned, whilst ensuring that it:*

- *Does not impinge in any significant way on the character, integrity and distinctiveness of the area.*
- *Meets high standards in siting and design.*
- *Contributes to and enhances local landscape character.*
- *Satisfies all other criteria, with regard to, inter alia, servicing, public safety and environmental considerations.*

Rural housing applications along Scenic Routes must comply with the requirements set out in Objective RHO 3 (Chapter 3).

Objective NEO 27 To ensure all development proposals are consistent with the Landscape Appraisal of County Mayo and the associated Landscape Sensitivity Matrix and future editions thereof.

Objective NEO 29 Require a Landscape/Visual Impact Assessment to accompany significant proposals, located within or adjacent to sensitive landscapes, where appropriate.

Per Map 10.1 the site is located in Policy Area 3A (Lakeland sub areas). In policy area 3, it notes that communication masts have a medium to high potential to create adverse impacts on the existing landscape character.

Per Map 10.2 (Scenic Routes and Views), the site is located c.2km west of a designated scenic view.

Volume 2

Section 8.10 Telecommunications

The Council recognises the importance of telecommunication infrastructure which is important in removing the peripheral barrier that the county experiences. It is also recognised that the location of telecommunication infrastructure is dictated by service provision and hence each application will be determined on its own merits. Planning applications relating to the erection of antennae and support structures shall be accompanied by:

- A reasoned justification as to the need for the particular development at the proposed location in the context of the operator's overall plans for the county having regard to coverage.*
- Details of what other sites or locations in the county were considered, and reasons why these sites or locations are not feasible.*
- Written evidence of site-specific consultations with other operators with regard to the sharing of sites and support structures. The applicants must satisfy the Council that a reasonable effort has been made to share installations. In situations where it not possible to share a support structure, the applicants will be encouraged to share a site or to locate adjacently so that masts and antennae may be clustered; and*

- *Detailed proposals to mitigate the visual impact of the proposed development, including the construction of access roads, additional poles and structures. Where possible they should be located so as to benefit from the screening afforded by existing tree belts, topography or buildings. On more exposed open sites, the Council may require an alternative design or colour finish to be employed, unless where its use is prohibited by reasonable technical reasons.*

5.2. National/Regional Plans/Policies

Climate Action Plan (CAP) 2025

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

Harnessing Digital. The Digital Ireland Framework.

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

National Planning Framework 'Project Ireland 2040' First Revision (April 2025)

- *National Policy Objective 31: Support and facilitate delivery of the National Broadband Plan as a means of developing further opportunities for enterprise, employment, education, innovation, and skills development for those who live and work in rural areas.*
- *National Policy Objective 62: In co-operation with relevant Departments in Northern Ireland, develop a stable, innovative and secure digital communications and services infrastructure on an all-island basis.*

National Development Plan 2021-2030

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

National Broadband Plan 2020

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

Regional, Spatial and Economic Strategy

Northern & Western Regional Assembly 2020-2032

- *Section 3.5: Telecommunication infrastructure is essential for accessing employment, education and healthcare lifelines.*

5.3. National Guidance

The following Ministerial Guidelines and Circulars are relevant:

- *Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities (1996)* (the Telecommunications guidelines).
- Circular Letter PL07/12 relates to Telecommunications Antennae and Support Structures Guidelines.
- Circular Letter PL 03/18 relates to Revision of Development Contribution Guidelines in respect of telecommunications infrastructure.

5.4. Natural Heritage Designations

In relation to designated sites, the subject site is located:

- c.2.1km north-west of Lough Mask SPA (site code 004062).
- c.2.1km north-west of Lough Carra/Mask Complex SAC and PNHA (site code 001774).
- c.5.7km east of Mweelrea/Sheeffry/Erriff Complex SAC and PNHA (site code 001932).
- c.6.3km west of Lough Carra SPA (site code 004051).

6.0 The Appeal

6.1. Grounds of Appeal

The grounds of the third party appeal on behalf of the Gortbunacullin Residents c/o Noel Gibbons, can be summarised as follows:

Inadequate Technical Assessment

- The F.I. concerns of the P.A. in relation to maximising the use of existing infrastructure at the Lough Mask Water Treatment Plant, effectively owned by the applicant, were not addressed with no evidence as to why the existing infrastructure and co-location could not be used.
- The concerns of the P.A. seem to have been addressed via assertion rather than evidence.
- The proposal seeks to relocate the infrastructure 1km further from Tourmakeady despite the presence of undulating terrain and no comparative propagation modelling, line of sight analysis, terrain corrected signal assessment or quantified before and after coverage data has been submitted to show improved service provision.
- The proposed site does not offer any substantial elevation advantage where the applicant has cited height and coverage limitations from the existing site.
- The applicant's F.I. confirmation that the Lough Mask site would be decommissioned contradicts the RF Technical Report claims that network overlap would be improved.
- The P.A. did not analyse the F.I. response and merely concluded that it adequately responded to its concerns.
- The burden rests on the applicant to demonstrate the necessity for a new telecommunications structure and the absence of reasonable alternatives.

Visual Amenity Considerations

- The landscape character in the vicinity where development is limited is characterised by the interaction of mountainous forms, open fields, bogland, rural road networks and panoramic views.

- The wider Tourmakeady and Partry Mountains landscape forms part of a broader scenic context recognised for its visual sensitivity and landscape value.
- The scenic route designations in the vicinity recognise not merely individual roads or view points but the wider landscape setting and scenic experience.
- The Landscape Sensitivity Matrix suggests that telecommunications infrastructure may have an elevated capacity to affect landscape character within sensitive upland environments and the proposed development would be contrary to Landscape Objective NEO 27.
- Objective NEO 29 requires a Landscape and Visual Impact Assessment to accompany such significant proposals.
- Section 8.10 of Volume 2 of the Development Plan and the 1996 Telecommunications structures guidelines place significant emphasis on minimising visual intrusion through careful siting and design.
- The proposal would introduce a substantial engineered vertical structure into a landscape characterised by limited built development and extensive visual connectivity across the countryside.
- The parties could not evaluate the extent of visibility of the structure in the absence of an LVIA, a Zone of Theoretical Visibility (ZTV) analysis, photomontages or equivalent documentation.
- There appears to have been no consideration of whether an alternative less visually intrusive design could have been achieved.
- There are similarities to the refusal of permission to the south where the proposal occupied the same broad scenic landscape setting.
- Regard should be had to the recreational and tourism value of the landscape with the Tourmakeady-Srah loop trail close by to the north-east.
- Given the elevated position within the wider landscape, the scale of the structure and the open character of the surrounding upland environment, the proposal has the potential to be visually prominent in the wider landscape.

- The Planning Report does not contain any detailed visual amenity assessment and insufficient regard was had to the sensitive landscape.

Natura 2000

- Substantial upgrade works along the access route were undertaken prior to the application and there are questions as to whether the full extent of associated infrastructure and environmental effects were adequately described and assessed in the application.
- The access route previously had an agricultural function and the scale of the widening, tarring and drainage works materially differ from the historic character and function of the route, photos attached.
- The Commission should be satisfied that all associated works have been appropriately authorised and assessed.
- Hydrological mapping suggests a direct drainage pathway between the upgraded access route and Lough Mask and this is a particular concern noting the extensive drainage works undertaken.
- A local stream the Srah Stream_010 may connect to the Seanghort river waterbody which flows towards Lough Mask and associated downstream receiving waters.
- Given the link to the Lough Carra/Mask Complex SAC, AA requires such pathways to be fully examined prior to the granting of consent and the potential for sediment mobilisation in the context of the proposed development should also be considered in this context and this was not assessed.
- The fluctuating changes in the water quality of the receiving water body suggests it may be susceptible to changes in water quality and potentially sensitive to upstream influences in the context of the Water Framework Directive.

Planning Irregularities

- There is uncertainty in relation to the proposed culvert works and what they would involve and how such infrastructure would interact with other works,

drainage pathways and hydrological conditions. Were associated hydrological and environmental implications assessed?

- There is uncertainty in relation to electricity infrastructure required and overhead poles and cables could further interfere with the landscape.
- No information has been provided as to how connection to the electricity network would be provided. If trenching or other groundworks are required, have the environmental and hydrological implications been assessed and is this project splitting?
- The Commission should satisfy itself that the full development proposed has been applied for and assessed.
- The significant further information public notice omitted mention of the culvert as part of the proposal and this was not an incidental part. Questions arise as to whether the public were adequately informed of any changes and whether the development description was consistent and sufficiently precise.

6.2. Applicant Response

The response on behalf of the applicant to the third party appeal can be summarised as follows:

Response to Ground 1 – Technical Justification

- In the case at Tourmakeady, the Board accepted the need for the infrastructure and the location as being justified and refused permission on visual amenity grounds alone.
- Antenna level rather than ground level governs signal propagation across undulating terrain.
- At the Lough Mask location where the ground level is 128.5m OD, the highest point of the roof is 134.7m OD which is the maximum height for the antenna and the ground level at the subject site is 127.5m OD with the highest antenna to be at c.157.5m OD.
- The additional 22.8m height will allow the signal to clear local terrain and obstructions and serve a more extensive area than the treatment plant.

- The Lough Mask site is unsuitable for a tower and the building has not been designed for such purpose.
- There are 6 houses within 400m of the water treatment plant whereas there will be one house c.400m from the subject site so a tower at the water plant would have greater impact.
- Three Ireland operates a policy of co-locating on existing structures where possible and the existing site was found to be unsuitable due to the height limitations and undulating terrain.
- The previous proposal assessed three alternative locations and a replacement, purpose built multi operator structure is proposed.
- This will improve coverage and capacity for Three and will improve service and will do so while resulting in no net increase in telecom structures.
- The justification report followed radio coverage surveys, propagation modelling and coverage assessments of the Tourmakeady area.
- Coverage deficiency can be independently verified by Comreg's Mobile Coverage Map which shows poor coverage.
- The appellant has produced no engineering evidence of its own and does not possess the technical expertise required.

Ground 2 – Visual Amenity and Landscape Character

- The subject site was deliberately selected to remove the objection in relation to being an elevated scenic route site which was the case previously.
- The nearest scenic route is over 2km away and the existing water plant site is closer to the scenic route and is in a more visually prominent position.
- Photomontages are included in appendices 1 and 2, and they demonstrate the assimilation of the proposed lattice structure particularly noting the site's position on the lower slopes read against rising ground.
- The verified views demonstrate the distant visibility of the structure from the scenic routes and the structure can be painted green to further aid this if required.

- More photographs would have been taken from the R300 but lack of mobile phone coverage compromised the collection of survey control points. They are willing to furnish additional verified views using different technology.
- The R300 scenic route is oblique to and at a considerable distance from the application site and would not be negatively impacted.
- The P.A. conclusion that the site is not close to any scenic route or designated view and that adverse impacts are not envisaged is a reasonable planning judgement.
- The structure would be 480m from the Tourmakeady-Srah loop and set against a backdrop of rising upland ground would not materially diminish the recreational or scenic experience offered by the walking route particularly when weighed against a reliable mobile signal which is currently absent.
- There is no requirement for an LVIA which, per NEO 29, are only required within or adjacent to sensitive landscapes “where appropriate”.
- The permeable open lattice structure would be of lower visual bulk than a monopole and the structure can be conditioned to be in green, see photomontages, if required.
- The proposal resolves the specific scenic route concern that led to the earlier refusal.

Ground 3 – Access Works, Advance Works and Appropriate Assessment

- The road upgrade works referred to relate to local road L-56314-0 which is a public road under Council control and this is the third section of road upgraded in the locality over the past five years.
- The public road works included drainage upgrade to the Council’s standards and the road serves several landowners and a cottage.
- The road works are not enabling works or unauthorised development being maintenance and improvement works.
- The P.A. undertook Appropriate Assessment and included in the applicant’s response is an AA Screening Report prepared by Moore Group Environmental Services which confirms the AA conclusion of the P.A..

- In relation to the Srah Stream the previous bad/moderate status of the Srah Stream in 2015 and 2016 related to sheep dipping in a village upstream and this episode is not connected to this proposal. The stream is considered not at risk and the appellant admits no direct causal relationship.
- Condition no. 9 requires a CEMP and to ensure that no surface water is discharged on to the public road which provide standard and appropriate control of any potential construction related sediment mobilisation.

Ground 4 – Other Issues and Project Splitting

- The permission includes the culvert as it refers to the plans and particulars lodged as amended by F.I. and the CEMP deals with any associated drainage detail.
- The variation in wording in the further information site notice is immaterial, the public was on notice of the development as a whole and the appellant has not be prejudiced by this process.
- Connection to the electricity network is provided for under the exempted development / statutory undertaker system and does not form part of this development.
- There has been no project splitting as the elements referred to are not interdependent components of a single project requiring composite assessment and the development was assessed as a whole.

Appropriate Assessment Screening

- The proposed piping of an 18m section of the roadside watercourse will remove any pathway to Lough Mask and the AA Screening report concludes that significant effects on European sites can be ruled out and that Stage 2 Appropriate Assessment is not required.

Water Framework Directive

- The development will not cause any deterioration in the status of any water body nor jeopardise the attainment of its WFD objectives.

6.3.Planning Authority Response

None.

7.0 Assessment

7.1. Having examined the application details and all other documentation on file, including all of the submissions received in relation to the appeal, the reports of the local authority, and 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:

- Development Plan Policy
- National Policy
- Access and Construction
- Other Matters

7.2. Development Plan Policy

7.2.1. I note that the appeal has raised issues in relation to compliance with the Development Plan including in relation to the justification for the proposed development, the location of the proposed development, its height and in the context of the existing mast at Lough Mask water plant. I propose to first assess the proposed development in relation to Section 8.10 of Volume 2 of the CDP as required.

The Council recognises the importance of telecommunication infrastructure which is important in removing the peripheral barrier that the county experiences. It is also recognised that the location of telecommunication infrastructure is dictated by service provision and hence each application will be determined on its own merits. Planning applications relating to the erection of antennae and support structures shall be accompanied by:

• A reasoned justification as to the need for the particular development at the proposed location in the context of the operator's overall plans for the county having regard to coverage.

7.2.2. I note the submitted RF Technical Justification Report prepared by Three Ireland submitted with the appeal response. I note that the stated purpose of the project is to provide data services in Tourmakeady and to enhance coverage in the surrounding area. This is proposed to replace the existing structure at Lough Mask

Water Treatment Plant. The developer sees this as critical to meet the network demand and to maintaining current and future service provision. It is also intended to bring next generation services to the area.

- 7.2.3. I note the Comreg mobile coverage maps which, for the Three network, shows generally good existing 3G coverage in the Tourmakeady area albeit with some gaps and some fringe areas. I note the 4G coverage maps submitted in the justification report which show some gaps in coverage over the area. Having reviewed the Comreg 5G coverage maps, I note a significantly greater absence of coverage over the area.
- 7.2.4. I note the appeal takes issue with the height of the proposed development by comparison to the existing structure at Lough Mask treatment plant. The appeal response has outlined how the proposed structure would have an additional 22.8m height which is designed to clear local terrain and to serve a larger area than the current infrastructure. It notes that the existing treatment plant is not designed for a tower and I concur with this.
- 7.2.5. I note the appeal takes issue with the absence of propagation information. The appeal response notes that radio coverage surveys and propagation modelling were undertaken. In the absence of a technical basis on which to justify its appeal in this regard, I am satisfied with the applicant's technical justification response to this issue as it justifies the proposed improved service, particularly noting the proposed significant improvement in coverage and service for the area.
- 7.2.6. Noting the above, in my opinion the provision of such telecommunication services is generally justified noting Section 8.10 of the CDP, the proposed improvements in mobile service, the removal of the existing water treatment plant infrastructure, the possibility to use the proposed development for co-location and noting other CDP policies which encourage such provision such as Section 7.4.4.4 (Telecommunications) and Objective INO 36. Should permission be granted, I recommend a condition to specifically require the decommissioning of the transmission facilities at Lough Mask Water Treatment Plant.

• Details of what other sites or locations in the county were considered, and reasons why these sites or locations are not feasible.

• Written evidence of site-specific consultations with other operators with regard to the sharing of sites and support structures. The applicants must satisfy the Council that a reasonable effort has been made to share installations. In situations where it not possible to share a support structure, the applicants will be encouraged to share a site or to locate adjacently so that masts and antennae may be clustered; and

- 7.2.7. I note the appellant's concerns in relation to the absence of a proposal for co-location at the existing facility. The RF Technical Justification Report notes that a replacement structure for the existing infrastructure at the Lough Mask plant is required due to the undulating terrain and structural limitations of that site, for improved coverage and to enable co-location where possible. It notes the existing sites analysed with four listed as being unsuitable and it notes that all other sites in the area operate at maximum efficiency.
- 7.2.8. These sites are mapped on page 7 of the report. 3G and 4G indoor and outdoor coverage maps are also included on pages 9 to 12. I note that in relation to 4G coverage, these show mainly very good/ good/fair signal over a significant portion of the Tourmakeady area. I note that the justification report notes that the lack of height on the existing structure and terrain in the area means that a replacement structure for the Lough Mask water treatment site is required to provide "*high quality 2G/3G/4G/5G network coverage and deliver good customer experience in Tourmakeady and surrounding wider area*".
- 7.2.9. I note the alternatives considered by the applicant and that the existing Lough Mask water treatment site is unsuitable. Having reviewed the Comreg coverage maps and based on the information on the file, I note that no other suitable existing telecoms structures in the vicinity have been identified where co-location would be suitable. In my opinion, seeking written evidence of site specific consultations would be excessive in this case. I consider that the proposed development would accord with Objective INO 34 of the CDP in relation to co-location noting that the existing infrastructure at the water treatment plant would be removed and that there is not an excess concentration of masts in the area. Should permission be granted I

recommend a condition requiring the developer to facilitate co-location use of the mast.

• Detailed proposals to mitigate the visual impact of the proposed development, including the construction of access roads, additional poles and structures. Where possible they should be located so as to benefit from the screening afforded by existing tree belts, topography or buildings. On more exposed open sites, the Council may require an alternative design or colour finish to be employed, unless where its use is prohibited by reasonable technical reasons.

- 7.2.10. In relation to visual impact, I note the concerns raised in the appeal particularly in relation to the sensitivity of the receiving landscape. I note the response to the appeal. The CDP landscape designation for the site is in Policy Area 3(A) where it notes that communication masts have a medium to high potential to create adverse impacts on the existing landscape character.
- 7.2.11. Having reviewed the scenic designations of the CDP, I note the site location at a significant remove (c.1.9km to the west) from these routes such that I consider it possible to avoid potential unduly negative visual impacts. I note the undulating nature of the surrounding landscape and that the site is at an elevated position relative to the Tourmakeady area to the east. I note that the construction of the new access would have a negligible visual impact being at a low level on the site and effectively being in the access valley type corridor where the land rises on the opposite of the existing laneway.
- 7.2.12. I also note that the site, while elevated, is in effect at the lower foothills of the higher ground to the west and south-west of the Partry mountains. I note the concerns of the appellant in relation to the extent of evaluation in relation to visual impact including in relation to the zone of theoretical visibility. I note the submitted three verified views in the appeal response with two views chosen from the scenic route to the east and one view chosen to the south-south-east. I consider this range of view points reasonable noting the topography of the surrounding landscape and its sensitivity rating in the CDP.
- 7.2.13. Having examined the verified views submitted, including the option for a green painted tower structure, I consider that the structure would blend into the higher ground to the west and that this would be aided by being painted green as shown. I

consider that despite the height of the tower structure, that the lattice structure would not be unduly visually prominent in the receiving landscape. I note this in the context of its significant distance from the dwellings in the vicinity and from the nearest scenic route to the east. I consider that the additional structures for the tower and at ground level would have a negligible visual impact due to their modest size and height.

- 7.2.14. I note the 480m distance from the Tourmakeady-Srah loop walk and I concur with the appeal response that enhanced mobile service for users of the loop would be a significant benefit by comparison with limited views of the structure in the wider landscape context. I agree with the appeal response that a Landscape Visual Impact Assessment is only required within or adjacent to sensitive landscapes where appropriate. Noting the above, I do not consider an LVIA requirement to be appropriate in this circumstance as I have sufficient information before me to evaluate the proposed development.
- 7.2.15. Noting the previous refusal of permission at a site c.3.3km to the south, in this case noting the above particular circumstances, I do not consider that the same negative visual impacts (or similar) would arise, particularly noting the manner in which the proposed structure would sit against the elevated receiving landscape when viewed from the scenic route to the east. I am satisfied that impacts on visual and residential amenities in the vicinity would be acceptable.
- 7.2.16. Therefore, I am satisfied that the proposed development would be consistent with Section 8.10 of Volume 2 of the CDP. Based on my assessment above, in my opinion the proposed development would not impinge in a significant way on the character, integrity and distinctiveness of the area, meets a high standard of siting and design, contributes to the landscape character and satisfies other relevant planning criteria in accordance with Objective NEO 25 of the CDP.
- 7.2.17. I also consider the proposed development would be consistent with the policies and objectives in relation to landscape listed in Section 5 above including Objectives NEO 27 and INO 33. Should permission be granted, I recommend conditions to require the tower structure be painted dark green, to be decommissioned should it no longer be used and for a low intensity light to be placed at the top of the tower structure although such is shown on the submitted elevations.

7.3. National Policy

- 7.3.1. I note that Policy INP 19 of the CDP refers to the 1996 guidelines in stating support for telecommunications developments and to Circular 07/12 and Policy INP 19 states support “*where it can be demonstrated that the development will not have significant adverse impacts on communities, public rights of way and on the built or natural environment, including the integrity of the Natura 2000 network*”. Based on my environmental assessments elsewhere in this report and noting that a CEMP and SUDS drainage measures can be conditioned, I consider that there would be no significant negative impacts on the natural environment from the proposed development.
- 7.3.2. I note this in the context of the culvert proposal and the construction method to avoid siltation of the stream under the new proposed entrance. I note that the proposed new entrance and route to the site, with negligible traffic levels, would not give rise to significant impacts on public rights of way. I have also noted below no significant impacts on Natura 2000 sites. I have noted the distance from houses in the vicinity to be acceptable in relation to visual impact and I also note that improved mobile coverage in the area would be of benefit to the local community.
- 7.3.3. I also consider that the applicant has demonstrated the efforts made to examine if alternative sites could be used and that no suitable alternative sites have been identified. Noting also consistency with the NPF First Revision which supports digital connectivity, I consider that the proposed development accords with the relevant national policies and guidelines.

7.4. Access and Construction

- 7.4.1. I note the proposed new access over the existing stream which the appellant has taken issue with the culverting of the stream which would run underneath and in relation to drainage matters. I note it would require some regrading of the land inside the new entrance through the existing agricultural driveway. While there is an existing agricultural access adjacent to the south-west, it is stated that the new access is required as the existing access is not suitable for HGVs.
- 7.4.2. There would also be a new access track from the new vehicular entrance up to the proposed tower area. I note there is an absence of detail on the site layout plan for this part of the proposed development other than in relation to the length of the

proposed 600mm (diameter) corrugated PVC pipe culvert and its design with it to be contained within a layer of clean granulated stone.

- 7.4.3. I note that a new vehicular access from the existing track would have more than adequate visibility with slow speeds along the adjacent private laneway due to its narrow width and gravel condition. Where the laneway meets the public road to the north-east, I note no visibility issues. I note that the proposed development would not result in a significant intensification of vehicular trips to and from the site as the site would only be visited occasionally for maintenance purposes due to the nature of the proposed use. I am therefore satisfied that no significant road safety issues would arise.
- 7.4.4. Should permission be granted, I recommend a condition to require, prior to commencement of development, the submission of detailed drawings in relation to the detailed access and track layout. I consider that a standard SUDS condition would be adequate to ensure surface water drainage is catered for sustainably on the site.
- 7.4.5. In relation to potential mobilisation of sediment into local receiving waters and onwards to sensitive receptors from the construction of the new entrance and culvert, I note my assessments in relation to AA and WFD separately in sections 9 and 10 below. In relation to the construction of the proposed development, should permission be granted I recommend that the submission of a Construction Environmental Management Plan be required prior to commencement by condition. This is to ensure that the application of best practice standard measures that would avoid the release of sediment or pollutants to waters or ground and to manage construction traffic. This would be similar to the P.A. condition no. 9.

7.5. Other Matters

- 7.5.1. I note the appeal concerns raised in relation to the works undertaken to the road leading up to the site which it is suggested were works for the proposed development. However, I note these are works, including any roadside drainage, which were undertaken outside of the subject site and to local road L-56314-0 which I am satisfied do not relate to the proposed development. Also noting that these works have previously been undertaken as part of the maintenance/upgrade of an existing road, I do consider them to form part of the proposed development in terms

of potential cumulative environmental impact. For the same reasons, I do not consider that the applicant has engaged in project splitting.

- 7.5.2. In relation to the appeal concerns in relation to the Srah Stream previously being of a bad/moderate status, I have undertaken an assessment in Appendix 3 and Section 10 of this report and I have found no significant issues in relation to the potential impact on water bodies.
- 7.5.3. In relation to the issue raised in the appeal as to works required for an electricity connection not being specified, I note the appeal response that such type of works are catered for by the exempted development / statutory undertaker regime. In this context, I concur with the applicant that such works are not in scope.
- 7.5.4. In relation to the public notices at significant further information stage, where the wording for the culvert was omitted, in the context of the overall application I note this did not alter the development being applied for and nor did it affect the ability of the appellant to participate in the development application process. I am therefore satisfied that no significant planning issue arises in this regard.

8.0 EIA Screening

- 8.1. The proposed development is not a class for the purposes of EIA as per the classes of development set out in Schedule 5 of the Planning and Development Regulations 2001, as amended (or Part V of the 1994 Roads Regulations). No mandatory requirement for EIA therefore arises and there is also no requirement for a screening determination. Refer to Form 1 in Appendix 1 of report.

9.0 AA Screening

- 9.1. 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 (Appendix 2), 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 Lough Mask SPA (site code 004062) and Lough Carra/Mask Complex SAC and PNHA (site code 001774) in view of the conservation objectives of these

sites and is therefore excluded from further consideration. Appropriate Assessment is not required.

9.2. This determination is based on:

- The scale and nature of the development with a small footprint and the culvert construction method incorporated into the development as part of the new access route and the standard sustainable drainage methods.
- The distance from the nearest European site.
- Taking into account the screening report/determination by the P.A.
- Taking into account the AA Screening report prepared by Moore Group Environmental Services.

9.3. 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

10.1. An assessment of the proposed development has been undertaken with regard to the objectives set out in Article 4 of the EU Water Framework Directive (see Appendix 3), together with relevant guidance published by the Environmental Protection Agency (Ireland), including applicable codes of practice for the protection of water quality.

10.2. Having considered the nature, scale, and location of the proposed development, it is concluded that the proposal will not result in any risk of deterioration in the status of any water body, including surface waters (rivers and lakes), groundwater, transitional waters, or coastal waters. This applies to both qualitative and quantitative status, and in respect of temporary and permanent effects.

10.3. The proposed development has been designed in accordance with EPA codes of practice and best practice guidance, ensuring that appropriate measures are

incorporated to prevent pollution, control runoff, and protect both surface water and groundwater receptors.

- 10.4. Furthermore, the development will not adversely affect the achievement of established environmental objectives, including the maintenance or attainment of Good Ecological Status/Potential and Good Chemical Status, as required under the Directive. Accordingly, the proposed development is considered to be compliant with the requirements of Article 4.

11.0 Recommendation

- 11.1. I recommend that permission be granted.

12.0 Reasons and Considerations

Having regard to the provisions of the Mayo County Development Plan 2022 – 2028, the location within an upland rural area, to the nature and scale of the proposed development and its relationship with the surrounding area and distance from the nearest scenic route, it is considered that subject to compliance with the conditions set out below, the proposed development would be acceptable and would not seriously injure the residential or visual amenities of the area or of property in the vicinity and would be acceptable in terms of design, visual impact, surface water drainage, environmental impact and traffic safety. The proposed development 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, as amended by the further plans and particulars received by the planning authority on the 9th day of April 2026, 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. The telecommunications tower shall be painted in a dark green colour and shall be permanently maintained in dark green colour.

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

3. Prior to commencement of development, the developer shall submit detailed technical drawings of the new entrance and track for the written agreement of the Planning Authority.

Reason: In the interest of clarity.

4. Drainage arrangements including for the attenuation and disposal of surface water, shall comply with the requirements of the relevant Section of the Council for such works and services. Prior to the commencement of development the developer shall submit to the Planning Authority for written agreement a Stage 2 - Detailed Design Stage Storm Water Audit. Upon completion of the development a Stage 3 Completion Stormwater Audit to demonstrate Sustainable Urban Drainage System measures have been installed, and are working as designed and that there has been no misconnections or damage to storm water drainage infrastructure during construction, shall be submitted to the planning authority for written agreement.

Reason: In the interest of public health and surface water management.

5. The existing telecommunications transmission infrastructure/equipment at the Lough Mask Water Treatment Plant site shall be decommissioned and removed from the site within three months of the completion of the proposed development.

Reason: In the interest of clarity.

6. The developer shall facilitate co-location with other telecommunication and broadband operators.

Reason: To limit the need for additional telecom structures.

7. The transmitter power output, antenna 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 the permitted development to which this permission relates and to facilitate a full assessment of any future alterations.

8. (a) A low intensity fixed red obstacle light shall be fitted as close to the top of the mast as practicable and shall be visible from all angles in azimuth. Details of this light, its location and period of operation shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.
(b) No other lighting other than that shown on the drawings is permitted.

Reason: In the interest of public safety.

9. In the event of the telecommunications structure and ancillary structures hereby permitted ceasing to operate for a period of 6 months, the structures shall be removed and the site shall be reinstated within six months of their removal. Details regarding the removal of the structures and the reinstatement of the site shall be submitted to, and agreed in writing, within three months of the structures ceasing to operate, and the site shall be reinstated in accordance with the agreed details at the operators expense.

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

10.A Construction and Environmental Management Plan (CEMP) shall be submitted to and agreed in writing with the planning authority prior to the commencement of development. The CEMP shall include but not be limited to construction phase controls for dust, noise and vibration, waste management, protection of soils, groundwaters, and surface waters, site housekeeping, emergency response planning, site environmental policy, and project roles and responsibilities.

Reason: In the interest of environmental protection.

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.

Ciarán Daly
Planning Inspector

26th August 2026

Appendix 1

Form 1 EIA Pre-Screening

Case Reference	PL-501448-MO-26
Proposed Development Summary	Erect a 30m high telecommunications lattice tower with antennas, dishes and associated equipment attached, and with equipment cabinets at ground level within a fenced compound together with construction of a culvert and extension to an existing access track.
Development Address	Gortbunacullin (TD), Srah, Co. Mayo.
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?	☒ Yes, it is a 'Project'. Proceed to Q.2.
	☐ 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)?	
☐ Yes, it is a Class specified in Part 1. EIA is mandatory. No Screening required. EIAR to be requested. Discuss with ADP.	State the Class here
☒ 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.	
☐ Yes, the proposed development is of a Class and meets/exceeds the threshold. EIA is Mandatory. No Screening Required	State the Class and state the relevant threshold
☐ Yes, the proposed development is of a Class but is sub-threshold.	State the Class and state the relevant threshold

Preliminary examination required. (Form 2) OR If Schedule 7A information submitted proceed to Q4. (Form 3 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 ☐	Screening Determination required (Complete Form 3)
No ☒	Pre-screening determination conclusion remains as above (Q1 to Q3)

Inspector: _____ **Date:** _____

Appendix 2

AA Screening Determination – Test for likely significant effects

Screening for Appropriate Assessment Test for likely significant effects	
Case Reference Number: PL-501448-MO-26	
Step 1: Description of the project and local site characteristics Erect a 30m high telecommunications lattice tower with antennas, dishes and associated equipment attached. The site consists of a gated access over a stream and a part linear area that leads up to an elevated grass area which is set above a laneway track and which is at the lower foothills of the Partry Mountains.	
Brief description of project	The proposed development, in summary, consists of the following: • Erect a 30 metre high telecommunications lattice tower with antennas, dishes and associated equipment attached. • Equipment cabinets at ground level within a fenced compound. • Construction of a culvert and extension to an existing access track.
Brief description of development site characteristics and potential impact mechanisms	The rural site area of 0.015ha is in a rural uplands area which leads up to the Partry Mountains. It is c.2km from the nearest European site. The proposed development includes a new culvert of a stream that runs through part of the site. Potential impact mechanisms include silt and/or

	pollutants from construction entering water courses in the vicinity.			
Screening report	Y – Report for the purposes of Appropriate Assessment Screening prepared by Moore Group Environmental Services			
Natura Impact Statement	Y			
Relevant submissions	N/A			
Step 2. Identification of relevant European sites using the Source-pathway-receptor model				
European Site (code)	Qualifying interests ¹ Link to conservation objectives (NPWS, date)	Distance from proposed development (km)	Ecological connections ²	Consider further in screening ³ Y/N
Lough Carra/Mask Complex SAC (site code 001774).	Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae) [3110] Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or	c.2.1km	Potential via stream flowing towards local rivers which flow to Lough Mask.	Y

	Isoeto- Nanojuncetea [3130] Hard oligo- mesotrophic waters with benthic vegetation of Chara spp. [3140] European dry heaths [4030] Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco- Brometalia) (* important orchid sites) [6210] Calcareous fens with Cladium mariscus and species of the Caricion davallianae [7210] Alkaline fens [7230] Limestone pavements [8240] Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion			
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	incanae, Salicion albae) [91E0] Rhinolophus hipposideros (Lesser Horseshoe Bat) [1303] Lutra lutra (Otter) [1355] Hamatocaulis vernicosus (Slender Green Feather-moss) [6216]			
Lough Mask SPA (site code 004062).	Tufted Duck (Aythya fuligula) [A061] Black-headed Gull (Chroicocephalus ridibundus) [A179] Common Gull (Larus canus) [A182] Lesser Black-backed Gull (Larus fuscus) [A183] Common Tern (Sterna hirundo) [A193] Greenland White-fronted Goose	c.2.1km	Potential via stream flowing towards local rivers which flow to Lough Mask.	Y

	(Anser albifrons flavirostris) [A395] Wetland and Waterbirds [A999]			
Step 3. Describe the likely effects of the project (if any, alone <u>or</u> in combination) on European Sites AA Screening matrix				
Site name Qualifying interests	Possibility of significant effects (alone) in view of the conservation objectives of the site*			
	Impacts	Effects		
Site 1: Lough Carra/Mask Complex SAC (site code 001774) <u>QI list</u> Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae) [3110]	Direct: N/A Indirect Potential negative impacts (temporary) on surface water/water quality due to construction related emissions including increased sedimentary and construction related pollution. Operational stage: all surface water run-off will be discharged to standard sustainable	The proposed development incorporates a minor roadside watercourse drain with distant connectivity to Lough Mask downstream. An 18m section of this watercourse would be piped as part of the works for the new access way. The placement of the corrugated PVC pipe via temporary flume bypass method and with clean granulated stone overlay surround		

Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or Isoeto-Nanojuncetea [3130] Hard oligo-mesotrophic waters with benthic vegetation of Chara spp. [3140] European dry heaths [4030] Semi-natural dry grasslands and scrubland facies on calcareous substrates (Festuco-Brometalia) (* important orchid sites) [6210] Calcareous fens with Cladium mariscus and species of the Caricion	drainage systems for appropriate treatment.	would remove the pathway downstream and this is incorporated into the development. Standard best practice construction methods can be conditioned to ensure no pathway to Lough Mask during construction. Standard SUDS drainage measures can be conditioned.
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davallianae [7210] Alkaline fens [7230] Limestone pavements [8240] Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno- Padion, Alnion incanae, Salicion albae) [91E0] Rhinolophus hipposideros (Lesser Horseshoe Bat) [1303] Lutra lutra (Otter) [1355] Hamatocaulis vernicosus (Slender Green Feather-moss) [6216]		
	Likelihood of significant effects from proposed development (alone): N	

	If No, is there likelihood of significant effects occurring in combination with other plans or projects? N	
	Impacts	Effects
Site 2: Lough Mask SPA (site code 004062). <u>QI list</u> Tufted Duck (Aythya fuligula) [A061] Black-headed Gull (Chroicocephalus ridibundus) [A179] Common Gull (Larus canus) [A182] Lesser Black-backed Gull (Larus fuscus) [A183] Common Tern (Sterna hirundo) [A193] Greenland White-fronted Goose (Anser albifrons)	Direct: N/A Indirect Potential negative impacts (temporary) on surface water/water quality due to construction related emissions including increased sedimentary and construction related pollution. Operational stage: all surface water run-off will be discharged to standard sustainable drainage systems for appropriate treatment. No indication that the subject site is an ex-situ site for the SPA.	The proposed development incorporates a minor roadside watercourse drain with distant connectivity to Lough Mask downstream. An 18m section of this watercourse would be piped as part of the works incorporated into the development for the new access way. The placement of the corrugated PVC pipe via temporary flume bypass method would remove the pathway downstream. Best practice standard construction methods can be conditioned to ensure no pathway to Lough Mask during construction. Standard SUDS drainage measures can be conditioned. The proposed development would be at a significant remove such that no disturbance impacts on mobile species of the SPA would arise.

flavirostris) [A395] Wetland and Waterbirds [A999]		
	Likelihood of significant effects from proposed development (alone): N	
	If No, is there likelihood of significant effects occurring in combination with other plans or projects? N	
*Where a restore objective applies it is necessary to consider whether the project might compromise the objective of restoration or make restoration more difficult.		
Further Commentary / discussion (only where necessary)		
Step 4: Conclude if the proposed development could result in likely significant effects on a European site		
I conclude that the proposed development (alone) would not result in likely significant effects on Lough Mask SPA (site code 004062) and Lough Carra/Mask Complex SAC (site code 001774). The proposed development would have no likely significant effect in combination with other plans and projects on any European sites. No further assessment is required for the project. No mitigation measures are required to come to these conclusions.		

Screening Determination

Finding of no likely significant effects

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 Lough Mask SPA (site code 004062) and Lough Carra/Mask Complex SAC (site code 001774) in view of the conservation objectives of these sites and is therefore excluded from further consideration. Appropriate Assessment is not required.

This determination is based on:

- The scale and nature of the development with a small footprint and the culvert construction method incorporated into the development as part of the new access route and the standard sustainable drainage methods.
- The distance from the nearest European site.
- Taking into account the screening report/determination by the P.A.
- Taking into account the AA Screening report prepared by Moore Group Environmental Services.

Appendix 3
Water Framework Directive

WFD IMPACT ASSESSMENT SCOPING TABLE			
Step 1: Nature of the Project, the Site and Locality			
An Coimisiún Pleanála ref. no.	PL-501448-MO-26	Townland, address	Gortbunacullin (TD), Srah, Co. Mayo.
Description of project		Erect a 30m high telecommunications lattice tower with antennas, dishes and associated equipment attached, and with equipment cabinets at ground level within a fenced compound together with construction of a culvert and extension to an existing access track.	
Brief site description, relevant to WFD Screening,		The site consists of a gated access over a stream and a part linear grass area that leads up to an elevated grass area which is set above a laneway track and which is at the lower foothills of the Party Mountains.	
Proposed surface water details		Standard sustainable drainage system with treatment.	
Proposed water supply source & available capacity		N/A	
Proposed wastewater treatment system & available capacity, other issues		N/A	
Others?		N/A	

Step 2: Identification of relevant water bodies and Step 3: S-P-R connection							
Identified water body	Water body name(s) (code)	WFD Status	Risk of not achieving WFD Objective e.g.at risk, review, not at risk	Identified pressures on that water body	Pathway linkage to water feature (e.g. surface run-off, drainage, groundwater) (Consider all phases)	Mitigation Measures proposed	Is mitigation sufficient? Will there be any residual impacts?
River	Srah Stream_010 (IE_WE_30S020400)	Good	Not at risk	Agricultural run-off – potential organic pollution	Via stream / groundwater to river.	Best practice standard construction measures can be conditioned and SUDS measures which can also be conditioned.	No residual impacts.
Ground	Maam-Clonbur (IE_WE_G_0006)	Good	Not at risk	Agricultural run-off – potential organic pollution, domestic wastewater treatment systems – pollution into ground, commercial forestry e.g.	Via drainage to ground.	Best practice standard construction measures can be conditioned and SUDS measures which can also be conditioned.	No residual impacts.

				sediment run-off.			
Lake	Mask (IE_WE_30_665a)	Good	At risk	Agricultural run-off – phosphorous and nitrogen enrichment, domestic and urban wastewater–pollution, commercial forestry e.g. sediment run-off, invasive non-native species and physical alterations.	Via stream / groundwater to river and on to lake.	Best practice standard construction measures can be conditioned and SUDS measures which can also be conditioned.	No residual impacts.