



An
Bord
Pleanála

Inspector's Report

ABP-319503-24

Development	Erection of a 24m high lattice tower together with antennas, dishes, associated telecommunications equipment and a proposed access track, all enclosed in security fencing.
Location	Willow Park Football Club, Bonavalley, Athlone, Co. Westmeath.
Planning Authority	Westmeath County Council
Planning Authority Reg. Ref.	2460018
Applicant(s)	Vantage Towers Ltd.
Type of Application	Permission
Planning Authority Decision	Grant permission with conditions
Type of Appeal	Third Party
Appellant(s)	Willow Park Residents Association
Observer(s)	None
Date of Site Inspection	22/8/2024
Inspector	Bébhinn O'Shea

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1.0 Site Location and Description

The site is located within the grounds of Willow Park Football Club, on the south-east extremity of Athlone, which includes a number of pitches, clubhouse and other structures. The grounds (landholding, as outlined in blue) are accessed from Kilmacuagh Avenue, where there is a parking area and open access as far as the clubhouse. From this point, there is a surfaced laneway which runs along the rear of houses on Willow Park, as far as Willow Park Avenue, where there is another (gated) entry point to the club grounds.

The proposed structure is to the rear of an existing floodlit astroturf pitch and adjacent a railway line. There is a pathway of flattened grass leading around the astro turf pitch, from a poorly surfaced parking area to the location of the proposed structure and enclosure. There is an established thick hedgerow along the railway line. West of the site and railway line is largely agricultural with some scattered rural housing. To east /north-east there is two storey residential development, beyond which there are the lands associated with the Shannon Midlands TU and a light industrial park.

2.0 Proposed Development

The proposed development is a 24m high lattice tower, with antennae, dishes associated equipment, access track and security fencing. Drawings indicate the following:

- 24 m lattice tower on a 7m x 7m concrete base
- Antennae for Vodafone and 2 other operators
- 3 No. operator cabinets
- ESB mini pillar
- Palisade fencing (or similar) to a height of 2.4m with 4m wide access gates to south-eastern side.
- 3m wide access track, extending from an existing internal access track which runs along the inside of eastern landholding boundary
- 3 X RFE cabinets within fenceline

3.0 Planning Authority Decision

3.1. Decision

The Planning Authority granted permission subject to 6 No. conditions including:

C2 Materials/finishes

C3 Making structure available to other providers

C4 Removal upon obsolescence

C6 Consultation with Irish rail in relation to railway risk

3.2. Planning Authority Reports

3.2.1. Planning Reports

- The Planning Report considered the matter of legal ownership to be a civil issue and considered the development compliant with Westmeath Development Plan policy CPO 16.58. A grant of planning permission was recommended. Development contributions were deemed not applicable in accordance with Section 7.6 of the Westmeath Development Contribution Scheme 2022.

3.2.2. Other Technical Reports

- Engineering: No objection

3.3. Prescribed Bodies

3.3.1. Irish Rail:

No objections in principle. As the proposed development is situated adjacent to a railway line it was recommended that conditions (11 No.) be attached.

3.3.2. Transport Infrastructure Ireland:

- Advised that DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012) are to apply
- States that claims in respect of impacts from roads infrastructure will not be entertained.

3.3.3. Commissioner for Railway Regulation:

- States that decision to be notified to Iarnród Éireann.
- States that Iarnród Éireann is to be consulted in relation to risk and works affecting safe operation of the site, road-rail interfaces on access routes.
- States that observations of Iarnród Éireann are to be addressed.

3.4. **Third Party Observations**

Willow Park Residents Association (Secretary D Walsh):

The site is the property of the Residents Association. The Football Club has not received permission to progress with the application and has no right to erect such a structure.

4.0 **Planning History**

P.A. Ref. 23/60357: Willow Park Football Club - New car park at grounds and installation of 5 number 6m high poles with LED Lighting. Conditional.

P.A. Ref. 17/7017: Willow Park Football Club – Dressing room/shower/changing area/toilets/store/laundry facilities. Conditional.

P.A. Ref. 06/3147: Willow Park Football Club - Synthetic pitch with 2.4m fence and four 15m flood lighting columns together with 2m masonry perimeter wall. Conditional; boundary wall revised to fence at Further Information stage.

5.0 **Policy Context**

5.1. **Westmeath County Development Plan 2021-2027**

5.1.1. ICT and Broadband Policy Objectives

CPO 10.176 Support and facilitate delivery of the National Broadband Plan.

CPO 10.177 Promote and facilitate the sustainable development of a high-quality ICT network throughout the County in order to achieve balanced social and economic development, whilst protecting the amenities of urban and rural areas.

CPO 10.178 Support the national objective to promote Ireland as a sustainable international destination for ICT infrastructures such as data centres and associated economic activities at appropriate locations.

CPO 10.179 Support the delivery of high capacity Information Communications Technology Infrastructure, broadband connectivity and digital broadcasting, throughout the County, in order to ensure economic competitiveness for the enterprise and commercial sectors and in enabling more flexible work practices e.g. teleworking.

CPO 10.180 Seek to provide public Wi-Fi zones in public spaces where possible.

CPO 10.181 Support the coordinated and focused development and extension of broadband infrastructure throughout the County.

CPO 10.182 Co-operate with the Department of Communications, Climate Action and Environment and public and private agencies where appropriate, in improving high quality broadband infrastructure throughout the County.

CPO 10.183 Achieve a balance between facilitating the provision of telecommunications infrastructure in the interests of social and economic progress and sustaining residential amenity and environmental quality.

CPO 10.184 Ensure that the location of telecommunications structures should minimise and /or mitigate any adverse impacts on communities, public rights of way and the built or natural environment.

CPO 10.185 Encourage co-location of antennae on existing support structures and to 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.

CPO 10.186 Facilitate the provision of telecommunications infrastructure throughout the County in accordance with the requirements of the “Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities”.

- 5.1.2. Policies in relation to Landscape and Lake Amenities are set out within Chapter 13 of the Westmeath County Development Plan. The site is located within the Lough Ree/Shannon Corridor Landscape Character Area, where the significant landscape

features are the river, callows and lake. CPO 13.1 to 13.6 set out the policy in relation to landscape and lake amenities.

5.1.3. Development Management Standards CPO 16.58 sets out that that telecommunications applications be assessed having regard to :

- Department of the Environment and Local Government's "Planning Guidelines for Telecommunications Antennae and Supports Structures" (1996) and Departmental Circular PSSP 07/12.
- Co-location agreements to be provided where possible. Where new facilities are proposed applicants will be required to satisfy the Council that they have made a reasonable effort to share facilities or to locate facilities in clusters.
- Visual impacts arising from proposal.

5.2. **Athlone Town Development Plan 2014–2020**

The site is zoned Sporting Recreational, where it is an objective

O-LZ7 To provide for, protect and improve the provision, attractiveness, accessibility and amenity value of sporting and recreational facilities.

Telecom structures are Open for Consideration under this zoning.

The Westmeath County Development Plan states that O = 'Open for Consideration' : The proposed use may be permitted where the local authority is satisfied that it is in compliance with the zoning objectives, standards and requirements as set out in the County Development Plan, and that the proposal would not conflict with the permitted, existing or adjoining land-uses by reason of its nature and scale, in accordance with the proper planning and sustainable development of the area.

Policies **P-ICT 1** to **P-ICT6** of the AthloneTown Development Plan reflect the provisions of the County Development Plan policies above. In addition to these, the Town Plan polices include:

P-ICT7 To protect areas of significant landscape, habitats and species importance from the visual and physical intrusion of large-scale telecommunications infrastructure.

P-ICT8 To review all telecommunication structures in the Town, in the light of advances in telecommunications and satellite technology.

P-ICT9 To maintain a register of approved telecommunications structures in Athlone, in cooperation with operators.

5.3. **S28 Telecommunications Antennae and Support Structures Guidelines (1996)**

The guidelines aim to provide a modern mobile telephone system as part of national development infrastructure, whilst minimising environmental impact. It is recognised that visual impact is among the more important considerations which have to be taken into account in arriving at a decision on a particular application. Care should be taken when dealing with fragile or sensitive landscapes. It is also stated that an applicant will only have limited flexibility as regards location, given the constraints arising from radio planning parameters etc. The Guidelines state that an unnecessary proliferation of masts should be avoided, and advocate sharing of installations to reduce visual impact on the landscape.

DoECLG Circular Letter PL07/12

This Circular issued in 2012 and updated some sections of the above Guidelines including ceasing the practice of limiting the life of the permission by attaching a planning condition and ceasing the attachment of bonds. It also includes advice on the issue of health and safety and reiterates that this is regulated by other codes of practice and is not a matter for the planning process

5.4. **National Planning Framework**

National Policy Objective 24 is *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 48 is *In co-operation with relevant Departments in Northern Ireland, develop a stable, innovative and secure digital communications and services infrastructure on an all-island basis.*

5.5. **Regional Spatial and Economic Strategy for the Eastern and Midland Region**

Regional Policy Objective 8.25 is that Local Authorities shall:

- Support and facilitate delivery of the National Broadband Plan.
- Facilitate enhanced international fibre communications links, including full interconnection between the fibre networks in Northern Ireland and the Republic of Ireland.
- Promote and facilitate the sustainable development of a high-quality ICT network throughout the Region in order to achieve balanced social and economic development, whilst protecting the amenities of urban and rural areas.
- Support the national objective to promote Ireland as a sustainable international destination for ICT infrastructures such as data centres and associated economic activities at appropriate locations.
- Promote Dublin as a demonstrator of 5G information and communication technology.

5.6. **Natural Heritage Designations**

Middle Shannon Callows SPA and SAC is 1.8km west. Crosswood Bog SAC 1.6km east.

5.7. **EIA Screening**

The proposed development does not fall within the scope of a Class of development for the purposes of EIA (See Appendix 1 attached) therefore EIA screening or EIA is not required.

6.0 **The Appeal**

6.1. **Grounds of Appeal**

The appeal is made by the Secretary of Willow Park Residents Association and includes 8 No. letters from local residents with 23 signatories and supporting documentation. I have reviewed the appeal and summarise the grounds of appeal as follows:

- Improper placement of site notices. The notices were placed out of public view, and not placed directly at either two of the entrances hindering public awareness of the application and breaching Article 19 (1)(c) of the Planning Regulations.
- The planning application contravenes the terms of the land registry folio and legal agreements associated with the property. Directors giving consent for the application have breached provisions of Companies Act 2014, breached the objectives of the company in its memorandum and articles of association. The application was made without consent/knowledge of all members of the board of the Residents Association.
- No public consultation took place.
- The proposal lacks public access. The mast will curtail the local dog walking route in Willow Park Football Field.
- The proposal will diminish the aesthetic appeal and recreational value of the area and devalue property. None of the other towers reference detract from visual aesthetics of surrounding areas.
- There are safety concerns re. proximity to playing field and seating area, and a densely populated residential area and horse breeding area.

6.2. **Applicant Response**

The first party response states that:

- Much of the appeal is in respect of the relationship between the appellant and the Club and is not a planning issue. Company matters, folio matters and conflict of interest are not planning issues.
- The site notices complied with the planning process; the Planning Authority confirmed they were in place and the appellant was able to make a submission and an appeal.
- Access arrangements to the sports facility are not affected.
- There is no obligation in relation to public consultation.
- There will be some visual impact, but the application has had regard to design and siting guidance. The mature vegetation and fencing will mitigate impact of the

lower section. Houses are not orientated towards the structure, and there are other structures such as flood lights, ESB poles, cables around it.

- Devaluation of properties based on visual impact is subjective. Previous determinations on planning appeals suggest that there is no evidence of property devaluation. The provision of high-quality broadband can also positively impact property values.
- In relation to health matters, compliance with conditions relating to non-ionising radiation are a matter for ComReg.

6.3. Planning Authority Response

None

6.4. Observations

None

6.5. Further Responses

None

7.0 Assessment

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:

- Legal right to make the application/progress the development.
- Adequacy of site notices.
- Justification for proposed development including location, form, scale.
- Obstruction of walking routes.
- Visual impact.

- Impact on property values.
- Safety Concerns.

7.1. Legal right to make the application/progress the development

I note that the owner of the property is stated in the application form to be Willow Park Sports & Social Club Ltd and a letter of consent to the application signed by two Directors of this body has been submitted. The appellant's case confirms this stated ownership but claims that two signatories does not satisfy the requirements of the company's articles of association.

I do not believe that the seeking of further information or submissions will assist in assessing this matter as ultimately it is beyond the remit of the Board. I consider that a reasonable degree of legal consent to the making of the application has been demonstrated and that in terms of the carrying out of development the provisions of Section 34 (13) of the Act must be relied upon.

7.2. Adequacy of site notices.

I note the comments in relation to the positioning of site notices. Three site notices were erected. The land to which the application relates, as shown with red site boundary, is removed from the public road. The notice at location 1 (to north-east) was fixed in a conspicuous position, which, given the lack of delineation of the landholding boundary and easily accessible nature of the grounds, I consider to be sufficiently near the main entrance to the land from the public road. The location of site notice 2 is where the red-line site boundary starts - through an extension of an internal access track within the grounds; the third at the entrance to the proposed compound and location of the proposed structures.

I consider the requirements of the Planning and Development Regulations have been satisfied. I note that this matter was considered acceptable by the Planning Authority and that this did not prevent the concerned party from making a submission.

7.3. Justification for proposed development including location, scale/form

7.3.1. Target area

A report accompanying the application set out that the target coverage area, particularly to the east of the site, including the Kilmartin N6 Centre, other commercial premises in the area, the Glen Abhainn Student Village, other residences and businesses, the surrounding road network including sections of the N62 and R446 roads and a large section of the railway line. It outlines deficiencies in current Vodafone coverage; current coverage of the relevant area is 'Fair' for 4G coverage, and fringe for 5G coverage. Comreg Coverage maps have been submitted.

(It is noted the above maps were generated in January 2024 based on an August 2023 data request. I have considered below the most up to date coverage maps on the Comreg site generated in August 2024 based on a May 2024 data request. These show much of the area having 'Good' 4G coverage and 'Fair' 5G coverage).

A map showing target coverage area does not form part of the report, but the narrative refers to the area to the east and southeast.

While the report focuses on the area to the east and southeast of the proposed site, as shown on the Comreg maps, other than part of the rail line there is no mention of the area to the west of the proposed site, in terms of the potential 360° coverage typically benefitting from a chosen point.

The report states that current coverage disparity will be exacerbated with the closure of 3G services. It is stated that there is also an expected jump in demand for enhanced 4G and the 5G services as equipment is upgraded from 3G services, and that the demand for 2G services will increase as existing 3G enabled mobiles will default back to 2G coverage.

7.3.2. Existing sites

The report outlines 5 alternative existing sites which were considered as follows:

1. TUS (formerly AIT), Dublin Road, Garrycastle – located circa 500m northwest of the application site at rooftop location. It is stated that Dense Air Ireland Ltd. currently transmits from a rooftop telecommunication installation at this location. However, this site only provides localised coverage and is insufficient to provide suitable coverage to the target area. Due to the limitations of the site, it has been discounted.

2. Athlone Institute of Technology (AIT) – located 900m northwest of the application site: Dense Air Ireland Ltd currently transmits from a rooftop telecommunication installation at this location. However, this site only provides localised coverage and is insufficient to provide suitable coverage to the target area. Due to the limitations of the site, it has been discounted.
3. Moydrum – located circa 1.5 km northeast of the application site – discounted due to distance.
4. Blyry Industrial Estate m- located circa 1.8 km north of the application site: Vodafone and Meteor currently transmit from rooftop telecommunication installations at this location. However, this site only provides localised coverage and is insufficient to provide suitable coverage to the target area. Due to the limitations of the site, it has been discounted.
5. Bushfield 38 KV Substation, Lissywollen – Located circa 2 km northwest of the application site: Discounted due to distance.

In terms of existing structures, while distance is given as the limitation for sites 3 and 5, it is unclear from the report what 'limitation' of the site has led to sites 1, 2 and 4 being discounted.

I note that location 1 and 4 are occupied by Dense Air. This body, according to their website, provide multi-carrier 4G and 5G network infrastructure to improve wireless coverage in buildings and outdoor spaces. As such I conclude that this infrastructure is intended to improve local coverage within the third level campus and the positions are unlikely to be suitable for wider areas.

Location 4 within Blyry Industrial estate is a roof top location and refers to transmissions by Vodafone and Meteor (now Eir mobile). I have compared the ComReg coverage maps from these providers, being the other two largest mobile phone networks. I note these maps do not indicate any better coverage than that that currently reflected in the Vodafone coverage maps, and thus there is no suggestion that alternative existing locations currently exist. It is noted that Location 4 is further away than sites 3 and 5 and therefore it is likely also too distant and, being a rooftop location not sufficiently high.

7.3.3. Alternative new sites

In terms of alternative sites, the report states that due to the mature nature of the current Vodafone networks in respect of signal propagation, coverage overlap and links for line of sight the area suitable for a new structure is very limited. It states *“Taking this and technical requirements into consideration to secure the necessary coverage and quality of coverage combined with planning considerations the site in question is the only realistic site available.”*

There is no technical detail supporting this statement, or details of other new locations considered.

A map have not been provided depicting proposed coverage compared to existing. There is no indication of overlap coverage from the location proposed. It has not been demonstrated how the proposed site, compared to others, represents the optimum location.

The 1996 Guidelines state *“In the vicinity of larger towns and in city suburbs operators should endeavour to locate in industrial estates or in industrially zoned land”*. I note the presence of other sites further south-east where light industrial uses exist (DPD depot, NCT centre, Mail Centre, Creggan industrial estate) and where there are significant amounts of lands within zoning types where telecoms structures could be considered; i.e. On lands zoned *Enterprise & Employment, Commercial Strategic Gateway Zone* telecom structures are ‘Permissible in Principle’ and on lands zoned *Retail Warehousing* telecom structures are ‘Open for Consideration’ (refer to Map ATC14 and zoning matrix of the Athlone Town Development Plan, 2014 -2020 and Creggan LAP 2010-2025 zoning matrix for the Strategic Gateway Zone).

I therefore consider the detail submitted relating to alternative locations considered by the applicant to be lacking.

7.3.4. Scale and form

The height of the proposed structure at 24m is stated to be the lowest height Vodafone can secure the coverage and line of sight needed for links. A lattice structure has been chosen on the basis of being versatile and robust to allow for additional operators, and avoid the necessity for other antennae support structures in the immediate area.

The proposed height is at the lower end of the typical height of between 20m and 40m set out in the 1996 Guidelines. The development is clearly designed to facilitate use by 2 other operators, in addition to Vodafone. A condition was attached to the permission granted, requiring the structure to be made available to other providers and there was no appeal to this condition.

I note that the 1996 Guidelines only emphasise the preference for monopole structures where a free standing mast is essential within residential area or beside schools, which is not the case in this instance.

I consider the scale and form acceptable in principle, subject to visual impact assessment (7.5 below).

7.4. Obstruction of walking routes

There is no evidence of a formal walking track at this location, or right of way indicated. There is no objective for a walking route within the Town or County Development Plan. I consider that it is likely that local residents have enjoyed easy access to these grounds and utilised them for walking. These are not public lands. I consider it likely that a revised arrangement could be agreed following the construction of the proposed development. Therefore this matter is outside the remit of the Board.

7.5. Visual impact

The national guidelines recognised that visual impact is among the more important considerations which have to be taken into account in arriving at a decision on a particular application and that great care should be taken when dealing with fragile or sensitive landscapes. Local factors which have to be taken into account include intermediate objects (buildings or trees), topography, the scale of the object in the wider landscape, the multiplicity of other objects in the wider panorama, the position of the object with respect to the skyline, weather and lighting conditions, etc.

I note the landscape characterisation applicable to this area, as set out in section 5.1.2 above. I do not consider this location to be within a sensitive landscape; the area is relatively flat and the location of the proposed development is c. 1.5 from the River Shannon and within an edge of urban landscape.

I have assessed the location of the proposed development from a number of vantage points, including An Doirin, Kilmacuagh Avenue, Willow Park, Willow Park Avenue, and remaining streets to south east, along with the rural road to south east. I note the photomontages submitted with the visual impact assessment, which I consider a reasonable representation of the proposal at the locations chosen.

The proposal will be visible from the surrounding area and intermittently along the road network and from the rear of properties located along the local road referred to as the Derries. The proposed development does not form an end view for the majority of locations, and is not at a direct view from houses, due to the the layout and orientation of housing. The nearest dwelling is at a distance of c. 65 m.

There will be direct views from two locations, as reflected in photomontages; Viewpoint 2 and 4. Views of the lower part of the mast and enclosure will be obstructed by other features. In terms of the higher mast structure, noting the urban character of the landscape, distance to the proposed structure, the natural vegetation at the western/south-western boundary with the railway line and in general the multiplicity of objects in the skyline, I do not consider that the proposed development would be obtrusive or significantly detract from visual amenity of the area.

7.6. Impact on property values

With regard to the view of a mast from a dwelling, and the impact of this on property values in terms of purchasers, I consider that this differs between individuals. It may matter to one individual and not another. I also consider that the argument that presence of improved broadband afforded by the mast would benefit property values is a reasonable argument. As such I consider the impact on property values is subjective. I am of the opinion that it is unlikely property values would be negatively affected due to limited visual impact, as set out at 7.5 above.

7.7. Safety Concerns and other issues

The proposed development will be secured by fencing which is the norm. In terms of health, Circular Letter PL07/12, DoELG, specifically clarifies that health and safety matters in relation to telecommunications infrastructure are regulated by other codes

and are not matters for the planning process. The proposed development is not adjoining or within a residential area of beside a school.

I note the Planning Authority did not require the fitting of an obstacle light. The site is at least 30 km from the nearest airfield. I do not consider an obstacle light necessary.

7.8. Conclusion

I consider that applicant has made a reasonable case in terms of the need for the proposed development, and the location chosen for same.

I do not consider that the proposal would conflict with the permitted, existing or adjoining land-uses by reason of its nature and scale, and therefore I consider it acceptable in terms of the zoning of the site.

I note a shortfall in terms information provided on alternative new locations considered, in particular industrial lands to the southeast. This information would help satisfy the policy of the Section 28 Guidelines which states "*In the vicinity of larger towns and in city suburbs operators should endeavour to locate in industrial estates or in industrially zoned land*".

Considering a mast should typically target 360° coverage, the proposed site benefits an area to the west which, other than a section of rail line, does not appear to be the target coverage area. A location within lands to the southeast (e.g. in the vicinity of the Kilmartin N6 interchange) would potentially provide coverage for the target area, along with an area of zoned land to the south.

This may also avoid the need for another structure in the future, thus preventing proliferation of masts. I note however that the proposed mast does not in itself lead to proliferation, there being no other such structures in the vicinity.

The Guidelines state that considerations demand "that that the fullest attention is paid to the location of masts by operators and planning authorities". I therefore consider that the applicant has failed to justify the site selected, having regard to the availability of industrial lands to the southeast, in closer proximity to the target area, where masts are Open to Consideration or Permissible in Principle under the land-use zoning. As such the proposed development does not meet the requirements of the Section 28 Guidelines.

Note: Given the Planning Authority decision and grounds of appeal, this would constitute a new issue in the consideration of this appeal.

8.0 **Appropriate Assessment**

AA Screening I have considered the proposed development in light of the requirements S177U of the Planning and Development Act 2000 as amended.

The subject site is located 1.8km from the Middle Shannon Callows SPA and 1.6 km from Crosswood Bog SAC.

The proposed development comprises a 24m high lattice tower together with antennas, dishes, associated telecommunications equipment, access track and security fencing.

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 there is no conceivable risk to any European Site. The reason for this conclusion is as follows:

- The small scale and nature of the development
- The location and distance from the nearest European sites and lack of connections
- Taking into account the screening report/determination by Westmeath County Council.

I conclude that 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 (stage 2) (under Section 177V of the Planning and Development Act 2000) is not required.

9.0 **Recommendation**

I recommend that permission is refused for the reasons and considerations below.

10.0 Reasons and Considerations

Having regard to the Guidelines on Telecommunications Antennae and Support Structures, issued by the Department of the Environment and Local Government in July 1996 (as revised by Circular PL07/12) which state that

In the vicinity of larger towns and in city suburbs operators should endeavour to locate in industrial estates or in industrially zoned land,

it is considered that the applicant has not submitted adequate justification for the proposed site, having particular regard to

- the absence of details of specific alternative locations considered, and
- the above provision of the S28 Guidelines and the presence of industrial uses and appropriately zoned lands to the south-east.

The proposed development would therefore be contrary to the Guidelines relating to Telecommunications Antennae and Support Structures issued to planning authorities under Section 28 of the Planning and Development Act, 2000 (as amended).

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

Bébhinn O'Shea
Senior Planning Inspector

17/9/2024

Appendix 1 - Form 1

EIA Pre-Screening

[EIAR not submitted]

An Bord Pleanála Case Reference	319503-24		
Proposed Development Summary	Erection of a 24m high lattice tower together with antennas, dishes, associated telecommunications equipment and a proposed access track, all enclosed in security fencing.		
Development Address	Willow Park Football Club, Bonavalley, Athlone, Co. Westmeath.		
1. Does the proposed development come within the definition of a 'project' for the purposes of EIA? (that is involving construction works, demolition, or interventions in the natural surroundings)		Yes	√
		No	No further action required
2. Is the proposed development of a class specified in Part 1 or Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) and does it equal or exceed any relevant quantity, area or limit where specified for that class?			
Yes		Class.....	EIA Mandatory EIAR required
No	√		Proceed to Q.3
3. Is the proposed development of a class specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) but does not equal or exceed a relevant quantity, area or other limit specified [sub-threshold development]?			
		Threshold	Comment (if relevant)
			Conclusion
No	√	N/A	No EIAR or Preliminary Examination required
Yes		Class/Threshold.....	Proceed to Q.4

4. Has Schedule 7A information been submitted?

No		Preliminary Examination required
Yes		Screening Determination required

Inspector: _____ **Date:** _____