



An
Coimisiún
Pleanála

Inspector's Report

PL-500480-DR-25

Development	Replace two advertising signs with LED digital advertising display signs
Location	Talbot Hotel Stillorgan, Stillorgan Road, Blackrock, Co. Dublin, A94V6K5
Planning Authority	Dun Laoghaire-Rathdown County Council
Planning Authority Reg. Ref.	D25A/0757/WEB
Applicant	Stillorgan Park Hotel Ltd.
Type of Application	Permission
Planning Authority Decision	Refuse
Type of Appeal	First Party
Appellant	Stillorgan Park Hotel Ltd.
Observer(s)	None
Date of Site Inspection	14/02/2026
Inspector	Rosemarie McLaughlin

Table of Contents

1.0	Site Location and Description	3
2.0	Proposed Development	3
3.0	Planning Authority Decision.....	4
4.0	Planning History	5
5.0	Policy Context	6
6.0	EIA Screening	7
7.0	The Appeal.....	7
8.0	Assessment	8
9.0	AA Screening	12
10.0	Water Framework Directive	13
11.0	Recommendation	14
12.0	Reasons and Considerations	14
	Appendix 1: Form 1 EIA Pre-Screening	15

1.0 Site Location and Description

- 1.1. The irregularly shaped appeal site (1.36 ha), is occupied by the Talbot Hotel, a large three/four storey building, over a semi-basement on the eastern side of the N11, north of Stillorgan. Part of the hotel building is a gym (Talbot Fit). There is extensive parking on the site, with the majority to the rear of the hotel (east). There are two vehicular entrances on the site frontage along the eastern side of the N11 dual carriageway, one to the north, which is entrance-only and one to the south which is exit-only. A static sign is located at each entrance, where the northern sign is beside a low wall and the southern sign is within a raised planter bed. The existing sign at the northern entrance advertises new business at the Talbot gym and has a top-lit lighting structure which was not turned on and appears to be redundant. Underneath the northern sign is a smaller signage structure advertising free parking. The top lighting element and advertising below the main sign are not included in the submitted drawings. The existing sign at the southern entrance advertises the Talbot Hotel and had a slim rear light box that appeared to be broken and had fallen at an angle below the sign.
- 1.2. The adjoining development is generally residential, to the north, east and southeast. To the south is a motor showroom located between the appeal site and Priory Hill office park to the south/southeast. Opposite the appeal site to the west are houses, and to the northwest is a Circle K garage. Oatlands College is located c 280 m southeast of the appeal site on the opposite side of the dual carriageway. A primary school and sports grounds are located within the Oaklands campus. A low wall with mature trees exist along the road frontage of the hotel onto the N11, which screens the hotel. Illuminated signs 'Talbot Hotel' are located on the upper floor of the hotel on the central façade facing the N11 and at both splayed corners of the building towards the N11.

2.0 Proposed Development

- 2.1. The development will consist of the replacement of 2 no. existing advertising display signs (of c.2750mm wide X 1420mm high and c.2000mm wide X 1000mm high) erected on steel pole structures with 2 no. LED digital advertising display signs (of C.2750mm wide X 1500mm high and 2000mm wide X 1000mm high) erected on steel pole

structures, the overall height of the signs will be c.2500mm high, all together with associated site works.

- 2.2. The application was accompanied by a technical specification for an outdoor multi-purpose panel LED display, brightness 5000nit. The specification includes that an auto light sensor control system detects the environment brightness in real time and automatically adjusts the display brightness to ensure proper brightness of the display 24/7.

3.0 Planning Authority Decision

3.1. Decision

1. The proposed development seeks permission to replace the existing 2 no. static signage displays with 2 new digital advertising display signs located on the interface between the subject site and the N11 which is a strategic transport corridor. Having regard to the nature and location of the proposed development, it is considered that to permit same would endanger public safety by reason of the potential distraction and confusion to all road users caused the proposed digital signage, which would danger public safety by reason of traffic hazard or obstruction of road users. Furthermore, it is considered that to permit the proposed development would establish a precedent for similar types of distracting advertising along this important transport corridor. Therefore, to permit the proposed development would be contrary to the proper planning and sustainable development of the area.

3.2. Planning Authority Reports

3.2.1. Planning Report

- The relevant planning history, relevant planning policy, and contents of the Transport Report are set out.
- The report refers to PLG05 Brightness of illuminated advertising (which provides guidance on the brightness of illuminated advertisements).
- The principle of the proposal is acceptable within the zoning objective, subject to meeting the relevant criteria.

- The proposal is unlikely to have a significant impact on residential amenity owing to the location.
- It is unclear whether the luminance is within the parameters of the guidance document. No details are provided whether the advertisement will be static or use visual effects. The two proposed advertising structures are broadly similar in size as the existing. Visual clutter is unlikely to arise. Notwithstanding these points, a refusal of planning permission is recommended on the basis of endangerment of public safety by reason of traffic hazard in accordance with the transport report recommendation.

3.2.2. Other Technical Reports

3.2.3. Transport Report: The report raises concerns about the proposal and recommends refusal in a form similar to the reason for refusal.

3.3. Prescribed Bodies

None on file.

3.4. Third Party Observations

None on file.

4.0 Planning History

4.1. The most relevant planning history on the subject site is as follows:

D98A/0408: Permission was granted for additional signage to previous approved north, south and west elevation and for external freestanding signage. The site plan indicates two free standing signs along the N11 road frontage. The design of the freestanding signage was higher and marginally narrower than the current signage on site and was relevant to the former Stillorgan Hotel.

D17A/0266/ABP Ref. PL06D.249146: Permission was granted for extension to the rear of existing hotel including alterations to car park, landscaping, and ancillary services and site works.

4.2. The relevant planning history as raised in the appeal site is as follows:

D24A/0582/WEB/ ACP Ref. 321021-24: Permission was granted on appeal, overturning the PA decision for replacement of existing advertising displays with 2 LED digital advertising displays at Whelehans Wines Limited, Bray Road, Loughlinstown, Co. Dublin, D18 VK37 on 20/02/2025.

5.0 Policy Context

5.1. Development Plan

5.2. The Dun Laoghaire County Development Plan 2022-2028 (CDP) applies. The sections of the CDP below are elaborated in the assessment where relevant.

- The site is zoned NC, '*To protect, provide for and/or improve mixed-use neighbourhood centre facilities*'. Uses that are permitted in principle include Advertisements and Advertising Structures. The surrounding areas are zoned A (residential) '*to provide residential development and improve residential amenity while protecting the existing residential amenities*'.
- Section 5.8.2 Policy Objective T24: Motorway and National Routes: It is a Policy Objective to promote, facilitate and cooperate with relevant transport bodies, authorities and agencies to secure improvements to the County's Motorway and National road network to provide, protect and maintain for the safe and efficient movement of people and goods both within and through Dún Laoghaire-Rathdown.
- Section 5.8.6 Policy Objective T28: Road Safety agencies. It is a Policy Objective to implement a Council Road Safety Plan in line with the emerging Government Road Safety Strategy 2021 to 2030 ...
- An Objective '*To protect and preserve Trees and Woodlands*' is indicated in the CDP maps along the N11 road frontage of the hotel.
- Policy objective RE T7: Neighbourhood centres.
- Section 12.6.1: Development proposals in towns, district, and neighbourhood centres.
- Section 12.6 8.5: Signage - free standing/outdoor advertising. Public information and advertising panels are permissible in situations such as pedestrian precincts of shopping centres, other areas of commercial activity and along major traffic routes.

The location of all proposed freestanding advertising structures should be carefully considered having regard to pedestrian movement, and vehicles entering, and exiting a site or parking space.

- Section 12.6 8.7: Signage-digital. Planning Authority acknowledges that the advertising world is moving at pace with new forms of advertising emerging, in particular with respect to digital advertising.
- Section 13.1.2: Transitional zones. Avoid developments detrimental to the more sensitive zone.

5.3. Natural Heritage Designations

5.3.1. The following are the closest designations to the appeal site.

- South Dublin Bay SAC [00210] c 1.7 km northeast.
- South Dublin Bay and River Tolka estuary SPA [004024] c 1.7 km northeast.
- South Dublin Bay pNHA [00210] c 1.7 km northeast.

6.0 EIA Screening

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

7.0 The Appeal

7.1. Grounds of Appeal

- Details of the site location and site context are provided. The planning history is referred to. The internal reports of the planning authority are repeated, and the Planner's opinion was that residential amenity and visual impact are acceptable, but the Planner concurred with the recommendation of the transport division.
- The Planner's report does not raise an issue with the principle of signage, but it is the potential brightness and animation of the LED element that is at issue, as it is considered distracting and dangerous to drivers.

- The existing signs are modest in scale and well established. No assessment of why the signage is considered dangerous was provided. Luminance may be conditioned as part of a grant of permission and examples are provided. The application included a brochure where the signage uses an intelligent auto light sensor control system and adjusts the display in response.
- Whelan's Wine Limited was granted permission (ACP 321021-24 / PA D24A/0582/WEB), overturning the PA decision to refuse permission on grounds of endangering public safety, visual impact and undesirable precedent and that development is similar to this application. That application was c 1 km south of the current application in the same zoning objective and adjacent to the N11. In that application, the transport division did not recommend a refusal. The conditions that applied to that decision are provided.
- The development is consistent with the CPD, details of which are set out.
- The development comprises the replacement of two existing signs with 2 LED signs to near identical dimensions which is appropriate in terms of location and principle. The element of concern about the LED aspect of the signage may be alleviated through appropriate conditions.

7.2. **Planning Authority Response**

The PA refer to the Planner's report and do not consider the appeal raises any matter that would justify a change in attitude.

7.3. **Observations**

None on file.

8.0 **Assessment**

8.1. I consider that the assessment may be considered under the following headings.

- Principle of development /Compliance with relevant CDP provisions on advertising
- Traffic safety - reason for refusal
- Visual impact/residential amenity

8.2. Principle of development/ Compliance with relevant CDP provisions on advertising

- 8.2.1. The proposed development is permissible in principle within the zoning objective for the site NC, 'To protect, provide for and/or improve mixed-use neighbourhood centre facilities'. The NC zoning applies to the hotel and other commercial uses to the south.
- 8.2.2. The proposed signs are free standing outdoor advertisements and section 12.6.8.5 provides that public information and advertising panels are permissible in situations such as pedestrian precincts of shopping centres, other areas of commercial activity and "along major traffic routes". The location of all proposed freestanding advertising structures according to the CDP should be carefully considered having regard to pedestrian movement, and vehicles entering, and exiting a site or parking space. In this regard, the existing panels are in place without issue and are proposed to be replaced on broadly the same size with LED lighting. Section 12.6.8.5 of the CDP is silent on digital signage along traffic routes and therefore I consider it is a permitted in principle, and a case by case approach is appropriate.
- 8.2.3. In section 12.6.8.7 of the CDP, the Planning Authority acknowledges advertising is modernising with new forms of digital advertising and states digital advertising may be permitted, in "certain locations" subject to design, size, detail, and level of illumination. Professional Lighting Guide PLG 05/23, 'The brightness of illuminated advertisements including digital displays' by the Institution of Lighting Professionals is referred to under 'Guidelines for Planning Authorities' in the Planner's report. This UK 2023 document has not been submitted or detailed in the appeal and is not included in the statement demonstrating compliance with Section 28 Guidelines in the CDP. I do not consider this is a statutory guidance document.
- 8.2.4. I consider the proposed development to be acceptable in principle subject to meeting the relevant criteria and planning considerations. Section 12.6.8.2 of the CDP provides that no advertising will be permitted where they would confuse or distract users of any public road. This section of the CDP is addressed in the following section on the reason for refusal.

8.3. Traffic safety - reason for refusal

- 8.3.1. On the recommendation of the Acting Senior Executive Engineer in the Transport Planning Section, the PA considered the development would be an endangerment of public safety due to the potential for distraction and confusion caused by the proposed development to motorists within the site and those on the N11, especially at peak times and the resultant traffic hazard arising from same. Section 12.6.8.2 of the CDP on signage provides that no commercial advertising structure will be permitted in several circumstances, "or where they would confuse or distract users of any public road". The grounds of appeal are outlined above which maintains there is a lack of reasoning by the PA why the LED signs would endanger traffic safety and the appellant does not consider there will be any traffic problems.
- 8.3.2. The appeal relies on an appeal decision (ACP 321021-24/ PA D24A/0582/WEB) (Whelehans Wines site) where the decision of the PA was overturned, and two signs were permitted to be replaced with two LED signs, c 1 km from the appeal site. In that application, the reason for refusal had four elements: endangering public safety by reason of traffic hazard, would not integrate satisfactorily with the existing pattern of development, would appear visually obtrusive in the streetscape and would set an undesirable precedent contrary to Section 12.6.8.2 (Signage) and Section 13.1.2 (Transitional Zonal Areas) of the CDP. The Whelehans Wine site can be distinguished from this application as the transport section of the PA had no objection to that development subject to conditions. In the refusal issued by the PA in this application, the reason for refusal is confined to endangering public safety by reason of traffic hazard and precedent and is based on the traffic engineer's recommendation.
- 8.3.3. The Planner's report indicates that no referrals were made on this application and therefore TII have not provided an observation on this application.
- 8.3.4. I consider that approaching the Talbot Hotel heading south on the dual carriageway is a different context to the Whelehans Wine site in terms of access and traffic movements. I accept that the current application is for a similar development of replacement LED signs but note the signs on Whelehans wine site were higher. The appeal states the sites are less than a kilometre apart, but the sites are c 8 km apart and the Whelehans site is very different in context. The Whelehans Wine site is a corner site at a junction and is set back and separated from the N11 by a raised

platform. The Whelehans site is bounded on the east by the Bray Road which runs parallel to the N11 and therefore the signage is not on the interface with the N11 as in this application and the northern signage is much higher off the ground and can be seen at distance. Traffic approaching the Whelehans site from the north on the dual carriageway must exit onto the Bray Road c 310 m north of the site or turn left at the junction with Cherrywood Road and then turn into the Whelehan site. Having regard to the above, I do not consider that the decision of the Commission to replace signs with LED lighting is a comparable precedent to be relied upon in the current appeal.

8.3.5. The proposed LED signage is directly adjacent to the footpath along the N11 in an area where there are two vehicular accesses, a cycle lane, a bus lane and two lanes for traffic on the eastern side of the dual carriageway. There is also a school traffic warden sign close to the proposed northern sign. There is a slight bend in the N11 when approaching from the north (Mount Merrion junction) and the appeal site appears in the view of drivers traveling south at the bend, rather than having a long view to the site. At this section of the N11, drivers also have an option at the hotel to move into the right lane to turn onto Trees Road Lower.

8.3.6. I consider that advertisements are part of an urban landscape, are designed to attract attention and note the CPD acknowledges that the advertising is moving at pace with new forms of advertising emerging, in particular with respect to digital advertising. The location of all proposed freestanding advertising structures according to the CDP should be carefully considered having regard to pedestrian movement, and vehicles entering, and exiting a site or parking space. Having regard to the two accesses along the appeal site, and particularly the adjacent signage for a school warden, I consider there is a risk of distraction from the proposed LED northern sign where attention could be diverted from the surrounding busy road context. There is also a west turn off the dual carriageway just to the south of the hotel where drivers must get into the correct (right) lane and I noted that the N11 was very busy in both directions. LED technology allows advertisements to change, and while the timing may be restricted by condition, changes on the panel are intended to draw attention to the new content which I consider may exacerbate the risk of distraction at this location. In relation to the southern sign, this is close to a junction and oriented towards traffic on the opposite side of the dual carriageway which again I consider could be a distraction, but I consider it would be less distracting than the proposed northern sign.

8.3.7. On balance, I concur with the PA decision that the location of LED lighting could cause a potential distraction and confusion to road users from the proposed digital signage in this location, contrary to Section 12.6.8.2 of the CDP. I also note Policy Objective T28, provides it is a Policy Objective to implement a Council Road Safety Plan in line with the emerging Government Road Safety Strategy 2021 to 2030. Section 5.8.6 in the CDP elaborates that Active Travel Routes and School Traffic Zones will continue to be developed and school wardens provided or retained near schools where warranted in order to encourage good user behaviour for motorists, cyclists and pedestrians on roads, footways and crossing points approaching schools.

8.3.8. In conclusion, having regard to the nature of the LED advertising proposed, the location and surrounding pattern of development, I consider that the decision of the PA should be upheld and permission refused. The PA considered the proposed development would also establish a precedent for similar types of distracting advertising along this important transport corridor, but I consider each application on signage should be considered in the locational context and having regard to the height and size of the advertising panels.

8.4. **Visual impact/residential amenity**

8.4.1. The appeal in section 5.1 (design) points to the view in the planning report, that the visual and residential amenity impact was considered acceptable. While the proposed replacement advertisements are generally the same in scale, I note the northern sign is only c 25 m from the residential block to the north which is located in zoning objective A and is therefore subject to section 13.1.2 of the CDP to avoid developments detrimental to the more sensitive zone in transitional areas. The sign is splayed onto the N11 towards the northeast and forward of the residential block to the north and therefore movement on the LED signage would be mitigated owing to the orientation of the sign. The sign to the south is adjacent to commercial development, and the nearest housing is on the opposite side of the N11. Accordingly, I concur the proposal is acceptable in terms of visual and residential amenity.

9.0 **AA Screening**

9.1. I have considered the proposed residential extension in light of the requirements S177U of the Planning and Development Act 2000 as amended.

- 9.2. The subject site is located c 1.7km southwest of South Dublin Bay SAC [00210], South Dublin Bay and River Tolka estuary SPA [004024] and South Dublin Bay pNHA [00210].
- 9.3. The proposed development comprises replacement signage.
- 9.4. No nature conservation concerns were raised in the planning appeal.
- 9.5. 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:
- Nature of works e.g. small scale and nature of the development
 - Location-distance from nearest European site and lack of connections
- 9.6. 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.
- 9.7. Likely significant effects are excluded and therefore Appropriate Assessment (stage 2) (under Section 177V of the Planning and Development Act 2000) is not required.

10.0 **Water Framework Directive**

- 10.1. The subject site is located c 375 m west of a waterbody, IE_EA_09B130400, EPA Name Brewery Stream_010, with a status of poor. The subject site is separated from that waterbody by houses and roads in an urban area.
- 10.2. The proposed development comprises replacement signage.
- 10.3. No water deterioration concerns were raised in the planning appeal.
- 10.4. I have assessed the development and have considered the objectives as set out in Article 4 of the Water Framework Directive which seek to protect and, where necessary, restore surface & ground water waterbodies in order to reach good status (meaning both good chemical and good ecological status), and to prevent deterioration. Having considered the nature, scale and location of the project, I am satisfied that it can be eliminated from further assessment because there is no conceivable risk to any surface and/or groundwater water bodies either qualitatively or quantitatively.

10.5. The reason for this conclusion is as follows :

- The small scale and nature of the development
- The location-distance from nearest Water bodies and lack of hydrological connections.

10.6. I conclude that on the basis of objective information, that the proposed development will not result in a risk of deterioration on any water body (rivers, lakes, groundwaters, transitional and coastal) either qualitatively or quantitatively or on a temporary or permanent basis or otherwise jeopardise any water body in reaching its WFD objectives and consequently can be excluded from further assessment.

11.0 Recommendation

11.1. I recommend that permission be refused.

12.0 Reasons and Considerations

1. By reason of the location of the proposed LED signage on the interface with the heavily trafficked N11 and pattern of development in the area including a school traffic warden sign adjacent to the proposed development, it is considered that the proposed LED signage would be contrary to the provisions of Section 12.6.8.2 of the Dun Laoghaire County Development Plan 2022-2028 which provides that no commercial advertising structure will be permitted where it would confuse or distract users of any public road. It is considered that the proposed development would endanger public safety by reason of traffic hazard, as the proposed digital signage could confuse or distract road users at this location and would be contrary to the proper planning and sustainable development of the area.

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

Rosemarie McLaughlin
Planning Inspector

26th February 2026

Appendix 1: Form 1 EIA Pre-Screening

Case Reference	PL-500480-DR-25
Proposed Development Summary	Replace two advertising signs with LED digital advertising display signs
Development Address	Talbot Hotel Stillorgan, Stillorgan Road, Blackrock, Co. Dublin, A94V6K5
IN ALL CASES CHECK BOX / OR LEAVE BLANK	
1. Does the proposed development come within the definition of a 'Project' for the purposes of EIA?	<input checked="" type="checkbox"/> Yes, it is a 'Project'. Proceed to Q.2.
	<input type="checkbox"/> No, No further action required.
(For the purposes of the Directive, "Project" means: - The execution of construction works or of other installations or schemes, - Other interventions in the natural surroundings and landscape including those involving the extraction of mineral resources)	
2. Is the proposed development of a CLASS specified in Part 1, Schedule 5 of the Planning and Development Regulations 2001 (as amended)?	
<input type="checkbox"/> Yes, it is a Class specified in Part 1. EIA is mandatory. No Screening required. EIAR to be requested. Discuss with ADP.	State the Class here
<input checked="" type="checkbox"/> No, it is not a Class specified in Part 1. Proceed to Q3	
3. Is the proposed development of a CLASS specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) OR a prescribed type of proposed road development under Article 8 of Roads Regulations 1994, AND does it meet/exceed the thresholds?	

<input checked="" type="checkbox"/> No, the development is not of a Class Specified in Part 2, Schedule 5 or a prescribed type of proposed road development under Article 8 of the Roads Regulations, 1994. No Screening required.	
<input type="checkbox"/> Yes, the proposed development is of a Class and meets/exceeds the threshold. EIA is Mandatory. No Screening Required	
<input type="checkbox"/> Yes, the proposed development is of a Class but is sub-threshold. Preliminary examination required. (Form 2) OR If Schedule 7A information submitted proceed to Q4. (Form 3 Required)	
4. Has Schedule 7A information been submitted AND is the development a Class of Development for the purposes of the EIA Directive (as identified in Q3)?	
Yes <input type="checkbox"/>	
No <input checked="" type="checkbox"/>	Pre-screening determination conclusion remains as above (Q1 to Q3)

Inspector: _____

Date: _____