



Development

Replacement of advertising display and associated site works. (to a Protected Structure RPS No. 3462), decommissioning of two advertising displays in a separate building and location.

Location

23 Sarsfield Street, Limerick
10 Saint Dymphna's Terrace, Limerick

Planning Authority

Limerick City and County Council

Planning Authority Reg. Ref.

2561295

Applicant(s)

JCDecaux Ireland Ltd

Type of Application

Permission

Planning Authority Decision

Refuse Permission

Type of Appeal

First Party Normal Planning Appeal

Appellant(s)

JCDecaux Ireland Ltd

Observer(s)

None

Dates of Site Inspections

1st and 2nd May 2026

Inspector

Suzanne Kehely

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1.0 Site Location and Description

- 1.1. The site relates to two separate locations: the primary one in Limerick city centre where development is proposed and the secondary one in the outer city environs where decommissioning work is proposed consequent on permission for the primary site.
- 1.2. The primary proposed development site relates to the gable elevation of a prominent corner property fronting Sarsfield Street and Liddy Street in Limerick City Centre. Both roads are regional routes (R445 and the R527) one of which extends over the Bridge across the River Shannon as part of a key approach to the site.
- 1.3. This site is occupied by a public premises with its main frontage onto Sarsfield St. where it retains many elements of the original façade such as window openings, shopfront and original brickwork. The gable end fronts onto Liddy Street and has evidence of later works than the main façade – it has a rendered stepped parapet finish on upper gable and the remaining elevation is otherwise faced with concrete brick which is proud of the render. This newer brick continues along the extended premises to the rear along Liddy Street. This elevation also includes a less traditional shopfront to the premises as compared to the main frontage. The original sliding sash windows have been replaced with aluminium frames on hinged sashes.
- 1.4. There is an existing large advertising display panel on an internally illuminated box type structure above eaves level onto the Liddy Street elevation. It is off centre and is visible from Sarsfield Bridge on entering the city centre from the northwestern approach to the site. This is a main thoroughfare into the city centre and historic sites.
- 1.5. The building is 3 storeys and appears similar in scale and building era with the directly opposing buildings on Sarsfield Street/Henry Street corner. The diagonally opposed building is four storeys high with brick facing and a curved corner. The opposing building on Liddy Street is similarly four storeys high with a brick façade,

chamfered corner and traditional solid to void elevation but is relatively recent construction.

- 1.6. The site area as delineated in submitted plans for the Sarsfield St. premises relates solely to the area occupied by the advertising display.
- 1.7. The secondary site relates to a double width advertising display beside the gable end of No. 10 Saint Dymphna's Terrace on the R527 (described as Blackboy Road) where it is adjoined to the east by open space and is therefore quite visible from the road corridor but obscured by a row of maturing trees. This location to the east of the city is in a mature outer city suburban area with extensive industrial/warehousing in the outlying area to the east along the R527. St Joseph's Psychiatric Hospital, a large Victorian building complex that is a Protected Structure, lies behind this terrace and some views of part of the hospital complex appear to be obscured from the east on approach to the city by the billboard. This is a key regional route into the city centre and is a continuation of the N24 from its intersection with the M20 to the east.

2.0 Proposed Development

- 2.1. Permission is sought for replacement of one existing internally illuminated advertising display structure (6.4xm x 3.35m with 1 digital advertising display structure of 6.28m x 3.4m and ancillary works and services on the Liddy Street gable elevation of the premises at no. 23 Sarsfield street - a Protected Structure. The proposal incorporates a digital display mechanism whereby it can remotely operate and be changed at 10 second interval and with a luminosity operating below the recommended maximum of 300 candelas per sq.m. from dusk to dawn. A restriction on hours with a curfew between 2am and 6am is proposed in grounds of appeal. A camera is also included to monitor displays.
- 2.2. The proposal also includes the permanent decommissioning of 2 advertising display at a separate location at the gable of 10 Saint Dymphna's Terrace on the R527. Each of these is 6.3m x 3.5m.
- 2.3. The application is accompanied by:
 - Letter of consent from JCDecaux Ireland Ltd to agent to make application
 - Letter of consent from owner of 23 Sarsfield Street premise.

- Architectural Heritage Impact Assessment
- A planning application report

3.0 Planning Authority Decision

3.1. Decision

3.1.1. By Order dated 11th February 2026 the planning authority issued notification of its decision to refuse permission for 3 reasons:

- Would materially detract from the historic architectural character and visual amenity of the building and its prominent setting on a key approach route into the Georgian City. By reason of its scale, illumination, animated digital context and visual dominance the proposed is not sensitively sited or designed and is not in character with the Protected Structure. The development is therefore contrary to Section 11.6.4.2 of the Development Plan, the Shopfront guidelines (2025) prepared pursuant to ECON O15(c) and objective EH O50(d) of the Development plan which seek to protect the architectural character of Protected Structures and restrict internally illuminated and inappropriate sign.
- The proposed internally illuminated, frequently changing sign, by reason of its dynamic display, illumination and location at a busy trafficked junction would likely distract drivers thereby endangering public safety by reason of traffic hazard.
- On the basis of planning history, it appears that the proposed development relates to a site the use of which is unauthorised for use as an internally illuminated sign. The proposed development would facilitate the consolidation and intensification of this unauthorised use. It is therefore considered that it would be inappropriate to consider granting of permission for the proposed development in such circumstances.

3.2. Planning Authority Reports

3.2.1. Planning Reports

- The planning report refers to planning history on the site and also for permission on adjacent site for alteration and extension to provide for apartments.
- No pre planning meeting was held.

- The protected structure status is referred to as is the policy basis for refusing such development in principle. It is considered the changing dynamic nature of the advertising display would be a material intensification of an inappropriate development. This is the primary basis for the detailed reasons for refusal of permission.
- It is note that a settlement was reached regarding enforcement DC-412-15 on site but that the existing sign is still unauthorised and merely immune from prosecution. Therefore, it is considered that the existing sign is still unauthorised.

3.2.2. Other Technical Reports

Conservation Officer: 21/1/26: Refusal is recommended based on development plan policy and that 'the existing billboard is in a prominent location on a key approach route into the historic Georgian City and is highly visible along Sarsfield Street and at the junction with Henry Street. The proposed replacement of the existing display with a digital display is likely to cause an increase in visual clutter on the views along this key route.'

3.3. Prescribed Bodies

No response from any of the consulted prescribed bodies.

3.4. Third Party Observations

None

4.0 Planning History

- 4.1. An Bord Pleanála Ref: RL3569 decided (in 2020) that the erection of an internally illuminated billboard sign in place of a static/trivision billboard sign on the gable wall of premises at 23 Sarsfield Street, Limerick is development and is not exempted development. The concluding elements to this decision were:

(a) the erection of the subject internally illuminated advertising billboard, whether it involved alterations/modification to the original advertisement sign that was the subject matter of planning permission register reference number P.92/088, or involved the complete replacement of the original sign, involved the carrying out of works within the meaning of Section 2 of the Planning and Development Act, 2000,

as amended, and, therefore, and in accordance with case law, constitutes development under section 3 of that Act,

(b) the subject internally illuminated advertising billboard, while of the same height and width dimensions as the original advertisement sign that was the subject matter of planning permission register reference number P.92/088, is materially different to the original sign by reason of its increased depth and framing, and by reason of its form of illumination (which illumination projects outwards from the sign, whereas the original sign was required by condition number 1 of that permission to shine solely inwards on to the sign),

(c) the works to provide the subject internally illuminated advertising billboard would not come within the scope of section 4(1)(h) of the Planning and Development Act, 2000, as amended, because the subject billboard, by reason of its design and the form of illumination, materially affects the external appearance of the structure so as to render the appearance inconsistent of the character of the structure, and, therefore, would not be exempted development pursuant to section 4(1)(h),

(d) the subject internally illuminated advertising billboard would not come within the scope of any of the exemptions provided for in Part 2 of Schedule 2 of the Planning and Development Regulations, 2001, as amended, and is, therefore, not exempted development, and

(e) in any event, the provisions of Article 9 (1)(a)(iii) apply in respect of the subject development, as the development in question, by reason of its scale, illuminated nature and location adjoining a busy road junction, would result in a traffic hazard by reason of distraction of road users at or adjoining this junction:.

4.2. Planning Authority reference: 92/088 refers to permission for erection of an externally illuminated trivision sign in place of existing sign at 23 Sarsfield Street.

The planning report in the subject case refers to the content of this file and states a condition required the removal of an existing 'clock sign' on the gable and provision of a suitable feature, street name sign or mural in its place. A letter is stated to be on file confirming that the planning authority were satisfied with the request to change the 3-way sign to a one face sign. Letter on file stating that the applicant proposes, in response to condition 2, to erect a tile mural reading Liddy Street which will

incorporate the city seal and an illustration of Sarsfield Street. No design was submitted or agreed.

5.0 Policy Context

5.1. Limerick City and County Development Plan 2022-2028

- 5.1.1. **City Centre Zoning Objective:** To protect, consolidate and facilitate the development of the City Centre commercial, retail, educational, leisure, residential, social and community uses and facilities.

Purpose: To consolidate Limerick City Centre through densification of appropriate commercial and residential developments ensuring a mix of commercial, recreational, civic, cultural, leisure, residential uses and urban streets, while delivering a high-quality urban environment which will enhance the quality of life of residents, visitors and workers alike. The zone will strengthen retail provision in accordance with the Retail Strategy for the Limerick Shannon Metropolitan Area and County Limerick, emphasise urban conservation, ensure priority for public transport, pedestrians and cyclists, while minimising the impact of private car-based traffic and enhancing the existing urban fabric.

- 5.1.2. **Site Specific:** No 23 Sarsfield St is included in the Record of Protected Structures. (RPS No. 3462.) It is described as a corner-sited end-of-terrace three-bay three-storey over concealed basement public house, built c. 1830. The adjoining building on Sarsfield Street and other corner buildings on the opposite side of the street at Sarsfield Street/Henry Street corners are also included in the RPS (RPS nos. 3464, 3463 and 3465 respectively).

5.1.3. Objectives relating to signage and Protected Structures

- **Objective ECON O15 Active Street Frontages**
 - (b) Encourage the upgrade and refurbishment of existing retail units and the maintenance of original shopfronts, or the reinstatement of traditional shopfronts where poor replacements have been installed, **discourage** the use of external roller shutters, **internally illuminated signs** or inappropriate projecting signs
 - (c) Prepare Shopfront Design Guidelines, within the lifetime of the Development Plan and ensure implementation of these guidelines on completion.

- **Objective EH O50 Work to Protected Structures**

It is an objective of the Council to:

a) **Protect structures included on the RPS from any works that would negatively impact their special character and appearance.**

b) Ensure that any development proposals to Protected Structures, their curtilage and setting, shall have regard to the Architectural Heritage Protection Guidelines for Planning Authorities published by the Department of the Arts, Heritage and the Gaeltacht.

c) Ensure that all works are carried out under the supervision of a qualified professional with specialised conservation expertise.

d) Ensure that any development, modification, alteration, or extension affecting a Protected Structure and/ or its setting, is sensitively sited and designed and is appropriate in terms of the proposed scale, mass, height, density, layout and materials.

e) Ensure that the form and structural integrity of the Protected Structure is retained in any redevelopment and that the relationship between the Protected Structure and any complex of adjoining buildings, designed landscape features, or views and vistas from within the grounds of the structure are respected.

f) Respect the special interest of the interior, including its plan form, hierarchy of spaces, architectural detail, fixtures and fittings and materials.

g) Support the re-introduction of traditional features on protected structures where there is evidence that such features (e.g. window styles, finishes etc.) previously existed. h) Ensure that new and adapted uses are compatible with the character and special interest of the Protected Structure.

i) Protect the curtilage of Protected Structures and to refuse planning permission for inappropriate development within the curtilage and attendant grounds, that would adversely impact on the special character of the Protected Structure.

j) Protect and retain important elements of built heritage including historic gardens, stone walls, entrance gates and piers and any other associated curtilage features.

k) Ensure historic landscapes and gardens associated with Protected Structures are protected from inappropriate development

5.1.4. **Development Management of signage**

Section 11.6.4 sets out guidance for shopfronts and signage with section 11.6.4.2 referring to signage and states in respect of advertising signage that it is required to be sympathetic with surrounding in terms of scale, design, material and colour and requirements area to:

- Encourage the use of hand painted signs and to prohibit plastic box signs, which are internally illuminated.
- Limit the numbers of signs where it is considered they would lead to a cluttered appearance at a junction or on a building.
- **On buildings and structures of historic, artistic and architectural interest, only permit advertising which is in character with the building or structure**
- Limit advertising in areas of special amenity, areas where views and prospects of scenic importance are listed, recommended maximum size of 1 sqm.
- Restrict the use of advertising structures on public footpaths and on road margins where they conflict with pedestrian or traffic safety or with visual amenity. Large advertising hoardings (billboards) will be prohibited in the countryside and will only be considered as temporary structures in towns and villages where they screen a derelict site.
- Digital advertising may be permitted, in certain locations subject to design, size, detail and level of illumination and the number of existing advertising signs on the shopfront (or similar.)

5.1.5. **Limerick City & County Council Shopfront Design Guidelines**

These were prepared pursuant to the development plan objective ECON O15 and set out detailed guidance on shopfront design with emphasis on historic importance. They reiterate the CDP objectives ECON O15 and EH O50. The guidelines for historic areas such as the ACAs and Georgian Limerick are:

- Advertising and Signage on historic buildings and within the Architectural Conservation Areas (ACA) should be minimised to protect their architectural character...
- **Internally illuminated signage will not be permitted on Protected Structures, or within ACA's or within the Georgian Character Area.**

- **Plastic signs or pre-finished boards will not be permitted on Protected Structures, or within ACA's, or in the Georgian Character Area."**

5.2. Relevant National or Regional Policy / Ministerial Guidelines

- 5.2.1. **The Architectural Heritage Protection Guidelines for Planning Authorities, Department of Housing, Local Government and Heritage (2011)** are relevant in respect of Protected Structures. Chapter 7 sets out conservation principles generally. Chapter 13 sets out development management guidelines. Section 13.8 provides guidance on assessing development in the setting of protected structures.

5.3. National Built Heritage Designations

- 5.3.1. The National Inventory of Architectural Heritage (NIAH) identifies the site and two of the three other corner buildings at the crossroads junction as being of regional importance for their architectural and artistic interest. The adjacent structure is also included. They are appraised accordingly:

- **The site (21512008)** - Corner-sited end-of-terrace three-bay three-storey over concealed basement public house, built c. 1830. Possibly originally one larger structure. Rendered shopfront to façade, rendered crow step gabled side elevation, and prolonged to rear with an accretion, built c. 1980. A modest late Georgian house, converted to public house use at some point during the nineteenth century and given additional interest with the introduction of a rendered shopfront, a signature addition of the late nineteenth- and early twentieth-century. In the 1872 edition of the Limerick City Ordnance Survey, Liddy Street did not exist. Sarsfield Street (then known as Brunswick Street) continued, in one terrace of buildings, to Sarsfield Bridge (then known as Wellesley Bridge). The site of this house appears to have incorporated part of its neighbouring building to the east.
- **Opposite building (21512007)** The record dates this building from 1880s. It is described as a corner-sited attached six-bay three-storey over basement former bank building, built c. 1880, possibly incorporating a number of earlier structures. Distinguished by a full-height two-bay entrance breakfront and full-height three-bay bow to the north-facing side elevation, and two-bay three-storey return facing Henry Street. Hipped artificial slate main roof with a semi-conical slate roof over

bow end bay, with copper flashing lining the junction of the two. While renovated internally, externally, the façade composition remains largely intact forming a significant building at this important corner site.

- **Diagonally opposing building (21512006)** The record dates building from 1820-1840 and described as s corner-sited terraced three-bay four-storey building, built c. 1830, with a rounded slightly recessed corner entrance bay, and rendered shopfront at ground floor level. It is appraised as being a key building in the streetscape situated at a prominent junction in the city. This building, with its unusual corner entrance bay, is more typical of late nineteenth-century commercial buildings. It forms the end of a terrace of relatively intact late Georgian buildings in the city.
- **Adjacent site: (21512009)** The record describes this as a Terraced single-bay three-storey former bakery, built c. 1890, with limestone shopfront and three-sided canted-bay oriel window at first floor level. Possibly originally one larger structure.

5.4. **Natural Heritage Designations**

The Lower Shannon SAC is c. 150m from the site boundary.

6.0 **EIA Screening**

- 6.1. The subject 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 Act.

7.0 **The Appeal**

7.1. **Grounds of Appeal**

- The proposed development is for replacement advertising of similar size and not for new signage.
- There is significant planning gain as:
 - The profile depth is halved to a depth of c. 300mm

- There will be a new curfew on illumination from 2am -6am which presently does not exist as it is illuminated through those hours.
- There will be a permanent decommissioning of two advertising displays on Blackboy Road thereby reducing advertising by 44sq.m. and they will be removed prior to commencement of other development and will enhance the visibility of St Joseph's Hospital, a Protected Structure
- The proposed is consistent with both the zoning objective of the city centre in overall terms and there is also provision for digital advertising subject to design detail, level of illumination and existing advertising on the shopfront.
- The proposed development would not materially detract from the historic architectural character and visual amenity setting or character of the building.
 - In this case as a sign already exists, this existing character will not be materially altered as a result of the proposed development.
 - The Architectural Heritage Impact Assessment confirms the impact to be neutral to positive.
- The Liddy Street elevation is not original as the building change from mid terraced to end of terrace. Reinstatement of original character if that is the intention is not possible.
- Refusal of permission is not consistent with the approach of appealed decisions to ABP/ACP or other planning authorities in respect of conservation or traffic safety.
- The proposed digital advertising will not have a negative impact on traffic safety relative to the existing premiere internally illuminated advertising display.
- The application is on site where the principle of advertising display is established and for which the council has accepted it is not unauthorised.

7.2. Planning Authority Response

No comments on appeal grounds.

7.3. Observations

None

8.0 Assessment

8.1. The Issues

- 8.1.1. This appeal relates to a first party appeal against a decision to refuse permission for a replacement advertisement display at a prominent corner site in Limerick City Centre. The extant display structure has been the subject of a prior referral to the Commission (previously An Bord Pleanála) wherein it was determined in 2020 that such development required permission.
- 8.1.2. Having examined the application details and all other documentation on file, including all of the submissions received in relation to the appeal, the report/s of the local authority, and having inspected the site and environs, and having regard to the relevant local and national policies and statutory guidance, I consider that the substantive issues in this appeal to be considered are:
- Nature and Principle of Development
 - Impact on Protected Structure
 - Impact on Traffic Safety

8.2. Nature and Principle of Development

Nature of development

- 8.2.1. In this case, the applicant, is seeking permission for an internally illuminated display sign to replace the existing sign at Sarsfield Street premises. The applicant is relying on the fact that there is an extant illuminated sign of comparable area (approx. 6m x 3m) which is illuminated throughout the evening from dusk to dawn and that the net effect of the improved modern slimline design with no illumination between the hours of 2am and 6am is an overall positive development, notwithstanding that there is no evidence of permission for the existing illuminated sign. While the grounds of appeal refer to an understanding of the sign being authorised this is not consistent with the view in the planning authority report which refers to its extant unauthorised status. For clarity in this regard, I refer the Commission to its declaration in 2020 that the erection of an internally illuminated billboard sign in place of a static/trivision billboard sign on the gable wall of premises at 23 Sarsfield Street, Limerick is development and is not exempted development and in determining this, it was concluded that

- the subject internally illuminated advertising billboard, whether it involved alterations/modification to the original advertisement sign that was the subject matter of planning permission register reference number 92/088, or involved the complete replacement of the original sign, involved the carrying out of works within the meaning of Section 2 of the PDA2000 as amended, and, constituted development under section 3 of that Act and
- the subject internally illuminated advertising billboard, while of the same height and width dimensions as the original advertisement sign that was the subject matter of planning permission register reference number 92/088, was materially different to the original sign by reason of its increased depth and framing, and by reason of its form of illumination (which illumination projects outwards from the sign, whereas the original sign was required by condition number 1 of that permission to shine solely inwards on to the sign).
- The works, by reason of its design and the form of illumination, materially affect the external appearance of the structure so as to render the appearance inconsistent the character of the structure, and
- the development in question, by reason of its scale, illuminated nature and location adjoining a busy road junction, would result in a traffic hazard by reason of distraction of road users at or adjoining this junction.

8.2.2. Accordingly, the permission under PA ref. 92/088 sets the baseline for assessing the nature and impact of the proposed development. The applicant is however using the existing unauthorised sign as a baseline for comparative purposes and is in effect seeking to regularise the status of an internally illuminated sign where permission for such has not existed and has been expressly stated to require permission. The applicant is also seeking to use the depth and bulk of the sign of c. 600mm as an established baseline from which to assess the impact of the current slimline proposal, whereas it would appear that a slimmer profiled structure than exists was permitted. This had a trivision mechanical feature incorporated into the structure that was externally illuminated development, but this was clarified previously to have been removed.

8.2.3. The case by the applicant for the re-design of the sign on the Liddy Street elevation is also supported by the removal of a double advertisement sign in a separate

location on Blackboy Road on the basis of the overall reduction of 44 sq.m of such signage in the city environs. Given the completely removed location and that there is no direct impact on the primary site at Sarsfield Street I do not consider the impact of the decommissioning of such signs to be relevant in assessing the impact on Sarsfield Street and its environs. I also note that this was not part of any Development Plan led strategy or pursuant to council led development management plan. I do not consider in principle that the 'planning gain' basis on one site such as Blackboy Road in an entirely different context can be a reasonable basis to influence the merits of development on the subject site. I do not consider any further appraisal of this decommissioning to be helpful in consideration of the signage proposed.

Principle of Development

8.2.4. The planning authority acknowledges that, as provided for in the Development Plan, advertising signage, including digital displays, are permitted in principle in 'certain locations' in the commercial centres of the city centre. As the site is located in a predominantly commercial site occupied by a public house and surrounded by predominantly commercial premises in the city centre, the location is generally of a nature where advertising signs (and shopfronts) associated with the respective businesses can be accommodated subject to complying with the guidance and criteria as set out in section 11.6.4 and specifically 11.6.4.1 and 11.6.4.2 of the Limerick City and County Development Plan in respect of shopfronts and advertising. There are however specific criteria that are relevant in considering the principle of a large internally illuminated advertising sign of over 6m x 3m in dimension.

- Firstly, large advertising hoardings (billboards) will only be considered as temporary structures in towns and villages where they screen a derelict site; (s.11.6.4.2)
- Secondly, while Digital advertising may be permitted, in certain locations, it is subject to design, size, detail and level of illumination and the number of existing advertising signs on the shopfront (or similar). (s.11.6.4.2)
- Thirdly, in terms of design, limitations apply in the context of complying with the objective specifically discouraging such development. I refer to Objective ECON O15 which seeks to 'Encourage the upgrade and refurbishment of existing retail units and the maintenance of original shopfronts, or the reinstatement of

traditional shopfronts where poor replacements have been installed...’ such as to **discourage**, inter alia, the use of **internally illuminated signs** or inappropriate projecting signs.

- Finally, in terms of reconciling with the built heritage objectives for Protected Structures such as Objective EH O50 to protect structures included on the RPS from any works that would negatively impact their special character and appearance. This objective is reflected in the Shopfront Guidelines (published pursuant to objective ECON 15) which state **Internally illuminated signage will not be permitted on Protected Structures.**

8.2.5. Accordingly, as the proposal relates to a billboard type sign that is internally illuminated and attached to a protected structure, there is generally a presumption in principle against the nature of the development.

8.3. Impact on a Protected Structure

8.3.1. The applicant makes the case that the proposed signage will have no material impact on the character of the Protected Structure. Aside from the case of relativity to the extant (unauthorised) sign and the stated improvement of a sleeker design, the applicant emphasises that the latterly introduced Liddy Street elevation is not a contributing feature to the intrinsic historic character of the structure as compared to the more sensitive Sarsfield Street elevation of the property which was originally constructed as a mid-terraced property. In this regard I note the submitted Architectural Heritage Impact Assessment with the application and appeal, and I also note the NIAH record which sets out the building morphology associated with the construction of the then new street – Liddy Street and the creation of a new exposed gable. This explains the later style of stepped parapet and blank upper gable construction.

8.3.2. While I accept the Liddy Street elevation is part of later c.1910 alterations, it nevertheless remains an integral part of a protected structure that is in a highly prominent location and that is described by the planning authority as being in a visually sensitive location. This is reasonable due to its prominence on a key approach route into the historic Georgian core of Limerick City from across Sarsfield Bridge. It is also noteworthy on review of the NIAH that the site is one of three of the four corner buildings at this junction of Sarsfield Street, Henry Street and Liddy Street

that are included in the NIAH and the RPS making it a relatively intact junction in the city and integral element of the urban fabric. All three structures are included in the Inventory with ratings of regional importance for both their architectural and artistic interest. In this context I consider the planning authority is reasonable in its approach to assess any new development affecting the building and its setting having regard to the detailed criteria in the recently adopted Shopfront Design Guidelines pursuant to and in compliance with the criteria and provisions of the development plan in objective ECON O15 and EH O50 in respect of shopfronts and signage and having particular regard to built heritage.

8.3.3. The proposal is for a large sign of 6.28m x 3.4m in size. (21.35sq.m.) as compared to a fractionally wider sign of is 6.4m by 3.35m (21.44 sq.m.) and to incorporate fixed digital display at controlled luminosity and set to change every 10 seconds.

Permission in this instance would introduce an internally illuminated display projecting light onto the street. I concur with the planning authority view that the nature of illumination represents a material intensification of signage when compared with a static external illuminated panel. Such an intensification would be contrary to the development plan aims through its objectives ECON 015 and EH050 and the more recent Shopfront Design Guidelines to require advertising on buildings of historic, artistic or architectural interest to be strictly limited and be demonstrably in character with the host structure and specifically to discourage internally illuminated and plastic signage on protected structures. While the applicant explains how the level of illumination can be controlled within the brightness limits as set in Professional Lighting Guide 05/23 (PLG05): Brightness of Illuminated Advertisements including Digital /display this does not overcome the inherent issue of introducing projecting illumination from an elevated area of over 21 sq.m in a prominent and sensitive setting governed by City Centre zoning objective, which seeks to support urban conservation and enhance urban quality.

8.3.4. While less bulky than the illuminated box structure that obviously projects from the façade, the proposed scale is likely to be comparable to the previously permitted sign. There are no comparative drawings to fully determine this degree. While the profile will be more slimline as viewed from Sarsfield Street and Henry Street, as the sign is being placed within the envelope of the existing sign, it remains off-centre in the symmetrical gable profile. This incongruity will be accentuated by the luminosity

and visibility over both short and medium distance views across Sarsfield Bridge and from key junctions and detract from important views of the historic urban fabric. This is in addition to what I would describe as visual clutter. For example, there is extensive visible electrical cabling into the illuminated box structure. Other signs and attachments on this facade include a mural type advertisement, uplighters, a down lighter, a clock, projecting signs on decorative metal arms with wall mounted lights over, other box lit signs, flag poles and advertising flags and canopies. The main frontage has similar attachments and projecting elements with an extensive array of cabling. In this case however the proposal relates only to a portion of the façade where the display is attached.

- 8.3.5. I note the drawings do not detail any of this building façade context and some aspects of the basic drawings appear inaccurate. For example, the stepped parapet is not correctly outlined, with an additional step on the northern side. The position of the display sign appears misrepresented as its northern side is shown to align with the 2nd step up but this appears different to what exists as evident in the photographs. The existing sign is shown in the drawings to extend closer to the 2nd window from the corner whereas in photographs it is only just beyond the first.
- 8.3.6. The Conservation Architect for the applicant is quite clear that the context of the existing sign is what is relevant in defining the character change to the facade and not the entire façade. I do not entirely agree with this approach. It appears from the previous permission that the signage at that time was addressed more comprehensively and was conditional on other elements of the façade being addressed. In this case however a piecemeal approach has been taken, and this inhibits the entire frontage being approached as a composite elevation which I consider would be a more appropriate means to address material changes of the nature and scale proposed on a Protected Structure. I also consider this appropriate in the context of the development plan criteria for signage generally in section 11.6.4.2 as it especially seeks to address clutter and in the case of Digital advertising, the number of existing advertising signs on the shopfront is a key consideration.
- 8.3.7. In further support for the proposed development, the appellant refers to signage appeal cases and perhaps most relevantly one at a bridge on Amiens St near the

River Liffey in Dublin City centre. This related to permission for illuminated signage on a Protected Structure and the case is made that permission in principle has been established for illuminated signage in such sensitive city settings. However, in that particular case the upgrading of the Protected Structure and reveal of its elevation to public view was part of a more composite approach and cannot be reasonably used as a basis for a new internally illuminated sign in isolation of other elevational considerations. On this matter of precedence for changing existing signs, while I note the applicant makes reference to a number of An Coimisiun Pleanála decisions with regards to new signage, none of those referenced relate to the same circumstances. I note the planning authority counters this reference by referring to a refusal for a replacement of an existing trivision advertising display with an LED advertising display with a smaller surface area on a protected structure in Parkgate Street in Dublin due to its scale, proportion, appearance and location within the curtilage of a protected structure, adverse impact on same, and that it would detract from and injure the ACA and protected structure. In that case it is also pointed out how the proposal for removal of alternative advertising signs did not represent a sufficient planning gain (ACP 319367-24). Ultimately on the matter of precedence, I consider the evidence of both permissions and refusals for what appears to be similar cases, underlines how the merits of the particular case are paramount.

- 8.3.8. In conclusion on this substantive issue, I consider the proposed digital display by reason of its scale, illumination, movement and design would visually dominate the Protected Structure to which it is attached, would contribute to visual clutter and would also detract from the setting of a grouping of Protected Structures at this junction. Accordingly, the proposed form of signage does not meet with the development plan criteria for signage (in section 11.6.4.2) and would serve to detract from the architectural character and urban fabric of this city centre location. While this presents a conflict with some of the aims of city centre zoning objective for the area, the proposal I consider wholly conflicts with both Objective ECON015 in respect of restricting internally illuminated signs and Objective EH O50 of the Development Plan namely subsections (a) and (d), which require the protection of structures included on the RPS from any works that would negatively impact their special character and appearance and that any development affecting a Protected Structure be sensitively sited and designed, and be appropriate in terms of scale, materials and visual

impact. Accordingly, permission should be refused on this basis of conflict with these specific objectives.

8.4. Traffic Safety

8.4.1. The planning authority has taken the position that the 10-second interval change of the proposed illuminated sign would cause a distraction to drivers at a point where traffic is busy. The appeal grounds refer to both the level of light in accordance with city centre business district limits and also the reduction in hours by not illuminating between the hours of 2a.m. and 6a.m. In traffic terms, this unlit period would occur when traffic is likely to be very light and have a limited benefit in terms of impact on traffic movements. While I note there is no Roads engineer's report on the case to support the planner's position, I note that the distraction to driver caused by illumination (of the extant structure) was a determining factor in terms of traffic safety being included as a material issue in the previous Board's consideration in the referral case on the same site. I also draw attention to the extensive road signage for key destinations in close proximity on approaching the site from Sarsfield Bridge and from which attention may be diverted. Taking a precautionary approach, I am not satisfied that there is sufficient evidence in this case to rule out the risk of traffic safety as grounds for refusal of permission.

8.5. Other Matters

8.5.1. Having regard to the planning history and evidence of an unauthorised status of illuminated signage and the reliance in the application on its existence to justify the proposed development I consider the planning authority reason for refusal on the basis of consolidation of unauthorised use to be reasonable.

8.5.2. There is also a possible issue relating to impact of illumination on opposing windows of the upper floors in Liddy Street. There were no submissions from other parties, and this was not raised and nor are there any drawings showing the relationship between light angles and level and opposing windows. However, I would not rule out nuisance and injury of amenities as a potential issue in this case. In the interest of fairness if this were to be considered as a reason for refusal the matter should be circulated for comment. However, in view of the substantive reason for refusal I do not consider this step to be warranted.

9.0 AA Screening

9.1. I have considered the proposed works in light of the requirements S177U of the Planning and Development Act 2000 as amended. The subject sites relate to minor external surfaces of existing structures where attachments are to be removed and/or replaced in urban city centre locations. No nature conservation concerns were raised in the planning appeal as the substantive issues relate to localised built heritage and associated traffic.

9.2. 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:

- small scale nature of works and nature of the development;
- distance from nearest European site and lack of connections.

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.

10.0 Water Framework Directive

10.1. The proposed development comprises minor works to existing structures and does not involve drainage issues. I have assessed the proposed development and have considered the objectives as set out in Article 4 of the Water Framework Directive which seeks 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.

10.2. 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.

10.3. The reason for this conclusion is as follows.

- Scale and size of the proposed development within an existing residential city centre location.

Taking into account WFD screening report, 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 for the proposed development based on the following reasons and considerations.

12.0 Reasons and Considerations

1. Having regard to Limerick City and County Development Plan 2022-2028 and its objective ECON O15 in respect of restricting internally illuminated signs and objective EH O50 subjections (a) and (d), which require the protection of structures included on the RPS from any works that would negatively impact their special character and appearance and that any development affecting a Protected Structure be sensitively sited and designed, and be appropriate in terms of scale, materials and visual impact, it is considered that the proposed replacement digital signage, by reason of illumination, animated digital context and visual dominance, would adversely affect the legibility of the Protected Structure and would negatively impact the special character and appearance of this and neighbouring protected structures. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

2. The proposed internally illuminated, frequently changing sign, by reason of its dynamic display, illumination and location at a busy trafficked junction would likely distract drivers thereby endangering public safety by reason of traffic hazard.

3. As the proposed development relates to a site, the use of which is unauthorised for use as an internally illuminated sign, it is considered that the proposed development would facilitate the consolidation and intensification of this unauthorised use. It is therefore considered that it would be inappropriate to consider granting of permission for the proposed development in such circumstances.

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.

Suzanne Kehely
Senior Planning Inspector

15th June 2026

Appendix 1: Form 1 EIA Pre-Screening

Case Reference	PL-500956-LK-26
Proposed Development Summary	<p>1) Replacement of advertising display and associated site works. (to a Protected Structure RPS No. 3462),</p> <p>2) Decommissioning of two advertising displays in a separate building and location.</p>
Development Addresses	<p>23 Sarsfield Street, Limerick</p> <p>10 Saint Dymphna's Terrace, Limerick</p>
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.
<p>(For the purposes of the Directive, "Project" means:</p> <ul style="list-style-type: none"> - 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 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.	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 Act.
<input type="checkbox"/> 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
<input type="checkbox"/> Yes, the proposed development is of a Class but is sub-threshold.	State the Class and state the relevant threshold
4. Has Schedule 7A information been submitted AND is the development a Class of Development for the purposes of the EIA Directive (as identified in Q3)?	
Yes <input type="checkbox"/>	Screening Determination required (Complete Form 3)
No <input type="checkbox"/>	Pre-screening determination conclusion remains as above (Q1 to Q3)

Inspector: _____

Date: _____