Bonneagar Iompair Éireann
Transport Infrastructure Ireland

Senior Executive Officer,
Economic Development ,
South Dublin County Council,
County Hall,
Tallaght, Dublin 24,

Submitted: on-line consultation portal.

Dáta | Date
10 August 2026

Ár dTag|Our Ref.
TII26-136998

Re: Part 8 : Outdoor Advertising Project

Dear Sir / Madam,

Transport Infrastructure Ireland (TII) acknowledges receipt of notification of the Part 8 for the Outdoor Advertising Project. TII observes that the documents associated with this Part 8 include proposals to be located within the public road curtilage/realm to involve the erection of digital signage structures with integrated lighting elements . The structures will display non- traffic regulatory information for the use of commercial advertisement .

TII's evaluation of the proposals has taken the following into consideration:

- Section 3.7 and 3.9 of the Section 28 Guidelines DHLGH Spatial Planning and National Roads Guidelines for Planning Authorities.
- Requirements for compliance with TII Publications (Standards & Technical) for projects and structures which are to be located on and in proximity to a national road and associated structures.
- Road Safety Authority's *"Our Journey Towards Vision Zero Ireland's Government Road Safety Strategy 2021–2030 "* .
- The absence of road safety audits and supporting technical road reports available online which would be expected for proposals for non- traffic related digital signage structures with integrated lighting elements to be erected within the curtilage and/or in proximity to national roads .
- The DoT's Traffic Sign Manual 2025 and the proposed developments which are to be located within the curtilage of public roads including national roads.
- Outcomes of research project co-funded by TII https://www.cedr-adverts.eu/en/; and associated report *'Minimising Distraction from Roadside Advertising: Recommendations for Road Authorities*' available at d2-1-adverts-recommendations-final.pdf

Further to this evaluation, TII has identified a number of issues with respect to the road safety and operational impacts on the N81 national road regarding Site 16 and in proximity to M50 Junction 11 at Site 13 TII recommends that the following issues and recommendations are considered and addressed prior to any decision is made by the South Dublin County Council as the roads and planning authority on this Part 8:

A. Site 16 – N81 Tallaght Bypass, D24, west of junction with Belgard Road (R113) on the central median of road

TII notes that the planning and road authority's supporting documentation for Site 16 highlights that a digital signage structure with integral lighting features is to be erected for the use of commercial advertisement , which will be visible to national road traffic travelling in both directions.

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At Site 16, the part 8 proposes the erection of digital signage structure (Digipole) with integrated lighting elements which will display non- traffic regulatory information for the use of commercial advertisement . The Site 16 structure is to be located within the grassed central median on the heavily trafficked N81 national road, where a speed limit of 80kmph applies in the proximity of a number of existing complex junctions. This particular stretch of the N81 contains a number of existing road related assets such as traffic lights, signage, road markings, lighting, bollards, and route directional signage.

The Council will be aware that this stretch of the N81 located within an identified high collision location(HCL). TII would highlight this HCL has been identified as reoccurring over numerous years. Greater complexity is added to the function of this national road, as the N81 is an emergency diversion route from the N7 (Junction 9 Red Cow) to Junction 11 (Tallaght/N81) bypasses. This emergency diversion route can be activated when a major road incident occurs on the N7 and/or the M50.

TII would expect that proposals that when a road authority proposes to erect any form structure into this location, within the curtilage of a national road , where a speed limit of 80kmph applies would seek to demonstrate compliance with Section 28 DHLGH Spatial Planning and National Roads Guidelines for Planning Authorities, the requirements and procedures associated with TII Publications and most critically ensure the safety of all road users and the public in general.

Given the N81 characteristics, policy factors and material available online , TII remains to be convinced that these elements of national road land use planning, transport and road safety policy have been addressed by the roads and planning authority.

TII firstly highlights that Chapter 3 of the DHLGH Spatial Planning and National Roads Network Guidelines for Planning Authorities indicates as key message that the " *Control of roadside and adjoining signage and lighting is an important contributor towards achieving enhanced road safety and planning authorities should use their regulatory and enforcement powers accordingly"*.

Section 3.8 of the DHLGH Guidelines goes on to state that
"On national roads, the erection of signage needs to be tightly regulated for road safety and environmental reasons. Planning authorities must avoid proliferation of roadside signage, especially outside the 50-60 kmh speed limit areas in a manner that would reduce the effectiveness of essential signage such as directional and other authorised road traffic signs, create visual clutter and distractions for road users, and/or reduce visibility at junctions, interchanges, and bends."

For comprehensiveness, the previous Section 3.7 addresses " *Avoiding Adverse Impacts from Existing and Future Roads*" matters such as lighting/glare; and visual impact as follows:
"*With regard to lighting, while such facilities help to ……. advertise commercial enterprises, permit outdoor working and sports activities, and highlight features of interest, artificial lighting that is poorly designed, installed or maintained can create adverse safety effects on road users by misleading the driver as to the road alignment, obscuring road signs or markings and/or distracting drivers' attention*."

South County Dublin County Council, as the roads and planning authority, is aware that there are specific national road safety, capacity and efficiency standards and procedural requirements which need to be met for proposals on national roads. The Council will be aware that the application of *TII Publications (Standards & Technical*) is required for projects which are located on a national road . TII has no record of the submissions nor discussions associated with meeting the requirements for TII Publications (Standards & Technical) for the Site 16 proposal for a digital signage structure with integral lighting to be erected for the use of displaying commercial advertisement at this location.

Allied to this, TII observes the absence of supporting technical engineering evidence being provided by the road and planning authority to demonstrate that the Part 8 proposal seeks to ensure the safety of road user and the public in general . It appears that the operational issues as well as road user and

public safety are to be addressed at a later stage after a decision has been made by the Elected Members.

The Council is reminded that the Road Safety Authority's "*Our Journey Towards Vision Zero Ireland's Government Road Safety Strategy 2021–2030*" indicates that the Safe System approach emphasises the need to focus on all elements of the road traffic system to successfully improve road safety. Part of this approach is to improve the protective quality of the nation's roads and infrastructure.

TII considers that the proposal at Site 16 by its nature, a digital signage structures for commercial advertising, with lighting, is designed to distract road users , passengers and the public in general for commercial advertising purposes , on a heavily trafficked national road at a high speed location where the consideration of the safety of all road users is critical and the distraction of drivers and other road users' needs to be avoided.

In TII's opinion , the proposal for the introduction of the digital signage structure with integrated lighting elements displaying non- traffic regulatory information for the use of commercial advertisement within the curtilage of a national road where a speed limit of 80kph applies at site 16, would need be omitted due to the following reasons :

i. The proposal Involves that the introduction of the digital signage structure with integrated lighting elements by displaying non- traffic regulatory information for the use of commercial advertisement at a location within the central median of the N81 where a speed limit of 80kmph applies where particular vigilance is required ,would endanger public safety by reason of traffic hazard due to location, character of the use and distraction of drivers and other road users.

ii. No exceptional reasons have been outlined by supporting documentation available to justify a departure from official planning policy included in Chapter 3 of Section 28 DHLGH Spatial Planning and National Roads Guidelines for Planning Authorities and compliance requirements with TII Publications for national roads especially in regard to the safety of the public and road users.

iii. The proposed digital signage structure, with integrated lighting elements , which will display non- traffic regulatory information for the use of commercial advertisement by itself, and by the precedent it would create, would endanger public safety by reason of traffic hazard and would interfere with the safety of all road users on the national road and would create a serious precedence for other similar proposals nationwide.

B. Site 13 Tallaght Road/Blessington Road, Templeogue, D6W (central median of road, east of junction M50)

The Council will be aware that a section of the national road network, in proximity to Site no. 13 is maintained directly by TII through a Motorway Maintenance and Renewal Contract (MMaRC) associated with M50 Junction 11.

Similar to site 16 above, TII observes with concern, the absence of appropriate technical assessment and supporting technical engineering evidence has been provided by the road and planning authority to demonstrate that the proposal ensures both road user and public safety. By its nature and use the proposed digital signage structure for commercial advertising , with lighting, is to be designed to distract road users , passengers, and the public in general.

It would be expected that the South Dublin County Council, as a road authority , will seek to avoid the distraction of drivers and other road users at a location where particular vigilance is required and demonstrate that the safety of all road users is met at a major national road interchange It, again, appears that the operational issues, as well as road user and public safety, are to be addressed at a later stage after a decision has been made by the elected members.

In the interests of public safety, TII expects that prior to a decision being made on this Part 8 Proposal. South Dublin County Council, as the planning and road authority , will address, demonstrate and document appropriately required technical engineering and road safety requirements related to Site 13 taking account of proximity to Junction 11 M50.

In relation to the interaction with the national roads network, TII recommends and requires that the Council shall consult and make agreement with TII and their MMaRC Contractor on the implementation of the Part VIII proposals, associated works and operation prior to a decision being made by the Elected Members. TII will require that the outcomes, from the discussions and agreements, will be included in any tender competition for a contractor to avoid any adverse impacts on Junction 11 of M50 in terms of national road operation and road safety requirements during the construction and operation of the structure.

Conclusion

To conclude, the Road Safety Authority's Our Journey Towards Vision Zero Ireland's Government Road Safety Strategy 2021–2030 advocates that the Safe System approach emphasises the need to focus on all elements of the road traffic system to successfully improve road safety . The Road Safety Strategy highlights that it is necessary to ensure that road safety plays an integral part in collective decision-making in agencies such as South Dublin County Council and TII that impact the planning, design, operation, and use of our road traffic system.

Taking on board these road safety commitments established nationally and operational requirements, TII looks forward to the Executive of South Dublin County Council consulting and addressing the issues raised in this observation prior to any decision being made on this Part 8 of the Planning and Development Regulations, 2001 (as amended) - Outdoor Advertising Project.

Please acknowledge receipt of this correspondence.

Yours faithfully,

Tara Spain
Head of Land Use Planning