15 March 2022

TfNSW Reference: SYD20/01461/05
DPE Reference: DA10649

Director
Department of Planning and Environment
Key Sites and Regional Assessment
Locked Bag 5022
PARRAMATTA NSW 2124

Attention: Minoshi Weerasinghe

RESPONSE TO FURTHER SUBMISSIONS - DIGITAL ADVERTISING SIGNAGE - M2 MOTORWAY, EPPING

Dear Sir/Madam,

Reference is made to Department of Planning and Environment (DPE) correspondence, regarding the abovementioned Application which was referred to Transport for NSW (TfNSW) for comment.

TfNSW understands that the proposed digital advertising sign on the western elevation (viewed by eastbound traffic) from this development application was withdrawn by the proponent. Therefore, TfNSW only provides response to the proposed digital advertising sign on the eastern elevation (viewed by westbound traffic) in this letter.

Furthermore, this letter only provides comment on the road safety aspect of the proposed signage. The proponent is to obtain all other necessary approvals required for the subject development.

TfNSW has reviewed the originally submitted Road Safety Assessment, dated 1 December 2020, and the two subsequent Responses to TfNSW Submissions, dated 14 April 2021 and 17 June 2021, and provides its comments on the attached Safety Assessment Sheet.

Should the development be approved by DPE, TfNSW requests the following conditions to be included in the development Consent:

1. The proposed signage shall be in accordance with the Transport Corridor Outdoor Advertising and Signage Guidelines 2017.

2. As per the above Guidelines, a road safety check which focuses on the effects of the placement and operation of all signs over 20sqm must be carried out in accordance with Part 3 of the TfNSW Guidelines for Road Safety Audit Practices after a 12 month period of operation but within 18 months of the signs installation. The road safety check

must be carried out by an independent TfNSW-accredited road safety auditor who did not contribute to the original application documentation. A copy of the report is to be provided to TfNSW and any safety concerns identified by the auditor relating to the operation or installation of the sign must be rectified by the applicant. In cases where the applicant is the TfNSW, the report is to be provided to the Department of Planning and Environment as well.

3. TfNSW reserves the right to re-assess the site using an independent TfNSW-accredited road safety auditor. Any safety issues identified by the auditor and options for rectifying the issues are to be discussed between TfNSW and the sign owner and operator.

4. Signage displays must not contain/use:

    - Flashing lights.
    - Electronically changeable messages.
    - Animated display, moving parts or simulated movement.
    - Complex displays that hold a drivers attention beyond “glance appreciation”.
    - Displays resembling traffic signs or signals, or giving instruction to traffic by using colours and shapes that imitate a prescribed traffic control device or words such as ‘halt’ or ‘stop’.
    - A method of illumination that distracts or dazzles.

5. The proposed signage and illumination levels are in accordance with relevant guidelines and standards.

6. The signage shall not hinder driver sightlines to critical road infrastructure. Additionally the signage must not distract a driver from or reduce the visibility and effectiveness of directional signs, traffic signals, other traffic control devices, regulatory signs or advisory signs or to obscure information about the road alignment.

7. The proposed sign should meet wind loading requirements as specified in AS 1170.1 and AS1170.2.

If you have any further questions, Mr. Felix Liu would be pleased to take your call on 8849 2113 or email development.sydney@rms.nsw.gov.au. I hope this has been of assistance.

Yours sincerely,

Zhaleh Alamouti
Senior Land Use Planner

Attachment
Road Safety Assessment

3. Advertisements and road safety

3.1 ROAD SAFETY OBJECTIVES

Advertising displays within the visual catchments of roads are designed to attract driver's and passenger's attention. A reduction in driver attention away from the road however has the potential to create a road safety hazard. It is the aim of RMS to minimise these hazards and improve road safety for all drivers where possible.

The purpose of this section is to outline RMS advertisement policy in relation to road safety. The policy is designed to ensure that roadside advertising does not create a road safety hazard or confuse or distract drivers in any road environment, or compromise bicycle and pedestrian safety.

Schedule 1 of SEPP 64 (Table 4) outlines safety considerations that must be addressed for any advertisement proposal under SEPP 64. Advertisements have the potential to create a safety hazard if designed and placed contrary to RMS' *Road Design Guide* and the principles and rules outlined below. The following traffic, bicycle, and pedestrian safety assessment criteria must be applied (as a minimum) in the design and assessment of all advertisement proposals on or within the vicinity of a classified road.

A separate assessment comprising of photo montages is required for each approach where the sign is visible from a classified road. It is essential the assessment is undertaken from the driver's perspective in both night and day environments. All of the following criteria need to be addressed and comments are to be documented where the proposal fails to comply.
This template can be used as an assessment tool. This should be attached to the relevant supporting information.

DA Number: SYD20/01461/04 **Direction:** Westbound

Road: M2 Motorway **Date Of Assessment:** 01/12/2021

Cross Streets: Beecroft Rd **Officer:** Nazli Tzannes

Table 4: ROAD SAFETY ASSESSMENT CRITERIA- SCHEDULE 1 SEPP 64
Safety 1) Would the proposal reduce the safety for any public road? 2) Would the proposal reduce the safety for pedestrians or bicyclists? 3) Would the proposal reduce the safety for pedestrians, by obscuring sightlines from public areas?

□ **Compliant**
□ **Non Compliant**

Comments:

This assessment has not identified an unacceptable increase in the road safety risk. However, further information is required to confirm if the advertisement includes technology which interacts 2 with in-vehicle electronic devices or mobile devices. The information provided states that proposed signage would not contain interactive

technology or technology that enables opt-in direction communication with motorists. The digital signage would not be designed to make motorists anticipate information.

However, the structure design review is a matter for design team.

3.2 ROAD SAFETY ASSESSMENT CRITERIA

3.2.1 Sign location and design

(a) An advertisement must not obstruct the driver's view of the road particularly of other vehicles, bicycle riders or pedestrians at crossings.

- □ **Non Applicable**
- ✓**Compliant**
- □ **Non Compliant**

Comments:

(b) An advertisement must not obstruct a pedestrian or cyclist's view of the road.

- □ **Non Applicable**
- ✓ **Compliant**
- □ **Non Compliant**

Comments:

(c) The placement of a sign should not distract a driver at a critical time. In particular, signs should not obstruct a driver's view:

(i) to a road hazard,

(ii) to an intersection,

(iii) to a traffic control device (such as traffic signals, stop or give way signs or warning signs) or

(iv) to an emergency vehicle access point or Type 2 driveways (wider than 6–9 metres) or higher.

- □ **Non Applicable**
- □ **Compliant**
- □ **Non Compliant**

Comments:

There are no critical decision making points on the approach to the digital sign.
The calculated SSD towards the beginning of the merge point at Beecroft Rd off ramp is 165m. The proposed digital signage would be located beyond the exit ramp.

(d) The advertisement must not distract a driver from or reduce the visibility and effectiveness of directional signs, traffic signals, other traffic control devices, regulatory signs or advisory signs or to obscure information about the road alignment.

- □ **Non Applicable**
- □ **Compliant**
- □ **Non Compliant**

Comments:

An interchange sequence sign is located on M2 Motorway median adjacent to the proposed digital sign. Proposed digital sign is positioned in a way that does not obstruct a driver's view of the interchange sign.

(e) The advertisement must not incorporate technology which interacts with in-vehicle electronic devices or mobile devices.

- □ **Non Applicable**
- □ **Compliant**
- □ **Non Compliant**

Comments:

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The information provided states that proposed signage would not contain interactive technology or technology that enables opt-in direction communication with motorists. The digital signage would not be designed to make motorists anticipate information. However, the structure design review is a matter for design team.

(f) The advertisement should not be located in a position that has the potential to give incorrect information on the alignment of the road. In this context, the location and arrangement of sign structures should not give visual clues to the driver suggesting that the road alignment is different to the actual alignment. An accurate photo-montage should be used to assess this issue

- □ **Non Applicable**
- ✓**Compliant**
- □ **Non Compliant**

Comments:

(g) A sign should not be located:

(i) less than the safe sight distance from an intersection, merge point, exit ramp, traffic control signal or sharp curves.

- □ **Non Applicable**
- □ **Compliant**
- □ **Non Compliant**

Comments:

The calculated SSD towards the beginning of the merge point at Beecroft Rd is 165m and visible from a distance of 320 m on approach. (240m off –ramp to Beecroft Rd)

(ii) less than the safe stopping sight distance from a marked foot crossing, pedestrian crossing, pedestrian refuge, cycle crossing, cycleway facility or hazard within the road environment.

- □ **Non Applicable**

✓**Compliant**

□ **Non Compliant**

Comments:

(iii) so that it is visible from the stem of a T-intersection.

✓**Non Applicable**

□ **Compliant**

□ **Non Compliant**

Comments:

Note: The minimum sight distance requirements for the design speed of the road must be met for road hazards (stopping sight distance), emergency vehicle access points and driveways (approach sight distance) and intersections (safe intersection sight distance). Refer to *RMS Road Design Guide* for minimum stopping sight distances, minimum approach and safe intersection sight distances.

Design speed means a nominal speed fixed to determine the geometric features of a road. In the context of sight distances, the design speed is taken as the higher of the posted speed limit or the 85th percentile speed.

(h) The advertisement must not interfere with stopping sight distance for the road's design speed or the effectiveness of a traffic control device. For example:

(i) Could the advertisement be construed as giving instructions to traffic such as 'Stop' or imitate a traffic control device?

a) (ii) If the sign is in the vicinity of traffic lights, does the advertisement use red, amber or green circles, octagons, crosses or triangles or shapes or patterns that may result in the advertisement being mistaken for a traffic signal.

□ **Non Applicable**

✓**Compliant**

□ **Non Compliant**

Comments:

(I) The advertisement should not distract a driver's attention away from the road environment for an extended length of time. For example:

(i) The sign should not be located in such a way that the driver's head is required to turn away from the road and the components of the traffic stream in order to view its display and/or message. All drivers should still be able to see the road when viewing the sign, as well as the main components of the traffic stream in peripheral view.

□ **Non Applicable**

✓**Compliant**

□ **Non Compliant**

Comments:

(ii) The sign should be oriented in a manner that does not create headlight reflections in the driver's line of sight. As a guideline, angling a sign five degrees away from right angles to the driver's line of sight can minimise headlight reflections. On a curved road alignment, this should be checked for the distance measured back from the sign that a car would travel in 2.5 seconds at the design speed.

□ **Non Applicable**
✓**Compliant**
□ **Non Compliant**

Comments:

(J) The advertisement must not create a physical obstruction or hazard. For example:

(i) Does the sign obstruct the movement of pedestrians or bicycle riders? (e.g. telephone kiosks and other street furniture along roads and footpath areas).

(ii) Does the sign protrude below a bridge or other structure so it could be hit by trucks or other tall vehicles? Will the clearance between the road surface and the bottom of the sign meet appropriate road standards for that particular road?

(iii) Does the sign protrude laterally into the transport corridor so it could be hit by trucks or wide vehicles?

□ **Non Applicable**
✓**Compliant**
□ **Non Compliant**

Comments:

The digital signage will be positioned at the height of the railway bridge, not impeding the motorists' visibility of the road alignment. The digital signage would not protrude below the underside of the railway bridge, and hence would not be obstructing visibility to any vehicles and cyclists on the M2 Motorway.

Note: Where advertising structures hang over the road, the minimum vertical clearance should be the same as other structures in that road environment. Generally, the sign should have a vertical clearance equal or greater than the overpass, tunnel portal or pedestrian bridge. However in cases where these structures exceed the minimum vertical clearance specified for the particular type of road, the sign may protrude below the bridge or other structure.

If the minimum vertical clearance for other surrounding structures is not known then a minimum vertical clearance of 5.8 metres is to be used for the sign structure. However on high performance motorways, the minimum clearance may be more than 5.8 metres.

See also **Section 2.5.5 Bridge signage criteria** for minimum road clearance criteria.

(k) Where the sign supports are not frangible (breakable), the sign must be placed outside the clear zone as defined in Section 3.7 of RMS' Road Design Guide or behind an RMS-approved crash barrier.

✓**Non Applicable**
□ **Compliant**

□ **Non Compliant**

Comments:

This is not applicable as the proposed digital sign is to be located on an overhead bridge.

(l) Where a sign is proposed within the clear zone but behind an existing RMS-approved crash barrier, all its structures up to 5.8m in height (relative to the road level) are to comply with lateral clearances as specified by Section 6 of RMS' Road Design Guide with respects to dynamic deflection and working width.

✓**Non Applicable**
□ **Compliant**
□ **Non Compliant**

Comments:

This is not applicable as the proposed digital sign is to be located on an overhead bridge.

Note: ***Clear zone*** means the total roadside border area, starting at the edge of the travelled way, available for safe use by errant vehicles and the display of traffic control signs. This area may consist of a shoulder, a recoverable slope, a non-recoverable slope and/or a clear run-out area. The minimum clear zone width is dependent upon the speed environment and roadside geometry.

(m) All signs that are permitted to hang over roads or footpaths should meet wind loading requirements as specified in AS 1170.1 and AS1170.2. All vertical clearances as specified above are regarded as being the height of the sign when under maximum vertical deflection.

□ **Non Applicable**
✓**Compliant**
□ **Non Compliant**

Comments:

The proposed digital sign is to be located on an overhead bridge with a clearance above the road pavement greater than 5.3m. However, the structure design review is a matter for design team.

(n) The location of a sign on footpaths or nature strips must meet the following criteria to ensure adequate clearance for pedestrian and wheel chair access:

(i) A sign must be positioned so that an absolute minimum envelope of 900 millimetres x 2000 millimetres of unobstructed clear path of travel is maintained for the entire length of the advertising structure (see figure below).

✓**Non Applicable**

□ **Compliant**

□ **Non Compliant**

Comments:

This is not applicable as the proposed digital sign is to be located on an overhead bridge.