



Department of Planning, Industry and
Environment
4 Parramatta Square,
12 Darcy Street
Parramatta NSW 2124

Your Reference	DA 10649
Our Reference	NCA/1/2021
Contact	Deepa Randhawa
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12 February 2021

Dear Ms. Jess Fountain

COUNCIL COMMENTS: M2 Motorway Epping Digital Advertising Signs.

The City of Parramatta Council thank you for the opportunity to comment regarding this proposal. The accompanying documentation has been reviewed and Council officers request that the following comments are considered for this proposal:

TRAFFIC IMPACTS

It is to be noted that Section 3.2.3 of the Transport Corridor Outdoor Advertising and Signage Guidelines 2017 states that a sign should not be located less than the safe sight distance from a merge point, exit ramp or a cyclist crossing and that the placement of a sign should not distract a driver at a critical time. It is considered that the applicant's assessment does not adequately consider the point that the placement of a sign should not distract a driver at a critical time. The size of the sign and the digital aspect of the signs are also factors not adequately considered the applicant's assessment.

The comments below are separated into eastbound and westbound directions. Images are attached that help explain the points below.

Eastbound Direction

The following conflict points have been identified to be in close proximity to the proposed advertising sign for eastbound traffic on the M2 Motorway:

1. The merge point of the M2 on ramp is located approximately 15m beyond the proposed advertising sign and the gap finding and decision making occurs on the approach to the proposed sign
2. The cyclists crossing point within the eastbound on ramp is located approximately 40m from the proposed advertising sign
3. The Variable Speed Limit Signs are located approximately 35m from the proposed advertising sign

The following points from the Road Safety Assessment for eastbound traffic are considered to be not an accurate assessment of the impact of the proposed advertising sign:

1. For the on ramp, the Road Safety Assessment for eastbound traffic states that "the beginning of the merge point is located beneath the railway bridge and beyond the visible

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distance of the digital signage” and that the “driver’s attention will not be focused on the signage since it will be out-of-view for the driver” to argue that the signage will not be expected to affect road safety. However, the decision making and gap finding occurs on the ramp on the approach to the main traffic lanes occurs and on the approach to the proposed sign. The sign would be a distraction during this approach. This applicant’s assessment also does not consider the merging on the on-ramp where vehicles merge into one lane. The proposed sign will be in view of the driver at the point where they may be required to make a decision to merge on the ramp.

2. In regard to the cyclists crossing point, the Road Safety Assessment argues that the “digital signage location is beyond the cycle crossing point and would not be positioned within the minimum SSD”. This point from the report is refuted as the crossing point is only 40m away from the proposed sign and therefore will be in view of the drivers. As such, this proposed sign could distract drivers and cause them to fail to detect any cyclist that may be crossing the road.
3. The Road Safety Assessment states that the advertising sign will be positioned behind the variable speed limit sign. This point from the report is noted however, both the variable speed limit sign and the advertising sign are in a similar line of sight and at times may have very similar colour contrast. This will cause the variable speed limit sign to become obscured and may cause the driver to miss the speed limit or be distracted by the advertising.

Westbound Direction

The following conflict points have been identified to be in close proximity to the proposed advertising sign for westbound traffic on the M2 Motorway:

1. The diverge point of the M2 exit ramp located approximately 120m from the proposed advertising sign
2. The cyclists crossing point within the westbound exit ramp located approximately 20m from the proposed advertising sign
3. The Interchange Sequence Sign located approximately 14m from the proposed advertising sign

The following points from the Road Safety Assessment for Westbound traffic are considered to not be an accurate assessment of the impact of the proposed advertising sign:

1. For the exit ramp, the Road Safety Assessment states that the “proposed digital signage would be located beyond the exit ramp, and thus, would not be situated within the safe sight distance”. This point is refuted as the diverge point of the exit ramp from the motorway is located at only 120m away from the proposed advertising sign with the sign in clear view of drivers. This means that it is in fact located can be viewed at a point where vehicles can suddenly change lanes to exit the motorway.
2. In regard to the cyclists crossing point on the off-ramp, the Road Safety Assessment takes the same approach as for the cyclist crossing point for eastbound traffic in that it is located outside of the minimum SSD. As stated above, this point is refuted as the crossing point is only 20m away from the proposed sign and located where motorists have a clear view of the sign. Therefore, motorists may become distracted and fail to detect any cyclists that may be crossing the road.
3. In regards to the interchange sequence signs, the report Road Safety Assessment claims that the advertising sign will not obstruct the drivers view. However, although the advertising sign is not physically obstructing the existing sign, it is still in very close proximity and may

cause an information overload for the driver causing them to miss key information regarding the approaching road environment to allow them to safely navigate the road.

As per the above, it is concluded that the proposed digital advertising signs in both directions do not satisfy section 3.2.3 of the Transport Corridor Outdoor Advertising and Signage Guidelines 2017 in that the advertising sign is proposed to be located less than the safe sight distance from a merge point, exit ramp and a cyclist crossing and that the placement of a sign may distract a driver at a critical time.

ENVIRONMENTAL HEALTH UNIT

No Objections raised to the proposed digital signage.

URBAN DESIGN

The proposed signage is to be attached to the face of the two overhead rail bridges that cross the M2 motorway at Epping. The rail bridges are seen primarily from the M2 motorway and associated on/off ramps. The proposed east sign can be viewed at a distance from Constance Close (on top of the west tunnel exit), Epping, otherwise the proposed signs are not visible from local roads due to the extent of noise walls installed along the M2 motorway corridor at this location. The rail bridges do not provide public access. For these reasons UD has little to no comments to offer.

Nevertheless, the proposed sign for Site 5 - Epping M2 (eastern Side) height dimension is approximately equal to the bridge depth (top of parapet/deck to underside of bridge), while the sign for Site 5 - Epping M2 (western Side) sits above the bridge deck. Unlike the eastern sign, the western sign interrupts the elevation and skyline of the bridge. The western sign dimensions should be reduced so as not to interrupt the elevation (top edge) and skyline of the bridge.

The western sign is at an acute angle to the vehicle's line of travel which may make it harder for drivers/passengers to register the message. The M2 motorway tunnel, to east of Site5, has space at the tunnel portal perpendicular to the line of travel and are clearly visible. Given the close proximity of the western sign to the tunnel entry consideration should be given to utilising the tunnel's western portal in place of the western rail bridge location.

Urban Design Recommendations:

- Consideration be given to the western sign dimensions not interrupt the elevation and skyline (top edge of parapet/deck) of the bridge, similar to the eastern sign. (This could be a condition)
- Consideration be given to utilising the western tunnel portal location in place of the western rail bridge.

Next Steps

Thank you for your consideration of Council's comments, please note in particular comments from Council's Traffic and Urban Design teams.

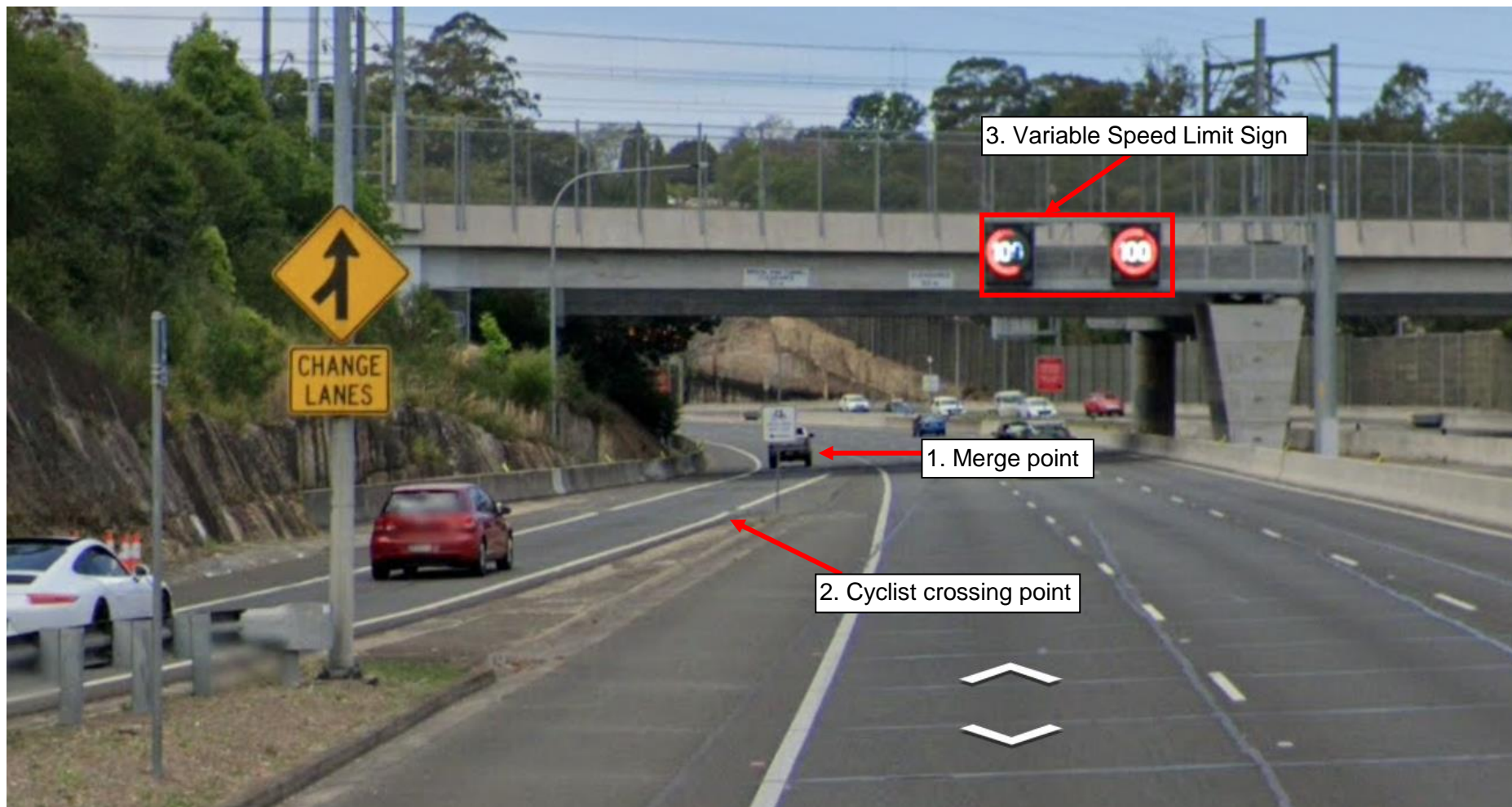
We look forward to working with the Department and the applicant to progress the development of this site. Please forward a copy of these comments to the proponent in order that all comments can be viewed by the proponent and addressed within the upcoming application.

Should you require any further information in this regard please Deepa Randhawa on 9806 5248 or drandhawa@cityofparramatta.nsw.gov.au .

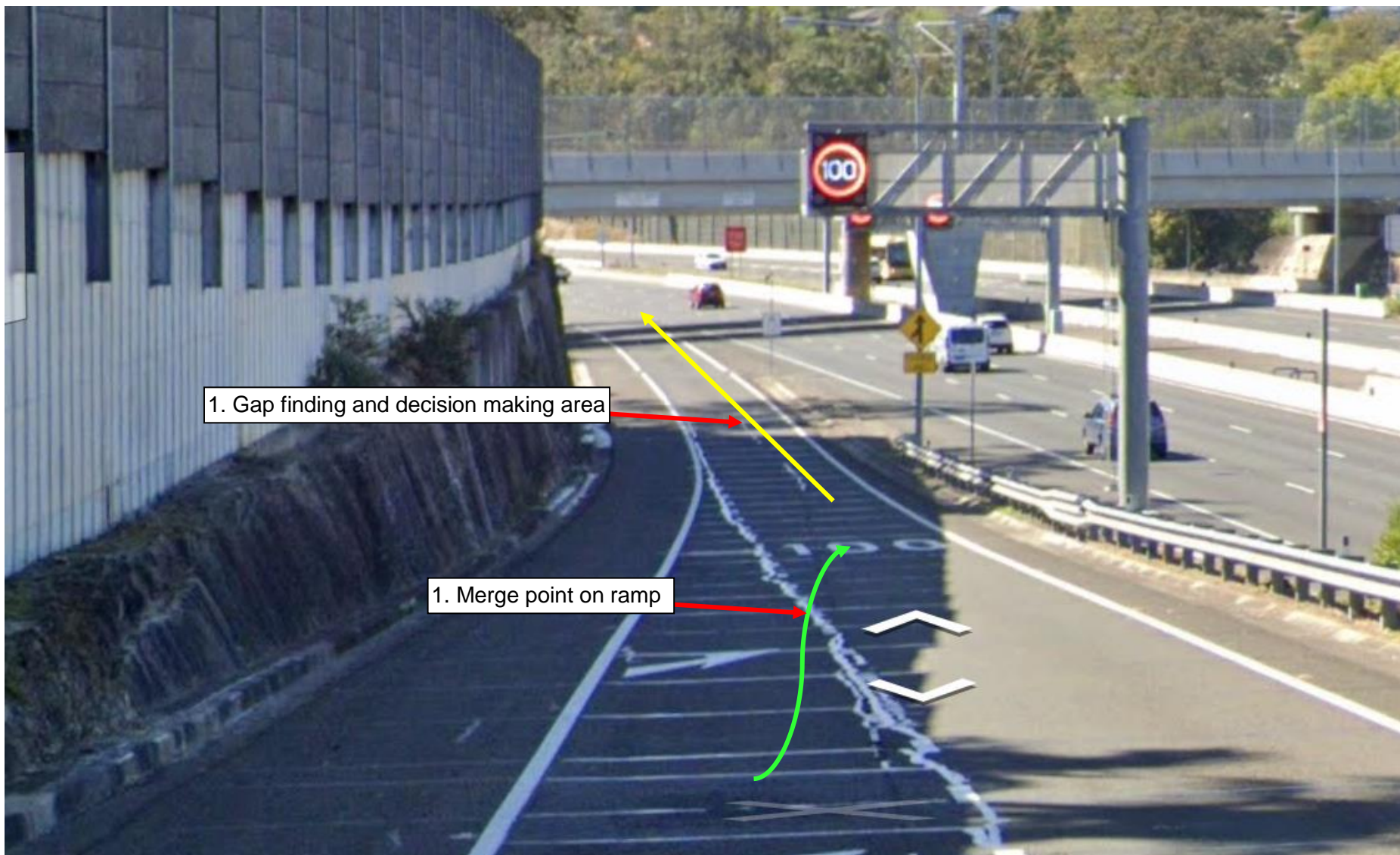
Yours sincerely,



Claire Stephens
Manager Development Assessment



Eastbound



1. Gap finding and decision making area

1. Merge point on ramp

Eastbound



1. Diverge point

3. Interchange sequence sign

2. Cyclist crossing point

Westbound