

Karl Fetterplace

From: Deepa Randhawa <DRandhawa@cityofparramatta.nsw.gov.au>
Sent: Tuesday, 11 May 2021 9:53 AM
To: Karl Fetterplace
Subject: RE: DA 10649 - Response to Submissions

Morning Karl,

Please see our response to the Response to Submissions by TTPP below:

Council's Traffic and Transport Services have reviewed the Response to Submissions by TTPP dated 14 April 2021. Council previously raised concerns that the proposed Digital Advertising Sign did not comply with Section 3.2.3 of the Transport Corridor Outdoor Advertising and Signage Guidelines 2017 in that the signs were not located less than safe sight distance from merge points, exit ramps or cyclists crossings and that the proposed advertising signage would cause a distraction to the driver at a critical time. The response provided by TTPP dated 14 April 2021 on Council's submission has been review and is not considered satisfactory.

Detailed Council comments are provided below and separated
The following additional comments are provided on TTPP's response:

Eastbound Direction

Submission 1: The Merge Point of the M2 On-Ramp

- The TTPP Traffic Response compared an existing similar situation in Homebush for the M4 Motorway at Centenary Drive where a digital advertising sign was installed in July 2016 and demonstrated that there have not been an increase in crashes since the installation. The assessment is rejected by Council on the following grounds:
 - o The M4 Motorway in this location has been subject to significant construction activity since the installation of the digital advertising signs which is shown in the Nearmap screenshots below. This would mean that there are many be other variables in play such as reduced speed limits, more engaged drivers during the on-going road works and overall safety improvements following completion of the road works. As such, this example should not be used to draw a conclusion that is contrary to accepted standards and guidelines.
 - o The merge point in the M4 example is between the two on-ramps for the vehicles coming from different directions in Centenary Drive. Where the on-ramp actually joins the M4 motorway, the on-ramp becomes an added lane rather than a merge point.
 - o The location where the digital advertising sign was installed in the M4 motorway had an advertising sign prior to 2016 which would also be a distraction. Accordingly, this example does not demonstrate the pre and post conditions similar to the M2 Motorway.



Figure 1: Nearmap Aerial Imagery to highlight the changes over time that have occurred on the M4 Motorway between 2015 and 2021

- The TTPP Traffic Response further referenced a 2015 paper by Carolyn Samsa to demonstrate that a digital advertising sign will not create a significant safety hazard. The conclusions drawn by TTPP from this study are disputed on the following grounds:
 - o The 2015 Samsa study recommended that further joint research between regulators and the industry to further explore the significance of their study. They did not recommend changes to any standards or guidelines made by regulators.
 - o The study was limited to daylight hours and not night time where a digital advertising sign will have higher contrast compared to other traffic control signage and would stand out to drivers more.

- o The study was limited to people aged 25-54 whereas other studies have shown that young and senior drivers are more likely to be affected by road side advertising (see Oscar Oveido-Trespalcacios, Verity Truelove, Barry Watson, Jane A. Hinton 2019, 'The impact of road advertising signs on driver behaviour and implications for road safety: A critical systematic review', Journal of Transportation Research, No. 122 pp. 85-98 (94)).

Submission 2: Cyclists Crossing Point

- In regards to the Cyclist Crossing Point, the first point raised by the TTPP Traffic Response was that cyclists are required to give way to motorists. Though this may be true, it does not take away from the duty of care expected of any reasonable motorists to use caution at points of conflict whether they have the right of way or not. The advertising sign will be a distracting factory causing the driver to divert attention away from their duty of care. Furthermore, this line of argument contradicts with the 'Safe Systems Approach' advocated with Austroads Guidelines for Road Design and Traffic Management where the road needs to be designed to allow for road user mistakes.
- The second point raised by the TTPP Traffic response was that the digital sign is located after the cyclist crossing point and therefore complies with the Guidelines. As commented in the previous Council submission, the crossing point is only 40m away from the proposed signs and therefore will be in view of drivers and be within the safe sight distance away as per the guidelines. As such, the proposed sign could still distract drivers and cause them to fail to detect any cyclists that may be crossing the road. This is shown in Figure 2 below which shows a number of critical points that a driver must navigate while within the zone where they could be distracted by the digital advertising signs.



Figure 2: StreetView image of M2 Motorway Eastbound near the proposed advertising sign as well as the location of the critical points near the sign that are impacted by the proposal

Submission 3: Variable Speed Limit Signs

- The Traffic Consultant for the applicant argues that only the secondary Variable Speed Limit Signs (VSLs) are effected by the proposed advertising sign. Furthermore, they argue there will be minimal overlap with the VSLs in the foreground to be obscured by the digital sign. This point is disputed considering the VSLs is located only 35m from the proposed sign meaning that the both signs will be in view of the driver for essentially the entire approach. This point is demonstrated in figure 2 above.

Westbound Direction

Submission 4: M2 Exit Ramp

- Similar to the response to Submission 2, the TTPP report argues that the diverge point is located before the railway bridge where the advertising sign will be located. As stated previously in Council's response above, the exit ramp is

located only approximately 120m away from the diverge point and is therefore in view of the drivers at key decision making points and within the safe sight distance. This point is demonstrated in figure 3 below.



Figure 3: StreetView image of M2 Motorway westbound near the proposed advertising sign as well as the location of the critical points near the sign that are impacted by the proposal

Submission 5: Cyclist Crossing Point

- The TTPP Traffic Response provided similar justifications to that for Submission 2. As stated already, these are refuted by Council. Figure 3 above further demonstrates how the cyclists crossing point is at a location where a motorist will have clear view of the advertising sign.

Submission 6: Interchange Sequence Sign

- The TTPP Traffic Response have referred to the study by Samsa (2015). As discussed already, the way this study has been used by TTPP is refuted.
- The TTPP Traffic Response argues that the sign is of limited importance. However, such signs allow drivers to plan ahead and gradually merge to the left lane when safe should their exit/destination be approaching, particularly for those drivers that may find motorway driving stressful such as seniors. As noted previously, studies have shown that seniors are more likely to be affected by advertising signs and are a demography that was not covered in the study quoted by the within the TTPP Traffic Response.

From the above assessment, it is clear that there are a number of critical points where driver decisions are required and the driver is required to be attentive and respond accordingly. This section of the motorway requires greater driver attention than compared to midblock locations away from critical points. Unnecessary clutter should not be introduced within the road environment that would cause a driver distractions, increase driver demand or obstruct visibility of key information on the road. Furthermore, it is reiterated that the proposed digital advertising signs for both directions of traffic 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 merge points, exit ramps and cyclists crossing points and that the placement of any sign may distract a driver at a critical time.

Regards,

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**CITY OF
PARRAMATTA**

From: Karl Fetterplace <Karl.Fetterplace@planning.nsw.gov.au>

Sent: Tuesday, 11 May 2021 9:42 AM

To: Deepa Randhawa <DRandhawa@cityofparramatta.nsw.gov.au>; PCC Council
<council@cityofparramatta.nsw.gov.au>

Subject: RE: DA 10649 - Response to Submissions

***[EXTERNAL EMAIL] Stop and think before opening attachments, clicking on links or responding. ***

Hi Deepa,

I am following up on the below. Noting comments have not yet been received, if you intend to comment could you please do so directly to myself as soon as possible.

If you have any enquiries, please contact me on 02 9274 6263 at karl.fetterplace@planning.nsw.gov.au.

Regards,

Karl

From: Minoshi Weerasinghe <Minoshi.Weerasinghe@planning.nsw.gov.au>

Sent: Friday, 23 April 2021 3:34 PM

To: Deepa Randhawa <DRandhawa@cityofparramatta.nsw.gov.au>; council@cityofparramatta.nsw.gov.au

Cc: Karl Fetterplace <Karl.Fetterplace@planning.nsw.gov.au>; Cameron Sargent
<Cameron.Sargent@planning.nsw.gov.au>

Subject: DA 10649 - Response to Submissions

Hi Deepa,

The Department of Planning, Industry and Environment has received a Response to Submissions for DA 10649 – M2 Motorway Epping – Digital Advertising Signs.

The Response to Submissions is available on the Department's website and can be accessed here:
http://www.majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=10649