

Report
January 2022

Digital Advertising Highway Safety Report- 22 Fox and Geese, Naas Road, Dublin



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Contents

1	Introduction.....	2
	Report Content.....	2
2	Site Location and Proposals.....	3
	Proposals	3
	Site Description	4
3	Safety Considerations.....	5
	Policy Considerations	5
	General Safety Considerations	5
	Relevant Site Considerations.....	7
	Details of Advertising Structure	8
	Control of Advertising form and content	8
4	Conclusions.....	9

1 Introduction

- 1.1 Steer have been commissioned to update a safety review to examine revised proposals for a digital advertising installation on land adjacent to the Naas Road in South Dublin.
- 1.2 Steer have previously engaged with South Dublin Council Officers but have not been made aware of any specific safety issues regarding the proposals. Following best practice, this report examines whether the proposal, by nature of its location, form or impact, would result in a public safety concern and, in accordance with the principle of a safety audit, consideration has been given to potential improvements or mitigation measures that may address any identified concerns.
- 1.3 It is noted that no highway safety concerns were raised with regard to the principle of digital advertising with the previous application for digital advertising at the site.

Report Content

- 1.4 At section 2, the report includes a review of the site and the proposed digital advertising installation. At section 3, a review of pertinent safety issues relating to digital advertising is provided. Section 4 provides a conclusion and recommendation.

2 Site Location and Proposals

Proposals

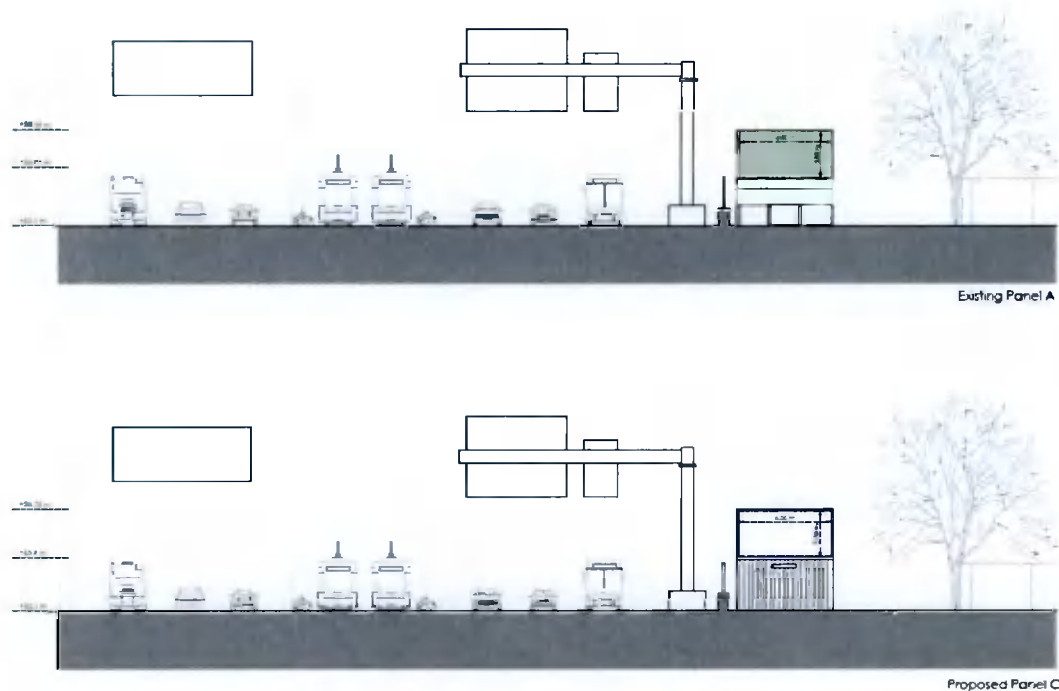
- 2.1 The proposed digital advertising will replace an existing established twin-faced advertising installation on land commonly known as 22 Fox and Geese, adjacent to Naas Road, Dublin. The site location is provided at Figure 2.1 below:

Figure 2.1 Site Location



A single advertising installation is proposed, replacing an existing static display at the same location.

Figure 2.1: Existing static display and proposed digital advertising



- 2.2 The advertising will be 6.0m x 3.0m landscape format screen approximately 3.5m above the carriageway and aimed at eastbound traffic passing along Naas Road. This is similar in size to the existing advertising boards at the site, though this has faces aimed at both eastbound and westbound traffic.

Site Description

- 2.3 At this location the Naas Road is a dual carriageway and subject to a 60 kph speed limit. It is a main transport corridor and three lanes in both directions. The westbound nearside lane being for buses only and the eastbound nearside lane for traffic leaving Naas Road to join the R134 and access the Knockmitten Lane Western Industrial Estate.
- 2.4 The site is located roughly midway between the junction of Naas Road with the M50 and R110, Long Mile Road, each around 500m distant from the site.
- 2.5 There is an overhead gantry directional sign in the immediate vicinity of the proposals but no signage to the side of the carriageway and no other highway features that could be potentially compromised by the introduction of digital advertising as proposed.

3 Safety Considerations

Policy Considerations

- 3.1 Schedule 6 of the South Dublin County Council Development Plan 2016-2022 relates to Outdoor Advertising Strategy. The policy is zonal based with Zone 3 covering main transport corridors. Zone 3 is considered as suitable for managed provision of outdoor advertising in the public domain, subject to compliance with section 7 of the schedule, 'Advertising Development Management Standards'.
- 3.2 Section 7 states that upgrading of existing outdoor advertising will only be permitted if it is acceptable in amenity/safety terms. Accordingly, the highway safety consideration is set out below.

General Safety Considerations

- 3.3 The DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (March 2011) provides no specific guidance relating to advertising and no guidance has been published by Transport Infrastructure Ireland. However, best practice guidance published elsewhere (such as Transport for London's *Guidance for Digital Roadside Advertising, 2013*) suggests a list of types of advertisement proposals which have potential to cause danger to road users due to their specific form or location. These are set out below along with a commentary relating to the proposals at Naas Road:

- Issue: Proposals which obstruct or impair sight-lines at corners, bends or at junction, or at any point of access to a highway.
- Response: None applicable for this site- the proposal is offset from the public highway and sits on private land beyond any sight lines. It is not located on a corner or bend in the highway.

- Issue: Proposals which, because of their size or siting, would obstruct or confuse a road-user's view, or reduce the clarity or effectiveness of a traffic sign or signal, or would be likely to distract road-users because of their unusual nature.
- Response: It is considered that the nature of the digital advertising used for these type of installations makes it clear that they are an advertisement rather than a traffic sign or signal.
The specific location of the proposal, to the side of the highway, and remote from the overhead signage gantry, means that there is no reason for a driver to think the screen would be a road sign but instead it will be clearly an advertising installation, as at present.
For traffic passing eastbound along Naas Road the installation will be offset to the offside of the highway and remote from the line of sight to the overhead gantry and carriageway, as illustrated in Figure 3.1 below:

Figure 3.1: Eastbound view of advertising from Naas Road



Issue: Proposals which effectively leave insufficient clearance above any part of a highway, or insufficient lateral clearance for vehicles on the carriageway (due allowance being made for the camber of the road-surface).

Response: The installation will be off highway land and there are no clearance issues.

Issues: Advertising which requires close study (such as Public Information Panels), which are situated so that people looking at them would be insufficiently protected from passing vehicles; or those advertisements sited on narrow footpaths where they may interfere with safe passage by causing pedestrians to step into the road.

Response: There is little pedestrian activity in the vicinity of the proposals and the proposal is for a large screen replicating the existing advertising.

Issue: Proposals where the means of illumination is directly visible from any part of the road.

Response: The screen will be self-lit, and no external lighting is proposed removing the risk of dazzling of drivers from external lighting.
The level of luminance of the screen can be controlled to 300 cd/m² as suggested below.

Issue: Proposals which, because of their colour, could be mistaken for, or confused with, traffic lights or any other authorised signals.

Response: This risk can be avoided as the digital advertising will be offset from the public highway and is not located such that it could be confused with traffic signals. It will also be a large installation that will have a clear purpose that will avoid any risk of confusion with traffic signals.

Issue: Proposals which, because of their size or brightness, could result in glare and dazzle, or distract road-users, particularly in misty or wet weather.

Response: The key to addressing this concern is managing the brightness of the digital advertising and their content. The proposal is similar in nature to digital advertising that have been introduced around the world over the past 10 years, and elsewhere in Dublin more recently, which have proven to be effectively managed. A series of controls are normally adopted by way of established planning conditions.

Issue: Proposals which are subject to frequent changes of the display.

Response: A minimum advertisement length of 10 seconds is suggested in line with established planning conditions that have been applied to digital advertising developments elsewhere in Dublin.. This ensures that changing digital advertising are not used to create animation and will mean drivers will have a limited number of changes whilst passing the site.

Issue: Advertising which incorporate moving or apparently moving elements in their display, or successive individual advertisements which do not display the whole message.

Response: Not proposed and controllable by condition.

- 3.4 On the basis of the responses outlined above it can be seen that there is nothing contrary to established best practice or fundamentally unreasonable in the proposal for digital advertising at the proposed location.

Relevant Site Considerations

- 3.5 In terms of the proposed site, one must consider the suitability of the location in its own right, and also the characteristics of the specific digital advertising scheme that might make an otherwise acceptable location unacceptable.

General location

- 3.6 The first consideration is whether digital advertising is appropriate on this section of the public highway. The site is located on a section of highway where there are a number of views of buildings, other roads and urban features that could attract a degree of driver attraction. There are other advertising boards and large format signs for buildings along Naas Road. Accordingly, the proposals would not be unexpected and would not by their nature be fundamentally distracting to drivers.

Specific Location

- 3.7 The next consideration is the specific site location and its relationship to local road geometry. As described in Section 2, the proposed location of the digital advertising is adjacent to a relatively straight section of Naas Road, remote from the highway and does not conflict with existing signage.
- 3.8 The site is subject to some degree of peak hour breakdown in free flow traffic, but this would not be likely to introduce additional weaving or other driver behaviour inconsistent with the introduction of digital advertising.

Details of Advertising Structure

- 3.9 The next test is the detailed arrangements for the mounting structure and the position of the advertising screen.
- 3.10 It has been set out in section 2 that there is no specific element of the local road features that makes advertising unacceptable in this location.
- 3.11 The advertisements are proposed to be positioned to provide advertising opportunities and public messaging focused on drivers and passengers passing along Naas Road. They would appear at an elevation similar to conventional road direction signs and are unlikely to distract drivers from concentrating on appropriate driving behaviour.

Control of Advertising form and content

- 3.12 The final consideration is whether there are any details of the proposal that might make an acceptable advertising location unacceptable. It is also understood that the proposals will include controls as planning conditions that address issues identified through research and established practice over illumination, rate of change of advertising and static images.
- 3.13 The following controls could be applicable in this location based on permitted digital advertising elsewhere in Dublin:
- Prior to the first operation of the digital advertising, a scheme for the testing of the appropriate level of illumination shall be submitted to and approved in writing by the local planning authority. Nonetheless, the maximum intensity of illumination of the digital advertisement signs shall not exceed a 300cd/sqm at night-time.
 - The signs shall not display any moving, or apparently moving, images.
 - The sequential advertisements shall not change more than once every 10 seconds.
 - Any change between advertisements will be immediate.
- 3.14 It is considered that, considering the above controls, that unless stationary at the signal junction, the majority of drivers are likely to see no more than a single change in advert and would not be distracted by the nature of the illumination or form of adverts in a manner that would create a hazard that would fail the key test.

4 Conclusions

- 4.1 The site is an established advertising site located within an urban location where advertising is common and digital advertising is generally likely to be acceptable.
- 4.2 There are no specific accident patterns or road geometry that makes this site inappropriate for locating roadside advertising adjacent to the motorway.
- 4.3 Suitable controls should be placed on the digital advertising to minimise risks of inappropriate driver distraction arising from over illumination, rate of change of advertising and moving images. The applicant proposes the imposition of the following conditions on any consent for digital advertising based on established research and practice:
- Prior to the first operation of the digital advertising, a scheme for the testing of the appropriate level of illumination shall be submitted to and approved in writing by the local planning authority. Nonetheless, the maximum intensity of illumination of the digital advertisement signs shall not exceed a 300cd/sqm at night-time.
 - The signs shall not display any moving, or apparently moving, images.
 - The sequential advertisements shall not change more than once every 10 seconds.
 - Any change between advertisements will be immediate.

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