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From: [REDACTED] transportscotland.gsi.gov.uk
Sent: 27 January 2014 13:42
To: [REDACTED] scot.gov.uk
Subject: Appeal 20 Croftcroighn Road, Glasgow - DPEA Reference ADA-260-2002
Attachments: Croftcroighn Road Statement - DPEA Ref ADA-260-2002.pdf

[REDACTED]

Please find attached Transport Scotland's statement for the above appeal

Regards

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TOWN & COUNTRY PLANNING (SCOTLAND) ACT 1997
THE TOWN AND COUNTRY PLANNING (NOTIFICATION OF APPLICATIONS)
(SCOTLAND) DIRECTION 1997

REMOVAL OF 2 NO WALL BANNERS 3M X 25M & 2 NO FENCE SIGNS 1M X 4M & 1M X 8M TO BE REPLACED BY 1 NO WALL BANNER 3M X 25M (NON ILLUMINATED) & 1 NO FREE STANDING SIGN 5M X 20M (INTERNALLY ILLUMINATED)
SITE ADJACENT TO SOCCERWORLD, 20 CROFTCROIGHN ROAD, GLASGOW

WRITTEN STATEMENT BY KEN AITKEN
TRANSPORT SCOTLAND
NETWORK OPERATIONS: TRUNK ROAD AND BUS OPERATIONS
DEVELOPMENT MANAGEMENT

DPEA Ref: ADA-260-2002
LA Ref: 13/01954/DC
TRNMD Ref: SW/211/2013

1 Details of Application

- 1.1 This written statement refers to the planning applications submitted to Glasgow City Council by Soccer World. The application relates to the removal of 2 wall banners (3m x 25m), 2 fence signs (1m x 4m & 1m x 8m) and their replacement with 1 wall banner (3m x 25m) and 1 internally illuminated advertising hoarding (5m x 20m) at Soccer World, 20 Croftcroighn Road in Glasgow.
- 1.2 Transport Scotland were notified of the appeal by Glasgow City Council in a letter received on the 13 January 2014 advising that any further statements in

relation should be submitted to the Directorate of Planning and Environmental Appeals within 14 days of receipt of the letter.

2 Planning Application

2.1 This planning application was referred to the Transport Scotland - Trunk Road and Bus Operations (TS - TRBO) by Glasgow City Council on the basis of its potential impact on the nearby M8 Trunk Road.

2.2 TS –TRBO responded to Glasgow Council in the form of a TR/NPA/2 dated 25 September 2013, recommending that planning permission be refused on the following grounds

The proposed advertisements would cause an unnecessary distraction to drivers on the trunk road which would result in an adverse impact on road safety

2.3 This response was based on an assessment of the distraction that such an advertisement would cause to trunk road traffic.

3 Background

3.1 Transport Scotland is concerned at the proliferation of the number of advertising signs which are being placed adjacent to the trunk road network and has consequently prepared guidance on advertising and signage adjacent to the trunk road network. It is intended to submit this draft guidance to the Minister of Transport and Veterans for approval, in the near future.

3.2 This guidance is based on previous research on the distraction to road users as a consequence of these signs or adverts.

3.3 This guidance reiterates the existing presumption against all advertising on or adjacent to the trunk road network due to safety reasons (including driver distraction).

4 Safety Considerations

4.1 Transport Scotland has a duty under the Roads (Scotland) Act 1984 to manage and maintain the trunk road network in Scotland. In managing these roads Transport Scotland has a responsibility to ensure that people can travel on the trunk road network in a safe manner. This is highlighted in the Transport White Paper Scotland's Transport Future where one of the five key objectives was to

"Improve safety of journeys by reducing accidents and enhancing the personal safety of pedestrians, drivers, passengers and staff"

4.2 In addition, the Government has identified targets for road casualty reduction across Scotland. Scotland's Road Safety Vision as published by the Scottish Government in "Scotland's Road Safety Framework to 2020" states that there will be:

"A steady reduction in the number of those killed and those seriously injured, with the ultimate vision of a future where no-one is killed on Scotland's roads, and the injury rate is much reduced"

4.3 This steady reduction is highlighted by means of a series of road safety targets which are detailed in Scotland's Road Safety Framework to 2020. This is primarily aimed at reducing the number of people killed or seriously injured in road accidents and the current target is to reduce the number of people killed and seriously injured in traffic accidents by 40% and 55% respectively by 2020.

4.4 Scotland's Road Safety Framework to 2020 also makes a number of other commitments to road safety one of which directly relates to driver distraction and this is to

"Continue to raise awareness through targeted campaigns of the dangers of driver distraction"

4.5 To achieve these aims Transport Scotland has prepared a Strategic Road Safety Plan to reduce the number of killed and seriously injured on Scotland's trunk road network. In 2010 there were 437 people killed or seriously injured on the network at a cost to the nation of nearly £1 billion.

4.6 In addition this is reinforced within the Scottish Planning Policy which states that

“Providing for the safe and efficient movement of traffic on the strategic road network requires the implications of development proposals on traffic and road safety to be taken into account in development plans and development management decisions.”

4.7 Therefore, it is clear to see that reducing the number of accidents through the delivery of Scottish Government Policy and, in particular, Transport Scotland’s Strategic Road Safety Plan is of national importance and links to the Scottish Government’s objectives of a wealthier, healthier and safer nation.

5 Application Site

5.1 This proposed site for the advert is on the M8 immediately to the west of junction 11. The M8 at this location is one of the most strategically important sections of Scotland’s trunk road network carrying about 79,500 vehicles per day.

5.2 The advert is located on the opposite side of the M8 from the end of a merge to the M8 and it is recognised that merges and diverges are the most common locations for accidents to occur when drivers require to maintain full concentration. Any advert at this location would act as a distraction and reduce driver attention thus having an adverse impact on road safety.

5.3 The advert is also located just beyond the change in speed limit from 70 mph to 60 mph and any distraction to drivers at this location could lead to drivers missing this change in speed limit and consequently driving at inappropriate speeds on the section of the M8 to the west of this location.

6 Accident History

6.1 The applicant has erected banners on this site without appropriate planning permission and as a consequence has tried to demonstrate that with these banners in place there has been a reduction in accidents and they are therefore having no adverse impact on road safety.

- 6.2 In the submission with the application they try to indicate that they are improving the existing illegal situation by reducing the size of the advertising.
- “At present there is approximately 237m² of signage across 5 displays on the site. As proposed this will be reduced to 175m² and on 2 signs giving a smarter, more ordered appearance.”*
- 6.3 This does not take into account that the existing banners relate to Soccer World itself and only indicate that this is an indoor football facility. In addition, the colour of the banners matches the building colour and is relatively inconspicuous except for the phone number and website address which are more obvious and in themselves a distraction if drivers attempt to note the details of either.
- 6.4 The new application leaves one of these banners, probably the most conspicuous one of the existing three (not two as detailed in the application) and replace the other two with an advertising hoarding which by its very nature is larger, illuminated and designed to be eye-catching to attract people’s attention.
- 6.5 The applicant provided an accident summary with their submission with a summary sheet indicating that there were 3 accidents in 2005; 2 accidents in 2006; 3 accidents in 2007; 1 accident in each of the years 2008, 2009 and 2010; with no accidents in 2011. The statement submitted with the application went on to state
- “We are grateful for your inter-application discussion with Transport Scotland and while we note their concern in relation to highway safety, we are unable to reconcile their view with the reality of the previous three years of accident records. These records show a decrease in accidents on the M8 since the existing signage has been erected and certainly do not tell a tale of a section of road that is particularly complicated or prone to accidents.”*
- 6.6 The accident details submitted by the applicant have been obtained from the “crashmap.co.uk” website. It is noted on the website that
- “This site uses data obtained directly from official sources but compiled in to an easy to use format showing each incident on a map. Incidents are plotted to within 10 metres of their*

location and as such, can sometimes appear to be off the carriageway. The CrashMap team accept no responsibility for errors within the data and all queries relating to accuracy should be directed to the appropriate authority”

- 6.7 Transport Scotland has access to Police Accident records which provides more detailed information than that available on the CrashMap website.
- 6.8 Transport Scotland in responding to this application examined these available records in more detail. To assess the impact of the advert the only section of road considered in the accident analysis are those which will clearly see the new advertising hoarding. The section of M8 considered has been offset to include 400 metres before the advert, the distance over which it is likely to be seen on approach and 300 metres after the advert, the distance over which the impact of driver distraction may still be a factor on road safety. In addition the two slip roads joining the M8 at this location were also considered at the proposed advert can be seen by vehicles using these slip roads to join the M8. The accidents considered only include those which could be considered to occur as a result of driver inattention, which would be exacerbated by the provision of an advertising hoarding at this location.
- 6.9 These accidents have been assessed over the last 20 years, and there have been 38 personal injury accidents of this type of which 6 were serious and the remaining 32 were slight injury accidents.
- 6.10 Accidents by their very nature are random events and statistically the rate at which they can occur can change from year to year. The only way in which they can be considered in a representative manner is to examine them over an extended period. It can be seen that the average number of accidents at this location equates to nearly 2 per annum over this 20 year period.
- 6.11 It should be noted that at the beginning of this 20 year period there were roadworks taking place when ten accidents took place. Consequently these have been discounted from the analysis even although they are still relevant as it even more likely that drivers are likely to be distracted by advertising

hoardings when traffic is slow moving during roadworks. Therefore, the total number of accidents considered in the accident analysis is 28 over an 18 year period, which gives an accident rate of just over 1.5 accidents per annum.

- 6.12 On this basis over a three year period it can be anticipated that there would be 5 injury accidents of which one could be serious. The variation between when a serious accident can become a fatal is very slight and there is the possibility that one of these accidents could even be a fatal.
- 6.13 It should also be noted that the claim made by the applicant that accidents have decreased since Soccer World opened is erroneous. Their accident submission considers all accidents in the vicinity regardless of direction of travel or causation. When looking at the Transport Scotland analysis of accidents which are caused by driver distraction at locations where the advertising hoarding can be seen in the same period of time there were 3 accidents in 2005; 2 accidents in 2006; 1 accident in 2007; no accidents in each of the years 2008 and 2009; 1 accident in 2010; and 2 accidents in 2011.
- 6.14 Of these 28 accidents noted in the Transport Scotland analysis, 9 have been as a result of vehicles running into the rear of another vehicle; 8 have been as a result of taking avoiding action or skidding; 7 have been side way collisions as vehicles merge from the slip road; 3 as a result of inattention during overtaking manoeuvres and one was a pedestrian attempting to cross the motorway. These accidents can generally be attributed to driver inattention and it is likely that even the skidding accidents are a result of drivers requiring to take avoiding action and end up skidding.
- 6.15 Furthermore, this analysis only considers accidents where the advertising hoarding can be seen clearly on the approach. It should also be noted that it is also possible that secondary accidents have been caused elsewhere on the M8 as it is not uncommon for additional accidents to occur further back on the westbound carriageway when traffic stops suddenly as a result of an accident or even an occurrence of sudden braking. Secondary accidents also often

occur on the adjacent carriageway as drivers travelling in the opposite direction are distracted by looking at an accident. None of these potential accidents have been included in this analysis.

6.16 It is therefore clear that driver inattention is a significant contributory cause to accidents at this location.

6.17 Consequently, it is therefore likely that an advertising hoarding at this location could lead to further driver inattention at this location, and contribute towards the possibility of further accidents occurring at this location.

7 Conclusions & Recommendations

7.1 Transport Scotland has recently prepared guidance on advertising and signage adjacent to the trunk road network, which is intended to be submitted to the Minister of Housing and Veterans for approval, in the near future.

7.2 Transport Scotland's position is that roadside advertising acts as distraction to the trunk road users.

7.3 Any interruptions to traffic flow at this location would have serious repercussions on adjacent roads and overall to the economy of the west of Scotland.

7.4 This location requires driver concentration with merging traffic and the change in the speed limit which could be missed with any additional distraction. The location also has a long sustained accident history based on driver inattention.

7.5 Scottish Government Policy and, in particular, Transport Scotland's Strategic Road Safety Plan is to reduce the number of accidents and therefore this must be of "National Importance" as this directly helps meet the Scottish Government's objectives of a wealthier, healthier and safer nation.

- 7.6 Therefore, as Transport Scotland has a duty to manage Trunk Road Network safely through Government Policy and to meet Scottish Government targets for reduction of killed and seriously injured, any factor which could distract drivers and adversely affect road safety must be resisted. Consequently, Transport Scotland must maintain the objection to this proposed sign.
- 7.7 Transport Scotland respectfully requests that the Reporter refuses this application due to its adverse impact on road safety.


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27 January 2014