



ABN 59 004 233 489

16 January 2009

Ms Sharon Thompson
Principal Advisor (Corridor Access)
Department of Main Roads
GPO Box 1412
BRISBANE QLD 4001

Dear Sharon,

As requested, I am writing to provide you with the Outdoor Media Association's (OMA) comments regarding the Department of Main Roads' (DMR) proposed restriction distances for large format advertising devices. Our comments incorporate those made by our members in addition to those made by Stepfair Traffic and Transport Consultants, who were commissioned by the OMA to assist in the analysis of the DMR's proposal. Please note that our comments refer to the proposed restriction distances on declared motorways zoned above 80km/h only as the industry believes the initial policy review should concentrate on resolving these restriction distances in the first instance.

As already outlined in our previous letter dated 10 December 2008 (**Attachment A**), the OMA considers these new proposed restriction distances to be just as restrictive as the current restriction distances in the DMR's *Guide to the Management of Roadside Advertising*. The only changes in this document that the industry would be prepared to accept at this stage is the reduction in restriction distances between advertising devices to 250 metres and the application of restriction distances to directional, VMS and VSL signage only.

We believe that there are three components to the DMR's restriction distances – lateral restrictions, longitudinal restrictions and restrictions around directional, VMS and VSL traffic signs. Our comments and recommendations on the proposed restriction distances for declared motorways zoned above 80km/h refer to each of these three components and are outlined below:

Lateral restriction distances

The DMR proposes to retain the current 2.5V lateral restrictions but change the measuring point so that this distance will be measured from the lane edge line rather than the property boundary. The industry does not believe this lateral distance is required if the advertising sign complies with the longitudinal distances. For areas on the motorway where longitudinal

distances do not apply the advertising sign should be able to be placed as close to the road reserve as possible (whilst still observing any clear zones) to reduce the amount of head movement required of a motorist to read the sign if they choose to attend to it.

Longitudinal restriction distances

The longitudinal restriction distances of 5V and 7.5V for on-ramp and off-ramp scenarios still remain in the new proposal. In addition, these distances have now been applied to a range of other traffic scenarios such as terminating lanes. The restriction distances of 5V and 7.5V, however, are judgement based determinations and the DMR at this stage has been unable to explain how these were derived.

The industry agrees with the DMR that no advertising signs should be placed in the immediate vicinity of complex traffic scenarios such as on-ramps and off-ramps. Provided that there were ample opportunities for advertising signs along stretches of road between these ramps, the industry would be prepared to accept reasonable longitudinal restrictions around these key decision making points.

The industry believes that Stopping Sight Distance (SSD), or the distance required for a driver to recognise, react and stop safely if required, is an appropriate engineering and behavioural countermeasure which could be applied instead of the current and proposed 5V and 7.5V restriction distances. If the SSD was applied to directional signs this would prevent advertising signs from being placed in the immediate vicinity of those key decision making points which are outlined in the DMR's new proposal.

Stepfair Traffic and Transport Consultants has further suggested that any proposals to develop signs within 7.5V from an on-ramp or off-ramp which comply with the SSD around directional, VMS and VSL signs could be separately evaluated by an independent, qualified engineer before approval is granted. The industry would be prepared to consider this approach and cover the costs of this kind of assessment if required.

Restrictions around directional, VMS and VSL signs

The industry agrees with the DMR's proposal to apply longitudinal restriction distances to directional signs (white legend on green background, GE1 and GE2 series signs) as well as Variable Message Signs (VMS) and Variable Speed Limit Signs (VSL). As mentioned above, the industry believes that SSD is an appropriate engineering and behavioural countermeasure which could be used to prevent an advertising sign from blocking the view of these signs.



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The industry recommends that the SSD be applied in front of the sign (at 100km/h this would be 170 metres) and a distance of 150m applied after the sign. If these distances were to be applied around these signs only, the industry believes this would open up far more opportunities for advertising signs than what currently occurs under the Guide.

As outlined in our last letter dated 10 December 2008, the industry continues to be concerned that guidelines for restriction distances be continued to be applied and designed specifically for third party advertising but not for other commercial / on-premise signage that is greater than 4sqm, even though the DMR acknowledges that this form of signage has similar driver distraction potential to third party advertising. The OMA therefore respectfully recommends that any resulting policy be applied to commercial / on-premise signage that is greater than 4sqm also.

Please also find attached the OMA's proposed position on restriction distances (**Attachment B**) which was sent to you on 10 December 2008. The industry would be prepared to accept any of the recommendations outlined above or those that are outlined in this position.

Thank you for giving the OMA the opportunity to comment on the DMR's proposed restriction distances for large format devices. Please contact me on (02) 8356 9000 if you have any further questions. I look forward to discussing this in more detail with you soon.

Yours sincerely,

Carolyn Samsa
Senior Policy Adviser