



Submission to Policy and Assessment Guidelines for Static and Digital Advertising Signs

15 March 2024



Executive Summary

The Outdoor Media Association (OMA) appreciates the opportunity to provide feedback on the revised drafts of Main Road WA's *Policy and Assessment Guidelines for Static Advertising Signs* and *Policy and Assessment Guidelines for Digital Advertising Signs*.

The OMA acknowledges the additional work Main Roads WA have done in this area and appreciates that the two documents are much simpler and easier to read than the first revised draft. However, the OMA is concerned that the current draft policy has become more complex and restrictive than the existing policy.

Further, this document may go beyond the jurisdiction and authority of Main Roads WA as outlined in the *Main Roads Act, Regulation 1996 of the Act*, and [WA Planning Commission Instrument of Delegation](#).

If endorsed in its current form, the State Government will lose significant revenue opportunities that typically generate a 50% revenue share in a billion-dollar industry growing at more than 12% per annum. The OMA supports the development of a policy that is pragmatic and merit based.

Considering this, our priority recommendations include:

1. Retain the scope as per the current policy
2. Remove the prohibitive methodology of crash risk allocation
3. Remove the prohibition zone for diverge as per the current policy
4. Apply a simpler methodology to determine dwell times or retain the dwell times as per the current policy
5. Adopt either an unlimited or a 25-year approval period for new advertising signs

It is alarming that the draft documents in its current form are the most restrictive State Road assessment guidelines for advertising signs in the country. The consequence of the draft policy and guidelines is the potential extinction of Out of Home advertising across Western Australia.

A balanced approach can lead to a mutually beneficial outcome supporting a successful Out of Home industry in Western Australia which benefits road users and government through a revenue stream, as evidenced in other markets.

Out of Home advertising has a positive impact by facilitating impactful road safety campaigns and helping to fund essential road improvements.

The OMA welcomes the opportunity to discuss with Main Roads WA how it can best utilise Outdoor advertising signs, given they can play a role in improving driver performance, increasing driver alertness, and reducing driver fatigue.

Each section of the submission reflects and addresses the corresponding section of the *Policy and Assessment Guidelines for Static Advertising Signs* and *Policy and Assessment Guidelines for Digital Advertising Signs* with a summary of recommendations at the end.

1 INTRODUCTION

The OMA and Main Roads WA are aligned with the three core principles of:

1. Safety is the overarching priority
2. Robust, data-driven and consistent assessment process
3. Traffic control signals have priority

The OMA understands the intention of the policy documents is to create safe environments for road users. However, the OMA is concerned that the phrasing of a statement in the introduction could lead to differing interpretations.

The Introduction states that:

Approval for static/digital signs must be sought from both Main Roads (in line with this policy) and the relevant local government or planning authority.

This statement can be interpreted as:

1. Approval for signs must be sought from both Main Roads WA and the relevant local government or planning authority. This implies that Main Roads WA deals, manages and controls all roadside advertising signs across all roads in the state.

Or its intended meaning:

2. Approval for signs must be sought from both Main Roads and the relevant local government or planning authority for new signs on roads outlined in the following Scope section.

The OMA recommends removal or rephrasing of the statement to minimise confusion and to better reflect the jurisdiction of Main Roads WA as it relates to roadside advertising signs in accordance with the *Main Roads Act 1930* and *Regulation 1996* of the Act.

OMA Recommendation

Remove “*Approval for static/digital signs must be sought from both Main Roads (in line with this policy) and the relevant local government or planning authority.*”

OR

Rephrase “*Approval for static/digital signs must be sought from both Main Roads (in line with this policy) and the relevant local government or planning authority.*”

to

“*Approval for static/digital signs on roads outlined in Section 2: Scope of this document must be sought from both Main Roads and the relevant local government or planning authority.*”

2 SCOPE

2.1 Static/Digital signs subject to this policy

The policy applies to all gazetted highways and main roads (state roads) controlled by Main Roads, as well as sections of the Western Australian road network where a traffic control signal (TCS) is situated.

The policy also applies to applications for new digital signs or conversion of existing static signs:

- within state roads*
- within 500 m of a state road and visible from a state road, or*
- within 100 m of a TCS on all roads, including local roads.*

The OMA supports the current application of the policy to State roads only.

The OMA does not support the additional application of the policy within 500m of a state road and visible from a state road, or within 100m of a TCS on all roads, including local roads.

The current version of the [*Policy and Application Guidelines for Advertising Signs*](#) applies to all gazetted highways and main roads (state roads) controlled by Main Roads WA. This revised draft policy attempts to extend the application of the policy and Main Roads WA's authority on roads that are currently not within Main Roads WA's jurisdiction.

The OMA understands that when an advertising sign is not within a state road or is not within 500m of a state road and not visible from a state road, then this policy should not apply.

In such circumstances, Main Roads WA will be a referral agency and the process outlined under [*WA Planning Commission Instrument of Delegation*](#) applies.

The Instrument of Delegation requires for an application to be referred to Main Roads if the site abuts a Primary Regional Road reservation. Only if the Primary Regional Road reservation extends over the site an approval from Main Roads is required, otherwise Main Roads remains a referral agency.

It should be recognised that state road authorities do not have any jurisdiction on local roads.

OMA Recommendation

Remove *“as well as sections of the Western Australian road network where a traffic control signal (TCS) is situated.”* **AND** *“within 500 m of a state road and visible from a state road, or within 100m of a TCS on all roads, including local roads.”*

OR

Remove *“as well as sections of the Western Australian road network where a traffic control signal (TCS) is situated.”* **AND** reduce *“within 500m of a state road and visible from a state road”* to *“within 250m of a state road and visible from a state road”* **AND** remove *“or within 100m of a TCS on all roads, including local roads.”*

2.2 Static/Digital signs not covered by this policy

Under dot point 1, Item (3) (b) states that:

(b) only that part or those parts of the sign which are reasonably capable of being seen and discerned from any one direction at a time are to be counted when computing the area.

The OMA understands that this extract is from *Main Roads (Control of Advertisements) Regulation 1996* and that this consultation does not seek to amend the legislation. However, the OMA recommends that future review of the legislation should remove “reasonably capable of being seen” so it reads as “... which are seen and...” to ensure objectivity.

The second dot point states that:

Digital signs that are more than 500 m from the roadway or are unable to be observed by a driver.

The OMA recommends replacing “roadway” with “a State Road” to minimise confusion and to better reflect the jurisdiction of Main Roads WA as it relates to roadside advertising signs in accordance with the *Main Roads Act 1930* and *Regulation 1996* of the Act.

At the end of this section, it states that:

Main Roads may also intervene in any case where advertising signs breach road safety principles.

OMA members build and manage safe, innovative and well-designed signage.

The OMA would like to seek clarity on the definition of “intervene” in the context of this statement.

The OMA supports Main Roads WA reviewing the unlikely case of advertising signs breaching road safety principles and engaging with the owner or occupier of the land on how to rectify the situation.

OMA Recommendation

Replace “roadway” with “a State Road” in *“Digital signs that are more than 500 m from the roadway or are unable to be observed by a driver.”*

AND

Replace “intervene in” with “review” in *“Main Roads may also intervene in any case where advertising signs breach road safety principles.”*

AND

Consider a 12-18 month post-operationalisation Road Safety Assessment by a qualified Road Safety Auditor whereby amendments are made to the operation of the sign if necessary.

3 ROLES AND RESPONSIBILITIES

3.1 Powers and Obligations

The last paragraph of this Section states that:

Roadside advertising planning approval is the responsibility of the relevant planning authority. Therefore, for roads not covered by this policy, Main Roads recommends the relevant road authority apply this policy.

The OMA recognises that many local governments have their own advertising signs policy and should assess applications according to those policies. The OMA also recognises the authority and jurisdiction of local governments for local roads.

OMA Recommendation

Remove “*Therefore, for roads not covered by this policy, Main Roads recommends the relevant road authority apply this policy.*”

OR

Replace “*Main Roads recommends the relevant road authority apply this policy.*” with “*Main Roads recommends the relevant road authority refer to this non-binding policy as a guideline for assessment.*”

3.2 Responsibilities

The second and third dot point of the applicant’s responsibilities outlined in Table 1 states that:

- *Arrange a pre-lodgement meeting with Main Roads – Network Operations.*
- *Prepare and submit the Static/Digital Sign Application Form in line with this policy. See section 9 for a link to download the application form.*

These items should only relate to signs which are covered by this policy and not all signs. Therefore, the applicant responsibility outlined is only relevant to signs which are within a state road. It should be noted that the OMA has not referred to the “*within 500m of a state road and visible from a state road*” and “*100m distance to a TCS*” requirements. Please refer to OMA’s comment under Section 2.1.

The OMA recommends that Main Roads WA clearly outlines the relationship between the applicant, LGA or relevant planning authority, and Main Roads WA.

OMA Recommendation

Clarify that a pre-lodgement meeting with Main Roads – Network Operations and submitting the Static/Digital Sign Application Form is only a requirement for new advertising signs under the OMA’s recommended policy scope.

AND

Clarify the concurrence relationship between Main Roads WA and the relevant planning authority.

4 DEFINITIONS

No definition of a road sign relating to Section 6.4.1 is provided.

This terminology without a definition can be potentially confusing.

The OMA suggests that a clear definition will need to be provided for “road signs” which could be traffic signs, and lane use management signs.

OMA Recommendation

Define “road sign”.

5 PROCESS OVERVIEW

The expression and wording of this section implies that the process applies to all signs on all roads, and not only those within the scope of the policy.

This Section should only apply to signs within the OMA’s recommended scope as outlined earlier in this response, i.e the policy applies to all gazetted highways and main roads (state roads) controlled by Main Roads.

The policy also applies to applications for new digital signs or conversion of existing static signs within state roads and within 250m of a state road and visible from a state road.

OMA Recommendation

Clarify that the process is only a requirement for new advertising signs under the OMA’s recommended policy scope.

6 LOCATION

6.1 Location Assessment Summary

The location assessment criteria includes three steps which are discussed in the following paragraphs:

Step 1: Define Crash Risk Level

Step 2: Check Visibility Distance (for Digital Signs Only)

Step 3: Check Prohibition Zones

The OMA understands that if one of the above steps is not satisfied, the sign is not permitted.

6.2 Crash Risk Category

The various intersections and road levels are defined in Appendix 1 of the policy, however, there is no reference to Appendix 1 in Section 6.2.

With respect to Level 3 – high risk crash category, the various conditions and restrictions set for this level are considered unreasonable as these conditions relates to Main Roads WA believing that this will increase the risk of casualty crashes. This is a very subjective matter. The subjectiveness of any assessment should be removed from the policy. Further, if there has been only one casualty

crash involving a pedestrian over a 5-year period, the location will automatically be categorised as Level 3.

Some casualty crashes and crashes involving pedestrians occur in highly unusual circumstances which is not a reflection of the road environment or the safety aspect of the road environment. Such circumstances may include a driver travelling on the wrong side of a road resulting in a head-on collision, or a drunk pedestrian being present on a section of the road not designed for pedestrians or crossing. In OMA's opinion, such crashes should not be considered in allocating crash risk categories.

The policy with respect to general thresholds of casualty crashes for each crash risk category, it is not clear what particular year (or years) has been assessed. The policy simply says for example, if 2-3 casualty crashes per year then the crash risk category is Level 3. This needs to be clearly specified in the policy. Particularly because, if there are more than three casualty crashes per year, then crash risk category is Level 4 and no signs are permitted.

Overall, the method of how the crash risk category levels is allocated to road sections and intersections does not appear to be transparent and clear. More concise explanation in the policy is required.

The OMA understands that the crash risk category goes beyond state roads and is provided for all roads above access roads. As a result, it is highly likely that Local Governments may elect to adopt this black box approach to establish if advertising signs are permitted or not on a particular section of a local road or in proximity of local road intersections.

The OMA recognises that maintaining the Crash Risk Map up to date at all times requires significant resources and therefore, an applicant cannot be confident that these maps are updated on a continuous basis.

The OMA requests that the crash risk maps should be made available to applicants and their consultants the same way that the applicants and their consultants have access to crash records at present.

Under the draft policy, the location of the sign, with respect to crash risk category, will only be communicated at the pre-lodgement meeting. This is an inefficient process both for applicants and for Main Roads WA. As a minimum, the crash risk category of a road section or an intersection should be established via email.

OMA Recommendation

Omit crashes in highly unusual circumstances not related to the road environment from the consideration of allocating crash risk categories.

AND

Explain the methodology of crash risk allocation in the policy.

AND

Provide crash risk maps to applicants and their consultants the same way that the applicants and their consultants have access to crash records at present.

AND

Establish the crash risk category of a road section or an intersection via email to the applicant and their consultants before a pre-lodgement meeting.

6.3 Visibility Distance (For Digital Signs Only)

The visibility distance measurements for at least 50% of the display area to be visible is contradicting with the first and second paragraph of Section 6.3 which defines the visibility distance as “uninterrupted visibility”.

The requirement for uninterrupted visibility is unreasonable as it increases the probability of the sign not satisfying the visibility distance requirement. The OMA notes that the assessment of an uninterrupted visibility can be subjective.

Table 3 outlines the minimum visibility distance requirement for different speeds based on a minimum of 6 seconds visibility. The basis of the 6 second visibility requirement is not clear.

Generally, the rule of thumb for an observation and reaction time is between 2-4 seconds depending on circumstances. Therefore, the application of 6 second visibility is considered onerous and increases the distances specified in Table 3.

Sight distance requirements are outlined in the *Austrroads Guide to Road Design*. This source document is referred in other jurisdictions such as the NSW Government’s *Transport Corridor Outdoor Advertising and Signage Guidelines*, South Australian Government’s *Advertising Signs Assessment Guidelines for Road Safety*, and Queensland Government’s *Roadside Advertising Manual (Technical Volume)*.

The OMA considers the selection of the kerb side for establishing uninterrupted visibility and/or measuring the visibility distance as unreasonable. This is because there are physical objects such as buildings and trees, particularly in an urban environment, which impact the uninterrupted visibility and therefore increase the probability of the sign not being compliant with the policy.

OMA Recommendation

Align the visibility distance to the sight distance requirements outlined in the *Austrroads Guide to Road Design*.

6.4 Prohibition Zones

6.4.1 Obstruction of a road sign

The revised draft policy states that:

Static/Digital signs must not obstruct a driver's view at a point where they may need to react (brake or change lanes).

The minimum distance between the digital sign and a road sign should be $0.6V$, where V = posted speed limit in km/h.

The OMA reiterates that advertising signs are always placed either to the side of a roadway or above a roadway and never obstruct a driver's view.

The signs may be within the peripheral vision of a driver but they never obstruct that view. Therefore, the above statement in the draft policy should be reworded or removed because it implies that advertising signs are obstructive.

As outlined earlier in this document, there is no definition of what is meant by a "road sign". The definition should be provided.

OMA Recommendation

Remove "*Static/Digital signs must not obstruct a driver's view at a point where they may need to react (brake or change lanes).*"

AND

Define "road sign".

6.4.2 Interference with a traffic control signal (TCS)

The formula and distance measurements provided in Figure 9 (for Static Signs guideline) and Figure 10 (for Digital Signs guideline) for the TCS Prohibition Zone (TPZ) do not necessarily result in interference of an advertising sign with a TCS. Therefore, a sign could be within a TPZ but does not interfere with a TCS.

OMA Recommendation

Remove the formula and distance measurements used to calculate the traffic control signals prohibition zone.

AND

Allow for merit-based assessment for the appropriateness of the location.

6.4.3 Critical movement prohibition zone

6.4.3.1 Merge

Table 4: Critical movement prohibition zone dimensions for merge and diverge road sections presents the largest restriction zones in the country.

The prohibition zone for merge in the current policy is “DRA for Terminating Lane”. However, the prohibition zone distances have now become four to five times longer (for non-freeway roads) than the DRA distances specified in the current policy.

The OMA believes that this is unreasonable. The prohibition zone distances are less for freeway type roads compared to the current standards.

The prohibition zone for diverge is not in the current policy. The same prohibition zone distances as for merge apply for diverge as well.

The significant distances/area for the prohibition zones for merge and diverge is unreasonable and there is no apparent justification for why it should be several times longer than the current policy.

Further, the OMA believes that it can be argued that the potential level of distraction in a diverge situation is nowhere near as a merge situation as the same level of potential vehicle conflicts when merging does not occur.

Therefore, there is no justification for the prohibition zone distances for diverge to be the same as the merge.

OMA Recommendation

Remove the prohibition zone for diverge as per the current policy.

7 AMENITY

The OMA encourages the development of safe, innovative and well-designed signage. It appears that the assessment of amenity is now mandatory in the draft policy. It is not mandatory in the current policy.

The OMA is of a position that an amenity assessment should only be asked by Main Roads WA if the sign is on roads controlled by Main Roads WA, as per the current policy.

The assessment of visual amenity should come under the jurisdiction of the local authority. Therefore, it should be the local authority who decides whether a visual amenity assessment is required as part of a digital/static sign application and planning approval process.

Amenity assessment can be highly subjective. This is evident by dot points provided under Section 7.1 which outline the locations where advertising signs will not be supported. For example, it is unclear who can determine and on what basis that a landscape or views are valued by the community. It is also unclear what the criteria is for a visually prominent landform.

In addition, under the last dot point in Section 7.1, there is no guidance provided of the acceptable and unacceptable separation distances between a sign and a public art.

Section 7.3 states that digital signs that do not comply with Section 7.1 and 7.2 will require a Landscape and Visual Assessment attached with the application. The OMA would like to highlight that many elements outlined in Section 7.1 and 7.2 would usually require expert assessment.

An additional Landscape and Visual Assessment should not be a mandatory requirement of Main Roads WA policy and the guidelines provided in the policy are considered unreasonable and restrictive.

OMA Recommendation

Remove the mandatory requirement of a Landscape and Visual Assessment.

OR

Apply the amenity assessment of this policy to new advertising signs on roads within the OMA recommended scope.

8 CONDITIONS AND RESTRICTIONS

The draft policy states that *Main Roads may also recommend conditions for a digital sign under planning regulations.*

It is unclear what conditions or considerations may be imposed on digital advertising sign. The recommended considerations should be reasonable, operational and within Main Road WA's remit of road safety.

The OMA notes that the list of blanket prohibitions and conditions for digital signs is more extensive than the current policy. This creates a restrictive environment for approval of advertising signs.

The OMA supports merit-based assessments that consider the subject land and surrounding environments. A merit based consistent and balanced review process for development applications will result in better Outdoor advertising signs.

OMA Recommendation

Ensure that the recommended conditions are reasonable, operational and within Main Road WA's remit of road safety.

AND

Consider merit-based assessments of development applications.

8.1 Installation requirements and conditions

Item one of Section 8.1.1 is considered subjective and vague for both static and digital signs. Item 5 states that,

Static/Digital signs must not obstruct pedestrian access along a road verge, even if no formal path is present.

It is unreasonable that such a requirement should apply to places with no formal paths, as the assessment can become broad and subjective. This is because pedestrians can traverse and walk anywhere. The OMA suggests that "even if no formal path is present" should be replaced with "where a formal path is in place".

Further, the OMA believes that if a sign overhangs a formal path but is at a height that does not obstruct pedestrian access, then it should be acceptable. It is suggested that a minimum height clearance of 2.5m over a formal path should be added to this item as per the existing policy.

The OMA would also like to highlight that development applications tend to include accessibility requirements and assessments.

OMA Recommendation

Remove Item 1 of Section 8.1.1. *"Digital signs less than 4 m² installed within the road reserve must be integrated with / designed in sympathy with facilities providing public benefit e.g., bus shelters, illuminated street name signs, seating, rubbish bins and similar."*

AND

Replace *"even if no formal path is present"* with *"where a formal path is in place"* in Item 5 of Section 8.1.1

8.1.4 Insurance

The minimum insurance amount of \$50,000,000 specified under Section 8.1.4 is five to ten times more than the current policy (depending on the sign type).

OMA Recommendation

Clarify that the minimum insurance amount of \$50,000,000 will be applied to new advertising signs within the OMA recommended scope only.

8.2 Sign Operating Conditions

8.2.1 Light emitting devices

The draft policy states an unjustified assumption that *Where a static/digital sign is adjacent to a TCS, in an otherwise uncluttered road environment, road users will observe the digital sign in preference to the TCS.*

The OMA is also concerned that the final paragraph in this section lacks a clear framework as to how Main Roads can form the opinion that a digital sign is likely to confuse a driver, adversely affect traffic or increase risk.

OMA Recommendation

Remove “*Where a static/digital sign is adjacent to a TCS, in an otherwise uncluttered road environment, road users will observe the digital sign in preference to the TCS.*”

AND

Clarify the assessment criteria for Main Roads WA to determine if a digital sign is likely to confuse a driver, adversely affect traffic or increase risk.

8.2.3 Dwell Time (For Digital Signs Only)

The dwell time assessment in the draft policy is based on a complex formula which unnecessarily complicates the process of establishing the appropriate dwell time for a digital sign, particularly considering disagreements about the appropriate visibility distance.

In addition, there are likely circumstances where multiple calculations need to be undertaken because a sign could be viewed from multiple roads.

The OMA supports Table 4.2 – Electronic advertising dwell times in the current policy which provides a dwell time relevant to speed limit. This table is more efficient and intuitive to use.

The OMA also does not agree with the unjustified assumption under Section 8.2.3 (e) which states that:

The further from the forward roadway a digital sign is positioned, the more likely a driver is to be distracted in their peripheral vision and turn their direction away from the road.

OMA members' large format digital advertising signs are compliant, appropriate and safe. Approximately 80% of large format digital advertising signs in NSW have a 12-18-month post-operational road safety assessment as a condition of consent. This includes all Government-owned sites. There is no record of a digital advertising sign in NSW increasing its dwell time or switching off following a road safety assessment.

The OMA suggests that Main Roads WA considers dwell time trials and reviews.

For example, a certain dwell time of the advertisements displayed on the digital screen can be subject to a 6 to 12-month trial period and review.

Then if no impacts we identified, Main Roads WA can approve the continuation of that dwell time, or a reduced dwell time.

OMA Recommendation

Retain the current dwell times as per Table 4.2 – Electronic advertising dwell times in the current policy.

AND

Consider dwell time trials and reviews.

8.3 Displayed content

The OMA understands the intent and encourages creativity and best practice.

Many of the concerns outlined in the Replication of a road sign section and the instruction to drivers section of the draft policy are addressed in the [Federal Chamber of Automotive Industries' Voluntary Code of Practice for Motor Vehicle Advertising](#).

The OMA recommends that the Main Roads WA avoids duplication of existing policies that OMA members already abide by.

OMA Recommendation

Remove the Replication of a road sign, Sequential content, Legibility of text, Complexity of message, and Instructions to drivers sections.

AND

Note and reference existing advertising self-regulation including the AANA, OMA and FCAI advertising policies.

8.5 Period of Approval

The imposition of time-limited consents is unique to the Out of Home industry, is being inconsistently administered and is not applied to other land uses such as commercial and industrial land uses.

The period of approval must consider commerciality and commercial viability.

Too short of an approval period stifles innovation and is not enough time for media owners to recoup capital investment for each asset.

A short period of approval poses a risk to landlord's ongoing income streams and discourages investment.

The OMA recommends a period of approval of 25 years for new signs.

Main Roads WA should protect time unlimited consents for signs which currently have the benefit of these provisions to encourage investment in upgrades and secure landlord's property rights and valuations.

The expected outcome from the recommendations above include boosting industry confidence to invest in better quality signage across Western Australia and landlords given certainty around property rights and valuations as time unlimited consents are grandfathered.

The OMA suggests that a period of approval should only apply to advertising signs on roads within the OMA recommended scope.

OMA Recommendation

Adopt an unlimited or 25-year period of approval for new advertising signs.

OR

Remove expiry timeframes for new advertising signs.

9 SIGN APPLICATION FORM

The OMA suggests that the application form should be amended as per the recommendations in this submission.

OMA Recommendation

Remove *"Is the proposed digital sign within 500m of a State Road?"* OR Replace *"Is the proposed digital sign within 500m of a State Road?"* with *"Is the proposed digital sign within 250m of a State Road?"*

Remove *"Which State Roads are within 500m?"* OR Replace *"Which State Roads are within 500m?"* with *"Which State Roads are within 250m?"*

Remove *"Are any Traffic Control Signals within 200m of the proposed Sign?"*

Replace mentions of *"digital sign"* with *"display sign"*.

10 SUMMARY OF OMA RECOMMENDATIONS

Section	Recommendation
1. Introduction	<p>Remove “Approval for static/digital signs must be sought from both Main Roads (in line with this policy) and the relevant local government or planning authority.”</p> <p>OR</p> <p>Rephrase “Approval for static/digital signs must be sought from both Main Roads (in line with this policy) and the relevant local government or planning authority.” to</p> <p>“Approval for static/digital signs on roads outlined in Section 2: Scope of this document must be sought from both Main Roads and the relevant local government or planning authority.”</p>
2.1 Static/Digital signs subject to this policy	<p>Remove “as well as sections of the Western Australian road network where a traffic control signal (TCS) is situated.” AND “within 500 m of a state road and visible from a state road, or within 100m of a TCS on all roads, including local roads.”</p> <p>OR</p> <p>Remove “as well as sections of the Western Australian road network where a traffic control signal (TCS) is situated.” AND reduce “within 500m of a state road and visible from a state road” to “within 250m of a state road and visible from a state road” AND remove “or within 100m of a TCS on all roads, including local roads.”</p>
2.2 Static/Digital signs not covered by this policy	<p>Replace “roadway” with “a State Road” in “Digital signs that are more than 500 m from the roadway or are unable to be observed by a driver.”</p> <p>AND</p> <p>Replace “intervene in” with “review” in “Main Roads may also intervene in any case where advertising signs breach road safety principles.”</p> <p>AND</p> <p>Consider a 12-18 month post-operationalisation Road Safety Assessment by a qualified Road Safety Auditor whereby amendments are made to the operation of the sign if necessary.</p>
3.1 Powers and Obligations	<p>Remove “Therefore, for roads not covered by this policy, Main Roads recommends the relevant road authority apply this policy.”</p> <p>OR</p> <p>Replace “Main Roads recommends the relevant road authority apply this policy.” with “Main Roads recommends the relevant road authority refer to this non-binding policy as a guideline for assessment.”</p>
3.2 Responsibilities	<p>Clarify that a pre-lodgement meeting with Main Roads - Network Operations and submitting the Static/Digital Sign Application Form is only a requirement for new advertising signs under the OMA’s recommended policy scope.</p> <p>AND</p>

	Clarify the concurrence relationship between Main Roads WA and the relevant planning authority.
4, Definitions	Define “road sign”.
5. Process overview	Clarify that the process is only a requirement for new advertising signs under the OMA’s recommended policy scope.
6.2 Crash Risk Category	Omit crashes in highly unusual circumstances not related to the road environment from the consideration of allocating crash risk categories. AND Explain the methodology of crash risk allocation in the policy. AND Provide crash risk maps to applicants and their consultants the same way that the applicants and their consultants have access to crash records at present. AND Establish the crash risk category of a road section or an intersection via email to the applicant and their consultants before a pre-lodgement meeting.
6.3 Visibility Distance (For Digital Signs Only)	Align the visibility distance to the sight distance requirements outlined in the <i>Austrroads Guide to Road Design</i> .
6.4.1 Obstruction of a road sign	Remove “ <i>Static/Digital signs must not obstruct a driver’s view at a point where they may need to react (brake or change lanes).</i> ” AND Define “road sign”.
6.4.2 Interference with a traffic control signal (TCS)	Remove the formula and distance measurements used to calculate the traffic control signals prohibition zone. AND Allow for merit-based assessment for the appropriateness of the location.
6.4.3.1 Merge	Remove the prohibition zone for diverge, as per the current policy.
7. Amenity	Remove the mandatory requirement of a Landscape and Visual Assessment. OR Apply the amenity assessment of this policy to new advertising signs on roads within the OMA recommended scope.
8 Conditions and restrictions	Ensure that the recommended conditions are reasonable, operational and within Main Road WA’s remit of road safety. AND Consider merit-based assessments of development applications.

8.1 Installation requirements and conditions	<p>Remove Item 1 of Section 8.1.1. <i>“Digital signs less than 4 m2 installed within the road reserve must be integrated with / designed in sympathy with facilities providing public benefit e.g., bus shelters, illuminated street name signs, seating, rubbish bins and similar.”</i></p> <p>AND</p> <p>Replace <i>“even if no formal path is present”</i> with <i>“where a formal path is in place”</i> in Item 5 of Section 8.1.1</p>
8.1.4 Insurance	<p>Clarify that the minimum insurance amount of \$50,000,000 will be applied to new advertising signs within the OMA recommended scope only.</p>
8.2.1 Light emitting devices	<p>Remove <i>“Where a static/digital sign is adjacent to a TCS, in an otherwise uncluttered road environment, road users will observe the digital sign in preference to the TCS.”</i></p> <p>AND</p> <p>Clarify the assessment criteria for Main Roads WA to determine if a digital sign is likely to confuse a driver, adversely affect traffic or increase risk.</p>
8.2.3 Dwell times (For Digital Signs Only)	<p>Retain the current dwell times as per Table 4.2 – Electronic advertising dwell times in the current policy.</p> <p>AND</p> <p>Consider dwell time trials and reviews.</p>
8.3 Displayed content	<p>Remove the Replication of a road sign, Sequential content, Legibility of text, Complexity of message, and Instructions to drivers sections.</p> <p>AND</p> <p>Note and reference existing advertising self-regulation including the AANA, OMA and FCAI advertising policies.</p>
8.5 Period of approval	<p>Adopt an unlimited or 25-year period of approval for new advertising signs.</p> <p>OR</p> <p>Remove expiry timeframes for new advertising signs.</p>
9. Sign application form	<p>Remove <i>“Is the proposed digital sign within 500m of a State Road?”</i> OR Replace <i>“Is the proposed digital sign within 500m of a State Road?”</i> with <i>“Is the proposed digital sign within 250m of a State Road?”</i></p> <p>Remove <i>“Which State Roads are within 500m?”</i> OR Replace <i>“Which State Roads are within 500m?”</i> with <i>“Which State Roads are within 250m?”</i></p> <p>Remove <i>“Are any Traffic Control Signals within 200m of the proposed Sign?”</i></p> <p>Replace mentions of <i>“digital sign”</i> with <i>“display sign”</i>.</p>



Outdoor Media Association
Suite 504, 80 William Street
East Sydney NSW 2011

info@oma.org.au
T 02 9357 9900