



30 April 2014

Mr Chris Rose
Chief Executive Officer
Logan City Council
PO Box 3226
Logan City DC Qld 4114
By email: draftplanningscheme@logan.qld.gov.au

Dear Mr Rose

Re: Submission in Response to the Draft Logan Planning Scheme 2014

The Outdoor Media Association (OMA) is the peak industry body representing 90% of Australia's outdoor media display companies and production facilities, and some media display asset owners. I hereby provide a submission in order to comment and specifically amend and/or delete specific sections of the Draft Logan Planning Scheme 2014, namely the Advertising Device Code which is of particular interest to our members and their businesses.

We would firstly like to commend Logan City Council on drafting its new 'performance-impact' based Logan Planning Scheme 2014. This new Planning Scheme has certainly been drafted to achieve an 'economically, ecologically, and environmentally' balanced sustainable outcome for both present and future generations.

The OMA is however somewhat concerned with some of the restrictions the proposed planning scheme places on outdoor advertising with respect to requirements outlined in the Advertising Device Code. Some of the requirements put forward by Council may restrict the industry to a certain extent that would make third party outdoor advertising financially unviable and an ineffective advertising medium. This is concerning for our members, and more importantly, the requirements put forward by Council will have numerous implications for the local businesses and consumers in the Logan region. For these reasons we request that the Logan City Council carefully assess our submission, which we are more than willing to discuss with Council in person.

Background Information on the OMA

Outdoor media display companies advertise third-party products including:

- on buses, trams, taxis, pedestrian bridges, billboards and free-standing advertisement panels;
- on street furniture (e.g. bus/tram shelters, public toilets, bicycle stations, phone booths, kiosks); and
- in bus stations, railway stations, shopping centres, universities and airport precincts.

The industry members build, clean and maintain the pedestrian bridges and street furniture, and provide other community infrastructure such as park benches, bins and bicycles.

The OMA does not represent businesses that install 'on-premise' advertisements (vehicles, billboards and other structures that advertise the business, services and products on the advertiser's property). On-premise advertising is more prolific than third-party advertising. For example, in NSW, along Parramatta Road between Broadway and Leichhardt, there are about 2140 on-premise signs compared to 14 third-party advertisements, an area similar to Gympie Road, Queensland.

The OMA is supportive of Logan City Council's strategic vision and the impact of our member's business in the area also supports the Council's strong economic vision. Outdoor advertising in Queensland has a significant impact on the local economy and a recent study by Deloitte Access Economics found that the industry:

- employed 150 full time equivalent staff;
- raised \$115 million in revenue;
- made a value added contribution to the Queensland economy of \$42.6 million;
- contributed an estimated \$10.43 million to the upkeep of public infrastructure;
- donated a considerable amount in funds and free advertising space to Queensland charities and not-for-profit organisations.

The industry also works with more local advertisers in Queensland than in comparison to the rest of Australia, assisting local businesses to grow.

Items of Benefits to Local Community

It is important to bring to Council's attention that local business in regional Queensland place great importance on their billboard advertising. It is a highly cost efficient media that provides an effective platform for businesses to promote their goods and services, not only to their community but this medium allows businesses to broaden their audience to include the tourist drive market.

Our members provide a range of assistance to Council community initiatives, charities and other not-for-profit advertising campaigns. Invariably, donations from the outdoor industry enable these organizations to excel in their service to the community through increased community awareness of their services, recruiting volunteers and soliciting donations from the community.

We believe these positive outcomes would not be achieved through the utilisation of other less targeted and usually higher cost mediums, especially with the limited budgets these small business owners have for advertising.

Items of Submission

We make this submission to discuss the following items which are of key concern to us, and we request that Council amend and/or delete the following sections of the *Level of Assessment for Operational Work (Table 5.8.1)* and the *Advertising Device Code (9.4.1) of the Proposed Draft Logan Planning Scheme* as indicated:

Item 1

Level of Assessment

Current Clause

Table 5.8.1 – Operational Work

Zone	Level of assessment	Assessment criteria
Advertising Device		
Centre zone, if in the Local Centre precinct or Neighbourhood Centre precinct Editor's note – Table 5.9.11 – Logan Village local plan – Operational work – advertising device makes an off premises sign in that local plan area impact assessment Low impact industry zone Medium impact industry zone Mixed use zone Specialist centre zone	Exempt	
	If carried out by local government.	
	Self-assessment	
	If not exempt and if – (a) it is an on premises sign; (b) not on a lot with frontage to a State-controlled road.	9.4.1 Advertising device code
	Code assessment	
	If not exempt and if- (a) it is - (i) an on premise sign; (ii) on a lot with frontage to a State-controlled road; or (b) it is an off premises sign.	9.4.1 Advertising device code
Centre zone, if in the Local Centre precinct or Neighbourhood Centre precinct Community facilities zone Emerging community zone Environmental management and conservation zone Low density residential zone Low-medium density residential zone Medium density residential zone Recreation and open space zone Rural zone Rural residential zone	Exempt	
	If carried out by local government	
	Self-assessment	
	If not exempt and if – (a) it is an on premises sign; (b) not on a lot with frontage to a State-controlled road.	9.4.1 Advertising device code
	Code assessment	
	If not exempt and if- (a) it is an on premise sign; (b) on a lot with frontage to a State-controlled area	9.4.1 Advertising device code
	Impact assessment	
If not exempt and it is an off premises sign	9.4.1 Advertising device code	

Comment

A review of the level of assessment as outlined in *Table 5.8.1 – Operational Work* indicates several areas of zoning where an *operational works application for an off premise sign would require impact assessment, however we note that all on premise devices are required to go through the code assessable process*, which we feel is highly discriminatory towards third party advertising (off premise advertising). The OMA's view as well as the majority of councils across South East Queensland that it is not the actual 'content' (i.e. the advertising skin) on a sign that creates impacts, but we consider that 'impacts' are created through the actual size, height and proportion of sign, its position/location on-site, distance from other signs, site specific context factors etc. By prescribing an impact assessable process for off premise signs as oppose to a code assessable process for on premise signs clearly shows discrimination against off premise signs which is against the intent of the IPA implementation note on Advertising Devices which has now been prepared as a SPA practice note by the Department of State Development, Infrastructure and Planning, (see attached) awaiting endorsement by the Minister. This practice note states the following:

"The state has an interest in ensuring there is a consistent, efficient, effective and accountable development assessment system. The Department's primary concerns with regulatory provisions applying to advertising devices relate to:

- *regulatory duplication—currently there are instances where the same characteristics of advertising devices are regulated in both local laws and planning schemes (e.g. dimension, location, placement)*
- *inappropriate regulation—including:*
 - *Inappropriate level of assessment (e.g. impact assessment where it could be code, or self assessable or exempt). The level of assessment is not consistent across local governments*
 - *regulation of content, which is not development and cannot be regulated under a planning scheme"*

It is important to point out that the regulation of signs' 'content' is not a planning related matter but it is a 'advertising industry related matter' that has always been appropriately dealt with through strict compliance with the Advertising Standards Bureau (ASB) to ensure the 'content' of signage complies with the specified guidelines. Hence, is it unnecessary for planners to try to regulate or control the content of signage when their attention should be focussed on size, height and location factors etc. to measure the true impact of signs where the same assessment process of requiring a code assessable application should apply for both on premise and off premise signage.

We acknowledge that Council may want to restrict the establish of off premise signs in some residential area in order to protect the views, vistas, and streetscape and residential amenity prevalent in such areas, therefore it is acceptable to classify off premise signs as requiring an impact assessable process in these areas only as indicated in the amended table below.

However, the requirement for an impact assessable application for an off premise device in such a 'vast range of zoning types' is both unnecessary and onerous. For similar zones, the majority of councils we have dealt with would require a 'code assessable' application. It is highly unnecessary to require an application for an off premise device in so many zones to go through such a time consuming and expensive process, where an equivalent assessment of 'impacts' could occur through a code assessable process where compliance against the provisions of the Advertising Device Code needs to be demonstrated. As mentioned above, we acknowledge that billboards should not be developed in residential areas and this needs to be clearly stated in the Advertising Device Code. It is both cumbersome and tedious to require billboards in zones such as; rural, emerging community, recreation and open space areas to go through the process of impact assessment, when currently there are many effective examples of off premise devices in such areas developed with great care and professionalism to ensure that the sign is integrated well into the streetscape to ensure that the visual integrity of that locality is maintained if not, improved - see figures one and two below.



Fig.1 – Rural Zone – Waterford-Tamborine Rd, Waterford



Fig. 2 – Emerging Community Zone – Mt Lindesay Hwy, Jimboomba.

Action Requested

The Level of Assessment (Table 5.8.1 – Operational Work) should be amended to read:

All Zones	Exempt	
	If carried out by the local government	
	Self-assessment	
	If not exempt and if – (a) it is an on premises sign; (b) not on a lot with frontage to a State-controlled road.	9.4.1 Advertising Device Code
	Code Assessment	
	If not exempt and if – (a) it is an on premises sign; (b) on a lot with frontage to a state-controlled road (c) it is an off premises sign.	9.4.1 Advertising Device Code
Residential Zones	Impact Assessment	9.4.1 Advertising Device Code
	If not exempt and it is an off premises sign	

In addition, to minimise the construction of off premise devices in residential areas, a new clause needs to be introduced to prevent the establishment of billboards in these areas.

Location and Zoning

P04

Advertising devices are located in appropriately zoned areas and are of a scale and nature that is compatible with both existing and/or proposed development in the zone.

A04

All advertising devices are located in the:

- *Centre;*
- *Industrial;*
- *Rural;*
- *Commercial zones; or*
- *Zones with an established lawful commercial use.*

A06

Off premise signs are not located in residential zones.

Item 2

Specific Standards - Advertising Device Code

Current Clause

AO1.1

An Advertising Device is designed and located:

(a) to comply with **Table 9.4.1.3.2 – Standards for signs;**

(b) so that it has a maximum total face area that complies with the lesser of:

(i) **Table 9.4.1.3.3 – Maximum face area of an advertising device in all zones or precinct;** or

(ii) **Table 9.4.1.3.4 – Maximum face area for particular types of advertising device.**

Table 9.4.1.3.2 - Standards for Signs		
Type of Advertising Device	Standards	Indicative Figure
Free Standing Sign	(a) is limited to one free standing sign per road frontage; (b) Has a maximum height from ground level of: (i) 10.5 metres in: (ii) Centre zone, other than neighbourhood centre; (iii) Low impact industry zone; (iv) Medium impact industry zone; (v) Mixed use zone; (vi) Specialised centre zone; (vii) five metres in all other zones; (c) being a pole or pylon sign, has a minimum clearance above ground level of 2.4 metres where pedestrian access is to occur under the free standing sign (d) is not located within; (i) Three metres of a side or rear boundary of premises in a Centre zone; (ii) 10 metres of a side or rear boundary of premises not in a Centre zone; (e) Has a tenant directory sign where the development contains more than one tenancy	Figure 9.4.1.3.4 – Free Standing Sign

Table 9.4.1.3.3 - Maximum face area of an advertising device in all zones or precincts		
Zone	Precinct (Where applicable)	Maximum total (cumulative) face area of all signs for a premises, being whichever is the lesser of column 3 and column 4
		Column 3

Centre	District	1m ² per metre of road frontage	40m ²
	Local	0.5m ² per metre of road frontage	20m ²
	Neighbourhood	0.25m ² per metre of road frontage	5m ²
	Any other land in the Centre zone	1m ² per metre of road frontage	40m ²
Specialised Centre	Logan River Tourist	1m ² per metre of road frontage	40m ²
	Highway business (a) Old Chatswood Road (b) Underwood business	0.5m ² per metre of road frontage	20m ²
	Low Impact Office	0.25m ² per metre of road frontage	5m ²
Low impact industry	-	0.5m ² per metre of road Frontage	20m ²
Medium impact industry	-	0.5m ² per metre of road frontage	20m ²
Mixed use	-	0.5m ² per metre of road Frontage	20m ²
Recreation and open space Community Facilities	All	0.5m ² per metre of road frontage where visible from a road	20m ² where visible from a road
Low Density	All	0.25m ² per metre of road frontage	5m ²

Table 9.4.1.3.4 – Maximum face area for particular types of advertising device	
Type of advertising device	Maximum total face area
Free standing sign	10m ² in the following zones: Centre zone Low impact industry zone Medium impact industry zone Mixed use zone Specialised Centre zone
	5m ² in all other zones

Comment

i) Number of Freestanding Signs (Table 9.4.1.3.2)

Table 9.4.1.3.2 indicates that only one freestanding sign should be allowed per road frontage. We acknowledge that the intent behind this clause is to reduce visual clutter in relation to signage but the number of freestanding signs should be relative to particular site characteristics, its location, frontage width, its principal use and its zoning etc. It is common to see more than one freestanding sign on a busy commercial block, a large industrial block or a large rural site which may run for several kilometres. Instead of imposing this impractical blanket clause, we feel it would be better to assess each site on its own merits and incorporate separation distances, size and other locational requirements to ensure that two or more freestanding signs can be positioned together to minimise visual clutter. This will be discussed below, and the table will be amended accordingly.

ii) Maximum Height of Signage (Table 9.4.1.3.2)

Table 9.4.1.3.2 prescribes maximum signage heights; however given our experience in the field of outdoor advertising, the heights imposed by Council may be restrictive in the respective zones and does not meet the industry's maximum size standards. A common misconception is that sign companies want their structures to be as high as possible. However, the objective of outdoor advertising billboard signs is to ensure effective delivery of an advertising message. During the development of a proposed new billboard our members undertake a full market analysis which includes evaluation of the following:

- Road Size and Speed: busy arterial versus build up inner city centre zones
- Market Demand: assessment of advertising demands based on proposed location
- Environmental Landscape: consideration of structural size and design aesthetic to ensure seamless integration to local amenities.
- Construction Expenditure: incorporating the above elements
- Vegetation Management: assessment of the surrounding vegetation in terms of impact to billboard and ongoing management

The above criteria is evaluated to determine the most appropriate size and height of the billboard structure.

A critical planning consideration for the location and future construction of any new advertising sign is that optimum height is needed to obtain effective visibility of the advertising face to its desired audience, the majority of who are in their vehicles and viewing from road level. Locating a sign structure too high can make its message delivery just as ineffective as one which is too low and therefore unreadable. Additionally, the greater the height, the more the construction cost so there is always a strong economic benefit to be gained by maintaining the sign height at the minimum and optimum viewing level. It is considered the maximum prescribed height from ground level of 10.5m would not achieve optimum visibility on a busy arterial route or a built up area. The Logan City Council Master Plan allows 10-12 storey high buildings in the City Centre zones which will be approximately 30m high, therefore a 10.5m high sign at these locations would limit optimum viewing, hence diminish advertising effectiveness. A

maximum height of 15m would allow the opportunity for more effective advertising with optimum viewing opportunity especially in built up locations or busy arterial routes.

It is important to mention that by allowing a 15m high sign does not necessarily mean that all signs will be developed at that height. However to the contrary, if a sign is too low, it may be obscured by vegetation and is an easy target for vandals, therefore the specified height of 4m in other areas could potentially be susceptible to such factors therefore also diminish optimum viewing visibility and ultimately advertising effectiveness. Thus, this table will require to be amended.

iii) Total Signage Area per Lot Frontage/ Cumulative Signage Area (Table 9.4.1.3.3)

The maximum overall total cumulative signage area within a site as indicated in Table 9.4.1.3.3 allows a maximum signage area on a site ranging from 5m² to 40m² depending on the zone or per 0.25m – 1m per road frontage. These clauses are in place to address the total amount of signage to be allowed on a site so as to avoid visual clutter, however the requirements outlined in column four are slightly restrictive in certain zones as they do not take account of the advertising industry maximum standard size of 48m² which is discussed below. Therefore, this table will be amended to address the maximum allowable size area.

iv) Maximum Sign Face Area (Table 9.4.1.3.4)

Table 9.4.1.3.4 outlines a maximum size area of 10 m² in some zones and 5 m² in other zones, which is well below the industry standard maximum size of 48m². It is a common misunderstanding that sign companies want to use the largest size sign structures available to project the largest advertisement. However, as explained above, the intent of the outdoor advertising billboards is to ensure delivery of an advertising message in the most effective and efficient manner, as noted above in the development of a proposed billboard our members undertake a full market analysis to ensure the scale and proportion of the billboard is in accordance with the evaluated variables including; road type and speed travelled, market demand, environmental landscape, design, cost and vegetation. In reviewing the table we feel that the current maximum size restriction limits the effectiveness of the signs as they are too small and can create detrimental effects to the drivers. For example main arterial roads or major highways will require a larger sign to produce the greatest result whereas smaller roads and streets will require a size much smaller in comparison. Figure three demonstrates that a sign of such size can be established without appearing out-of-scale or obtrusive to the local views and streetscape, but on the contrary in suitable circumstances actually contribute positively to the general streetscape façade. A good example of this is Brisbane City Council's new regulations for a maximum size of 48m² the industry would appreciate other councils achieving consistency with this size.



Fig. 3 – Non obtrusive billboard, proportionate to surrounding streetscape – Inner City Bypass, Herston

In considering design aesthetics our members compliment the design of their advertising structures with badged 'skirts' not only does this add to the overall clean and uncluttered visual of the structure it also allows for structural and safety elements to be hidden from public view. A size of 48m² allows for the industry standard size of 42.41m² plus the addition badged skirt (see figure four below). Additionally new billboard developments work in accordance with the outdoor advertising industry standard billboard sizes which are currently implemented across Australia. Industry standard sizes are important as they enable advertisers to produce common size advertising messages across the country. It also enables advertisers to rotate their messages between signs therefore maximising the use of their advertising substrate.



Fig. 4 – Badged Skirt – Coopers Plains, Beaudesert

Action Requested

With respect to AO1.1, the following tables should be amended:

Table 9.4.1.3.2 – Standards for signs

Table 9.4.1.3.3 – Maximum face area of an advertising device in all zones or precinct

Table 9.4.1.3.4 – Maximum face area for particular types of advertising device

Table 9.4.1.3.2 Standards for Signs		
Type of Advertising Device	Standards	Indicative Figure
Free Standing Sign	<p>(a) A freestanding sign has a maximum height from ground level of 15 metres from the finished road level in;</p> <p style="padding-left: 40px;">(i) Industrial; (ii) Rural; (iii) Commercial</p> <p>Zones; or</p> <p style="padding-left: 40px;">(iv) Zones with an established lawful commercial use.</p> <p>(b) being a pole or pylon sign, has a minimum clearance above ground level of 2.4 metres where pedestrian access is to occur under the free standing sign</p> <p>(c) is not located within;</p>	Figure 9.4.1.3.4 – Free Standing Sign

	<p>(i) Three metres of a side or rear boundary of premises in a Centre zone;</p> <p>(ii) Three metres of a side or rear boundary of premises not in a Centre zone;</p> <p>(d) Has a tenant directory sign where the development contains more than one tenancy</p>	
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Table 9.4.1.3.3 Maximum face area of an advertising device in all zones or precincts

Zone	Precinct (Where applicable)	Maximum total (cumulative) face area of all signs for a premises, being whichever is the lesser of column 3 and column 4			
		Column 3	Column 4		
Centre	District	1m ² per metre of road frontage	A maximum size of 48m ²		
	Local				
	Neighbourhood				
	Any other land in the Centre zone				
Specialised Centre	Logan River Tourist	1m ² per metre of road frontage	A maximum size of 48m ²		
	Highway business (a) Old Chatswood Road (b) Underwood business				
	Low Impact Office				
Low impact industry	-	1m ² per metre of road frontage	A maximum size of 48m ²		
Medium impact industry	-				
Mixed use	-				
Recreation and open space Community Facilities	All				
Environmental management and conservation Rural Emerging community					
Low Density residential Low-medium density residential Medium density residential	All			0.25m ² per metre of road frontage	5m ²

Rural residential			
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Table 9.4.1.3.4 – Maximum face area for particular types of advertising device	
Type of advertising device	Maximum total face area
Free standing sign	<p>48m² in the following zones:</p> <ul style="list-style-type: none"> Centre zone Low impact industry zone Medium impact industry zone Mixed use zone Specialised Centre zone Recreational and Open Space Zone Community Facilities Zone Environmental Management and Conservation Zone Emerging Community Zone Rural Zone <p>(Freestanding advertising devices have a maximum face area including any associated structure around the face of the sign) of 48m² per side)</p>

Item 3

Visual Amenity / Reduction of Visual Clutter - Advertising Device Code

Current Clause

AO2.2

An advertising device that is an off premises sign is not erected in conjunction with:

- (a) another off premises sign; or*
- (b) an on premises sign that is a free standing sign.*

Comment

AO2.2 indicates Council's attempt to minimise visual clutter by regulating the number of freestanding signs. The restriction imposed by Council is unnecessary and alternative solutions can be utilised to achieve the Performance Outcome. The Performance Outcome is to 'avoid visual clutter of signage'. It is a misunderstanding that a freestanding off premise device erected in conjunction with another freestanding sign automatically creates visual disorder/clutter. It is our opinion that visual clutter can be minimized through careful strategic positioning of the freestanding signs to resolve the issue. Two signs can be placed in conjunction with each other but strategically spaced apart in proportion to size thus achieving visual harmony and cohesiveness.

The OMA supports the orderly display of outdoor advertising billboards/signs. Reasonable restrictions for spacing and concentration of signs can assist in some circumstances to achieve this goal. The purpose of an advertising sign is to be noticed and to be read by the intended audience. However, when there are too many signs in a small area this becomes visually

unappealing and the effectiveness of each sign (and therefore the economic benefit of the advertising message) is compromised. Where the intended audience is in moving vehicles, the messages are less effective when there is a high concentration of signs and a lack of adequate viewing opportunity to the sign.

Conversely, when the signs are well spaced, the audience has the ability to absorb each advertising message and this increases its effectiveness. A sensible spacing policy in these circumstances is therefore not only a desired economic outcome, but provides a visually appealing streetscape.

The proposed restrictions for spacing and concentration of signage will be an effective planning tool to achieve the orderly display of signs. There are some circumstances where a bend, dip or curve in the road alignment may allow two signs to be laterally positioned within 300 metres of each other yet not be readily visible to each other. (i.e. lots with wide frontages).



Fig. 5 – Example of sensible spacing (1.5km) with multiple billboards on the same street frontage – Warrego Hwy, Chinchilla

Action Requested

AO2.1 should be amended to read:

AO2.1

(i) Where an off premise advertising device is erected in conjunction with another freestanding sign on an industrial or centre/commercial zone, a maximum of 2 freestanding advertising devices may be constructed for any 100m length per street frontage on a site.

(ii) In the rural zone, off premise advertising devices have a minimum separation distance of 300m in the same direction of travel, with a maximum of 6 (six) Advertising devices in the same direction of travelling any 5km zone.

The OMA has collaborated with our members with experienced town planners to create a model Advertising Device Code specifically for the Logan City Area. This code has been attached for convenience.

We are concerned that the proposed Draft Logan Planning Scheme will not meet some of our outdoor advertising business' core needs. As such, we request an opportunity for our members to meet with Ms Catherine Swift in person to discuss the above in greater detail prior to the submission being finalized.

Thank you for taking the time to consider this submission, and we hope that our experience in the area of signage can be of practical use in your development of the Advertising Devices Code.

If you would like to discuss any of these issues further, please don't hesitate to contact me on (02) 9357 9922.

Yours sincerely



Emma Luttrell
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