



Draft Whitsunday Regional Council Planning Scheme 2015

16 October 2015

Submission from the Outdoor Media Association

01 ABOUT THE OUTDOOR MEDIA ASSOCIATION

The Outdoor Media Association (OMA) is the peak national industry body representing most of Australia's Out-of-Home (OOH) media display and media production companies, as well as some media display asset owners.

Part of the role of the OMA is to develop constructive relationships with state and local governments, and to contribute to the process of developing policy for outdoor advertising that is both fair and equitable to governments, the industry and the community.

On behalf of its members, the OMA advocates for planning systems across Australia that deliver the following:

- The recognition of outdoor advertising signage as a legitimate land use;
- The removal of the distinction between 'on-premise' and 'third-party' signage in planning policy and local laws;
- Provision of a set of fair and reasonable development standards that are appropriate for signage land use;
- Provision for the responsible display of outdoor advertising signage within mixed-use zones, commercial and industrial zones and along transport corridors; and
- Guidance on the use of digital signage.

OMA members display advertisements on billboards, free-standing advertising panels, buses, trams, taxis, pedestrian bridges and street furniture (including bus/tram shelters, public toilets, phone booths and street kiosks). OMA members also display advertisements in bus stations and train stations, at shopping centres, universities and airport precincts.

02 THE CONTRIBUTION OF THE OUT-OF-HOME INDUSTRY TO THE ECONOMY AND COMMUNITY IN QUEENSLAND

The OOH industry plays an important role within the national and local economy. For example, in 2014 the industry raised revenue of \$602.1 million, making up approximately 5.2% of advertising spend in Australia. The industry also plays a considerable role within the Queensland economy.

In 2013, the OMA engaged Deloitte Access Economics¹ to estimate the economic contribution of the OOH industry. The Deloitte research found that in Queensland for the calendar year of 2012, the industry:

- Employed 150 full time equivalent staff;
- Raised revenue of \$115 million;
- 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; and
- Donated a considerable amount of money and free advertising space to charities and 'not for profit' organisations.

Local businesses in Queensland place great importance on billboard advertising. It is a highly cost effective advertising medium that provides an effective platform for businesses to promote their goods and services to the community as well as the tourist drive market. The OMA considers that these positive outcomes for small business owners would not be achieved through the utilisation of other less targeted, higher cost advertising mediums.

The OOH industry in Queensland differs from other states in that there are more independent members working in a range of different regional and metropolitan areas. Queensland has a much higher rate of local or regional advertising campaigns compared to other states (15.3 million in Queensland in 2010, compared to 4.7 million in NSW in 2010). This would indicate that outdoor advertising has a considerable positive impact for local business owners and operators in the state.

OMA members place a significant level of attention and investment in the development and presentation of billboards. Once a site is selected the industry liaises closely with all stakeholders from planning through to engineering to ensure the sign is well designed and meets Australian Standards.

In addition to providing affordable advertising to local businesses, the OMA's members also make contributions back to the community each year. In 2014, the outdoor advertising industry donated advertising space valued at more than \$22 million across Australia to community campaigns.

Outdoor advertising is also widely used by government bodies to advertise community messages such as road safety messages and health awareness campaigns.

¹ Deloitte Access Economics, Contribution of the Outdoor Media Industry (Queensland), published 2013

In 2014, the Queensland Government was among the top twenty advertisers using outdoor advertising, with a total spend of \$7.5 million on OOH advertising.

03 COMMON MISCONCEPTIONS

There is sometimes a misunderstanding that the industry seeks to build the largest signs possible. This is not the case. Larger signs require higher construction costs for the industry and may not be appropriate in every location. The size of the sign is generally based on several factors such as road size, road category and speed limit. Main arterial roads or major highways sometimes need a larger sign to convey an advertising message, whereas smaller roads and streets can often utilise a sign which is smaller in size.

There is also a common misconception that the industry aims to develop large numbers of advertising signs leading to proliferation of billboards along transport corridors. In fact, proliferation of signs is not an advantage for the industry as it reduces their commercial value, impact and viability.

04 DRAFT WHITSUNDAY REGIONAL COUNCIL PLANNING SCHEME

The OMA welcomes the opportunity to provide comments on the Draft Whitsunday Regional Council Planning Scheme 2015.

Through our telephone discussions with the Council we understand that there is a concern about the number of old advertising signs along one or more roads within the region. In order to ameliorate this situation it is important to include policies within the Draft Plan that will allow for the upgrade of existing sites. This may include reasonable consolidation of some existing sites. The OMA is available to meet with Council to discuss ways to facilitate this potential avenue.

To facilitate improvements and upgrades to outdoor signage within the Regional Council area, the following recommendations are made for amending the Draft Plan:

- Modification of the definition of 'Advertising Device Types' in Tables 9.4.1.3.1 and Table 9.4.1.4.2 so that there is no distinction between 'Freestanding Signs' 'for on-premise' and 'third-party' use. Currently table 9.4.1.4.2 does not permit any Freestanding Signs for 'third-party' use within the Draft Plan area.
- Include provision for the upgrading of existing signs within the Draft Plan area. This would allow the OMA's members to upgrade to current industry standards existing signs which are reaching the end of their operational life. Without a provision to upgrade old signs, these signs will deteriorate which could negatively impact visual amenity in the area.
- Provide specific guidance for the development of digital media signage within the Draft Plan area.

4.1 Distinction between advertising types

The Queensland Department of State Development, Infrastructure and Planning has prepared a 'Draft User Guide on Advertising Devices' (Refer Attachment 1). The purpose of the Draft User Guide is to outline and provide guidance to stakeholders about the role of planning schemes in regulating the development impacts of advertising devices.

The Draft User Guide sets-out the Government's commitment to streamlining assessment and approval processes and removing unnecessary red tape (refer page 2). One of the objectives is to ensure that there is no inappropriate regulation under a planning scheme, such as the use of sub-definitions for advertising devices and applying different levels of assessment for each sub definition. This principle is not applied within the Whitsunday Draft Regional Plan as the Council is not allowing any type of freestanding billboard (third party) sign, whereas private (on-premise) freestanding signs will be considered for assessment.

The OMA suggests that the separation of 'third-party' signage as a sub-definition of advertising devices in Draft Plan, be removed to be consistent with the Department of State Development, Infrastructure and Planning's Draft User Guide.

4.2 Advertising Devices Code

The OMA is supportive that the Council has included an Advertising Devices Code (section 9.4.1.1) within the Draft Regional Planning Scheme. The OMA's concern however, is that Table 9.4.1.4.2 'Requirements for Particular Advertising Devices' does not allow billboards within the Draft Plan area. We understand that this means that there will be limited or no opportunity for the future upgrading of existing billboard signs in the region. Existing signs will require upgrade as they reach the end of their operational life and their condition deteriorates. To leave them with no upgrade could have a negative impact on the visual amenity of the area.

In March 2012, the OMA finalised a Model Advertising Devices Code specifically for Queensland Regional Council areas (Refer Attachment 2). This Code was developed in liaison with the Queensland Department of Local Government and Planning. The OMA's Code sets out the development parameters required by the Outdoor industry for the operation of the business. The OMA would welcome the opportunity to discuss the industry's requirements further with Council and we would be pleased to visit Council at a time convenient to you to do this.

4.3 Digital Guidelines

The OMA is also concerned about the lack of provision for digital signage within the Draft Plan. In the past five years the use of digital signage has grown across Australia. Currently digital technology makes up nearly 25%² of total out of home advertising revenue and it will continue to grow.

² Based on digital out of home as a percentage of total out of home revenue 2015– Outdoor Media Association

The Queensland Government has worked with the OMA to develop guidelines around digital signage which are included as part of the Department of Transport and Main Roads '*Roadside Advertising Guide 2013*'.

Digital technology in OOH is increasingly being used by businesses and governments to engage with the broader public. This technology affords a level of flexibility, creativity and versatility; for example, digital OOH can offer Wi-Fi networks, can support public transport with real-time data, offer interactive services helping people to navigate their towns and cities, and much more.

05 RECOMMENDATION

The OMA requests that the Whitsunday Regional Council takes the following matters relating to the OOH industry into consideration in the review of the Draft Planning Scheme:

- The important contribution of the Outdoor advertising industry to the Queensland economy;
- The recognition of outdoor advertising devices including billboards as a legitimate land use;
- Providing opportunities for new outdoor advertising signage, including billboards, within the Draft Plan.
- Recognition of the industry planning and development requirements set out within OMA's Model Advertising Devices Code (refer Attachment 2).
- Acknowledge technology changes and the growth of digital advertising signage.

06 CONCLUSION

Thank you for considering the OMA's submission, and we trust that it will be of practical use in the review of the Draft Whitsunday Regional Council Planning Scheme.

Should you have any questions regarding this submission, please contact the OMA's Senior Policy Adviser, Tess Phillips, on (02) 9357 9900.

ATTACHMENT 1

DLGP SPA Practice Note

ATTACHMENT 2

OMA Model Advertising Devices Code