



21 August 2014

Mr Daryl Hitzman
Chief Executive Officer
Moreton Bay Regional Council
PO Box 159
Caboolture QLD 4510
Email: mbrc@moretonbay.qld.gov.au

Dear Mr Hitzman

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

The OMA made a submission to Morton Bay Regional Council Draft Planning Scheme in August 2014 which included a number of recommendations for the Council to amend the Draft Scheme in relation to advertising devices. The OMA is very pleased that the Council has included some of the OMA's recommendations within the New Draft Regional Planning Scheme, including the following:

- All advertising device requirements are now located in an Advertising Devices Code (section 9.4.4);
- Some allowable sizes of signage have been increased; and
- The number of allowable freestanding signs per property has been increased.

There are still however, some areas of concern for the OMA and its industry members relating to the interpretation of the requirements of the industry, as identified by the Council within the *'Submissions Report Advertising Devices – Signage'*.

In Clause 8 of the Submissions Report, the Council's interpretation of the OMA's submission is that the industry requires "*large amounts of freestanding signage (up to 48m² as an acceptable outcome)*". The OMA would like to clarify that this is an incorrect interpretation for the reasons set out within the paragraphs below.

A common misunderstanding is that sign companies want to use the largest size sign structures available to project the largest advertisement. However, this is not the case as the purpose of the advertising sign is to ensure delivery of an advertising message in the most cost effective and efficient manner. The larger the size of the sign the higher the construction costs for the industry. The size of the sign is generally based on several factors such as the road size, road category and travel speed; main arterial roads or major highways need a larger sign to convey the advertising message whereas smaller roads and streets can often effectively utilise a sign which is comparatively smaller in size.

The size and height requirements of billboards cannot be assessed in isolation from one another. In general, a higher supporting structure is required to structurally support a larger sign, whereas a lower structure is required to support a smaller sign.

In addition, there is a general misunderstanding that the outdoor media industry aims to develop large numbers of advertising signs in any one location, and this is expected to lead to proliferation of billboards along transport corridors. This is not in fact the case. The industry does not benefit from proliferation in any one place as this weakens the value, commercial impact and viability of signage.

Whilst the OMA is pleased that the Council has increased the allowable size of some signs from 10m² to 20m², this still falls short of the industry's size and height requirements, which is for a range of billboard sizes billboards up to a maximum size of 43m². The Brisbane City Council has made new regulations for a maximum billboard size of 48m²; this size allows for the industry standard size of 42.41m² with the addition of badged skirt which allows for structural and safety elements to be hidden from public view. However, we would stress that for commercial reasons it is not the industry's aim to develop a proliferation of signs of this size throughout the Council area.

Finally, the OMA is concerned about the limited provision for digital signage within the Advertising Devices Code. Currently, the Code only provides for illumination in the form of static lighting and does not appear to allow for digital advertising screens with a changing advertising display. In the past five years the use of digital signage has grown across Australia. Currently digital technology makes up nearly 19%¹ of total OOH advertising revenue and it will continue to grow.

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'. In addition, Brisbane City Council has prepared 'Technical Guidelines for Advertisements with Illumination &/or Electronic Display Components'.

In 2013 the OMA undertook a study to investigate driver behaviour in the presence of advertising signage – both third party and on-premise. This included analysis into the differences in driver behaviour in the presence of digital and static signage. The on-road study was carried out with the research company 'eyetracker' in Brisbane with 29 driver participants aged between 25 and 54 years old using an eye-tracking technology and v-box technology which measured the movements of the vehicle. The research concluded that there was no difference in the fixation durations on digital and static signage.

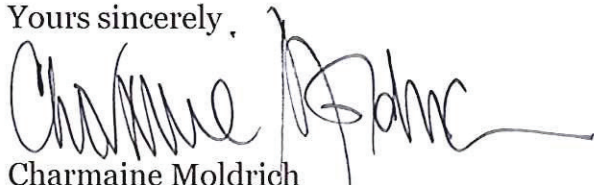
Digital technology in OOH advertising is increasingly utilised by businesses and governments to engage with the broader public. This technology affords a level of flexibility, creativity and versatility; for example, digital OOH can offer Wi-Fi networks, support public transport with real-time data, offer interactive services helping people to navigate their city, and much more. To support this future potential it is important that digital OOH is acknowledged within the New Moreton Bay Regional Council's Planning Scheme.

¹ Based on digital out of home as a percentage of total out of home revenue 2014 – Outdoor Media Association

Thank you for taking the time to consider the OMA's comments on the new Draft Planning Scheme. If there is any further information that we can provide, we would be pleased to do so. The OMA would also be available to deliver our presentation on the Driver Behaviour Study to Council if this would be of assistance.

Please contact the OMA's Senior Policy Adviser, Tess Phillips, via email, tess.phillips@oma.org.au or by telephone on 02 9357 9900, if you have any further questions.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Charmaine Moldrich', with a long horizontal flourish extending to the right.

Charmaine Moldrich
Chief Executive Officer