



12 September 2016

Ms Lindy Deitz
The General Manager
Campbelltown City Council
PO Box 57
CAMPBELLTOWN NSW 2560

Attn: Ms Rana Haddad

Email: council@campbelltown.nsw.gov.au

OMA Submission: Draft Amendment No. 2 to Campbelltown (Sustainable City) Development Control Plan – Draft Part 16 – Advertising and Signage

Dear Ms Deitz

Executive Summary

The Outdoor Media Association (OMA) is pleased to be invited to comment on the Draft Amendment No. 2 to Campbelltown (Sustainable City) Development Control Plan – Draft Part 16 – Advertising and Signage. The OMA congratulates the approach taken by the City to provide a set of development controls that are consistent with current planning legislation/policy. However, we are disappointed that the draft policy does not make provision for any **'General Advertising'** signage. General Advertising signage is defined in the policy as signage which **does not** relate to the use of the land/building to which it is attached; this also known as Third Party signage. The draft policy also prohibits billboard signs and roof signs, without providing adequate justification, and these are the key signage types for the Out-of-Home (OOH) advertising industry. The OMA cannot support the draft Part 16 policy as it stands and seeks further consultation with the Council to make provision for General Advertising signage and also for billboard and roof signs within the DCP policy.

Introduction

Thank you for inviting the Outdoor Media Association (OMA) to comment on the Draft Amendment No. 2 to Campbelltown (Sustainable City) Development Control Plan – Draft Part 16 – Advertising and Signage. As the peak industry body representing 90% of Australia's outdoor media display companies and production facilities, we are pleased that the City Council has invited the OMA to comment.

The OMA has spoken with Ms Rana Haddad, Senior Strategic Planner, about the role of the OMA and has suggested that we meet with representatives from the Strategic Planning Team to discuss the Draft Part 16 – Advertising and Signage, later in September.

The OMA has set out this letter in two parts. The first part provides background information about the OMA; the second part provides our comments on Draft Part 16 – Advertising and Signage.

1. Background

Information about the OMA

Advertising and marketing play a fundamental role in the Australian economy, and are significant drivers of economic growth, contributing some \$40 billion of value in 2014. This means that advertising is responsible for driving approximately 2.5% of Gross Domestic Product. For every person directly employed by advertising another three people are reliant upon advertising for their jobs. There are over 200,000 people in Australia employed due to advertising.¹

The OMA is the peak national industry body representing 90% 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 governments and stakeholders that lead to better policy decisions. The OMA advocates for regulation that is fair and equitable for governments, the community and the OOH industry.

The OMA's current media display members are:

ADLED Advertising	oOh!media
Adshel	Outdoor Systems
APN Outdoor	Paradise Outdoor Advertising
Bailey Outdoor	QMS Media
Bishopp Outdoor Advertising	TAYCO Outdoor Advertising
Executive Channel Network	Tonic Health Media
goa Billboards	TorchMedia
JCDecaux	

OMA media display members advertise third party products on both digital and static signs across a variety of OOH formats and locations including, airports, bicycle stations, billboards, buses, bus stations, cafes, doctors' surgeries, free-standing advertisement panels, medical centres, office buildings and lifts, pedestrian bridges, railway stations, shopping centres, trams, universities and street furniture (bus/tram shelters, public toilets, telephone booths and kiosks).

The OOH industry plays an important role in supporting the arts, sports and charitable organisations and is widely used by government bodies to advertise community messages such as road safety alerts and health awareness campaigns. In 2015, the industry donated advertising space valued at more than \$34 million to more than 160 charitable and community campaigns.

The OOH industry also provides over 17,600 items of infrastructure to the community across Australia, including pedestrian bridges, bus shelters, kiosks, phones, park benches and bicycles. Total replacement value for this infrastructure is estimated at around \$352 million in December 2014.²

¹ 2016, Deloitte Access Economics, *Advertising Pays - The economic employment and business value of advertising.*

² 2016 Deloitte Access Economics, *Out-of-Home Adds Value: Out-of-Home Advertising in the Australian economy.*

Driver Behaviour

The OMA has undertaken research about driver behaviour around advertising signs. This research looked at the behaviour of drivers around roadside digital, roadside static and on premise signage. In summary, the research found that driver attention is not unreasonably diverted away from the road if roadside advertising is present. Key findings of the research were as follows:

1. People spend the same amount of time (average 78%) with their eyes on the road whether in the presence of digital, static or on premise signs. This is the same percentage reported by other studies even when there are no signs around.
2. Less than 1% of all looks (fixations) towards advertising signage was over 750 milliseconds, the safe time required to perceive and react to an unexpected event.
3. Drivers maintain the same safe average vehicle headway, (distance between their car and car in front) of 1.85 seconds in the presence of all three signage types. This is within the preferred safe headway of most drivers.
4. There may be some increase in lane deviation in the presence of different signage types but not enough to cause a single lane departure.

The industry is committed to road safety and willing to collaborate with councils and road authorities regarding road safety around advertising signs. The OMA would be pleased to present the full research findings of the driver behaviour study to the Council.

2. Comments Draft Part 16 – Advertising and Signage

Generally the OOH industry relies on the following types of signage for the display of advertisements, as defined within Draft Part 16.

1. Billboard Signs and Roof Signs
2. Wall Signs
3. Bus Shelters and Street Furniture

Billboard and Roof Signs

Clause 16.4.1 – Restrictions, of Draft Part 16 states that billboard and roof signs will not be permissible within the Campbelltown local government area. Billboard signs are defined within clause 16.2, as freestanding structures supported by columns or posts which display advertisements **not relating to the use of the site**. Advertising which does not relate to the use of the land/building to which it is attached is later defined as **General Advertising**.

The OMA does not support the City's decision not to recognise billboard signs and roof signs as a legitimate land use. The OMA is also concerned that the City does not provide any reasons why this is the case.

Recommended Policy: Billboard and roof signs should be assessed on merit with the size of advertising face and height of a sign appropriate for its position and location.

Wall Signs

The OMA acknowledges that there is no restriction in the Draft Part 16 on General Advertising on wall signs. However, the size of a wall sign within land zoned for industrial use is limited to 18m² or 20% of the building elevation, whichever is the lesser; and for land zoned for commercial use the size of a wall sign is limited to 6m² or 20% of the building elevation, whichever is the lesser.

The OOH industry advocates for a merit based policy for the assessment of size for wall signs, as follows:

Recommended Policy: Advertising wall signs should be designed to cover unsightly or unused wall spaces, with the following controls in place:

1. The sign face is an appropriate size for its position and location.
2. The sign must not cover architecturally prominent building design features or other architectural elements that feature in the façade of the building.
3. Signs should be contained within the outermost projection of the wall of the building and should be designed to integrate with the design of the building and character and amenity of the surrounding area.

Bus Shelters and Street Furniture

Draft Part 16 also fails to address the importance of OOH companies providing public infrastructure like bus shelters, waste bins, bicycle stations and kiosks within cities. OOH companies supply, construct and maintain this infrastructure at no cost to local governments, with the understanding that General / Third Party Advertising will be displayed on this infrastructure.

Recommended Policy: The Draft Part 16 therefore, needs to make provision for this type of advertising, which is predominantly located on roadways.

Digital Signage

The OMA is pleased that provision has been made in Clause 16.4.8 for a new set of controls for Digital Signs. The OMA has also noted the comment in the Reporting Officer's report (page 6) to the Planning and Environment Committee meeting that digital signs are being increasingly used "...because of their instant ability to change the displayed messages without additional cost to the operators."

The OMA supports the inclusion of the NSW Transport Guidelines although it generally advocates for a 6-8 second display time for advertisements.

The OMA offers over page, best practice guidance for luminance levels for digital signs. This guidance has been developed in conjunction with an industry luminance expert. These luminance levels differ in part, from the levels provided within Table 16.1 of Draft Part 16. The main concern for the OMA is that there is no luminance provision in Area 3 at night time. This is a particular concern if this policy also refers to street furniture and bus shelters.

OMA LUMINANCE LEVELS FOR DIGITAL SIGNS

Lighting Condition	Zone 1	Zone 2	Zone 3
Full Sun on Face of Signage	Maximum Output	Maximum Output	Maximum Output
Day Time Luminance	6000-7000 cd/m ²	6000-7000 cd/m ²	6000-7000 cd/m ²
Day Time Luminance Morning and Evening and Twilight and Inclement Weather	1000 cd/m ²	700 cd/m ²	600 cd/m ²
Night Time	500 cd/m ²	350 cd/m ²	300 cd/m ²

Zone 1 covers areas with generally very high off-street ambient lighting, e.g. display centres, central city locations.

Zone 2 covers areas with generally high to medium off-street ambient lighting.

Zone 3 covers areas with generally low levels of off-street ambient lighting.

Finally, the OMA supports clause 16.4 xi) to encourage the use of renewable energy sources to power digital signs.

Thank you for the time that you have taken to review this submission. Should you wish to discuss any of the issues raised in more detail, please contact Tess Phillips, General Manager, Government Relations on (02) 9357 9900 or tess.phillips@oma.org.au.

Yours sincerely



Charmaine Moldrich
Chief Executive Officer

