



22 September 2016

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Dear Mr Kyron

## **OMA Submission: Draft Local Planning Policy LP.07 – Advertising Signs**

### **Executive Summary**

The Outdoor Media Association (OMA) is pleased to be invited to comment on the Draft Local Planning Policy LP.07 – Advertising Signs. The OMA congratulates the approach taken by the council to provide an updated set of development controls for advertising signs. The OMA greatly appreciated the opportunity to meet with the Director of Planning and Regulation last month. However, we are disappointed that the draft policy does not make provision for third party advertising signage. The purpose of the policy is to ensure that advertising signs only relate to services and products on the site and this precludes any third party advertising. The OMA therefore, cannot support the Draft Local Planning Policy LP.07 as it stands and seeks further consultation with the Council to make provision for third party advertising signage within the council area.

### **Introduction**

Thank you for inviting the Outdoor Media Association (OMA) to comment on the Draft Local Planning Policy LP.07 – Advertising and Signs (Draft Local Planning Policy). As the peak industry body representing 90% of Australia's outdoor media display companies and production facilities, we are pleased to be part of the planning policy consultation process.

Charmaine Moldrich, OMA CEO, and Tess Phillips, OMA General Manager – Government Relations met with Mr Graeme Bride, Director of Planning and Regulation on Thursday 31 August to introduce the OMA and discuss the Draft Local Planning Policy. We hope that this meeting was of interest to the council and helped to explain the role of the OMA, our comments on the Draft Local Planning Policy and also some of the exciting projects that we are currently involved in.

The OMA has set out this letter in two parts. The first part provides additional background information about the OMA and the second part sets out our comments on the Draft Local Planning Policy.

### **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.<sup>1</sup>

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.<sup>2</sup>

### 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.

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

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



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.

### **Comments Proposed Local Planning Policy LP.07 – Advertising Signs**

Generally the OOH industry relies on the following types of signage for the display of third party advertisements:

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

#### Billboard, Roof Signs and Wall Signs

Clause 5 of the Draft Local Planning Policy – Specific Requirements (Table 1) sets out the acceptable standards for various sign types and includes definitions, diagrams and requirements for Hoarding (Billboard), Roof Signs and Wall Signs.

In addition to the OMA's primary concern that the Council will not permit any third party advertising signage on these structures (with the exception of limited advertising for the purposes of club sponsorship on sports fields, as set out in Policy CS400), the following comments are made:

The size and height of Billboard Signs as set out in Table 1 do not meet industry standards. The size of the Billboard is not to exceed 20m<sup>2</sup> and the height no greater than 5 metres above ground level. The size and height for Roof Signs as set out in Table 1, also do not meet industry standards.

*Recommended Policy:* Applications for Billboards and Roof sign should be assessed on merit, with the size of the advertising face and height of the sign to be appropriate for its position and location.

In addition, the OMA advocates for a merit based policy for the assessment of 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

The Draft Local Planning Policy 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 third party advertising will be displayed on this infrastructure.

*Recommended Policy:* The Draft Local Planning Policy makes provision for advertising on bus shelters and street furniture, which is predominantly located on roadways.

### Digital Signage

Finally, the OMA is concerned that the development provisions for illuminated signs within the Draft Local Planning Policy are very general and do not specifically address digital signage. This is a concern as during the past five years the use of digital signage has grown significantly across Australia. Currently digital technology makes up nearly 39%<sup>3</sup> of total OOH advertising revenue and it will continue to grow. Digital technology is increasingly being accepted as the new way to advertise given its flexibility, creativity and versatility, and the OMA considers that this should be recognised in the Draft Local Planning Policy.

The technology of outdoor advertising is constantly evolving, bringing with it new opportunities for attracting public interest and meeting industry objectives. Static and non-static electronic message display can add to a streetscape, be more environmentally friendly, avoid occupational health and safety issues associated with changing screens and help disseminate emerging or community information.

The Western Australian Government has developed guidelines around digital signage which are included as part of the Main Roads WA Roadside Advertising Guide 2013.

### OMA Code for Model Advertising Devices

The OMA has developed a Model Advertising Devices Code for councils in Western Australia. The Code sets out the best practice guideline for the regulation of outdoor advertising devices for local government. The Council is invited to incorporate the OMA's Model Devices Code into the Local Planning Policy and the OMA would welcome the opportunity to discuss this further with Council.

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](mailto:tess.phillips@oma.org.au).

Yours sincerely



Tess Phillips  
**General Manager,  
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<sup>3</sup> Based on digital out of home as a percentage of total out of home revenue at August 2016 – Outdoor Media Association