



OUTDOOR MEDIA ASSOCIATION

**SUBMISSION TO THE DRAFT
METROPOLITAN STRATEGY FOR SYDNEY to
2031**

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01 INTRODUCTION

The Outdoor Media Association (OMA) is pleased to make a submission to the Draft Metropolitan Strategy for Sydney to 2031. The OMA is the peak national industry body representing most of Australia's Out of Home (OOH) media display companies and production facilities, as well as some media display asset owners.

Part of the role of the OMA is to develop constructive relationships with Federal, State and Local Governments with the aim of ensuring that new laws and regulations for outdoor advertising are fair and equitable. This OMA submission to the Draft Metropolitan Strategy for Sydney to 2031 adds to the body of work by the OMA in participating in the NSW Planning Review, specifically our submissions to the statewide planning reform (Nov 2011), Green Paper (Sept 2012) and White Paper (2013).

The OMA supports the planning reform process in NSW, with the focus on strategic land use planning and a more streamlined development approval process. The review process is an excellent opportunity for all parties within NSW to have input into the strategic direction of the NSW planning system and to inform the proposed Regional Growth Plan for Sydney.

The OMA is committed to ensuring that planning reform provides a system for its members that:

1. Recognises outdoor advertising signage as a legitimate land use. The new planning system must enable the outdoor advertising industry to operate in a fair and objective manner
2. Provides a set of fair and reasonable development standards that are appropriate for signage land use and which acknowledge the introduction of digital technology
3. Promotes the responsible display of outdoor advertising signage within urban centres and along transport corridors

The position of the OMA is that the best approach to achieve these reforms is through a proposed statewide Planning Policy for advertising and signage, developed in conjunction with all stakeholders, including the OMA. Such a Planning Policy would directly inform the Regional Growth Plans and Subregional Delivery Plans as well as the content of Local Plans, whilst providing a statewide framework and philosophy in regards to outdoor advertising.

In regard to the new planning system, the OMA supports the objectives upon which the system will be based, providing certainty, transparency and simplicity. From the perspective of the OMA, it is essential that the new planning system deliver the same level of certainty and flexibility for advertising and signage related proposals as is currently provided under SEPP64.

In regard to the Draft Sydney Metropolitan Strategy, we understand that this document, together with the NSW Long Term Master Plan and the State Infrastructure Strategy, will ultimately form the Regional Growth Plan. There is therefore some concern that the Strategy has been released prior to the implementation of the new statewide planning policy and as a result the intended framework and philosophy in regards to outdoor advertising will not be reflected. This also runs the risk of creating *uncertainty* amongst the community. OMA members trust that this risk is being managed, and that the submissions made and lessons learnt in each part of the review process are being integrated throughout its' entirety, including the OMA submissions to the White and Green Papers.

02 BALANCED GROWTH

The OMA supports the plan to stimulate investment across the City of Sydney.

The concept of strengthening and growing 'Centres' where "*people come together to access shops, offices, business and civic uses*" resonates strongly with the OMA. These centres, whether larger 'Strategic Centres' or smaller 'Local Centres' as described in the Draft

Metropolitan Strategy for Sydney to 2031, will act as community hubs. The OMA supports the proposed hierarchy (Table 1, p.16, “Balanced Growth”), as long as the process of adopting the centre types into subregional and local planning (Action 2.1, p.15, “Balanced Growth”) reflects the importance of outdoor advertising in all sizes of Strategic and Local Centres.

Specifically, advertising and signage should be recognised and promoted as:

- A legitimate land use;
- An essential component of a global city and the transport corridors that connect the cities; and
- A core requirement to support local, state, national and international business markets.

With the continued growth of social media, outdoor advertising is becoming essential for businesses as they look to promote brand recognition and encourage audiences to their websites. The new planning regime must acknowledge and provide for the display of outdoor advertising and look to embrace the new digital technologies.

With the recognition of advertising as a legitimate land use comes the understanding of the role outdoor advertising has in the economy, for example, in 2010 the industry contributed \$127.5 million to GDP and employed 431 FTE staff in NSW. The Global Economic Corridor as stated in the Draft Metropolitan Strategy for Sydney recognises that “*Sydney markets are shifting towards professional services*”. Outdoor advertising is part of this shift and this must be recognised in the detail of the Subregional and Local Plans to be developed, particularly in Strategic and Local Centres, as well as along Transport Corridors and the Global Economic Corridor.

As part of the Sub Regional Delivery Plans, we would recommend that suitable locations where advertising and signage can be advanced as exempt, complying, code assessable, and merit based development be identified. Exempt and code assessable areas must include rural, transport corridors, commercial centres, industrial areas, mixed use and enterprise zones (or their equivalent).

The existing legislation which prohibits advertising in certain circumstances such as residential zones, environmentally sensitive zones, and tollways and freeways is inconsistent with available information as well as government contracts. Freeways and Tollways which have existing contracts regarding advertising (Eastern Distributor, M2, M4, M5 and Sydney Harbour Tunnel) are exempt from this provision, demonstrating that under certain conditions, advertising on Freeways and Tollways is safe and appropriate. The review of the NSW Planning System and the consequent shift towards performance based planning schemes provides a perfect opportunity to review and acknowledge and incorporate the conditions under which advertising on Freeways and Tollways is safe and appropriate in order to achieve nation-leading guidelines and regulations that deliver high quality advertising signage, sensitive to its’ context, cultural and environmental settings. This opportunity to update the provisions to increase compliance and consistency across the Region is fully supported by the OMA.

03 LIVEABLE CITY

The OMA supports the ambitious target to provide 545,000 new homes through expanding into new areas and consolidating existing areas. Such a target relies on effective provision of infrastructure such as public transport. The provision of effective public transport is recognised as a vital aspect of all accepted measures of livability (e.g. the EIU, Mercer’s Quality of Living and Monocle’s Most Livable Cities). Similarly, the Federal Government’s Livable Cities Program recognises the reliance upon effective public transport to achieve improvement in the ‘livability’ of a city.

The OMA members have a direct role to play in the provision of public infrastructure associated with public transport. In NSW alone, OMA members provide and maintain over 7000 items of public infrastructure (such as street furniture and bus shelters) to the value of \$90 million. This provides a considerable saving for local and state Government agencies, and a revenue stream back to Local Councils from these assets. As part of the NSW planning review and strategic overhaul, the uncertainty around the application of SEPP 64 on street furniture assets must be clarified, as well as the application of Clause 10 of SEPP 64 in residential zones, where bus shelters are necessary.

As we move forward into greater use of digital technology, the role of digital signage on street furniture will also increase. We acknowledge that the RMS's draft guidelines recommend that digital signage be a minimum of 4.5m above the ground. The OMA do not support this position as it does not allow for inclusion of digital signage in street furniture. This must be addressed in ongoing planning policy to enable OMA members to realistically continue their strong role in the provision of street furniture, and supporting the targets for expansion and consolidation of residential areas.

The proposed urban renewal and associated local plans must recognise the role outdoor advertising has and will continue to have in the community, now and increasingly into the future.

04 PRODUCTIVITY AND PROSPERITY

The OMA supports the intention to “*open up new opportunities for business to invest and ... increase confidence in order to build Sydney's economic success*”. The Productivity and Prosperity chapter in the Draft Metropolitan Strategy for Sydney recognises the land use requirements for business and industry investment throughout the region and the importance of providing sufficient and strategically placed land to supply these requirements. There is particular focus upon “*support(ing) the land use requirements of industries with high potential*” (Objective 11, p.8, Productivity and Prosperity). Six high growth industries are identified within this chapter. Outdoor advertising has grown a massive 92% since 2002 and falls directly within four of these categories, being the visitor economy; creative industries; the digital economy; and professional services.

The Draft Metropolitan Strategy for Sydney thoroughly addresses the requirements of our industry (and similar) for office space (Objective 14) through Subregional and Local Plans. However, our industry does not operate solely within the confines of office spaces. In order to “*support the land use requirements*” of our high growth industry, Subregional and Local Plans must also provide zonings on land which accommodate the outdoor advertising industry, allowing for code based assessment where appropriate, and merit based assessment for the remainder.

For example, it is commonly accepted that the most desirable locations for large format advertising and street furniture are on major arterial roads, railways, airports, tollways, transport interchanges and light rail. This review provides an opportunity for Councils to review their zonings to be in compliance with the Department of Planning Circular PN 10-001 (DOP Circular), which provides guidance to Councils on the zoning of public infrastructure land in standard instruments, or the proposed Local Plans, by zoning roads that pass through business zones with the zoning for the adjoining land.

05 HEALTH AND RESILIENT ENVIRONMENT

The OMA also recognises the unique geography and natural values of the City of Sydney and its surrounds. As the peak representative body for the Australian OOH industry, the OMA recognises its responsibility to minimise the impact of the industry's operations on the built and natural environment, and to contribute to the sustainability of the communities in which it operates.

The OMA will continue to work with its members to reduce the impact of outdoor advertising on the natural environment by reducing waste, increasing recycling, and conserving energy, water and natural resources in their own operations. This will support the initiatives proposed in the Chapter “Healthy and Resilient Environment” within the Draft Metropolitan Strategy for Sydney.

06 ACCESSIBILITY AND CONNECTIVITY

The Accessibility and Connectivity Chapter recognises the likely ongoing importance of car travel within the Sydney region as well as the need for improved public transport connections throughout the region into the future. The proposed policies are intended to *“make it easier for people to be a part of their local community...and contribute to more attractive vibrant communities”*.

For the proposals in this chapter to be successful, much of the community will need to change their habits and attitudes towards transport, increasing their use of public transport and *“active transport choices”* such as walking and cycling. The NSW Government frequently utilises the outdoor advertising industry to convey its message, and was the third largest advertiser in OOH media in 2011. The OMA wishes to offer the support of its members to continue this relationship and support the communication of these messages to the community throughout the lifetime of the Metropolitan Strategy for Sydney.

07 SUBREGIONS

The OMA recognises the value in identifying the separate Subregions of Central, West Central and North West, North, West, South West and South and is anticipating further participation as a key stakeholder in the development of the Subregional plans for these areas.

The OMA views the Subregional delivery planning as an opportunity to approach outdoor advertising with a coordinated suite of legislation across all Subregions, building upon and reinforcing the SEPP 64 position that outdoor advertising is a viable and legitimate land use.

Currently, the degree of difference between approval rates on private owned land and State owned land demonstrates incongruity between state and local planning laws. Research by the OMA suggests that since SEPP 64 came into effect in 2001, there has been only one new large format sign developed on private land, for every four on State land (road-facing signage only, and excludes State signage inside railway stations).

While the OMA’s members recognise that much of the prime land for signage is along major roads and therefore owned by the State, these figures indicate that the planning law framework for advertising signage in NSW may be weighted in favour of the State. A comparison of State laws and local laws reveals that these incongruities can be assigned to:

the issue of third party advertising;

the area dimensions prescribed within local laws; and

appeal costs in NSW.

OMA members wish to see this addressed in the new planning framework.

Specific to local legislation in the form of the proposed Local Land Use Plans, we would recommend that a number of provisions are appropriate for standardisation across all Local Government Areas to ensure consistency between these areas.

The following table identifies the signage and advertising types and locations that the OMA considers appropriate to be advanced as code assessable development:

| Signage Types | Land Use location equivalents |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|
| Super 8 – illuminated and non-illuminated Supersites – illuminated and non-illuminated Billboard – Illuminated and non-illuminated Building wrap Special Promotional Hoarding Digital illuminated signs and advertisements under 45 square metres in advertising display area | Business Zones Mixed Use Zones Enterprise Zones Infrastructure Zones for transport corridors Industrial Zones |

The OMA supports merit based assessment for the following signage types and locations:

| Signage Types | Land Use location equivalents |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------|
| Super 8 – illuminated and non-illuminated Supersites – illuminated and non-illuminated Billboard – Illuminated and non-illuminated Signs utilising digital technology in these locations Signs over 45 square metres in advertising display area | Heritage Conservation Areas Open Space Zones Environmental and Scenic Protection Suburban Character Zones Residential Zones All Zones |

08 CONCLUSION

Throughout this submission, the OMA has suggested how advertising and signage can be managed under the new planning system within the Sydney Region. These suggestions are detailed in each of the relevant sections in direct response to the Draft Metropolitan Strategy for Sydney and are summarised as key recommendations below:

09 RECOMMENDATIONS

- The OMA be included as a Key Stakeholder in Community Consultation.
- The attitudes of SEPP64 towards signage as a legitimate land use, essential for a global city and a core requirement to business markets be upheld.
- General consistency with SEPP 64 as well as consistency of terminology across all environmental planning instruments
- The provisions within future Subregional and Local Plans recognise and accommodate digital signage appropriately.
- Advertising and signage be determined as appropriate for exempt, complying, and code assessable, particularly within Strategic and Local Centres, as well as merit based assessment.
- Exempt and code assessable areas must include rural, transport corridors,

commercial centres, industrial areas, mixed use and enterprise zones (or their equivalent in the simplified zoning system), including the Global Economic Corridor.

- Clarification be provided regarding the application of SEPP64 (or its future equivalent) on street furniture assets, and within residential zones.

We look forward to the Government's review of our submission and welcome the opportunity to meet and discuss our key points raised.