



Proposed Bundaberg Regional Council Planning Scheme

28 November 2014

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 policies, laws and regulations for outdoor advertising that are both fair and equitable to governments, the community and the industry.

On behalf of its members, the OMA advocates for planning systems across Australia that will 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 law;
- Provision of a set of fair and reasonable development standards that are appropriate for signage land use; and
- Provision for the responsible display of outdoor advertising signage within commercial and industrial zones and along transport corridors.

OMA members advertise 'third-party' products 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.

Outdoor Media Association

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02 VALUE OF THE INDUSTRY TO THE QUEENSLAND ECONOMY AND COMMUNITY

Advertising and marketing play a fundamental economic role in Australian society and in 2013 the OOH industry raised revenue of \$543.8 million, making up approximately 5% of advertising spend in Australia.

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

- o Employed 150 full time equivalent staff;
- o Raised revenue of \$115 million;
- o Made a value added contribution to the Queensland economy of \$42.6 million;
- o Contributed an estimated \$10.43 million to the upkeep of public infrastructure; and
- o Donated a considerable amount of money and free advertising space to charities and 'not for profit' organisations.

The industry provides, maintains and cleans public infrastructure at no cost to Local Government, including bus shelters, footbridges, public toilets, bicycle stations and park benches.

The Strategic Framework for the Proposed Plan (Part 3) recognises the importance of strengthening and diversifying the economy within the Regional Council area. A 'critical planning challenge' set-out on page 3-3 of the plan is to provide:

"...the conditions to support employment of existing and future residents by strengthening existing economic sectors and promoting the establishment of an even more diverse and resilient regional economy with multiple strengths;"

The OMA submits that recognising and embracing the planning and land-use requirements of the OOH industry within the Draft Planning Scheme, will assist in meeting the above 'critical planning challenge', for the reasons outlined within the following paragraphs.

Local businesses in Queensland place great importance on billboard advertising. It is a highly cost effective advertising media 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 such positive outcomes for small business owners would not be achieved through the utilisation of other less targeted and usually 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 and 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 very positive impact for local business owners and operators in the state.

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

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 designs meet Australian Standards and the billboard device integrates with the architecture of the landscape. The industry strives to ensure that devices are painted in a harmonious colour scheme, that vegetation selection and management is in keeping with other local government programmes and lighting on the devices is the latest technology in terms of energy efficiency and minimising environmental impact.

Examples of billboard advertising for businesses in the Bundaberg area are provided below.



Isis Highway, Bundaberg West



Elliot Heads Road, Windermere

In addition to providing affordable advertising to local businesses, the OMA's members also make contributions back to the community each year. In 2013, the outdoor advertising industry donated over \$13 million across Australia in advertising space to a variety of causes, including charities, education, arts and sporting organisations.

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

An example of a billboard displaying a community safety message within the Bundaberg area is provided below.



Splitters Creek, Bundaberg Gin Gin Road

03 PROPOSED BUNDABERG REGIONAL PLANNING SCHEME

Distinction between Advertising Types

The OMA notes that the Draft Planning Scheme includes separate administrative definitions (refer pages S1-27 to S1-36) for an 'advertising device' and a 'third-party advertising device', as follows:

“Advertising device - Any permanent structure, device, sign, or the like intended for advertising purposes. It includes any framework, supporting structure or building feature that is provided exclusively or mainly as part of the advertisement.”

“Third party sign – A third party advertising device is an advertising device placed on premises for the purpose of advertising a matter not associated with the primary purpose for which the premises is used or developed.”

The OMA notes that the assessment criteria within the Draft Planning Scheme (Table 9.4.1.4.1, pages 9-71 to 9-74) include additional (and separate) requirements for third-party advertising devices.

The Queensland Government 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 primary 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. For example, Bundaberg Regional Council is proposing a different, more onerous, level of assessment for third-party advertising devices.

The OMA supports the removal of the separation of 'third-party' signage as a sub-definition of advertising devices in planning policy.

Third-Party Advertising Device Exclusion Areas

The OMA has noted that the assessment criteria for advertising devices, set-out in Table 9.4.1.4.1 of the Draft Planning Scheme's Advertising Devices Code, includes 'third-party advertising devices exclusion areas', as identified in Figures 9.4.1A to 9.4.1C of the Draft Plan. There are 11 'third-party advertising devices exclusion areas' included within the Draft Plan, but there is no explanation provided as to why these areas have been excluded specifically for third-party advertising signage.

The OMA submits that the planning impacts of a 'third-party' advertising device (relating to scale, amenity issues and impact on views etc.) are the same as for other types of advertising device and the type of assessment criteria for all advertising devices should be comparable.

Advertising Devices Code

The OMA supports the inclusion of an Advertising Devices Code within the Draft Regional Planning Scheme. However, some of the provisions contained within the Advertising Devices Code are unworkable for the OOH industry. In particular, the following prescribed outcomes are of concern because of their limiting nature:

- The third-party advertising device is not located in a third-party advertising device exclusion area (refer Page 9-72, AO8.1 & AO8.4 of the Draft Plan);
- The third-party advertising device does not exceed a sign face area of 18m² per site (refer Page 9-72, AO8.4 of Draft Plan);
- Only one (1) third-party advertising device is established on any site (refer Page 9-72, AO8.5 & Table 9.4.1.4.2, of Draft Plan; and
- The third-party advertising device does not exceed a maximum height of seven (7) metres above ground where erected in a Centre Zone, the Specialised Centre Zone or an Industry Zone, or four (4) metres above ground level where erected in another zone (refer Table 9.4.1.4.2, of Draft Plan);

Details of the reasons why the clauses are impractical for the OOH industry are set-out within the following sections.

Sign Size and Height of Billboards

The Draft Planning Scheme's Advertising Devices Code, fails to match the size and height requirement of some of the industry's larger sized billboards. Freestanding advertising devices have a maximum face area (including any associated structure around the face of the sign) of 48m² per side, and a varying height of up to 12m above the ground.

A common misunderstanding is that billboard sign companies want to use the largest size sign structures available to project the largest advertisement. However, the purpose of an outdoor advertising sign is to ensure delivery of an advertising message in an effective and efficient manner.

The larger the size of the advertising sign the higher construction costs for the industry, so there is also an economic benefit by only constructing an advertising sign that is of a size suitable for the location. The size of the sign is dependent on several factors such as the road size, road category and travel speed. Main arterial roads or major highways will require a larger sign to produce the greatest result whereas smaller roads and streets will require a sign much smaller in size in comparison.

The size and height requirements of billboards cannot be assessed in isolation from one another as 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. For example a 42.41m² 'Supersite' billboard cannot be supported by a low height structure.

There are other reasons why low height limits for freestanding signs are not supported by the industry, as follows:

- Low-set signs can become attractive targets for vandalism and graffiti, as they are easier to access; and
- Height restrictions will limit the options for the installation of signage in a dip in the landscape, as this will limit the visibility of the sign from a higher roadway.

A common misconception is that sign companies want sign structures to be as high as possible. However, the purpose of outdoor advertising signage is to ensure the delivery of an advertising message in an effective and efficient manner. A critical planning consideration for the location of any new advertising sign is the optimum height needed to obtain effective visibility of the advertising face to its audience, the majority of who are in their vehicles and viewing from road level.

Locating a sign structure too high can make its message delivery just as ineffective as one which is too low and unreadable. In addition, the greater the height, the more the construction cost so there is always a strong economic benefit to be gained by maintaining the sign height at the minimum optimum viewing level.

Spacing of Billboards

The OMA is aware that there is a concern within the community about an over proliferation of billboard signage on roads and transport corridors. However, the OOH industry does not want to see a multitude of signs in any one location as this weakens the commercial impact and viability of the signage. Visual amenity issues and concerns regarding clustering of signs can be addressed by requiring reasonable spacing between signs. Therefore, the 'one sign per premises' restriction, could limit a significant income source for a rural property owner who has a large property frontage, where several suitably spaced signs could be accommodated.

It is understood that the decision to employ size, height and location restrictions would have been made in the interest of preserving the character, amenity and lifestyle values of the region. However, while the preservation of these values is important to achieving the outcomes of the Draft Planning Scheme's Strategic Framework, it should not be at the expense of other, equally important strategic outcomes such as 'strengthening and diversifying the economy'

Outdoor advertising is a cost-effective way for local organisations and small businesses to advertise their products, services and events. Many of the Queensland OMA members are themselves independent small businesses. The advertising signage requirements put forward by Council, if not reassessed, could have significant impacts on advertising and economic opportunities for the local businesses in the Bundaberg Region.

04 OMA MODEL ADVERTISING DEVICES CODE

In March 2012, the OMA finalised a Model Advertising Devices Code specifically for Queensland Regional Council areas, including the Bundaberg Region (Refer Attachment 2). The OMA's Code sets out the specific development provisions required by the OOH industry. The Council is invited to incorporate the OMA's Model Devices Code into the Planning Scheme and the OMA would welcome the opportunity to discuss this further with Council.

05 DIGITAL SIGNAGE

In the past five years the use of digital rather than static signage has grown across Australia. Currently digital technology makes up 13.9%² of total OOH advertising revenue and it will continue to grow.

The OMA considers that the Planning Scheme's Advertising Devices Code should include performance criteria/outcomes for digital advertising signs, as demonstrated within the OMA's 'Model Advertising Devices Code'. Digital technology is increasingly being accepted as the new way to advertise given its flexibility, creativity and versatility, and it is important that this is acknowledged within the Draft Planning Scheme.

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 OMA supports specific regulation to guide the development of such technology on a permissible and reasonable basis and has worked with Local Governments and State Governments across Australia on this specific matter. 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'.

² Based on second quarter 2014 revenue numbers – Outdoor Media Association

o6 CONCLUSION

OMA members are committed to working with Local Governments to develop policies for advertising devices that meet the requirements of both Councils and the OOH industry.

The OMA appreciates your time in considering this submission and looks forward to having the opportunity to work with the Council to further develop the Draft Bundaberg Regional Planning Scheme and the provisions which regulate outdoor advertising throughout the region.

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

ATTACHMENT 1

Department of State Development, Infrastructure and Planning Queensland Planning Provisions User Guide – Advertising Devices

ATTACHMENT 2

OMA Model Advertising Devices Code