



Draft Cairns Region Planning Scheme

12 December 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 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 all levels of government 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;
- Provision of a set of fair and reasonable development standards that are appropriate for signage land use;
- Provision for the responsible display of outdoor advertising signage within commercial and industrial zones and along transport corridors; and
- The removal of the distinction between 'on-premise' and 'third-party' signage in planning policy and local laws.

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.

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02 DRAFT CAIRNS REGION PLANNING SCHEME

The OMA fully supports the inclusion of an *Advertising Devices Code* (Section 9.4.1) within the draft Cairns Region Planning Scheme. In particular, the OMA supports the recognition in the introductory section (Section 9.4.1.2) of “...***the legitimate need for enterprise to advertise.***”

The OMA does however, have some concerns with the code, which are as follows:

- The statement within Section 9.4.1.2 that “*the use of billboard signage is limited*” and;
- The requirement for the main types of advertising devices used by our members, including billboards, to be impact assessable.

The Queensland Department of State Development, Infrastructure and Planning’s *Draft Planning Provisions User Guide – Advertising Devices* (refer Attachment 1), provides clarity to stakeholders. The User Guide states that an advertising device defined under the Queensland Planning Provisions may include:

- A freestanding sign, such as a pylon sign or billboard, or
- A sign attached to a building, such as an awning sign, a projecting wall sign or a roof sign.

The draft User Guide sets-out the Government’s commitment to streamlining assessment and approval processes and removing unnecessary red tape. One of the stated key objectives is to ensure that there is no inappropriate level of assessment (e.g. impact assessment where code assessment, self-assessable or exempt may be more appropriate).

The draft User Guide also states that there should be no regulatory duplication (e.g. same aspects of advertising devices regulated in both local laws and planning schemes).

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 OMA is concerned that the planning requirements put forward by Council may impact negatively upon the commercial viability of the core business activities of the out of home industry within the Region.

03 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 out of home industry raised revenue of \$543.8 million, making up approximately 5% of advertising spend in Australia.

The out of home 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 out of home industry in Queensland for the calendar year 2012. The Deloitte research found that in Queensland in 2012 the out of home industry:

- Employed 150 full time equivalent staff;

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

- Raised revenue of \$115 million;
- Made a value added contribution to the Queensland economy of \$42.6 million;
- Contributed an estimated \$10.43 million to the upkeep of public infrastructure; and
- 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 Intent' for the draft Plan (Part 3) recognises the importance of promoting **“a diverse and thriving economy”** within the Regional Council area. The draft Plan states that the Region has a diverse and thriving economy with tourism and primary production being substantial economic drivers and employers in the Region, and other emerging industries also contributing to the local economy.

The OMA submits that recognising and embracing the planning and land-use requirements of the out of home industry will assist in meeting one of the key the strategic intentions of the draft Plan, 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 medium 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.

Examples of billboard advertising for local businesses in the Cairns area are provided below and over-page.



Bruce Highway, Gordonvale



Bruce Highway, Fishery Falls

The out of home industry in Queensland differs from other states in that there are more independent members working in a range of different Metropolitan and Regional areas. Queensland has a much higher rate of local or 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.

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 into 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 Council programmes and any lighting on the devices is the latest technology in terms of energy efficiency and minimising environmental impact.

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.

Examples of billboard advertising for community messages within the Cairns area are provided over-page.

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Meringa, Bruce Highway



Bruce Highway, Miriwinni

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 Cairns Region (Refer Attachment 2). The OMA’s Code sets out the development provisions required by the out of home industry which align with the Council’s recognition of “...*the legitimate need for enterprise to advertise.*” (refer Section 9.4.1.2)

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. The Model Advertising Devices Code addresses the following requirements of the industry.

Sign Size and Height of Billboards

A common misunderstanding is that sign companies want to use the largest 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. Billboard signs range in size from 18m² to 48m². The maximum size of 48m² allows for the industry ‘supersite’ sign face area of 42.41m² with the addition of badged skirt which allows for structural and safety elements to be hidden from public view.

However, the larger the size of the advertising sign the higher construction costs for the industry, so there is 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 ‘supersite’ billboard cannot be supported by a 2-4m high structure.

There are also other issues relating to the height restrictions for freestanding signs that 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.

Another 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 desired 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 out of home 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.

It is understood that the decision to employ development control for advertising devices within the plan 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 economic development.

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 out of home advertising revenue and it will continue to grow.

The OMA considers that the draft 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 better achieving public interest and 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 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'*.

05 CONCLUSION

OMA members are committed to working with Council to develop an advertising policy that ensures all advertising structures, regardless of size or content, are located in areas permitted by Council and that they are well integrated with the urban and environmental fabric of the Region.

The OMA does however, have some significant concerns about how the draft Planning Scheme, if implemented, would affect our members core business activities. This is in regard to the highest level impact assessment criteria for many of the advertising device formats used by our members. In addition, there is also concern about the statement within the advertising devices code that the use of billboard signage will be limited.

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

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 Cairns Region Planning Scheme and the provisions which regulate outdoor advertising throughout the locality.

We would welcome the opportunity to further discuss the issues raised within this submission. Please contact the OMA's Town Planner, Cathy Towers via email, cathy.towers@oma.org.au or by telephone on 02 9357 9900, should you have any questions.

ATTACHMENT 1

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

ATTACHMENT 2

OMA Model Advertising Devices Code (Category B)