

23 May 2014

OUTDOOR MEDIA ASSOCIATION (OMA) SUBMISSION TO THE PROPOSED VICTORIAN PLANNING POLICY FRAMEWORK (PPF) 2014



01 SUPPORT OF VICTORIAN PLANNING REFORM

The OMA supports the planning reform process in Victoria, with the focus on strategic land use planning and a more streamlined planning permit approval process. The review of the SPPF is an excellent opportunity for all parties within Victoria to have input into the strategic direction of the planning system and to inform ongoing planning reform.

The OMA is committed to ensuring that all planning reform, including the proposed PPF provides a system for its members that:

1. Recognises outdoor advertising signage as a legitimate land use. The proposed PPF must enable the outdoor advertising industry to operate in a fair and objective manner
2. Provides a framework to allow for 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 through policy setting
4. Protects members' long term existing advertising investments within Victoria.

The OMA therefore strongly supports the inclusion of 'Advertising' policy as a new State policy item in the proposed PPF.

02 THE PROPOSED STRUCTURE

We understand that the Advisory Committee has proposed that for each policy item (i.e. 'Advertising'), the proposed PPF will include State Policy and provide a 'placeholder' for Regional and Local Policy to be located.

The OMA strongly support this proposed structure as it provides an opportunity for consistency across local government areas, in keeping with leading practice and research.

We therefore support the initiative to 'nest' Local policy under regional and State policy providing a clear context for our members and a clearer understanding for local government in ongoing regulation.

We also understand that 'pointers' to other areas of the Scheme are proposed in the PPF, such as the inclusion of a reference to 'Particular Provisions' (i.e. Clause 52.05 –

Advertising Signs). Again, we support this proposal as a clear connection between overarching policy and specific regulation. We also believe that this will assist in removing detailed regulation in regard to advertising which has been slowly creeping into local policy and diluting the role of policy setting. This has also added difficulties for our members in obtaining separate policy and regulation guidance when preparing and lodging applications.

03 THE PROPOSED CONTROLS – CLAUSE 06.06 ADVERTISING SIGNS

The proposed PPF incorporates a new State Policy, '06.06 Advertising Signs' within a new grouping of 'Urban Design'. The OMA are pleased to see the inclusion of 'Advertising' within a section of State policy that acknowledges the contribution that advertising brings to our built environment.

Specifically, Clause 06.06 Advertising Signs includes one Objective and three supporting Strategies:

Objective 1 - To provide for signs that are compatible with the amenity and visual appearance of an area, including the existing or desired future character.

Strategy 1.1 - Minimise excessive visual clutter or visual disorder from signs.

Strategy 1.2 - Minimise any loss of amenity or adverse affect on the natural or built environment from signs.

Strategy 1.3 - Avoid signs that affect the safety or efficiency of a road.

We understand that this objective and associated strategies are drawn from the 'Purpose' of the existing Clause 52.05 – Advertising Signs. To this end we commend the Advisory Committee in extracting key regulatory requirements and transposing them to State policy to provide clear guidance.

We would, however, contend that the phraseology of the proposed objective and strategies is overly regulative and does not acknowledge the benefit that advertising brings to the built environment or the important place that advertising holds in our community. Specifically:

- Advertising can assist in the growth of local communities, supporting and advertising local businesses and offering affordable advertising solutions.
- Outdoor advertising subsidises public amenities such as bus shelters, public toilets, kiosks, phone booths, park benches and pedestrian bridges to an estimated value of over \$275 million. At last count, there are close to 7,000 pieces of public infrastructure provided by Outdoor companies across Australia which support the public good.
- Advertising space is donated to a tune of over \$15 million (2012 expenditure) to a variety of charities, education and sporting organisations, thereby providing a community service.
- Local community events and activities are also advertised using outdoor media, garnering community support and local knowledge of their environment. A 2011 AC Nielsen study found that Entertainment & Leisure advertising is one of the most preferred categories of outdoor advertising by

consumers.

We would therefore ask that the Advisory Committee consider rewording Objective 1 to better reflect the positive elements of 'Advertising' rather than just incorporating strategies to regulate location and impact. Perhaps a reconsideration of the use of verbs 'minimise' and 'avoid' could achieve this objective.

A minor amendment would also be to change 'affect' to 'effect' in Strategy 1.2.

We have acknowledged the excellent work that the Advisory Committee has done in translating Clause 52.05 into State Policy. We would, however, contend that a second Objective should be created to reflect new technology in advertising; a specific area within Clause 52.05 which has been increasing in use and more recently addressed through local policy.

With continuous advancements in technology, the OMA supports policies which allow for different types of signage into the future. As we move forward into greater use of digital technology, the role of digital signage will increase. Any prohibitions or inappropriate restrictions on digital signage will unnecessarily affect the future growth of an industry that contributes significantly to the community. We would therefore ask that a second objective be incorporated regarding new technologies, reflecting existing content within Clause 52.05 which relates to digital advertising.

04 CONCLUSION

The OMA supports the objectives of providing certainty, transparency and simplicity within planning policy. From the perspective of the OMA, it is essential that the proposed PPF deliver this same level of certainty and flexibility for advertising and signage related proposals.

We strongly support the inclusion of a new State Policy on 'Advertising' within the 'Urban Design' chapter, as is currently proposed, and offer the following amendments/ recommendations:

1. Consider rewording Objective 1 to better reflect the positive elements of 'Advertising' rather than just incorporating strategies to regulate location and impact. Perhaps a reconsideration of the use of verbs 'minimise' and 'avoid' could achieve this objective.
2. Amend 'affect' to 'effect' in Strategy 1.2.
3. Create a second objective regarding new technologies, reflecting existing content within Clause 52.05 which relates to digital advertising.

We look forward to the Advisory Committee's review of our submission and welcome the opportunity to meet and discuss the issues raised.