

19 January 2024

City of Perth  
Council House  
27 St Georges Terrace  
Perth WA 6000

**Re: Submission: Draft Revised City Of Perth Planning Scheme No. 2 Policy 4.6 – Signs**

As the peak body for Out of Home (OOH) advertising in Australia, the Outdoor Media Association (OMA) welcomes the opportunity to comment on the City Planning Scheme no. 2 Policy 4.6 Signs (Policy), as currently advertised by the City of Perth (the City).

The OMA understands that the draft revised Policy applies to new signage within the Scheme Area for the City of Perth City Planning Scheme No.2 and seeks to ensure new signage is well designed and makes a positive contribution to the city.

This Policy, as advertised, discounts the important role of third-party signage in modern cities, does not follow industry best practice, nor does it support investment and innovation in OOH technology.

The consequence of this Policy in its current form is the extinction of the accepted and widely used OOH formats in the City of Perth.

**In addition, the City will lose significant revenue opportunities that typically generate a 50% revenue share in a billion dollar industry growing at more than 12% per annum.**

This outcome can be prevented if the City consults with the OMA.

A balanced approach can lead to a mutually beneficial outcome supporting a successful Out of Home industry in Western Australia, which benefits government through a revenue stream, as evidenced in other Australian markets. OMA members build and manage safe, innovative and well-designed advertising signs.

They actively engage with experts in heritage, planning, road safety, and illumination, as well as government and community during all phases of billboard development.

The OMA would like to work collaboratively with the City to deliver a Policy that is reasonable and better reflects modern Outdoor advertising practices, encourages innovation and future proofing the Policy for years to come.

Implementing our proposed reforms can potentially unlock additional funds and resources available for community projects.

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## Background

The Outdoor Media Association (OMA) is the national peak industry body representing most of Australia's Outdoor media owners, suppliers and some asset owners.

The Outdoor advertising industry is a \$1 billion industry and a significant contributor to the local economy. There are currently 55 members, with almost half of our media display members operating in Western Australia. Most of the OMA's media display members are small to medium businesses and most are Australian owned and operated.

Investment in Out of Home contributes to placemaking and helps create more vibrant and safer areas at no cost to the City. OMA members invest in local communities by developing and maintaining essential public infrastructure (such as bus shelters and pedestrian bridges) at no cost to ratepayers.

OMA members display third party advertisements across classic and digital signs, including signs on buses, trams, trains, pedestrian bridges, billboards, freestanding advertising panels and street furniture (bus/tram shelters, public toilets, bicycle stations, EV charging stations, telephone booths and kiosks), as well as in office buildings, cafes, bus stations, railway stations, shopping centres, universities and airports.

Out of Home advertising is one of the most trusted channels used for broadcasting government and community awareness messaging. OMA members are committed to ensuring that the advertising they display meets community standards.

The OMA [Code of Ethics](#) mandates that members comply with 17 self-regulatory codes, policies and guidelines in addition to state and federal legislation. This ensures that members are accountable and ethical with the community, government and advertisers.

## Digital Advertising Signage and Community Contribution

Great destinations around the world have embraced digital technology to enhance the vibrancy of cities, streetscapes and contribute to placemaking. While there will always be a place in the industry for classic signs, digital advertising provides the City with a range of additional benefits, including:

- **Providing community utility and infrastructure** - Digital signs can provide Wi-Fi hubs, charging stations and wayfinding services. It can also be used to raise awareness of City events and other community engagement initiatives. OMA members invest in local communities by developing and maintaining essential public infrastructure (such as bus shelters and pedestrian bridges) at no cost to ratepayers.
- **Better economic growth opportunities** - Digital signs are directly aligned to future e-commerce and economic growth consistent with other forms of digital media and many of the strategic growth objectives of government and private industry.
- **Better sustainable practices** - Digital signs result in long term environmental benefits when compared to classic signs, given that they do not require the use of PVC or vinyl skins, thus reducing the carbon footprint of the sign. Further, electrical generation allows for smooth transitions to alternative sources of energy generation.
- **Targeted and efficient display of emergency information** - Digital signs can be quickly adapted to provide emergency messaging in times of natural disaster, and for geographically-targeted community messages such as event information or transport network disruptions.
- **Increased safety for our employees** - Digital signs can be easily changed remotely, reducing occupational safety and health issues, which are associated with the physical changeover between advertising campaigns.

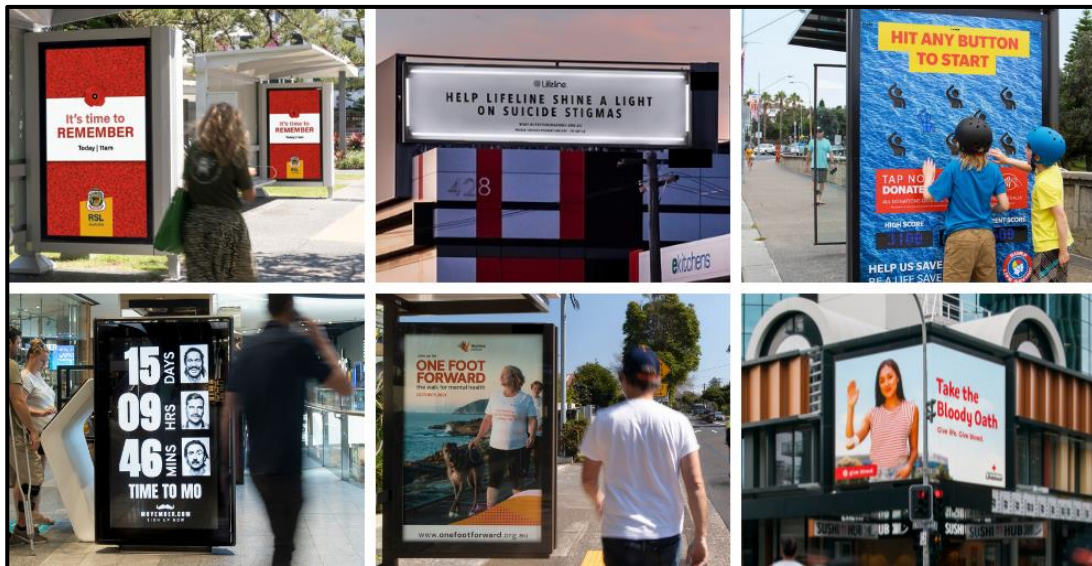
Digitisation also allows for the rationalisation of classic assets and its revenue contributes to network maintenance. Third party digital advertising also plays a leading role in the public space for government messaging.



*City of Perth Advertisement on Graham Farmer Freeway*

Outdoor signs are a canvas for local businesses to advertise their products and services, be a source of information for local events, and support vibrant cities by giving back 50 per cent of revenue to the government and landlords through rent, taxes and profit shares.

In 2022, OMA members donated more than \$126 million in advertising space to more than 200 not-for-profit organisations, including arts, sport and charities across the country.



*Examples of OMA members supporting charities and not-for-profits*

## Proposed Amendments to Signs Policy

The OMA understands that the draft revised Policy applies to new signage within the Scheme Area for the City of Perth City Planning Scheme No.2 and seeks to ensure new signage is well designed and makes a positive contribution to the city.

The OMA is supportive of this Policy objective. However, certain aspects of the Policy are limiting the industry's potential to deliver innovative and well-designed signage for the City of Perth.

### Wall Sign Size Restriction

It is understood that the proposed amendments are looking to reduce the maximum size of a wall sign that displays third party content to 4sq.m.

This represents a significant reduction in the permissibility of signage and demonstrates overly onerous signage provisions. 4 sq.m as a maximum displays a significant departure from other Signage policies in metropolitan Perth, including that of Main Roads Western Australia's [Policy and Application Guidelines for Advertising Signs](#), as well as varying from industry standards.

These are demonstrated in the below table and are already utilised in other policies, such as the [NSW Transport Corridor Outdoor Advertising and Signage Guidelines \(2017\)](#) and the [Queensland Roadside Advertising Manual \(Technical Volume\) \(2022\)](#). This highlights an acceptance of these sizes to operate safely in an urban environment.

Further, there is no publicly available justification for the proposed signage size reduction. The OMA requests evidence-based justification be provided for the proposed wall sign size reduction.

| Description    | Dimension (m) | Area (sq.m) | Maximum height (m) |
|----------------|---------------|-------------|--------------------|
| Small Portrait | 3 x 4.5       | 13.5        | 7.5                |
| Poster         | 6 x 3         | 18          | 10                 |
| Super 8        | 8.3 x 2.2     | 18.6        | 10                 |
| Portrait       | 4 x 6         | 24          | 10                 |
| Supersite      | 12.33 x 3.35  | 42.4        | 12.5               |
| Spectacular    | 18.99 x 4.5   | 84.5        | 12.5               |

### *Industry standard signage size*

The introduction of a maximum sign face of 4 sq.m for wall signage is a backwards step for the City in the provision of advertising devices in a CBD context. This is particularly evident when compared to other inner-urban policies across Australia.



| Local Government Area                | Maximum Sign Face Prescribed for Wall Signs and/or Third Party Signage |
|--------------------------------------|--|
| City of Brisbane                     | 48 sq.m  |
| City of Gold Coast                   | 45 sq.m  |
| <i>City of Perth (as advertised)</i> | <i>4 sq.m</i>  |

*Comparison between maximum wall signage sizes*

The OMA promotes innovative, unique and creative signs that contribute positively to the character and vibrancy of the council area and integrate well within the buildings, streetscapes, and the urban skyline. Signage over time has been a significant contributor to the creation of place, and medium to large scale signage in urban/CBD areas acts as an attractor in addition to its primary use as a medium for message delivery.

A maximum of 4sq.m prevents third party wall signage from being delivered as a whole, as the size and scale of signage becomes ineffective, and more dangerous due to inability to convey appropriately sized text. This may result in potential wider disruption through forcing drivers to stop or slow down subconsciously, leading to greater risk of incidents.

As such, the permitted sizing of the sign should be context and principle driven, supporting innovation and best practice whilst ensuring the right sign is delivered for the right location. Such provision would support the development of signage that may not exist at this stage, but would be the most contextually appropriate outcome.

This is opposed to a blanket ban on signage greater than 4 sq.m which prevents the ability to deliver context driven signage.

**Street Furniture Signage Size Restriction**

Street furniture signage plays a significant role in the communication of messaging within the urban environment, delivering information at a human scale. These signs are particularly prevalent in the City of Perth due to the large daily commuter population and subsequent requirement for bus shelters. Further, telephone booths are present due to the consolidation of Perth’s population in the CBD during the week.

The as-advertised document seeks to reduce the Street Furniture Sign size to a maximum of 1 sq.m. This significantly contradicts the current provision of communication infrastructure at street level in the CBD, with the current Telstra Smart City Payphones as a clear example (1.5 sq.m sign face). These phones are provided to the community at no-cost to use, allowing for maximum accessibility, social inclusion and equality.

This infrastructure is further able to be utilised by Western Australia Police (WAPOL) transforming payphones into a visible voice for community safety during a major event or civic disruption. In emergency situations, the new payphone network can display emergency information, including warnings of a live event threatening community safety, such as terrorism, floods, bushfires, or extreme heatwaves or pollen storms.

As such, it demonstrates a greater contribution to the City of Perth than just commercial advertising. In order to maintain and fund this service, the ability to display messaging through a digital screen is required. A reduction in size will put the community service at risk and, as such, will limit its ability to be utilised in future.



### *Telstra Smart City Payphones*

Further, and similar to the wall sign typologies, there is no publicly available justification for the proposed signage size reduction. The OMA requests evidence-based justification be provided for the proposed signage size reduction.

The consequence of the proposed size reduction is the extinction of future street furniture in the City. This will result in the potential loss of more than 50% revenue to the City from future third party advertising signs. OMA members will also be unable to build and maintain bus shelters since the revenue from advertising signs on bus shelters contribute towards the cost of the build. This cost and responsibility will likely fall onto Council if the advertised Policy is endorsed in its current state.

The draft Policy is a regressive step for the provision of street furniture and community infrastructure in the City of Perth, one which trails other examples in Australia. Of note is the City of Brisbane, who through their local law depict a maximum sign face of 10 sq.m for likeminded infrastructure (pay phones, bus shelters). A limitation of 1 sq.m illustrates a significant misunderstanding by the City on the value of this infrastructure and the community messaging they can deliver.

In a similar approach to the Wall Sign sizing, the OMA recommends that street furniture screen sizes be context and principle driven. A merit based consistent and balanced review process for development applications will result in better Outdoor signs.

To allow for a range of innovative responses, it is suggested that the standard dimensions be recognised as 3m x 1.5m, as mentioned in the [NSW Transport Corridor Outdoor Advertising and Signage Guidelines \(2017\)](#). This represents industry and planning best practice, delivering a preference for performance-based solutions that deliver an outcome moulded to its context.

### **Differentiation Between Third Party and Animated Signage**

It is noted that in the as-advertised Policy, the assessment criteria for Third Party Advertising signs and Animated and Variable Content signs are separated into two separate sections (Sections 7 and 8, respectively).

Whilst appropriate control of advertising devices is supported, it is not clear how a sign

that is both of a Third-Party Nature and includes Animated and Variable content would be assessed.

As such, it is requested that further clarity be provided so that potential variable content third party signage can be assessed appropriately and improves the legibility of the document for potential applicants and landowners.

### **Levels of Delegation for Approval**

Following review of the advertised draft Policy, it is not clear as to what the proposed levels of delegation for signage will be, particularly when an application will involve variations to the prescribed provisions. It is requested that clarity be provided on the levels of delegation for signage applications throughout the policy finalisation process.

### **Conclusion**

The OMA would like to extend our thanks to the City of Perth for the ability to review and provide comment on the advertised City Planning Scheme no. 2 Policy 4.6 Signs during its public consultation process. We would appreciate the opportunity to work closely with the City before the Policy is finalised to ensure transparency and effective consultation with industry.

The OMA generally agrees with the objectives of the draft revised policy. However, the OMA cannot support the Policy as advertised because it represents a backwards step for what is an emerging piece of City infrastructure in urban environments across the globe. The draft Policy as current is a significant deviation from other policies across Australia and is overly onerous on the delivery of critical messaging and advertising.

The OMA is concerned that the draft Policy in its current form will lead to the extinction of the industry in the City of Perth, resulting in the potential loss of more than 50% revenue to the City from future third party advertising signs. This outcome can be prevented if the City consults with the OMA on the development of this revised Policy.

A lack of a pathway for performance and/or context-based assessment is a severe concern for the administration of orderly and proper planning, with blanket bans being an outdated mechanism and one that limits innovation in the sector.

OMA supports the production of the City's revised Policy, however advocate for specific alterations as prescribed above in this submission. The suggested alterations and questions of clarity would result in a policy that is contemporary, champions innovation, and supports the delivery of messaging within the City of Perth.

I will contact the City to organise a meeting for industry and government to work collaboratively on this Policy. Should you wish to discuss any of the issues raised in more detail beforehand, please contact me via email at [jessie.nguyen@oma.org.au](mailto:jessie.nguyen@oma.org.au)

Yours sincerely

A handwritten signature in black ink, appearing to read 'Jessie Nguyen', with a long horizontal flourish extending to the left.

**Jessie Nguyen**

Senior Policy Advisor

Outdoor Media Association