

PROPOSED EMPLOYMENT ZONES FRAMEWORK

Submission from the Outdoor Media Association

01 INTRODUCTION

Out of Home (OOH) advertising can significantly contribute to the comfort and convenience of a city. Well-placed and well-designed OOH advertising can add incredible visual appeal (for example Piccadilly Circus in London and, closer to home, Yagan Square in Perth), as well as contribute significantly to the liveability, function and amenity of a city.

OOH advertising can also provide an important economic opportunity to local businesses by providing a means of communicating with consumers, both local and tourists, as well as providing a means of passive income for building owners and councils.

The Outdoor Media Association (OMA) submits that several of the new 'Employment Zones' proposed to be implemented in the Standard Instrument (SI) would benefit from well-placed and well-designed advertising structures within certain parts of the council area. As such, the OMA is advocating that 'Advertising Signage' be included in the updated SI as permitted with consent in the following zones:

- E1 – Local Centre
- E2 – Commercial Centre
- E3 – Productivity Support
- E4 – General Industrial
- E5 – Heavy Industrial
- MU – Mixed Use

Including them in the SI means that councils will have the option to permit advertising signage within their localities unless they expressly opt out of including them in individual LEPs.

The OMA submits that by including Advertising Signage in the SI, councils will be afforded the benefits of permitting signage in their area, such as wayfinding, public information as well as the economic benefits, with minimal impact.

02 THE AUSTRALIAN OOH ADVERTISING INDUSTRY

OMA members advertise third party products on digital and traditional signs across a variety of OOH formats and locations, including airports; buses; bus, train and tram stations; office buildings and lifts; pedestrian bridges; shopping centres; taxis; trains; trams and street furniture.

OMA members make significant economic contributions to government and the community, contributing close to \$647 million to Australia's GDP and supporting approximately 4,500 jobs. Most OMA members are Australian owned and operated, with profits going back into

the Australian economy. The industry also provides a revenue stream to government and private landholders alike, returning 50% of revenue in rent and taxes.¹

In 2020, OMA members donated \$92 million in media services and advertising placement to over 140 community groups and charities.

The industry also delivers essential services and savings. The OOH advertising industry builds and maintains \$352 million of public infrastructure across Australia. That is over 17,000 pieces of public infrastructure delivered by the OOH advertising industry which make our cities more user-friendly by providing bus stops, park benches and even rubbish bins. The industry also invests in innovation and provides digital utility such as Wi-Fi and wayfinding services.

OOH advertising is one of the most trusted channels to broadcast government and community awareness messages, including road safety, public health and community service campaigns.

03 THE BENEFITS OF INCLUDING SIGNAGE IN THE STANDARD INSTRUMENT

Advertising signage provides an important amenity to the local area. Not only does it support the local economy and jobs by providing an outlet for local businesses to promote their goods and services, OOH advertising also provides public facilities such as wayfinding and even public toilets.

Well thought out advertising signage adds amenity and resources within a council area and would be particularly well suited in the newly proposed Employment Zones:

- E1 – Local Centre
- E2 – Commercial Centre
- E3 – Productivity Support
- E4 – General Industrial
- E5 – Heavy Industrial
- MU – Mixed Use

3.1 Building local communities together

Councils will always have an option of opting not to include Advertising Signage within their individual LEPs, even with an opt-out system. However, should they choose not to opt out, OOH structures would be allowed only with consent and would be subject to the usual Development Application process.

OMA members work closely with councils and communities across Australia before, during and after the Development Application process to ensure OOH advertising is functional and

¹ Deloitte Access Economics (2016). "Out of Home Adds Value: Out of Home Advertising in the Australian Economy," Outdoor Media Association.

aesthetically pleasing.

The inclusion of Advertising Structures in the SI simply means that councils will be reminded to include this important aspect as part of their individual LEPs when the time comes for their review.

3.2 Building Local Amenity

Advertising signage does not just include billboards, it also encompasses street furniture such as transit advertising (for example at train stations) as well as advertising on payphones, in lifts and in shopping centres.

OOH advertising pays for local infrastructure and amenities, and their maintenance, benefiting local communities without costing the public purse.

In addition, the development of OOH advertising structures often includes funding for other community benefits, such as green spaces, playgrounds or road repairs, subsidising or fully funding public infrastructure such as pedestrian bridges, bus shelters, public toilets, kiosks, bins and park benches.

As well as the funding, building and maintenance of these amenities, OOH advertising provides an information medium that is agile, adaptive and able to meet the needs of a broad range of messaging. This includes local wayfinding, public service information including emergency messaging and the promotion of local services and businesses.

3.3 Supporting local businesses and community groups

The proposed Employment Zones should allow for the incorporation of appropriate advertising signage because they provide a mix of industrial, commercial and recreation areas. They will be the heart of the community and economy of the local area and a place where the community comes together.

Business and industrial zones are the backbone of the local economy. They are the ideal location for advertising signage which supports the local economy by allowing local traders to advertise their goods and services.

It should also be noted that advertising structures can provide an important second income stream for building owners who choose to use the façade of their buildings in this way. The OOH advertising industry provides significant returns to private landlords through the leasing of advertising structures. Especially now, as NSW works towards economic recovery from the COVID-19 pandemic, providing opportunities for passive income to local business operators is more prudent than ever.

3.4 OOH advertising gives back

Unlike other advertising industries in Australia, the OOH advertising industry returns over 50 per cent of its revenue to government, including local government, through rent and taxes.

OOH advertising's significant contribution to government revenue also helps to fund essential improvements to roads and infrastructure as well as impactful road safety

campaigns.

The OOH advertising industry in NSW alone makes a \$136 million economic contribution, a \$20 million charitable contribution and builds and maintains over 6,382 pieces of public infrastructure.

Importantly, the industry also supports over 2,500 jobs. For every person directly employed by the OOH advertising industry, another two people are indirectly employed. This is because advertising supports jobs by helping businesses connect with their consumers, benefitting the local economy.

The vast majority of OOH advertising businesses are Australian owned, small to medium enterprises, so the revenue remains in Australia and contributes right back to local communities.

The OOH advertising industry also donates over \$92 million across Australia to over 140 not for profit organisations, supporting local arts, sports and cultural causes.

3.5 OOH supports strong communities

OOH advertising contributes to the community through more than just economic benefits. OOH advertising is a useful tool for community messaging. During the COVID-19 pandemic, OOH advertising was an essential tool for communicating health messaging to the public when they needed it most – when they were out and about.

In addition to this important public health messaging, OOH advertising can be used to share important community messaging. For example, the OMA is working with the Australian Federal Police to roll out a pilot program for pushing Amber Alerts – alerts for missing children – onto OOH advertising in real time, directly to the communities and places from which they are missing and/or thought to be in.

3.6 OOH is a responsible industry

Although OOH advertising is a very public medium, the industry takes the issue of meeting community standards, particularly with regard to the content of OOH advertising, very seriously.

The desire for a sustainable self-regulated industry led to the development of the OMA Code of Ethics and seven policies that guide members and ensure they operate their businesses responsibly.

The industry is also bound by the AANA Code of Ethics and a suite of codes which govern the content and placement of all types of advertising.

Compliance with all of these codes is a condition of membership for OMA members and it should be noted that there has been an incredibly low number of complaints and breaches in OOH advertising. In 2019, billboards represented just 4.03% of complaints to the Ad Standards board and only one campaign was found to be in breach. This content was immediately removed from circulation.

The OOH advertising industry has demonstrated a willingness to respond to community standards with the introduction of policies such as the OMA Placement Policy. This policy restricts advertising for alcohol, gaming, wagering and sexual products and services from being placed within 150m of a primary or secondary school. This is to meet community expectations that those types of advertising are not appropriate for younger audiences.

The OMA recently expanded this policy to preclude the display of advertising for certain less-healthy food and drink choices around schools. This was in direct response to community and government priorities around tackling the growing problem of childhood obesity in Australia.

The OOH advertising industry has an exemplary record of managing compliance with these codes and continues to ensure that internal policies remain fit for purpose while meeting community standards.

04 OTHER MATTERS

4.1 Definition of Kiosk

The OMA does not support the change to the definition of 'Kiosk' contained in the Dictionary section of the SI. The broad definition of kiosk, through the inclusion of the words 'and the like' allows for future, innovative uses of kiosks to be captured in an LEP. The OMA submits that the definition should remain unchanged.

05 CONCLUSION

OOH advertising is an important part of creating vibrant and useful public spaces. OOH advertising can significantly contribute to the amenity of a local area, providing support for local businesses through the provision of advertising space as well as important public communications and other community services. The industry gives back to councils, government and communities and with appropriate regulation will assist NSW council areas to grow.

The OMA recommends that Advertising Signage be included in the SI as permitted with consent in certain appropriate zones.

This will allow councils to opt out of having advertising signage permitted if they wish, while allowing those that do not wish to opt out to reap the benefits of OOH advertising for their communities.

06 THE OUTDOOR MEDIA ASSOCIATION

The OMA is the national peak industry body that represents 80 per cent of Australia's traditional and digital OOH media display companies and production facilities. Part of the role of the OMA is to help develop and advocate for policy and regulation for OOH advertising that is fair and equitable to governments, the community and the industry. The

industry's aim is to deliver high quality, well-designed and innovative signage that provides economic and utility benefits to communities.

07 FURTHER INFORMATION

For more information please contact:

Kirsten Samuels

Senior Policy Advisor

Outdoor Media Association

kirsten.samuels@oma.org.au

02 9357 9900