

# DRAFT LIVERPOOL LOCAL ENVIRONMENTAL PLAN 2008 (AMENDMENT 69)

## Submission from the Outdoor Media Association

### 01 INTRODUCTION

The Outdoor Media Association (OMA) thanks Liverpool City Council for the opportunity to make comment on the Draft Liverpool Local Environmental Plan 2008 (Amendment 69).

The OMA believes that good outdoor advertising can have a positive effect on the amenity of a local area providing not only economic benefits but also an agile and innovative communication method. This is consistent with Council's vision for Liverpool, "A highly connected and vibrant City, with a strong City Centre supported by a hierarchy of neighbourhood and local centres."

The OMA is largely supportive of the amendment, however, there are a few areas of the proposed Local Environmental Plan (LEP) and Development Control Plan (DCP) that could be improved to deliver on Council's vision. Specifically, a definition of signage is required to differentiate between third party advertising and building/business identification signage.

Further, the OMA submits that the restriction on square meterage of signage is inappropriate when considering industry standard billboard sizes. We recommend that signage be considered on its merits and contribution to the amenity of the local area, rather than a set limit on sizing.

Finally, the OMA is seeking an amendment to the wording of Clause 26.5 (5). Although the OMA accepts that Council wishes to discourage the development of stand-alone structures, the wording of this clause pre-determinately prohibits the building of stand-alone billboards which prejudices Council decision making against what could be better outcomes.

## **02 THE AUSTRALIAN OUT OF HOME ADVERTISING INDUSTRY**

OMA members advertise third party products on digital and traditional signs across a variety of outdoor formats and locations, including airports, billboards, buses, bus shelters office buildings and lifts, pedestrian bridges, railway stations, shopping centres, trains, trams, and street furniture.

OMA members make significant economic contributions to government and the community. Each year, the outdoor advertising industry contributes close to \$647 million to Australia's GDP and supports 3,100 jobs. Most OMA members are Australian owned and operated, with profits going back to the Australian economy. The industry provides a revenue stream to government, including local governments, returning \$1 in every \$2 of revenue in rent and taxes.<sup>1</sup>

In 2019, OMA members donated \$87 million in media services and advertising placement to over 230 community groups and charities.

The industry also delivers essential services and savings having built and now maintaining \$352 million of public infrastructure. The over 17,000 pieces of public infrastructure delivered by OOH make our cities more user-friendly – the industry is investing in innovation and providing digital utility such as Wi-Fi and wayfinding services. OOH 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 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 outdoor 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.

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

## **04 DRAFT AMENDMENT 69 – LIVERPOOL LOCAL ENVIRONMENTAL PLAN 2008**

The OMA believes that good outdoor advertising can greatly contribute to the amenity of a local area, being used not just for advertising but also for information and wayfinding and the promotion of community events and activities.

In addition to the benefits of public amenity, outdoor advertising creates and supports jobs and local businesses and provides a revenue source for the owners of the land on which the media is situated.

Outdoor advertising isn't just billboards and advertising, there are many innovative uses for outdoor media. Due to its public nature and the innovations of digital technology, outdoor advertising provides agile and effective messaging. This was most recently illustrated during the ongoing COVID-19 health crisis where outdoor advertising was used to communicate important social distancing messaging when and where people needed it most – while they were out in public.

The outdoor advertising industry is also very responsive to the need for content to be held to a high standard, given the medium is so public. All outdoor advertising is governed by the AANA Code of Ethics, which ensures all advertising meets and exceeds prevailing community standards.

In addition, OMA members are also bound by several outdoor specific policies and codes such as the OMA placement policy, which bans advertising for alcohol, sexual services, gambling products, unhealthy foods and drinks from within a 150-metre sightline of a primary or secondary school.

The OMA is confident that signage being allowed in the Liverpool City Centre will contribute significantly to the local economy and overall amenity of the area.

### **4.1 Definition of Signage**

The OMA notes the DCP proposes to remove the terms 'building identification signs' and 'business identification signs' and replace them with the all-encompassing 'signs'/'signage'. While the OMA appreciates that this facilitates the inclusion of third party advertising signage within the Liverpool Local Government Area, there is still an important distinction to be made with regard to third party advertising and business/building identification signage.

This is especially important in the context of Clause 26.5 (1) (a) which permits only one sign per land allotment frontage. This could be interpreted in many different ways, but could be taken to mean that only one sign would be allowed, regardless of whether they were business identification signage, building identification signage or a third party advertising sign.

It would be preferable to define what is meant by one sign per lot frontage. It is assumed that the objective is to limit the number of signs at any one property and that having one sign per allotment means it is limited to one third party advertising sign. We therefore request the wording be amended to reflect;

*“a. is limited to a maximum of one third party advertising sign per land allotment frontage”.*

This will ensure that third party advertising signs can be considered where building identification signage and business identification signage already exist on a property.

The OMA acknowledges Council’s concerns about the proliferation of signage in the Council area and that this clause is designed to protect the amenity of the area however, the wording, as it stands, limits the opportunities for suitable properties. Clarifying the wording of the control still ensures adequate protection from the proliferation of signage and does not allude to an automatic approval but rather allows for it to be considered.

#### **4.2 Restrictions on Square Meterage**

The OMA submits that the restriction on square meterage contained in Clause 26.5 (1) (b) is too small to be widely commercially viable as per industry standard billboard sizes.

The outdoor advertising industry is aware of Council’s focus on limiting visual clutter and ensuring that advertising complements the amenity of the area. However, under industry size format billboard measurements, only the smallest possible billboard size would meet the proposed standards.

A ‘Super 8’ billboard measures 8.3m by 2.2m for a total of 18.26m<sup>2</sup>. While these billboards have their place in advertisements and will absolutely contribute and complement the existing aesthetic of the Liverpool Local Government Area, this sizing is not the preferred size by industry standards because their measurements make them less agile and therefore less desirable to advertisers. This makes them less commercially viable.

'Supersites' are mid-sized billboards measuring 12.66m by 3.35m for a total of 42.411m<sup>2</sup>. These billboards are bread and butter to the industry and much more suitable for high-turnover advertisement displays.

Both 'Super 8' and 'Supersite' billboards are also landscape format. The standard size of a portrait-oriented billboard – known as a 'Portrait' – is 8m by 5.3 m for a total of 42.4m<sup>2</sup>. The maximum sizing of billboards contained in the draft DCP will also prevent portrait-oriented billboards from being added to building sides, even where these may be most appropriate.

As the DCP already has a requirement to ensure signage is appropriately sized relative to the size of the building, it seems redundant to also place an upper limit on the total square meterage of a billboard.

As the commercial viability of the advertising structures is directly linked to the planning priorities of the Draft Western City District Plan, namely to encourage economic growth and generate revenue for local businesses, the OMA would encourage Council to consider removing the square meterage requirements or increasing them to allow for the construction of 'Supersites' and 'Portraits' where appropriate.

#### **4.3 Standalone Structures**

Although the OMA understands Council's focus on maintaining the local amenity of the area and not 'cluttering' the city centre with signs, the wording of Clause 26.5 (5) unnecessarily prejudices the outcome of applications relating to stand-alone structures. The wording essentially binds town-planners to reject all stand-alone structure applications and the test of 'civic benefit' is non-defined. This could lead to better proposals that deliver on Council's vision of vibrancy and connectivity being discounted or rejected. The OMA submits that stand-alone structures can provide amenity and they should not be completely ruled out.

#### **4.4 Overall Signage Allowance**

Finally, clarity is required in relation to Clause 26.5 (2). It is unclear what the overall signage allowance refers to.

The OMA acknowledges the overarching goal of the controls in ensuring that advertising does not clutter the city centre, however, it is unclear whether the overall signage allowance refers to the single signage limit referred to in Clause 26.5 (1) (a) or the square meterage limit referred to in Clause 26.5 (1) (b).

Clarity is sought on this matter.

The OMA recommends in place of signage allowance, Council provide positive guidance to encourage merit-based architectural integration. It is possible to achieve excellent design and architectural integration without a prescriptive size limit. Take for example the Young and Jackson building in Melbourne which is approximately 115m<sup>2</sup> – the individual context is key and merit-based assessment can result in integrated, high quality signage.

## **05 CONCLUSION**

The OMA again thanks Council for the opportunity to consult on this matter and believes the inclusion of third party advertising in the Liverpool City Council LEP and DCP will provide great economic benefit and amenity to the council area, consistent with Council’s vision for Liverpool, “A highly connected and vibrant City, with a strong City Centre supported by a hierarchy of neighbourhood and local centres.”

## **05 FURTHER INFORMATION**

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