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24<sup>th</sup> February 2022

To Whom it May Concern,

**RE: FURTHER SUBMISSION IN OPPOSITION TO PROPOSED BILLBOARD – RMA2020/1877**

The following is a further submission in opposition to the application by Wilsons Parking Limited to establish an 18m<sup>2</sup> free-standing digital billboard at 235 Manchester Street, Christchurch.

Our client, Mr Lallu, owns the land adjacent to the application site where there is an existing consent for a mixed residential/commercial development and a total of 68m<sup>2</sup> of static advertising signage located within the northern elevation.

An application is currently being processed for a redesigned building with a smaller 18m<sup>2</sup> digital billboard along the northern façade. It is important to note that the majority of floor space in the proposed building remains intended for residential use.

Despite the ability to install a billboard on his site under the operative consent, Mr Lallu is not considered as trade competition as he is supportive of digital advertising in general but believes that within the central city digital billboards are only appropriate when contained within the façade of a building.

**Summary of Council Position**

The Council's s42a report identified that the key effects of the proposal relate to urban design, traffic and planning considerations. The following provides a brief summary of the s42a conclusions to these matters.

**Urban Design**

The urban design and landscape report prepared by Mr Nicholson made the following conclusions regarding the effects of the proposal on the amenity of the surrounding area:

- a) That the proposal will have adverse effects ranging from low to high on the amenity of sites in the surrounding area with those within close proximity and residential site being most affected;
- b) That the effects of the proposal when viewed from residential activity would reduce the quality of the outlook from existing and future development in the surrounding area;
- c) The proposed billboard is not considered to enliven the space or result in a more orderly or coordinated display;
- d) That in order to mitigate the adverse effects of the proposal conditions would need to be imposed that limiting the duration of the consent and do not allow images to be displayed between midnight and 6am;

### Traffic

An assessment of the effects of the proposed billboard on the safety of the surrounding traffic network was prepared by Axel Downard-Wilke of ViaStrada Ltd. The conclusion of this report is as follows:

- The location of the billboard will result in an overlap with signals of pole 5 at the south-western corner of the Manchester Street and Gloucester Street intersection;
- This may create horizontal overlap in the critical decision zone for southbound drivers;
- For these reasons ViaStrada did not support the application

### Planning

The position of the Council is best summarised by the following comment made by Ms. Georgia Brown:

*“I consider the adverse effects of the proposal in respect to the character and amenity values of the surrounding environment, and visual coherence will be inappropriate in the context of the receiving environment. I reach this decision due to the scale of the billboard and it’s freestanding, and digital nature. It will in my opinion adversely affect the surrounding environment, including the future development in the East Frame, as well as the high-quality pedestrian environment.”*

It was also assessed by Ms Brown that the proposal was inconsistent with objectives and policies for both signage and commercial areas. Specifically, the Council s42a report concluded the proposal was inconsistent with policies 6.8.2.1.3, 6.8.2.1.4, 6.8.2.1.6 and 15.2.6.5 and that the effects on the environment will be more than minor.

These policies are outlined below:

6.8.2.1.3 Policy – Managing the potential effects of signage

- a) *In considering Policies 6.8.2.1.1 and 6.8.2.1.2, ensure that the size, number, height, location, design, appearance and standard of maintenance of signs:*
- i. *do not detract from, and where possible contribute to, the character and visual amenity of the surrounding area and public realm;*
  - ii. *integrate within the façade of the building, do not detract from the integrity of the building design, and maintain the building as the primary visual element;*
  - iii. *are in proportion to the scale of buildings and the size of the site; and*
  - iv. *enhance the Central City.*

6.8.2.1.4 Policy – Transport safety

- a) *Ensure that signs do not cause obstruction and/or distraction for motorists and pedestrians and other road users.*

6.8.2.1.6 Policy – Managing off-site signage

- a) *Limit off-site signs in the sensitive zones specified in Policy 6.8.2.1.2 and to enable such signage where it:*
- i. *is compatible with the surrounding environment and is located within a commercial or industrial context;*
  - ii. *is appropriately maintained;*
  - iii. *will not cause or contribute to visual clutter and other cumulative adverse effects; and*
  - iv. *is consistent with the outcomes sought in Policy 6.8.2.1.3.*

15.2.6.5 Policy – Pedestrian focus

- a) *Ensure compactness, convenience and an enhanced pedestrian environment that is accessible, pleasant, safe and attractive to the public, by:*
- i. *identifying a primary area within which pedestrian orientated activity must front the street;*
  - ii. *requiring development to support a pedestrian focus through controls over building location and continuity, weather protection, height, sunlight admission, and the location of parking areas;*
  - iii. *establishing a slow street traffic environment; and*
  - iv. *ensuring high quality public space design and amenity.*

Reading these policies, and noting the position the Council’s experts have arrived at in terms of urban design, amenity and transport effects, it is not possible for them to conclude that the proposal is consistent with the relevant objectives and policies. We agree with this position, and note that if the proposed billboard was integrated into some form of larger structure, such as a building like many other digital installations elsewhere within the central city, then a different conclusion may well be reached. We offer examples of better incorporated installations of digital signage in Figures 1-5 below:



Figure 1: Digital Billboard at 160 Manchester Street within the Central City Inner Zone Overlay



Figure 2: Digital Billboard at 329 Durham Street North within the Central City Inner Zone Overlay



Figure 3: Digital Billboard at 245 Saint Asaph Street within the Central City Inner Zone Overlay

As demonstrated above there is a precedent for digital billboards within the inner central city to be attached to buildings and it is the position of this submission that this is the appropriate standard for any digital advertising within the central city.

### Consideration of Alternative Environments

In our opinion, free-standing digital billboards similar to the proposal are more appropriate in other commercial and industrial areas where the expected amenity is lower than the Manchester Street site. Examples of this type of signage are given below.



Figure 4: Free-Standing Digital Billboard at 392 Moorhouse Avenue – Commercial Retail Park Zone



Figure 5: Corner of Moorhouse Avenue and Colombo Street where there are several digital billboards either free-standing or outside the facades of a building - Commercial Retail Park and Industrial General Zone

### **Position of Submitter**

While Mr Lallu is generally in support of digital advertising signage in the central city the effect of free-standing signage on the amenity of this area is not supported.

Mr Lallu's position aligns with that of the Council, that the scale and nature of the proposed advertising signage is not appropriate for the surrounding environment. Mr Lallu is of the opinion that digital advertising billboards within the Central City are more appropriate and effective where they are contained within the frame of a building, as demonstrated in the examples provided below:

Given the residential and commercial activities that will be in close proximity to the development we concur with position of the Council and seek that the application be declined.

### **Hearing of this Application**

Upon consideration of the evidence presented by the Council, and the Councils subsequent decision to recommend rejecting the proposal Mr Lallu **no longer wishes to be heard** in support of his submission.

Yours sincerely,



Callum Ross

Planner

**URBIS TPD LIMITED**