

Before a Commissioner  
Appointed by the Christchurch City  
Council

Under the Resource Management Act 1991

In the matter of a resource consent application for a free standing digital  
billboard at 235 Manchester Street (RMA/2020/1877)

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**Statement of Evidence of Anita Clare Collie**

17 February 2022

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**anderson  
lloyd.**

- 1 My full name is Anita Clare Collie.
- 2 I have thirteen years' experience in the field of resource management planning and on numerous occasions have provided planning evidence in proceedings before Local Councils. I hold a Bachelor of Science in Environmental Science (University of Western Australia).
- 3 I am currently employed as a Principal Planner at Town Planning Group and have held that position since 2021. Prior to that, I was a Senior Planner with Town Planning Group since 2017. In this role I am responsible for preparing and overseeing a range of consent proposals for the company's clients, including private development and government agencies. I work with the Christchurch District Plan on a daily basis and I am familiar with its provisions, particularly those relating to the Central City.
- 4 My previous work experience includes working as a planning consultant, in industry applying for and implementing resource consents, and as a Council processing planner.
- 5 My role in relation to Wilson Parking New Zealand's ("**Applicant**") application for consent for signage at 235 Manchester Street, Christchurch ("**application site**") has been to provide advice in relation to resource management planning. My colleague drafted the Assessment of Environment Effects ("**AEE**") report accompanying the Application. I had various conversations with my colleague about this proposal while the application was in process and have familiarised myself with the application history.
- 6 In preparing this statement of evidence I have considered the following documents:
  - (a) the AEE and further information response;
  - (b) the s95A report and appendices;
  - (c) the submissions; and
  - (d) the section 42A report and supporting documents.
- 7 I have visited the application site on several occasions, most recently on 2 February 2022.

### **Code of Conduct for Expert Witnesses**

- 8 While this is not a hearing before the Environment Court, I confirm that I have read the Code of Conduct for expert witnesses contained in the

Environment Court of New Zealand Practice Note 2014 and that I have complied with it when preparing my evidence. Other than when I state I am relying on the advice of another person, this evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

### **Scope of evidence**

- 9 I have prepared evidence in relation to:
- (a) the nature of the proposal;
  - (b) the relevant rules and activity status of the proposal;
  - (c) the existing environment;
  - (d) the effects on the environment;
  - (e) matters raised by submitters to the Application;
  - (f) proposed conditions of consent;
  - (g) the evaluation of the activity against the relevant statutory planning instruments; and
  - (h) the s42A report.

### **Overview and Executive Summary**

- 10 Resource consent is sought to establish a 18m<sup>2</sup> freestanding digital billboard displaying off-site signage, at 235 Manchester Street, Christchurch (the “**application site**”). The digital display will measure 6m high by 3m wide, with the top of the display being 9m above ground level.
- 11 Subsequent to notification and having considered the submissions received, the Applicant amends the application to remove the structure and plants surrounding the digital billboard. This reduces the overall size of the structure to 18m<sup>2</sup> of digital display supported by a single pole.
- 12 The site is located within the Commercial Central City Business Zone and subject to a number of overlays. Resource consent is required for a discretionary activity.
- 13 In my evaluation of the proposal, I have found that:
- (a) The permitted baseline is relevant and allows up to 11m<sup>2</sup> of signage on the site, illumination of signs and 20 lux of light spill. This indicates

that the environment in which the site is located should be expected to contain signage and be a well-lit environment.

- (b) The existing environment is unique, with large areas of undeveloped land following the earthquakes.
- (c) The CCCBZ is anticipated to develop into a highly urban, well lit, busy, commercial environment. Tall buildings, vehicles, public transport, infrastructure and signage will all form part of the receiving environment in time.
- (d) The District Plan enables signage in commercial environments and recognises it as a contributor to Christchurch's recovery by supporting the needs of business.
- (e) The proposed billboard will be noticeable, but not out of context with expected city views considering the commercial character of the receiving environment. The overall effects on visual amenity values are acceptable with regard to the permitted baseline and District Plan anticipated outcomes for the CCCBZ.
- (f) The proposed billboard does not prevent unobstructed views of significant heritage buildings and the effects of the proposed billboard on heritage values are acceptable.
- (g) The proposed billboard does not give rise to any unacceptable adverse effects on transport safety, subject to the mitigation in the proposed conditions.
- (h) A limited consent duration is not proposed by the Applicant and is not necessary to mitigate any adverse effects to an acceptable level.
- (i) The application gives rise to a number of positive effects, including investment into the Christchurch Central City and providing a medium for other businesses to promote their services, and for the display of community messaging.
- (j) Overall, the proposal provides investment into the Central City, contributing to revitalisation and recovery, increasing the intensification of development, maintains transport safety and avoids unanticipated adverse effects on character and visual amenity. For these reasons I consider the proposal to be consistent with the Objectives and Policies in the District Plan.

- (k) The application meets the necessary tests for approval and can be granted subject to the proposed conditions included in my **Attachment [A]**.

### Nature of the Proposal

- 14 Post notification, the Applicant has amended the proposal to remove the surrounding mesh structure. The size and location of the digital display is unchanged from the application. The digital display will be supported by a single pole.
- 15 I note that the removal of the structure surrounding the proposed billboard changes the height of the digital display above pavement level from 2.5m to 3m.
- 16 An updated set of plans and visual package is provided as part of Mr Compton-Moen's urban design evidence. The location and an elevation of the proposed sign is shown in **Figure 1** below.
- 17 I consider the proposed amendment to be within the scope of the application as notified, given the size and location of the digital display is unchanged.

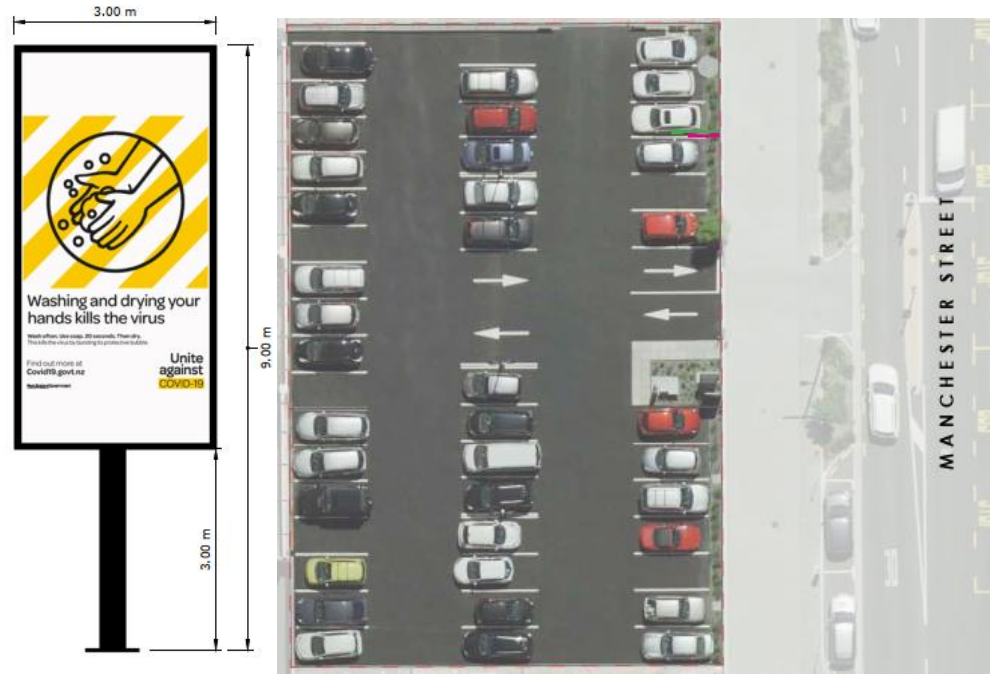


Figure 1: An elevation of the proposed billboard. Location of the proposed billboard at 235 Manchester indicated by green line on the plan view image. (Source: DCM Graphic Attachment)

## Rules and Activity Status

- 18 The proposal is a Discretionary Activity under Rule 6.8.4.1.4 D1 and D2, as it is a digital sign and does not meet all of the built form standards in Rule 6.8.4.2.

## The existing environment

- 19 I generally agree with the description of the existing environment in the AEE, s42A report and Mr Compton-Moen's evidence. I have commented below on differences, additional or key matters.
- 20 The application site is utilised as a car park. The site is sealed, internally lit and with landscaping planted along the road boundaries. A 2.64m<sup>2</sup> digital sign is in place at the vehicle access to the site as authorised by consent RMA/2021/1935.
- 21 The application site and surrounding land is zoned Commercial Central City Business Zone ("**CCCBZ**") under the Christchurch District Plan ("**District Plan**"). The District Plan enables a range of permitted activities in the CCCBZ, however resource consent is required for any built development, including billboards.
- 22 Manchester Street is a Central City Local Distributor and the application site is located in the Central City Core.
- 23 **Figure 2** below depicts the site and some of the surrounding land which I discuss further in my evidence below.



Figure 2: Site and surrounds

### 192 Gloucester Street

- 24 192 Gloucester Street is located to the east of the application site, on the opposite side of Manchester Street. It is currently used as a car parking facility, authorised by resource consent RMA/2020/2633 which expired on 31 December 2021. A consent application has been lodged by the car park operator, seeking to continue to operate the car park until 30 September 2022<sup>1</sup>. The site has been used for car parking since approximately mid-2015<sup>2</sup>.
- 25 Designation V4 applies to 192 Gloucester Street. This Designation relates to the North and East Frame of the Central City and Ōtākaro Limited is the Requiring Authority. A copy of the Designation is appended to my evidence (**Attachment [B]**). In short, the Designation enables a range of residential, open space, retail and recreational activities. This Designation will lapse on 31 July 2022. Ms Brown undertook enquiries and advised me by email on

<sup>1</sup> Consent reference RMA/2022/8, provided by Council Duty Planner on 31/1/2022.

<sup>2</sup> As authorised by RMA/2015/715

28 January 2022 that Ōtākaro Limited intend to lodge a Notice of Requirement to extend the Designation lapse date, though have not yet done so.

- 26 I agree with Ms Brown that residential development - on at least part of this land and to an unknown degree - appears to be a likely outcome. However, at the time of writing my evidence, I cannot consider any residential development on 192 Gloucester Street (or any other undeveloped land in the East Frame) as part of the existing environment because there is no reasonable likelihood of any residential development being constructed prior to the lapsing of the Designation (given that no building consents have been lodged for any such development). I further consider that commercial use of this land is a possible development outcome, as is mixed use development.
- 27 Should an application be lodged to extend the expiry date of the Designation V4, I would consider it reasonable to consider the range of activities listed within the designation (including residential development) to be part of the existing environment, as the development would be able to occur as of right.
- 28 Regardless of the existence of the Designation V4, I do consider residential development on this land to be one of many anticipated outcomes under the District Plan CCCBZ provisions, though the built form (without the designation in place) would be subject to resource consent requirements.

#### 221 Manchester Street

- 29 221 Manchester Street is located immediately to the south of the Applicant's site.
- 30 RMA/2017/467 is a resource consent authorising the development of a three-storey mixed use commercial and residential building, at 221 Manchester Street. This consent also authorises a 55m<sup>2</sup> static billboard on the northern elevation (visible to southbound traffic) and a 13m<sup>2</sup> static billboard on the western elevation of the building (visible to the East Frame land). Condition 3 of the consent requires that the billboards shall only be in place for a maximum of five years following the first occupancy of the building. There are no windows or balconies on the north elevation of the consented building. This consent will lapse on 9 June 2022 and may form part of the existing environment until it lapses if it is more likely than not that it will be implemented. However, I note that the landowner has lodged an application for a different design (see below).



31 RMA/2021/3727 is an application for resource consent lodged for the development of a different design three-storey mixed use commercial and residential building, also at 221 Manchester Street. The application includes an 18m<sup>2</sup> digital billboard on the northern building elevation, proposed for a limited duration of 5 years from the date of first occupancy of the completed building at 221 Manchester Street. The application acknowledges that the billboard can only be in place until built development occurs on the Applicant's site<sup>3</sup>. The processing planner at Council has advised me by email on 31 January 2022 that the notification decision for the application has not yet been made.

### **Assessment of effects**

32 The AEE provided in the application addresses the range of effects that could arise from the proposed billboard.

33 Further to this assessment, this section of my evidence evaluates what I consider to be the key effects of concern raised by the submitters and s42A report:

- (a) Permitted baseline
- (b) The receiving environment
- (c) Character and visual amenity values
- (d) Heritage effects
- (e) Transport effects
- (f) Precedent
- (g) Duration
- (h) Positive effects

34 I will address each of the matters referred to above in turn.

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<sup>3</sup> RMA/2021/3727 AEE, section 5.3

### Permitted baseline

- 35 Section 5.2 of the AEE sets out the relevant permitted baseline for signage on the site. Page 10 of the s42A report also contains a permitted baseline discussion.
- 36 I agree with the conclusion at paragraph 37 of the s42A report that the District Plan permits 11m<sup>2</sup> of on-site signage on the application site, which is 61% of the area of the proposed billboard. Permitted signage can be illuminated, though the permitted baseline does not include off-site signage, nor digital signage. The difference between the permitted baseline and this application is the digital, off-site and changing nature of the signage, and the area of signage is 7m<sup>2</sup> greater than the permitted baseline.
- 37 A visual representation of the permitted baseline is provided in Mr Compton-Moen's evidence, shown in **Figure 3** below. The permitted signage shown in **Figure 3** is only a permitted vehicle access sign. One additional 2m<sup>2</sup> pedestrian access sign also forms part of the permitted baseline. The visual representation of the permitted baseline is therefore a conservative scenario.



*Figure 3: Visual representation of 9m<sup>2</sup> of permitted signage. (Source: DCM Graphic Attachment)*

- 38 The District Plan permits outdoor lighting, including the illumination of signs (though not flashing or intermittently illuminated signs, nor digital signs),

provided the illumination is not directed at the windows of habitable spaces of sensitive activities and does not cause light spill of 20.0 lux horizontally or vertically<sup>4</sup>. I note that the CCCBZ has one of the highest permitted light spill standards by zone in the District Plan. The light spill proposed in the application is 10 lux horizontally or vertically, which is half of the permitted baseline.

39 In my opinion:

- (a) Up to 11m<sup>2</sup> of signage permitted on the site, which is 61% of the size of that proposed. This indicates that smaller signs in this location are accepted in this environment.
- (b) The environment in which the site is located should be expected to be a well-lit environment.

### The Receiving Environment

40 The receiving environment includes the environment as it physically exists, however District Plan provisions assist our understanding of the anticipated environmental outcomes for the CCCBZ. This is particularly relevant given the unique existing environment, comprising large areas of undeveloped land and temporary land uses, resulting from the Canterbury Earthquakes.

41 Any new building within the CCCBZ would require resource consent for a controlled activity as a minimum, and as such there is no permitted baseline in respect of built form on the application site. The District Plan enables a new building on the site as a controlled activity, subject to the built form standards in Rule 15.10.2. I summarise the key criteria which would relate to the scale of a potential built development on the application site as follows:

- (a) The first and second floors of the building must be built up to the road boundary, across the entire width of the site (except for one vehicle crossing).
- (b) The building must be at least two floors high and may be up to 28m high.

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<sup>4</sup> Rule 6.3.4.1 P1 and Rule 6.3.5.1 P1

- (c) At the maximum road wall height of 21 metres, a 45 degree recession plane angles in from the road boundary.
- 42 The District Plan anticipates a multi-storey built form on the site, of substantial scale and occupying the majority of the site area. Signage could then be established on this potential building up to 9 metres above ground level with an area of 0.5 x the building frontage length as a permitted activity. These types of built form and signage outcomes are commonplace throughout the zone and Central City, and therefore in my opinion, are a reasonable expectation for the future environment.
- 43 The District Plan anticipates concentrated development and a wide range of activities in the CCCBZ including retail, commercial, residential, entertainment, recreational, community, healthcare, office, spiritual activities, and others.
- 44 Mr Compton-Moen describes the receiving environment in his evidence as a dynamic, urban area, currently "*defined by its significant amounts of roading, traffic including bus movements, signage, lighting and additional infrastructure*"<sup>5</sup>.
- 45 I have considered the number and size of 'sites' in the surrounding environment to assist in the understanding of the scale and density of signage anticipated in the CCCBZ. There are currently at least 4 'sites' on the western side of Manchester Street between Worcester Street and Gloucester Street, as shown in **Figure 4** below.

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<sup>5</sup> David Compton-Moen evidence, para 14

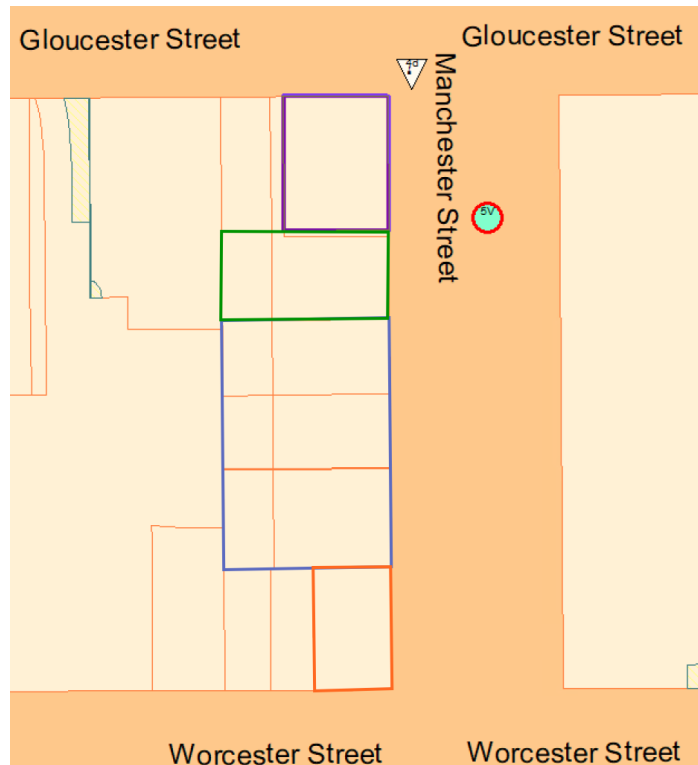


Figure 4: Land ownership along the western side of Manchester Street identified by different colour polygons

- 46 The block is approximately 100m long and therefore people in the receiving environment could expect to see up to 11m<sup>2</sup> of permitted signage on average every 25m. This assists in understanding the scale and density of signage that is permitted by the District Plan within the surrounding environment. This is much greater than the signage that is permitted by the District Plan within Residential and Open Space Zones.
- 47 At paragraph 38 of the s42A report, Ms Brown considers that digital signage located internal to a building does not form part of the permitted baseline, as resource consent would be required for the building. I consider that this type of permitted digital signage can be expected in the CCCBZ as it could be installed within existing buildings in the surrounding environment. The installation of digital signage inside the building and displayed toward the public realm, is a realistic scenario given several Central City businesses currently utilise this type of display<sup>6</sup>. This type of digital signage does not

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<sup>6</sup> A brief walk on 16 February 2022 confirmed that the following businesses in the vicinity of Cashel and Colombo Streets in the CCCBZ were observed to have digital displays in their windows, oriented to the public footpath: Alchemy Equipment, Country Road, BNZ, General Pants Co., Kathmandu, The Crossing; Mecca, Spark, Vodafone, Witchery, Kiwibank and TSB. This is not an exhaustive list.

form part of the permitted baseline for the application site as there is currently no building.

48 In my opinion:

- (a) The existing environment is unique, with large areas of undeveloped land following the earthquakes. Redevelopment of the vacant land will occur, but the timing is uncertain.
- (b) The CCCBZ is anticipated to develop into a highly urban, well lit, busy, commercial environment. Tall buildings, vehicles, public transport, infrastructure and signage will all form part of the receiving environment in time.
- (c) The CCCBZ comprises small sites, and each is permitted signage. This indicates that a reasonably dense array of signage within the surrounding environment should be expected.

#### Character and visual amenity values

49 In terms of the structure of this part of my assessment, I first address the effects on the environment of the luminance, size, digital nature and off-site nature of the proposed billboard, with due regard to the permitted baseline. I will then address the effects on the overall character and visual amenity values from specific locations.

50 I note that the application provides mitigation for the visual effects of the proposed billboard in the form of restrictions on luminance levels (both day and night time), the nature of imagery on the billboard, image transition, and light spill. These mitigation measures are contained within the draft conditions attached to my evidence (**Attachment [A]**), and I consider them to be representative of industry good practise.

#### *Luminance*

51 Mr Nicholson recommends lower luminance levels for the billboard than proposed in the draft conditions and that the digital billboard be switched off between 12am-6am to reduce the degree of visual impact.

- 52 Mr Compton-Moen considers the proposed luminance levels to be appropriate for the receiving environment<sup>7</sup>.
- 53 In my opinion, the luminance of the proposed digital billboard will not create adverse effects that are unacceptable. My reasons for this conclusion are as follows:
- (a) The light spill will be half that permitted by the District Plan in the CCCBZ.
  - (b) The receiving environment is well lit, and lighting is expected within the receiving environment (with reference to my paragraphs 38 and 39 above).
  - (c) I agree with and accept Mr Compton-Moen's assessment that the luminance values proposed align with current industry good practice to avoid unacceptable adverse effects.

*Size*

- 54 I have considered the effects of the size of the sign. The removal of the mesh frame around the billboard reduces the overall size of the structure from 36m<sup>2</sup> to 18m<sup>2</sup> plus the support pole. The bulk of the structure is decreased by approximately 50%. I note that the permitted baseline enables signage on the site up to approximately 60% of the size of the proposed billboard.
- 55 I note Mr Nicholson raises concerns about the size of the sign<sup>8</sup> and the gap between the proposed size and the permitted baseline. Mr Nicholson concludes that the size of the sign will detract from visual enjoyment of the city views. The permitted baseline provides an acceptable level of effect, and after this, effects are not automatically unacceptable, but a resource consent is required and site-specific assessment occurs, as is the case with this application.
- 56 Mr Compton-Moen does not consider the size of the sign inappropriate in the context of the receiving environment, noting that the existing receiving environment is highly urban and dynamic, dominated by vehicles and infrastructure, and that the anticipated built form to develop is likely to be

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<sup>7</sup> David Compton-Moen evidence, paragraph 35

<sup>8</sup> S42A Report, Appendix 1A, paragraph 11.2, page 13 and paragraph 11.4, page 14

between two and seven storeys high<sup>9</sup>. Mr Nicholson also expects built form on the site between two and seven storeys tall<sup>10</sup>.

- 57 I have taken into account the scale of built form existing to the west, which provides a backdrop for the billboard when viewed from several angles. I have also taken into consideration the scale of built form anticipated by the District Plan in the receiving environment. Having considered these factors, I do not consider that the proposed digital billboard is excessively large, nor out of scale with the receiving environment.

*Digital and off-site signage*

- 58 The introduction of off-site digital advertising has the potential to create visual clutter resulting in cumulative adverse effects. Digital signs also have changing images.
- 59 Mr Nicholson notes in regard to the digital nature of the sign that changing images and associated changes in colour / luminance create an illusion of movement, and considers that this would adversely affect the character and visual amenity of residential activities at 192 and 198 Gloucester Street<sup>11</sup>.
- 60 Mr Compton-Moen considers the proposed billboard to be compatible with the surrounding environment and considering the commercial context, will not cause or contribute to visual clutter<sup>12</sup>.
- 61 I note there are few signs in the surrounding environment as it exists currently, though the District Plan permits some on-site signage in the surrounding CCCBZ. Noting the presence of the consented digital and off-site signage in the receiving environment (which is detailed in the s42A report so I will not duplicate that here), and noting that any further digital and off site signage would require resource consent, I do not consider that this proposed digital billboard will create an unacceptable level of visual clutter. Ms Brown and I agree on this point<sup>13</sup>.
- 62 In regard to the digital nature of the sign, and changing images, I do not consider that any view of the proposed billboard from a residential or open

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<sup>9</sup> David Compton-Moen evidence, paragraph 19 and 24

<sup>10</sup> S42A Report, Appendix 1A, paragraph 7.8, page 9

<sup>11</sup> S42A Report, Appendix 1A, paragraph 11.5, page 14

<sup>12</sup> David Compton-Moen evidence, paragraph 25

<sup>13</sup> S42A report, paragraph 113, page 22.



space land use automatically creates an adverse effect. The facts of the individual situation must be considered. I discuss this further in terms of the specific effects on viewers from different locations below.

*General effects on viewers*

- 63 Mr Nicholson and Mr Compton-Moen have both considered the effects of the proposed billboard on character and visual amenity values from a common set of viewpoints, but with substantially different conclusions.
- 64 On the NZILA's Aotearoa New Zealand Landscape Assessment Guidelines Mr Nicholson considers that the adverse effects are high (corresponding to 'more than minor' in an RMA context) on key viewpoints from the western footpath of Manchester Street within 50 metres of the proposed billboard, from the Manchester Street super stop for bus patrons and for future residential development at 192 Gloucester Street.
- 65 In my review of Mr Nicholson's memo, I find the basis for his assessment of effects on residential activity to be problematic for the following reasons:
- (a) His assessment takes account of Policy 6.8.2.1.2, which Ms Brown and I agree does not apply to this proposal, and sets a different standard to character and visual amenity value outcomes for residential and open space zones.
  - (b) Paragraph 11.14 identifies the application site as a sensitive location. In terms of the definitions provided in the Council Practice Note<sup>14</sup>, I do not agree that the application site is a sensitive location.
  - (c) Paragraph 11.2 refers to the proximity of residential zones to commercial zones. There are no relevant residential zones to consider.
- 66 I consider Mr Nicholson's assessment may give undue protection to character and visual amenity values for residential and open space land uses, and does not give sufficient weight to the commercial nature of the receiving environment as anticipated in the District Plan. I do agree with Mr Nicholson that the Manchester Street public space has been upgraded and is of high quality.

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<sup>14</sup> Christchurch City Council Billboard Practice Note, 6/8/2021, <https://ccc.govt.nz/assets/Documents/Consents-and-Licences/resource-consents/PN-03-2021-Billboard-practice-note.pdf>

- 67 Mr Compton-Moen considers the effects on character and visual amenity from all viewpoints to be low, that is they are discernible, but do not adversely affect the viewer experience<sup>15</sup>.
- 68 It is apparent that Mr Nicholson and Mr Compton-Moen do not disagree on the degree of visibility of the proposed billboard. Their disagreement is in regard to how views of the billboard impact the viewer and arise from their consideration of effects within different anticipated development contexts. Mr Nicholson's assessment is in the context of a sensitive residential and open space receiving environment. Mr Compton-Moen's assessment is in the context of a commercial receiving environment, which I consider to be more aligned with the anticipated outcomes in the District Plan.

*Views from proximate public spaces*

- 69 I have considered the effects on persons viewing the proposed digital billboard from proximate public spaces; the Manchester Street footpath areas, bus patrons and people waiting at the super-stop.
- 70 I note Mr Nicholson's conclusion that the sign will be visually dominant, and he equates this to a high adverse effect. With reference to the visual representations of the permitted baseline scenario in the DCM Graphic Attachment, I consider that any permitted 9m<sup>2</sup> freestanding illuminated sign could also be considered visually dominant, and this is an important consideration in determining the degree of effect on the character and visual amenity of the receiving environment.
- 71 Mr Compton-Moen states that the sign will be viewed against the backdrop of the commercial buildings to the west from most viewpoints, and I consider this will reduce the visual dominance of the billboard.
- 72 The changing nature of the digital images will attract attention, however I do not necessarily equate this to an adverse effect. I note that the base of the proposed billboard will be 3m above ground level, being above eye level for pedestrians who are very close to the proposed billboard. I note that persons at the super stop will have side-on or oblique views of the proposed billboard, and that these will be against the backdrop of the existing commercial buildings to the west.

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<sup>15</sup> David Compton-Moen evidence, para 26

73 For these reasons, I do not consider that the proposed billboard will be visually dominant to an unexpected or obtrusive degree for proximate pedestrians and users of the super stop.

*Views from the East Frame*

74 In regard to the effects on the East Frame land, with particular regard to 192 Gloucester Street, I have considered the following factors:

- (a) Ōtākaro Ltd (the landowner) and Fletcher Residential Ltd (the developer) were served notice but have not made a submission.
- (b) The separation distance is approximately 30m at the closest point of 192 Gloucester Street, directly opposite the proposed billboard, though in this location any views of the billboard will be side-on and viewed against the commercial buildings to the west (refer to DCM Graphic Attachment, View Point 4).
- (c) At the northern and southern-most ends of 192 Gloucester Street, the separation distance is approximately 55m. Any views of the billboard will be angled, not direct. These views would be less prominent than represented by View Points 5a and 5c in the DCM Graphic Attachment, as the View Points 5a and 5c are closer to the proposed billboard location but on a similar angle.
- (d) West-facing views from the East Frame land directly adjoining Manchester Street are of an urban environment, including large commercial buildings, signage and illumination. While the block that the application site is on is largely undeveloped currently, a commercial built environment is likely to re-establish in time.
- (e) Mr Nicholson is concerned that the proposed billboard will “*distract from the visual enjoyment of the city views*”<sup>16</sup> from this location.
- (f) Mr Compton-Moen identifies the billboard as a small element within the wider city view<sup>17</sup>.

75 I do not consider the proposed billboard to be out of context with city views. I consider signage and illumination to be expected components of city views (with reference to my paragraphs 39 and 48). Even the changing imagery I

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<sup>16</sup> S42A Report, Appendix 1A, paragraph 11.4, page 14

<sup>17</sup> David Compton-Moen evidence, paragraph 29

do not consider to be out of context with city views, as elements within the city are dynamic. There is much movement and change in an urban commercial landscape.

*Overall consideration of effects on character and visual amenity effects*

- 76 In my overall consideration of the effects on character and visual amenity values, I note the following key matters:
- (a) The density of signage and brightness of lighting that forms the permitted baseline in the CCCBZ, leads me to conclude that views of signs, including illuminated signs, and bright lights are anticipated in the receiving environment. Views of these elements cannot automatically create an adverse visual effect.
  - (b) Views of billboards in the CCCBZ are not unanticipated or unusual and I do not consider this proposed billboard to detract from the commercial character of the environment, subject to the mitigation proposed in the draft conditions.
  - (c) The public spaces in the receiving environment have been upgraded and are of a high quality. The private land in the receiving environment is dominated by vacant land and off-street car parking lots. The proposed billboard would add a new structure to the environment in a location that lacks built development.
  - (d) Based on my site visit and the visual illustration package provided by DCM, I agree that from multiple public viewpoints, the tall commercial buildings to the west form a backdrop to views of the proposed billboard. I also agree that the billboard is of a similar scale to other structures within the same viewshed.
  - (e) The application was publicly notified and no submissions have been received from any residents with potential views of the proposed billboard.
- 77 For guidance on the acceptable character visual amenity outcomes for the CCCBZ, I have referred to the relevant objectives and policies, which I discuss in detail below (see paragraph 125 onwards).
- 78 I agree with Ms Brown that Policy 6.8.2.1.2, which affords a high standard of protection of character and amenity values from the adverse effects of signage to residential or open space zones, is not applicable to this application. The District Plan provides for residential and open space land uses in the CCCBZ but does not specify any unique character or visual

amenity outcomes for those types of land uses (except that lights should not be directed into windows of sensitive activities, which is not the case here). I consider that the appropriate standard of character and visual amenity values for views from residential and open space land uses within the CCCBZ, are the same as from a commercial activity. This is different to the expectation of character and visual amenity values of a residential or open space zone.

- 79 While Designation V4 enables the East Frame development, it does not change the planning framework that applies to this application. To this end, I have considered the effects on the Designation V4 land on the basis that it enables residential (and other) activity in a commercial zone.
- 80 Relevant objectives and policies (discussed in specific detail in paragraphs 126 to 137 below) seek that signage does not “*detract from, and where possible contribute to, the character and visual amenity of the surrounding area and public realm*”<sup>18</sup> and that it enhances “*the visual amenity values and character of the surrounding area, building or structures*”<sup>19</sup>. Further, signage is enabled in commercial environments and recognised as a contributor to Christchurch’s recovery by supporting the needs of business.<sup>20</sup>
- 81 Taking guidance from the planning framework as outlined above, I determine that the appropriate approach is to assess the effects on the commercial character and commercial visual amenity values of the receiving environment. The nature of this has been discussed above in my paragraphs 40 to 48 and in Mr Compton-Moen’s evidence<sup>21</sup>.
- 82 I consider that the proposed billboard will be noticeable to occupants at 192 Gloucester Street. I do not consider that views of the billboard will be dominant considering the scale of the surrounding built form and side-on or angled views, nor out of context with expected city views.
- 83 I consider that the proposed billboard will be noticeable to pedestrians, bus patrons and users of the super stop. I consider all these receivers to be transitory, though patrons at the super stop may retain views of the billboard

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<sup>18</sup> Policy 6.8.2.1.3a.i.

<sup>19</sup> Objective 6.8.2.1

<sup>20</sup> Objective 6.8.2.1a.i., Policy 6.8.2.1.1a.i. and Policy 6.8.2.1.6a.i.

<sup>21</sup> David Compton-Moen evidence, paragraphs 14-20

for longer periods of time than pedestrians or people on a bus. I consider that the proposed billboard will not obscure other city views; these remain available. Again, I do not consider the proposed billboard to be out of context with expected city views. I consider that the billboard is likely to dominate views of pedestrians walking on the western Manchester Street footpath within a limited catchment, though I do not consider this to be a significant adverse effect due to the transitory nature of the view and elevation of the billboard above eye level. I consider that the proposed billboard will be less dominant to patrons at the super stop due to the angled nature of views.

- 84 For completeness, I note that I have considered the adverse effects from other viewpoints to be lesser than from the viewpoints I have specifically addressed above.
- 85 On the basis of the above, I conclude that the effects of the proposed billboard on character and visual amenity values are acceptable.

#### Heritage effects

- 86 Objective 9.3.2.1.1 seeks to protect the overall contribution of historic heritage to the Christchurch District's character and identity.
- 87 A number of heritage buildings are located near the corner of Manchester and Worcester Streets, as shown in **Figure 5** below. A description of the heritage items and settings is contained within Appendix 1C of the s42A report, in the Memorandum authored by Suzanne Richmond, Heritage Advisor in the Council Planning and Consents Unit. I accept her description of the heritage elements in the surrounding environment.



Figure 5: District Plan heritage items and settings noted in purple outline, application site in black outline.

- 88 I have read the advice of Ms Richmond appended to the s42A report. She notes that the billboard has either limited or no effect on views of heritage buildings from the south and east. I agree with her reasoning and accept her conclusions.
- 89 Ms Richmond identifies that there is an important group of scheduled heritage items on the southwest corner of Manchester Street and Worcester Street. She considers that views of these buildings from the north from Manchester Street will be impacted to some extent, though not significantly<sup>22</sup>. The proposed billboard features in some, but not all significant views of these buildings. Unobstructed views of these buildings are possible from the north after passing the proposed billboard<sup>23</sup>.
- 90 With respect to the above-mentioned points, I agree with Ms Richmond’s reasons and accept her conclusions.
- 91 Ms Richmond further states:

*“It is important to note that the unobstructed views to the heritage buildings from the north are temporary views which have only opened up since earthquake demolitions in the block containing the application site, and the expectation is that once this block*

<sup>22</sup> S42A report, Appendix 1C, page 1

<sup>23</sup> S42A report, Appendix 1C, page 2

*is redeveloped these views will again no longer be possible. The placement of the proposed billboard mid-block is anticipated to be temporary for the duration of the associated carpark use, and it could be expected that buildings will eventually be built along this frontage which will make it redundant.*<sup>24</sup>

- 92 I disagree with Ms Richmond's point quoted above that the proposed billboard is anticipated to be temporary. It may be temporary, however the application does not propose a limited duration, nor is it impossible that a building may be developed on the site incorporating the proposed billboard. I have undertaken my assessment of effects on the basis that the consent duration is not limited.
- 93 Ms Richmond makes a comparison to a billboard authorised by consent RMA/2017/467 on the adjacent site to the south, which is authorised for a period of five years. This consent authorises a billboard on the northern façade of the consented building. It will effectively be built out when a building is constructed on the adjacent land. This provides an important distinction between the two proposals.
- 94 I consider that any effects of the proposed billboard on views of heritage buildings are likely to decrease as time passes. The redevelopment of surrounding vacant land, particularly 221 Manchester Street, will further restrict views of the cluster of heritage buildings located on the corner of Worcester Street and Manchester Street from Manchester Street north of the proposed billboard. Effectively, opportunities for the billboard and the heritage buildings to form part of the same view reduce as redevelopment occurs. Therefore, there is no effects mitigation purpose served by limiting the proposed duration of this consent.
- 95 Considering that the billboard does not prevent unobstructed views of the cluster of significant heritage buildings on Worcester Street and Manchester Streets, and that it will have either limited or no effect on views of heritage buildings from the south and east, I consider that the effects of the proposed billboard on heritage values are acceptable.

#### Transport effects

- 96 I have reviewed the evidence of Mr Carr and Mr Downard-Wilke. I understand that the two experts agree that no more than minor transport

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<sup>24</sup> S42A report, Appendix 1C, page 2



safety effects arise from the south facing billboard. Issues in contention relate to the north facing billboard.

- 97 Mr Downard-Wilke and Mr Carr agree that there is no visual overlap of the billboard and traffic signals in the critical decision zone, for traffic travelling southbound in the general traffic lane through the Gloucester Street / Manchester Street intersection. This includes drivers traveling straight through the intersection, and those turning right into Gloucester Street.
- 98 Mr Downard-Wilke and Mr Carr agree that there is a visual overlap of the billboard and one of the traffic signals ("**signal pole 5**"), for drivers traveling southbound in the kerb side lane, while in the critical decision zone for the Gloucester Street / Manchester Street intersection. The experts disagree on what degree of effect on transport safety this creates.
- 99 Mr Downard-Wilke further identifies that the vertical position of the driver may influence the degree of visual overlap between the signal pole and the billboard. Mr Carr has assessed the visual overlap in the vertical plane in his evidence and has concluded that it does not change the position of visual overlap for southbound drivers<sup>25</sup>. I accept his assessment and conclude that the vertical position of the driver is immaterial to the effects assessment.
- 100 Mr Downard-Wilke and Mr Carr agree that the primary function of signal pole 5 is to indicate to stopped traffic when they may start driving, though Mr Downard-Wilke considers that drivers may use signals in the real world, in a different way to the purpose that they are designed for. Mr Carr notes that by necessity, design guides and driver behaviours are generally well aligned, and that drivers will also take input from the other signals in their field of vision<sup>26</sup>.
- 101 I summarise the concerns raised by Mr Downard-Wilke as follows:
- (a) He considers that drivers in the kerb side lane may be looking at signal pole 5 (the secondary signal) to determine whether or not to stop at the intersection.
  - (b) The traffic signals may change at the same time as the billboard image changes, while the driver is in the critical decision zone,

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<sup>25</sup> Andy Carr evidence, paragraphs 37-48

<sup>26</sup> Andy Carr evidence, paragraph 88

potentially reducing the visual stimulus to the driver and reducing their ability to identify and react to the change in traffic signal.

- (c) Colour-blind drivers may be particularly affected by the above scenario, and may not receive sufficient visual stimulus, reducing their ability to identify and react to the change in traffic signal.

102 Mr Downard-Wilke considers that *“it should be avoided to have an electronic billboard form the backdrop to any traffic signal display while a driver travels through a critical decision zone.”*<sup>27</sup>

103 Mr Carr has responded to the above concerns as follows:

- (a) He considers that it is unlikely that drivers in the kerbside land will be looking solely at signal pole 5, given its position diametrically opposite the intersection for drivers in the kerbside lane, and considering that the primary and primary overhead signals are closer, and therefore larger and more prominent in the drivers’ visual field.
- (b) The billboard and traffic signal will infrequently change at the same time, as the timing of the changes to the billboard and traffic lanterns will be out of phase with each other.
- (c) A driver is very unlikely to confuse the signal head with the billboard as the signal head will appear to move in front of the billboard, and there is a black backing surrounding the lanterns on the signal head.
- (d) Mr Carr has provided a detailed response to Mr Downard-Wilkes concerns about the risks for colour-blind drivers and concludes that *“the number of crashes reported for vision-impaired drivers does not correspond to evidence of a significant adverse road safety effect arising from colour-blindness.”*<sup>28</sup>

104 The increase in crash risk that Mr Downard-Wilke identifies as a concern appears to be subject to a number of adverse factors occurring at the same time<sup>29</sup>. That is, Mr Downard-Wilke is concerned that the proposed digital billboard may increase the crash risk in a situation where a driver is traveling in the kerb side lane, through the critical decision zone, looking at

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<sup>27</sup> Axel Downard-Wilke memorandum dated 31/1/2022, section 3.1.4, page 8

<sup>28</sup> Andy Carr evidence, para 67

<sup>29</sup> Axel Downard-Wilke memorandum dated 31/1/2022, section 3.1.4, page 7-8

the billboard / signal pole 5, and at the same time the billboard and traffic signal both change, and the image of the digital billboard has the same dominant colour as the traffic signal, and the driver is sufficiently distracted that the visual stimulus of the moving signal head with the black backing is not sufficient to register, and the driver does not look at any other signal heads which are more prominent in their visual field. I consider this to be a highly unlikely scenario.

- 105 Should the above very unlikely confluence of adverse factors arise, the question to determine is whether the presence of the digital billboard creates any additional crash risk.
- 106 Mr Carr has reviewed one example of a digital billboard where there is overlap of the primary signal head and the billboard in the driver's visual field in the critical decision area. I note Mr Carr's view that this billboard has more significant risk factors (traffic volume and speed), however no crashes have been recorded as a result of distraction by the billboard<sup>30</sup>.
- 107 While one example is not sufficient basis for a definitive conclusion, it is demonstrative of a real-world example in a New Zealand environment and Mr Carr supports this example with his wider literature review. For these reasons I am inclined to give his conclusions weight and prefer his approach to assessing risk specific to the situation and proposal, over Mr Downard-Wilkes's position of general opposition to any visual overlap between a digital billboard and signal heads in the critical decision zone. Mr Carr concludes that "*it is very unlikely that adverse safety-related effects will arise from the operation of the billboard, and I am able to support the proposed digital billboard from a traffic and transportation perspective.*"<sup>31</sup>
- 108 I have also read and accept the evidence of Mr Harries which further supports the evidence of Mr Carr.
- 109 Proposed consent conditions control the nature of imagery displayed on the billboard so as not to resemble or distract from traffic control devices, or other types of imagery such as moving or flashing images that present a greater risk of distracting drivers. This is essential mitigation in my view.

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<sup>30</sup> Andy Carr evidence, paragraphs 59-60

<sup>31</sup> Andy Carr evidence, paragraphs 105

110 For the above reasons, I conclude that the proposed billboard does not give rise to any unacceptable adverse effects on transport safety.

### Precedent

111 Mr Nicholson has raised a concern about the precedent effect of allowing this digital billboard. Ms Brown in her s42A report does not identify precedent as a matter of concern.

112 I do not consider precedent to be an issue for the following reasons:

- (a) Any digital billboard in the CCCBZ requires resource consent and the application would have to be assessed on its own merits, with the specific issues arising from each proposal needing to be properly evaluated at that time.
- (b) The Council has authorised digital billboards in different locations in the CCCBZ. The application is not unique and billboards of varying forms and functions are common in the Central City. I am also aware of a number of digital billboards that are visible from residential areas that have been granted resource consent<sup>32</sup>.
- (c) This application may limit further off-site digital signage in the local area. There are no other digital billboards in the same viewshed as this proposal. Any future applications will need to consider the cumulative effects of an application in combination with this proposed digital billboard (if granted).
- (d) As set out in the AEE and my evidence, the proposal is not inconsistent with the relevant policy such that approval would create an unexpected outcome.

### Positive effects

113 I refer to the evidence of Mr Turner. The proposed billboard will generate a revenue stream for the Applicant and fuel their reinvestment back into Christchurch.

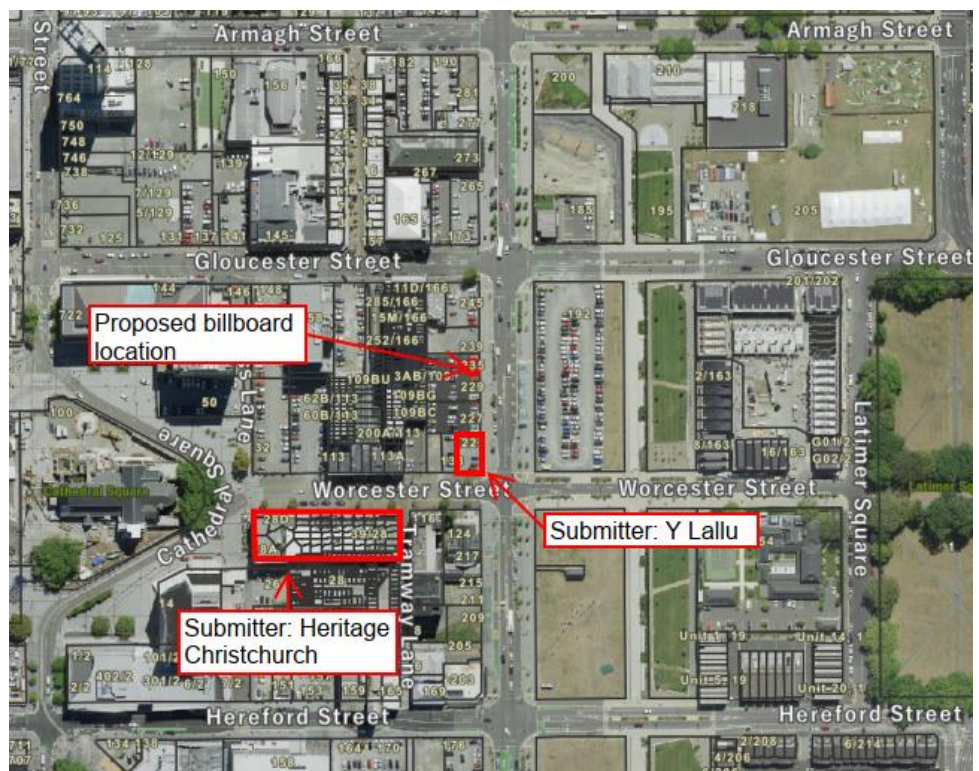
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<sup>32</sup> Examples: 18m<sup>2</sup> single-sided, freestanding digital billboard at 21 Bealey Avenue (RMA/2021/4179). 18m<sup>2</sup> double-sided, wall-mounted digital billboard at 55 Riccarton Road (RMA/2021/1007). 18m<sup>2</sup> single-sided, freestanding digital billboard at 116-118 Tuam Street (RMA/2021/2163). 18m<sup>2</sup> single-sided, freestanding digital billboard at 151 Blenheim Road (RMA/2020/2577).

- 114 I also consider that the proposed billboard will provide a medium for other businesses to promote their services, and for the display of community messaging.
- 115 Mr Compton-Moen states that the proposed billboard will add to the vitality, visual interest and character of the surrounding area<sup>33</sup>.

**Matters raised by submitters**

- 116 Nine submissions were received in total, with eight in opposition and one in support. A number of matters have been raised by submitters. I will address these grouped by common themes. **Figure 6** below depicts the site and the location of the two submitters in proximity to the site.



*Figure 6: Location of two local submitters.*

- 117 One submitter supports the application, but requests that the mesh and plants surrounding the digital display are removed. The Applicant has amended the proposal to give effect to the submitter's request.
- 118 One submission was received opposing the application, but provided no reasons or relief sought. I have given this submission no further

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<sup>33</sup> David Compton-Moen evidence, paragraph 31

consideration given there are no reasons provided for the submitter's opposition.

119 A number of submitters opposed the application on the basis of visual amenity effects, summarised as follows:

- (a) Brindi Joy considers that digital billboard create visual clutter there are enough digital billboards in the city.
- (b) Marilyn Wells raises that digital billboards and advertising intrude on personal space.
- (c) Ian Wells considers that digital advertising adversely affects their view of the urban landscape, preferring to see buildings and landscapes without advertising.
- (d) Katrin McAra finds that a proliferation of bright LED lighting and changing digital images adversely affects people's health and creates visual clutter.
- (e) Maurice Roers considers that the billboard will detract from redevelopment and negatively impact visual amenity and property values.
- (f) Heritage Christchurch is concerned about the scale of the sign in the receiving environment and about the effects of illuminated signage on the visual amenity of their residents and hotel guests.

120 I acknowledge the concerns in regard to the visual amenity effects of the proposed billboard and the opposition to illuminated and digital billboards in general by some submitters. Their concerns may be addressed to a degree by the amendment to the proposal removing of the surrounding structure, which will serve to reduce the bulk of the structure, and controls proposed in respect of imagery and luminance. I note that views of the billboard from the Heritage Hotel will only be possible from a small number of windows at the eastern end, at a distance of 80m, with views from the remainder of the building being blocked by Cathedral Junction (on the northern side of Gloucester Street)<sup>34</sup>. I remain of the view that the proposed billboard is appropriate in the commercial context of the receiving environment.

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<sup>34</sup> David Compton-Moen evidence, paragraph 40

- 121 A number of submitters opposed the application on the basis of transport safety effects<sup>35</sup>, considering digital billboards on the whole to be a distraction to drivers, prevent them from being present and have the potential to create transport safety risks to drivers, cyclists and pedestrians. I have reviewed these submissions carefully and acknowledge the transport safety concerns raised in relation to digital billboards in general. I consider that a thorough and site-specific assessment of the potential for adverse transport safety effects of this particular proposed digital billboard has been undertaken, with my assessment and conclusions in regard to transport safety effects as stated above.
- 122 Yateen Lallu opposes the application, with the reason for opposition provided being that the proposed billboard would render their own proposed billboard redundant. I consider that this submission is beyond the scope of resource management matters that I am able to consider (being trade competition). I note that the summary of submissions in the s42A report provides an incorrect record of the submission that was provided during the notification period. I have attached a copy of the submission that the submitter served on the Applicant (Attachment [C]).
- 123 Heritage Christchurch also opposes the application due to concerns about the effects of the sign on the heritage character of the locality. I note that Heritage Christchurch is part of the cluster of significant heritage buildings on Worcester Street discussed in my evidence above. While there may be some overlap of views of the heritage buildings from Manchester Street north of the proposed billboard, I acknowledge that uninterrupted views of these significant heritage buildings will remain from Manchester Street south of the proposed billboard, and from the west and east.

### **Proposed consent conditions**

- 124 A full set of the conditions that I recommend are included as **Attachment [A]** to my evidence. My assessment of effects above is based on the mitigation measures contained within this draft set of conditions.

### **Evaluation of Objectives and Policies (s104(1)(b))**

- 125 The most relevant planning document is the Christchurch District Plan, noting the discrete nature of the proposal. The District Plan gives effect to the higher order planning documents and there are no relevant National

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<sup>35</sup> Brindi Joy, Marilyn Wells, Ian Wells, Katrin McAra, Maurice Roers

Environmental Standards or National Policy Statements. The relevant District Plan Objectives and Policies are identified and discussed below.

#### Chapter 6.8 Signs

- 126 Objective 6.8.2.1 requires that signage collectively contributes to Christchurch's vitality and recovery, by supporting the needs of business and community activities, maintaining public safety and contribution to Christchurch's vitality and recovery by enhancing the visual amenity and character of the surrounding area, building or structures.
- 127 Policy 6.8.2.1.1 enables signage and recognises it as an integral component of commercial environments. I consider the proposal to be consistent with and enabled by this policy.
- 128 I do not consider Policy 6.8.2.1.2 to be relevant to the proposal as it is not located within a residential, open space or rural zone.
- 129 Policy 6.8.2.1.3 seeks to manage the potential effects of signage. Part i. requires that signs do not detract from, and where possible contribute to, the character and visual amenity of the surrounding area and public realm. I consider this aspect of the policy cannot be read in isolation, but with regard to the nature of the receiving environment. The District Plan permits a degree of signage and illumination, and therefore also the adverse effects associated with these. While there are noticeable effects on character and visual amenity from some viewpoints, these are not to the degree that would inappropriately affect the anticipated visual amenity of the receiving environment.
- 130 Part ii. of the Policy 6.8.2.1.3 has limited relevance to this proposal given there is no building on the site. However I do not consider that the proposed billboard detracts from views of the surrounding buildings, considering it's scale and position.
- 131 Part iii. requires that signs are in proportion to the scale of buildings and the size of the site. Although there are no buildings currently on the site, the District Plan sets a clear direction for the scale of anticipated development on the site and surrounding sites, being up to 28m above ground level. Adjacent sites to the west are developed to heights of between 6 and 75 metres above ground level. I consider that the proposed billboard is small compared to surrounding existing buildings and not larger than the anticipated development of the surrounding vacant land, and no adverse effects in relation to proportion or size arise.



- 132 Part iv. requires that signage enhance the Central City. I agree that this sign will provide additional development, income, visual interest, vibrancy and activity, and thus contributes to enhancing the Central City as the primary commercial centre in the District.
- 133 Overall, I consider the proposal to be consistent with Policy 6.8.2.1.3.
- 134 Policy 6.8.2.1.4 protects transport safety by ensuring signs do not cause obstruction and/or distraction for motorists and pedestrians and other road users. Based on my conclusions in paragraph 110 above I consider that the proposal is consistent with this policy.
- 135 Policy 6.8.2.1.6 seeks to enable off-site signage subject to four criteria. Part i. requires that the signage is compatible with the surrounding environment and is located within a commercial context. This sign is located in the heart of a commercial centre. The District Plan establishes the expectation for signage and illumination in the CCCBZ, and therefore I consider it compatible with the surrounding environment. Part ii. requires that the sign be appropriately maintained. I consider that this can be achieved through appropriate conditions of consent (refer to Attachment [A]). As discussed above in paragraphs xx to xx, the sign will not contribute to visual clutter or adverse cumulative effects, and so I consider that the proposal meets part iii. of the policy. Part iv. refers back to Policy 6.8.2.1.3 which I have assessed above. Overall, I consider that the proposal is not only consistent with Policy 6.8.2.1.6, but also enabled by it.
- 136 I consider that the aspect of Policy 6.8.2.1.6 seeking to limit off site signage is not relevant to this proposal, as it is not located in a sensitive zone specified in policy 6.8.2.1.2.
- 137 Overall I consider the proposal to be consistent with Objective 6.8.2.1 and the supporting policies.

#### Chapter 7 Transport

- 138 I consider the proposal to be consistent with the outcome sought in Objective 7.2.1 for a transport system that is safe and efficient for all transport modes, based on my conclusions in paragraph 110 above.

#### Chapter 9.3 Historic Heritage

- 139 Objective 9.3.2.1.1 seeks to protect the overall contribution of historic heritage to the Christchurch District's character and identity. I consider the proposed digital billboard to be consistent with this outcome, considering the conclusion in my paragraph 95.

## Chapter 15 Commercial

- 140 Objective 15.2.2 seeks to focus commercial activity in centres, with supporting Policy 15.2.2.1 giving primacy to the recovery of the Central City as a focal point for community and business through intensification. Table 15.1 identifies the Central City as the principal employment and business centre for the city and wider region.
- 141 Objective 15.2.4 seeks a scale, form and design of development, consistent with the role of a centre, which recognises the Central City as strategically important focal points for investment. The objective further requires that development contributes to an urban environment that is visually attractive and responds positively to local character and context and manages adverse effects on the surrounding environment.
- 142 The proposal will add investment and activity to the Central City, and for reasons discussed above, is appropriate in the context of local character and amenity.
- 143 Objective 15.2.5 requires a range of activities are supported in the Central City to enhance its vitality, viability and the efficiency of resources. This Objective speaks to the diversity and concentration of activity in the Central City, and the importance of enhancing its vitality and viability. This proposal makes efficient use of resources (land) by the concentration of activity on a site that is currently unoccupied by a building, adding to the viability and vitality of the Central City.
- 144 Objective 15.2.6 and supporting policies are of primary relevance to the application. Objective 15.2.6 seeks that the CCCBZ redevelops as the principal commercial centre for Christchurch and is attractive for businesses, residents, workers and visitors, consistent with the Strategic Direction outcomes for the built environment.
- 145 Policy 15.2.6.1 directs the CCCBZ to provide for the widest range of activities and the greatest concentration and overall scale of built development in Christchurch. This speaks to the intensity, nature and scale of development anticipated for the CCCBZ.
- 146 Policy 15.2.6.3 is key to this proposal in that it sets specific amenity outcomes for the CCCBZ. Amenity outcomes are directed by the supporting parts of the policy. An urban design assessment has been provided with the application and concludes that the visual effects of the proposed billboard are compatible with the receiving environment, being in a

commercial context<sup>36</sup> (point i.). The proposed billboard is lower than the prescribed height limits for the site, and so can be considered to protect the provision of sunlight, and avoidance of overly dominant buildings (and structures) required by point ii. There are no residential zones to consider (points iii. and iv.). The proposal protects the efficiency and safety of the adjacent transport networks as discussed above. Although the proposed billboard does not recognise the values of Ngāi Tūāhuriri/ Ngāi Tahu in its built form, I consider there to be limited ability to do so considering the nature of the structure and note that the proposed billboard does not preclude another built form on the site which would better meet the criteria in point viii. Overall, I conclude that there is no inconsistency with the amenity outcomes sought for the CCCBZ as set out in Policy 15.2.6.3.

- 147 Policy 15.2.6.4 provides for intense residential activity in the CCCBZ. I read this alongside the other commercial objectives and policies and conclude that the District Plan anticipates residential activity to co-exist with intense commercial built form and activity, which would include large commercial buildings, signage and lighting.
- 148 Policy 15.2.6.5 provides for a pedestrian environment that is accessible, pleasant, safe and attractive by achieving the subsequent four limbs of the policy. Parts i., ii. and iii. are not relevant to this proposal. Part iv. requires public spaces to be of high-quality design and amenity. I consider that the public spaces on Manchester Street achieve this. I consider that the standard of amenity of development on private land to be informed by Policy 15.2.6.3. Therefore, I consider Policy 15.2.6.5 has limited relevance to this proposal and that there is no inconsistency with this Policy.
- 149 Overall, I consider that the proposal provides investment into the Central City, contributing to revitalisation and recovery, increasing the intensification of development, maintains transport safety and avoids unanticipated adverse effects on character and visual amenity. For these reasons I consider the proposal to be consistent with the Objectives and Policies in the District Plan.

### **Relevant Other Matters (s104(1)(c))**

- 150 The Greater Christchurch Regeneration Act 2016 Section 60(2) requires that decisions and recommendations on resource consent applications are

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<sup>36</sup> Dave Compton-Moen evidence, paragraph 25

not inconsistent with Recovery Plans and Regeneration Plans. This section has been repealed effective 30 June 2021 and is no longer relevant.

- 151 The Christchurch Central Recovery Plan (“CCRP”) directed changes to the District Plan to give effect to the provisions in the CCRP. I consider that the relevant provisions of the CCRP are incorporated into the District Plan, and have been given due consideration above.

### Comments on s42A report

- 152 I have read the s42A report prepared by Ms Brown, and note that our conclusions differ in respect of the degree of adverse effects on character and visual amenity. Ms Brown prefers Mr Nicholson’s evidence as she does not consider that Mr Compton-Moen has given sufficient weight to the improved local public realm. Mr Compton-Moen’s evidence addresses this matter.

- 153 Ms Brown concludes at paragraph 65 that:

*“Overall I consider the proposed sign to be out of scale and character with the signage typically anticipated and seen within the zone, given its size, height and variable digital display, which are exacerbated by its freestanding nature.”*

- 154 With respect, I disagree with this comment. There are a number of digital billboards in the zone, and so I do not agree that it is out of scale and character with signage seen within the zone. Additionally, the removal of the surrounding structure reduces the scale of the proposal. While there are fewer freestanding digital billboards, there are several larger digital billboards in the CCCBZ<sup>37</sup>. I do agree that the proposed billboard is larger than permitted in the zone. However, I do not agree that it is out of scale and character with signage anticipated in the zone as the District Plan Objectives and Policies do enable signage (including off-site signage) in commercial zones.

- 155 At paragraph 15 of the s42A report, Ms Brown notes that Superlot 12 (being 192 Gloucester Street, opposite the application site) was recently listed for sale to speed up development. I have read the referenced article and consider it does not relate to 192 Gloucester Street. The article relates to land further south at 192 Cashel Street (fronting Manchester, Lichfield and

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<sup>37</sup> Examples: 32m<sup>2</sup> single-sided, freestanding digital billboard at 183 Victoria Street (RMA/2019/2309). 111.75m<sup>2</sup> single-sided, wall-mounted digital billboard at 617-649 Colombo Street (RMA/2017/1354). 46m<sup>2</sup> single-sided, wall-mounted digital billboard at 65-67 Victoria Street (RMA/2017/1276).

Cashel Streets) and 132 Worcester Street (fronting Manchester, Hereford and Worcester Streets).

- 156 The s42A report recommends that the proposed billboard not operate between 12am and 6am in order to protect residential activities. I do not consider that the District Plan provides for residential activities to be protected from views of digital signage at night and note that the CCCBZ is expected to be a well lit environment with reference to my paragraphs 38 and 39 above. I consider this mitigation to be inappropriate.
- 157 I note that the s42A report identifies that an information gap prevents firm conclusions in respect of traffic safety effects<sup>38</sup>. Mr Carr's evidence has provided further detail on this matter.
- 158 The s42A report submission summary references one submission from Yateen Lallu which is entirely different to the submission that the Applicant received from the submitter. I have not been advised by the Council of any changes to this submission.
- 159 At paragraph 127 of the s42A report, Ms Brown notes in her discussion of Policy 6.8.2.1.6 that she does not consider the site the term 'commercial context' to be the same as 'commercial zone'. Ms Brown goes on to say that the site context includes residential and open space. In my view, this interpretation is inappropriate for several reasons. Firstly, the zoning is CCCBZ and so the surrounding land, including the East Frame, could be developed as a fully commercial area. Secondly, the CCCBZ provides for residential activity even outside Designation V4. Applying the policy as Ms Brown intends would frustrate the policy where there was non-commercial activity. Thirdly, even if one accepts Ms Brown's point, the policy does not preclude or discourage off-site signage in a context that is a combination of commercial and other land uses. My conclusion remains that the Policy 6.8.2.1.6 is enabling of off-site signage in this location, subject to the detailed provisions of the policy.

## **Conclusion**

- 160 The Applicant has removed the proposed supporting structure in order to address some of the concerns raised in regard to the scale of the structure.

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<sup>38</sup> S42A Report, paragraph 101

- 161 My overall assessment is that the effects on the environment can be appropriately mitigated by conditions to an acceptable level. For the reasons set out above, I find that the proposal overall is consistent with the relevant District Plan objectives and policies.
- 162 For the reasons discussed above, I consider the Application can be granted, subject to the proposed conditions set out in **Attachment [A]**.

**Anita Clare Collie**

Dated this 17th day of February 2022

List of Attachments:

- [A] Proposed Draft Conditions
- [B] Designation V4
- [C] Copy of Submission from Yateen Lallu

Draft Proposed Conditions

1. Only still images shall be displayed on the billboard, with a minimum duration of 10 seconds per image.
2. The transition between images shall occur by way of a 0.5 second cross-dissolve.
3. The screen shall not display any of the following:
  - a. Live broadcast or pre-recorded video;
  - b. Movement or animation of images;
  - c. Flashing lights or images;
  - d. Sequencing of consecutive advertisements (ie where the meaning of an image is dependent upon, or encourages viewing of, the image that immediately follows);
  - e. A split screen (i.e. more than one advertisement at any one time);
  - f. Graphics, colours (red, green, orange, white or yellow), text or shapes in isolation or in combinations such that they can be reasonably considered to resemble, cause confusion with, or distract from a traffic control device; or
  - g. Content that invites or directs a driver to take any kind of driving action.
4. The screen shall not contain any retro-reflective material to prevent sunlight or reflection which may dazzle drivers.
5. The billboard must use LED technology.
6. There shall be no sound associated with the sign.
7. In the event of digital screen failure, the billboard screen shall either default to black or switch off.
8. The billboard shall result in no more than 10.0 lux spill (horizontal and vertical) of light when measured or calculated 2 metres within the boundary of any adjacent site, and any arterial or collector road.
9. The digital screen shall incorporate lighting control to automatically adjust brightness in line with ambient light levels.
10. The billboard shall not exceed the following luminance values:
  - a. Daytime: 5000 cd /m<sup>2</sup>; and
  - b. Night-time: 175 cd/m<sup>2</sup> maximum.
11. Within 30 working days of the display becoming operational, the consent holder shall submit a certification report from an appropriately qualified lighting designer/engineer confirming compliance with conditions 8-11. The report shall include at least three luminance readings of the billboard, including:
  - a. One recording at midday;
  - b. One recording during the hours of darkness; and
  - c. One recording up to 30 minutes after sunrise or 30 minutes prior to sunset.The report shall be submitted to the Council via email to rcmon@ccc.govt.nz, Attention: Team Leader Compliance and Investigations.
12. The condition and appearance of the billboard shall be maintained at all times.
13. Prior to the erection of the billboard, a written maintenance programme, in the form set out in Appendix 6.11.16, shall be prepared by the operator/provider and submitted to the Christchurch City Council via email to rcmon@ccc.govt.nz, Attention: Team Leader Compliance and Investigations.
14. Pursuant to Section 128 of the Resource Management Act 1991, the Council may serve notice on the consent holder of its intention to review, in whole or in part, conditions 1 to 13, in order to deal with any adverse effect on the environment which may arise from the exercise of this consent and which it is appropriate to deal with at a later time.

**Advice notes**

The consent holder's attention is drawn to the following:

- a. The guidelines for advertising contained in the NZTA Traffic Control Devices Manual, Part 3, Advertising Signs.
- b. The Advertising Standards Authority Advertising Code of Practice and the Broadcasting Act 1989.

A cross-dissolve (condition 2) is a transition between images where one image fades out while at the same time another image fades in.

The purpose of condition 3f is not to prohibit the use of a particular graphics, colour, text or shapes but to manage the use of these in order to avoid confusion with traffic control devices.



**V4 The Frame - North and East**

Designation Number	V4
Requiring Authority	Ōtākaro Limited
Location	Frame North: Blocks defined by Cambridge Terrace and Kilmore Street (refer to planning maps). Frame East: Blocks defined by Oxford Terrace, and Madras, Lichfield and Manchester Streets (refer to planning maps).
Roll-over Designation	Yes (without modification)
Legacy Reference	Christchurch City Plan, Volume 3, Part 12, Clause 2.10A
Lapse Date	10 years from 31 July 2012 (i.e. 31 July 2022)
Underlying Zone	Commercial Central City Mixed Use Zone, Transport Zone and Commercial Central City Business Zone (refer to planning maps)
Map Number	32, 39, CC

**Purpose**

Frame - North and East.

- a. Open space, park land
- b. Family playground
- c. Walking/cycling tracks
- d. Stormwater management
- e. Memorial sites
- f. Residential units
- g. Retail/Food and beverage
- h. Christchurch club
- i. Amenities
- j. Temporary activities
- k. Public art
- l. Leisure and recreational activities and facilities including gymnasium facilities
- m. Ancillary activities including car parking

**Conditions**

N/A

**Attachments**

N/A

## Resource Consents Unit

# Submission on an application for resource consent

Application Reference

RMA/2020/1877

Planner: Georgia Brown

Resource Management Act 1991 – Form 13

Email to: [resourceconsentssubmissions@ccc.govt.nz](mailto:resourceconsentssubmissions@ccc.govt.nz); or

Deliver to: Resource Consents Unit, Christchurch City Council, 53 Hereford Street, Christchurch; or

Send to: Resource Consents Unit, Christchurch City Council, PO Box 73013, Christchurch Mail Centre, Christchurch, 8154

For enquiries phone: (03) 941 8999

## 1. Submitter details

Full name of submitter: YATEEN CALLU.  
 Street address: 221 MANCHESTER STREET.  
 Postal Address (if different): 190 BRADSHAW TERRACE, PACCARTON  
 Contact phone number (daytime): 021-655-926. Postcode: 8011  
 Email: yateen@xtra.co.nz

My address for service for receiving documents and communication about this application is:  By email  By post

## 2. Application details

RMA number (if not stated above): RMA/2020/1877  
 Name of applicant: Wilson Parking New Zealand Limited  
 Application site address: 235 Manchester Street  
 Proposed activity: To establish and operate a double sided free standing digital billboard comprising a digital screen area of 18sqm, framed by a 4mx9m support structure.

## 3. Submission details

- I / We:  Support all or part of the application  
 Oppose all or part of the application  
 Am neutral towards the application

The specific parts of the application that my / our submission relates to are: (give details, using additional pages if required)

In the next 12-24 months we are planning to start the process of rebuilding Greenwich House which was on our site at 221 Manchester St. We have already obtained resource consent (RMA/2017/467) for the build.

The reasons for my / our submission are: (use additional pages if required)

I recently met with Ray at URBIS Group to go thru our consent and he suggested we put an electronic billboard on the north face of our building. I had the plans re-done by our architect Boyd Chamberlain, (which I have included), to show the billboard which can be seen on the North elevation. If this billboard was to go ahead it would render our billboard redundant as it would be pointless have 2 billboards within the same proximity. We are going to great expense to rebuilt our building with 3 something not

The decision I / we would like the Council to make is: (give details including, if relevant, the parts of the application you wish to have amended and the general nature of any conditions sought. Use additional pages if required)

a lot of other land owners in the CBD are doing, and Wilsons whose I acknowledge their contribution in the CBD, they are not investing in that particular area like we will soon be.

#### 4. Hearing of this application

If a hearing is held, I / we:

- Wish to speak in support of my / our submission
- Do not wish to speak in support of my / our submission
- If others make a similar submission I / we will consider presenting a joint case with them at the hearing
- Request that the Council delegates its functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the Council, under section 100A of the Resource Management Act.

Please note that only submitters who indicate that they wish to speak at the hearing will be sent a copy of the planning report.

If you change your mind about whether you wish to speak at the hearing, please contact the Council by telephone on 941 8999 or by email at [resourceconsentssubmissions@ccc.govt.nz](mailto:resourceconsentssubmissions@ccc.govt.nz).

#### 5. Signature (of submitter(s) or person authorised to sign on behalf of submitter(s))

Signature:



Date:

13/10/2021.

Signature:

Date:

Note: A signature is not required if you make your submission electronically

#### Important information

1. The Council must receive your submission before the closing date and time for submissions on this application.
2. You must also send a copy of this submission to the applicant as soon as practicable, at the applicant's address for service.
3. If this application was limited notified the Council may adopt an earlier closing date for submissions once responses have been received from everyone who was notified.
4. If you are a trade competitor, your right to make a submission may be limited by the provisions in Part 11A of the RMA.
5. The Council may strike out a submission (or part of it) in the following situations:
  - It is frivolous or vexatious
  - It discloses no reasonable or relevant case
  - It would be an abuse of the hearing process to allow it to be taken further
  - It contains offensive language
  - It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialist knowledge or skill to give expert advice on the matters.

#### Privacy information

The information requested on this form, including your contact details, is required by the Resource Management Act 1991 (RMA). The information will be held by the Council, and you may ask to check and correct any personal information that we hold about you. The RMA requires your submission, including your name and contact details, to be made available to the Council (including the Council decision-maker) and the applicant.

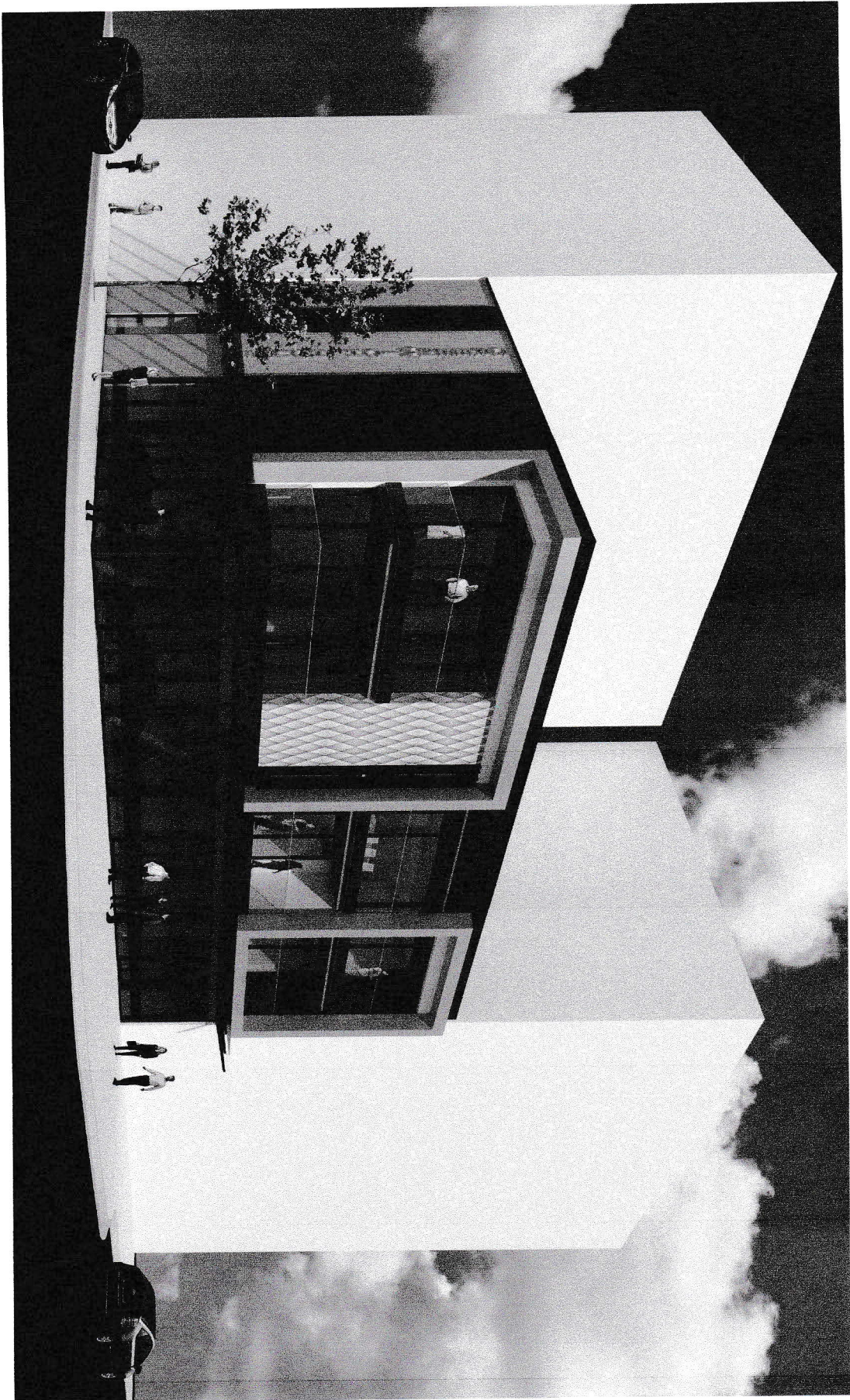
Your submission, including your name and contact details, may also be made available to other submitters and to the public on the Council's website, or on request. If requested, the Council may legally be required to make all submissions available to the public (which can include the media), including the name and contact details of the submitter, subject to the provisions of the Local Government Official Information and Meetings Act 1987 (LGOIMA). If you believe there are compelling reasons why your contact details should be kept confidential from other submitters or the public under LGOIMA, please contact the processing Planner for this application prior to making your submission.

- I / We request that my / our name and contact details are withheld under section 6 or 7 of LGOIMA for the following reason:  
(attach additional pages if necessary)

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Received at the ..... Office on ..... at ..... am / pm

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Sheet Number	Sheet Name	Sheet Issue Date	Drawing Issue
A00.1	TITLE SHEET	11/28/17	A
A01	PLANS & ELEVATIONS	11/28/17	A
A02	SECTIONS	11/28/17	A
A03	AREA PLAN	11/28/17	A

Drawn: \_\_\_\_\_  
 Rev. No.: \_\_\_\_\_  
 Description: \_\_\_\_\_

**WORK IN PROGRESS**

DATE: 11/28/17  
 SCALE: AS SHOWN  
 SHEET NO: A1  
 TITLE: TITLE SHEET  
 OF 22 SHEETS  
**A00.1**

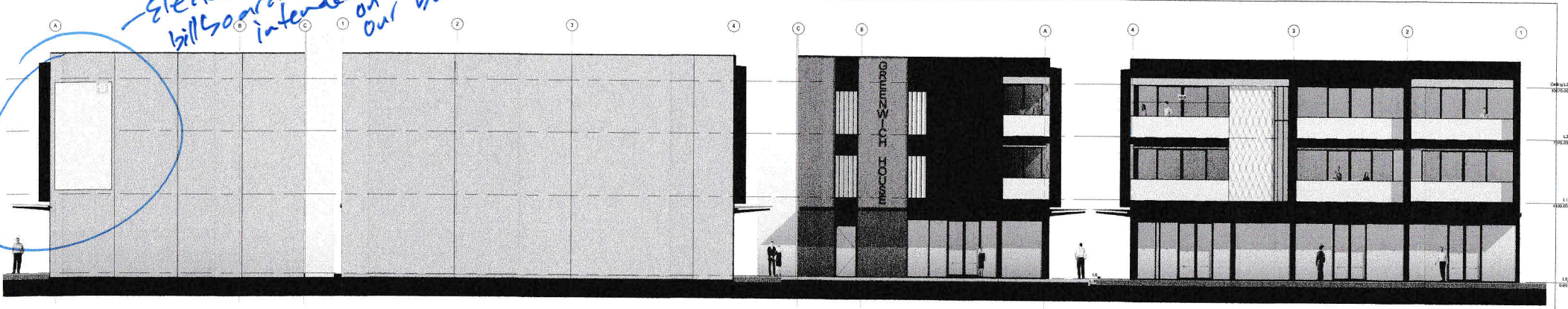
**Boyd Chamberlain**  
 ARCHITECTURE LTD.



GREENWICH HOUSE - 221 MANCHESTER STREET PROJECT

ALL DRAWINGS MADE BY OR UNDER THE CLOSE PERSONAL SUPERVISION OF THE ARCHITECT AND SHALL BE VOID WITHOUT HIS SIGNATURE AND SEAL.

*Electronic bill board intended on our build.*



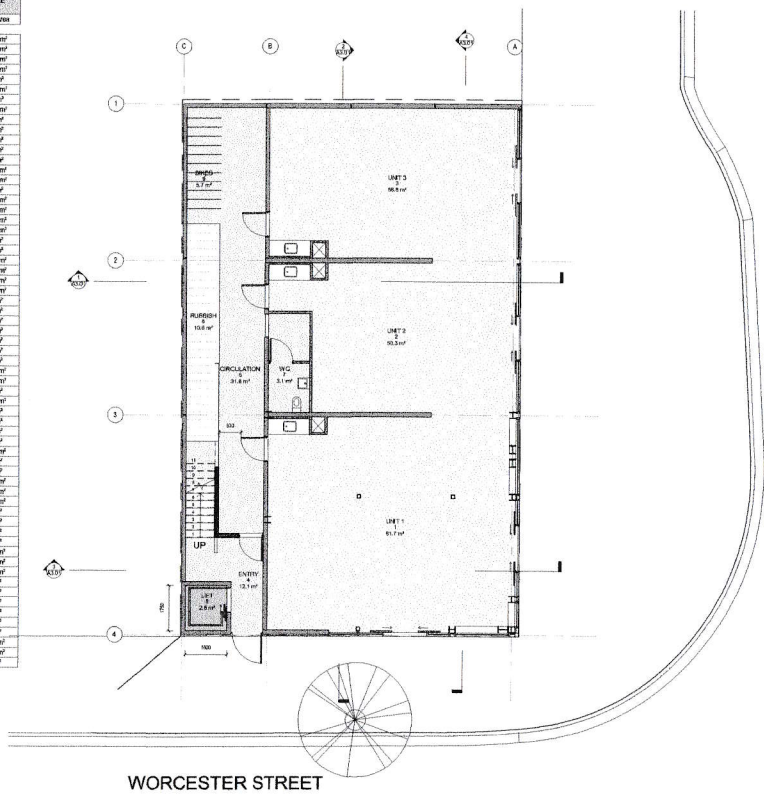
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1:100

6 WEST ELEVATION  
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4 SOUTH ELEVATION - WORCESTER STREET ELEVATION  
1:100

5 EAST ELEVATION - MANCHESTER STREET  
1:100

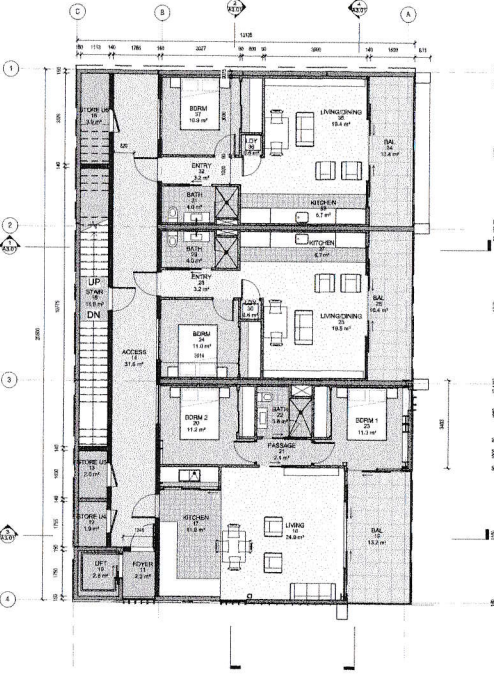
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1	LMT 1	81.7 m <sup>2</sup>
2	LMT 2	80.3 m <sup>2</sup>
3	LMT 3	86.6 m <sup>2</sup>
4	ENTRY	2.1 m <sup>2</sup>
5	LIFT	2.8 m <sup>2</sup>
6	CIRCULATION	27.8 m <sup>2</sup>
7	WC	1.1 m <sup>2</sup>
8	HUBBISH	10.9 m <sup>2</sup>
9	BENCH	3.7 m <sup>2</sup>
10	LIFT	2.8 m <sup>2</sup>
11	HOKER	2.3 m <sup>2</sup>
12	STORE UP	1.9 m <sup>2</sup>
13	STORE UP	2.9 m <sup>2</sup>
14	ACCESS	27.8 m <sup>2</sup>
15	STAIR	11.8 m <sup>2</sup>
16	STORE UP	3.9 m <sup>2</sup>
17	KITCHEN	11.8 m <sup>2</sup>
18	LIVING	24.9 m <sup>2</sup>
19	BAL	13.2 m <sup>2</sup>
20	BENCH 1	11.2 m <sup>2</sup>
21	PASSAGE	2.1 m <sup>2</sup>
22	BATH	3.8 m <sup>2</sup>
23	BENCH 2	11.3 m <sup>2</sup>
24	BENCH	11.5 m <sup>2</sup>
25	LIVING DINING	38.4 m <sup>2</sup>
26	BAL	10.4 m <sup>2</sup>
27	KITCHEN	5.7 m <sup>2</sup>
28	ENTRY	3.2 m <sup>2</sup>
29	BATH	4.0 m <sup>2</sup>
30	LIFT	0.9 m <sup>2</sup>
31	BATH	4.0 m <sup>2</sup>
32	ENTRY	3.2 m <sup>2</sup>
33	KITCHEN	5.7 m <sup>2</sup>
34	BAL	10.4 m <sup>2</sup>
35	LIVING DINING	38.4 m <sup>2</sup>
36	LIV	10.4 m <sup>2</sup>
37	BENCH	10.9 m <sup>2</sup>
38	LIFT	2.8 m <sup>2</sup>
39	HOKER	2.3 m <sup>2</sup>
40	STORE UP	1.9 m <sup>2</sup>
41	STORE UP	2.9 m <sup>2</sup>
42	ACCESS	48.5 m <sup>2</sup>
43	KITCHEN	5.9 m <sup>2</sup>
44	LIFT	1.7 m <sup>2</sup>
45	LIVING DINING	34.9 m <sup>2</sup>
46	BALCONY	13.1 m <sup>2</sup>
47	BENCH 1	10.2 m <sup>2</sup>
48	PASSAGE	2.1 m <sup>2</sup>
49	BATH	3.8 m <sup>2</sup>
50	BENCH 2	8.8 m <sup>2</sup>
51	BENCH 1	8.7 m <sup>2</sup>
52	LIVING	14.2 m <sup>2</sup>
53	BENCH	11.5 m <sup>2</sup>
54	KITCHEN	12.5 m <sup>2</sup>
55	HOKER	2.3 m <sup>2</sup>
56	BATH 1	3.8 m <sup>2</sup>
57	BATH 1	3.8 m <sup>2</sup>
58	ENTRY	4.0 m <sup>2</sup>
59	BENCH 2	8.4 m <sup>2</sup>
60	LIFT	0.9 m <sup>2</sup>
61	LIVING	17.7 m <sup>2</sup>
62	BALCONY	21.0 m <sup>2</sup>
63	STAIR	7.9 m <sup>2</sup>



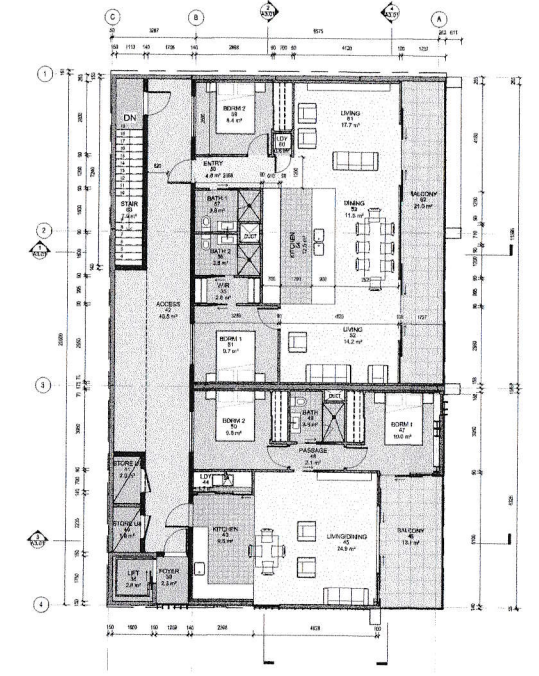
1 SITE & GROUND FLOOR PLAN  
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MANCHESTER STREET



2 FLOOR PLAN LEVEL 1  
1:100



3 FLOOR PLAN LEVEL 2  
1:100

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DRAWING TITLE:  
**GREENWICH HOUSE - 221 MANCHESTER STREET PROJECT**



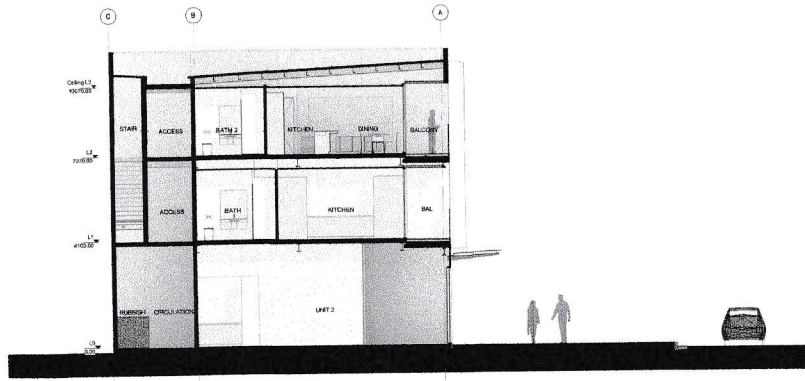
Revision Schedule		
Date	Rev. No.	Description

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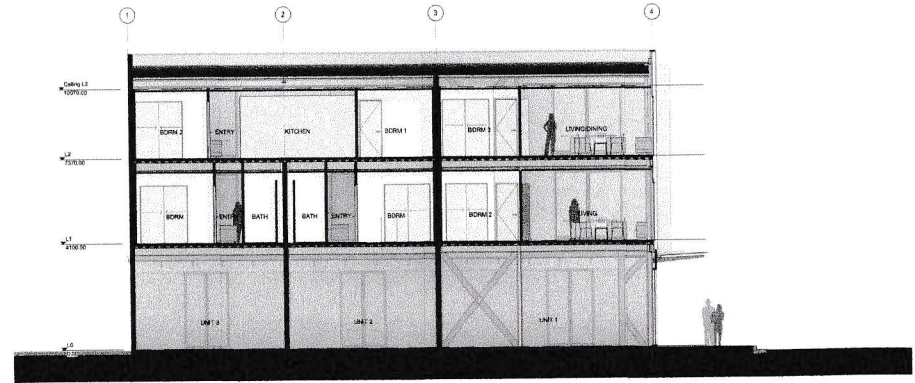
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DRAWING:	PLAN	JOB No:	0001
SHEET TITLE:	PLANS & ELEVATIONS	DATE:	11/26/17

ALL DIMENSIONS SHALL BE CHECKED BY THE ARCHITECT PRIOR TO CONSTRUCTION. DIMENSIONS SHALL BE TAKEN FROM THE FINISHED SURFACE UNLESS OTHERWISE SPECIFIED. THE ARCHITECT SHALL BE RESPONSIBLE FOR THE ACCURACY OF THE DIMENSIONS AND FOR THE COMPLETION OF THE WORK.

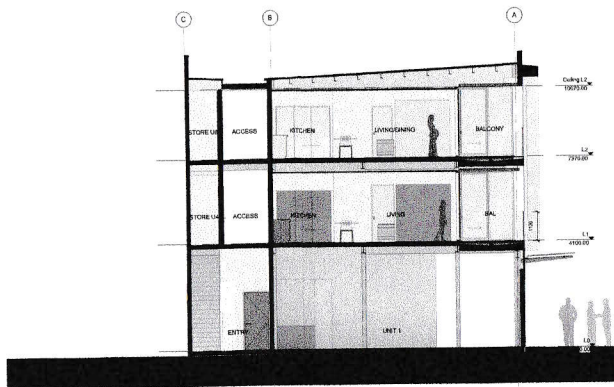
**A1.0**  
22 REV. A



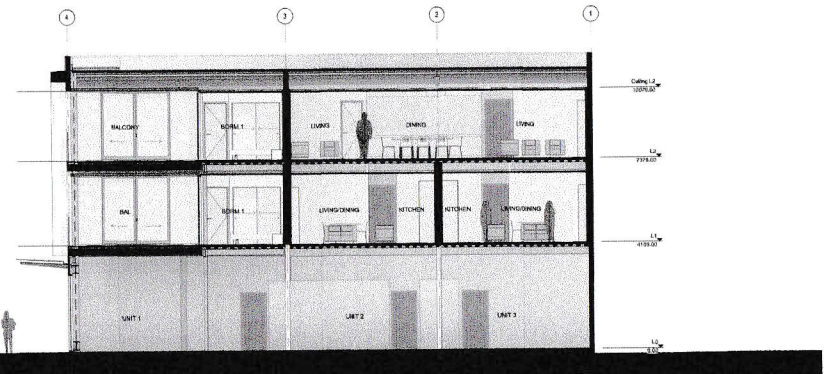
1 SECTION 1  
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2 SECTION 2  
1:100



3 SECTION 3  
1:100



4 SECTION 4  
1:100

DRAWING TO BE USED FOR CONSTRUCTION ONLY. NOT TO BE USED FOR ANY OTHER PURPOSES WITHOUT THE WRITTEN PERMISSION OF BOYD CHAMBERLAIN ARCHITECTURE LTD.

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Revision Schedule		
Date	Rev. No.	Description

**WORK IN PROGRESS**

DATE:	11/20/17	SHEET No:	A1
SCALE:	1:100	JOB No:	A3.01
DRAWN:	Autour		
SHEET TITLE:	SECTIONS		
	of 22	REV.	A

ALL MEASUREMENTS ARE GIVEN UNLESS OTHERWISE SPECIFIED AND SHOULD BE TAKEN FROM THE FINISHED SURFACE UNLESS OTHERWISE SPECIFIED. ALL DIMENSIONS ARE GIVEN UNLESS OTHERWISE SPECIFIED. THE CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY PERMITS AND APPROVALS FROM THE LOCAL AUTHORITY AND OTHER RELEVANT AGENCIES.

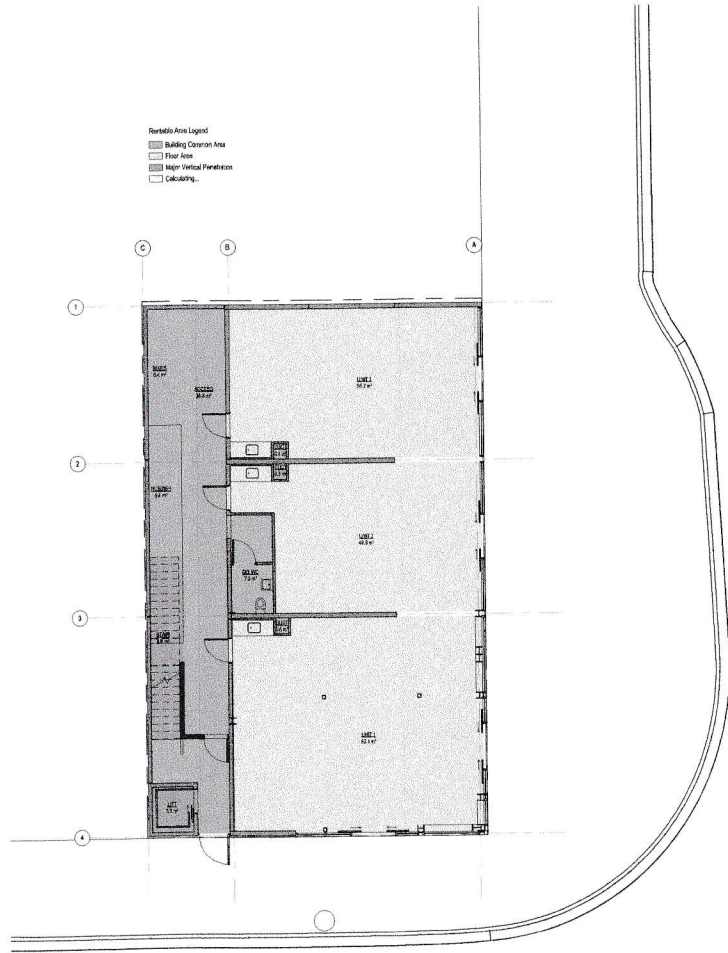
REANTABLE SPACE			
LET	Name	Area	Area Type
L0	UNIT 1	82.1 m <sup>2</sup>	Floor Area
L0	UNIT 2	48.6 m <sup>2</sup>	Floor Area
L0	UNIT 3	56.7 m <sup>2</sup>	Floor Area
L0-3			
L1	UNIT 4	86.9 m <sup>2</sup>	Floor Area
L1	UNIT 5	48.8 m <sup>2</sup>	Floor Area
L1	UNIT 6	46.5 m <sup>2</sup>	Floor Area
L1	UNIT 4 BALCONY	13.5 m <sup>2</sup>	Enticement Area
L1	UNIT 5 BALCONY	11.0 m <sup>2</sup>	Enticement Area
L1	UNIT 6 BALCONY	10.8 m <sup>2</sup>	Enticement Area
L1-6			
L2	UNIT 7	87.1 m <sup>2</sup>	Floor Area
L2	UNIT 8	82.2 m <sup>2</sup>	Floor Area
L2	UNIT 7 BALCONY	13.1 m <sup>2</sup>	Enticement Area
L2	UNIT 8 BALCONY	20.7 m <sup>2</sup>	Enticement Area
L2-4			

Area Schedule (Rentable)			
Level	Name	Area	Area Type
L0	UNIT 1	82.1 m <sup>2</sup>	Floor Area
L0	UNIT 2	48.6 m <sup>2</sup>	Floor Area
L0	UNIT 3	56.7 m <sup>2</sup>	Floor Area
L0	ACCESS	25.8 m <sup>2</sup>	Building Common Area
L0	STAIR	3.9 m <sup>2</sup>	Major Vertical Penetration
L0	LIFT	3.3 m <sup>2</sup>	Major Vertical Penetration
L0	BRICKS	5.9 m <sup>2</sup>	Building Common Area
L0	PERISHING	6.4 m <sup>2</sup>	Building Common Area
L0	DIS W/C	7.2 m <sup>2</sup>	Building Common Area
L0	DUCT	26.5 m <sup>2</sup>	Building Common Area
L0	DUCT	17.8 m <sup>2</sup>	Building Common Area
L0	DUCT	10.8 m <sup>2</sup>	Building Common Area
L0-12			
L1	UNIT 4	86.9 m <sup>2</sup>	Floor Area
L1	UNIT 5	48.8 m <sup>2</sup>	Floor Area
L1	UNIT 6	46.5 m <sup>2</sup>	Floor Area
L1	UNIT 4 BALCONY	13.1 m <sup>2</sup>	Enticement Area
L1	UNIT 5 BALCONY	11.0 m <sup>2</sup>	Enticement Area
L1	UNIT 6 BALCONY	10.8 m <sup>2</sup>	Enticement Area
L1	STAIR	14.0 m <sup>2</sup>	Major Vertical Penetration
L1	LIFT	3.3 m <sup>2</sup>	Major Vertical Penetration
L1	STORE UB	1.9 m <sup>2</sup>	Store Area
L1	STORE US	2.5 m <sup>2</sup>	Store Area
L1	STORE UF	2.4 m <sup>2</sup>	Store Area
L1	DUCT	6.2 m <sup>2</sup>	Building Common Area
L1	DUCT	6.3 m <sup>2</sup>	Building Common Area
L1	DUCT	18.8 m <sup>2</sup>	Building Common Area
L1	ACCESS	34.8 m <sup>2</sup>	Building Common Area
L1-15			
L2	UNIT 7	87.1 m <sup>2</sup>	Floor Area
L2	UNIT 8	82.2 m <sup>2</sup>	Floor Area
L2	UNIT 7 BALCONY	13.1 m <sup>2</sup>	Enticement Area
L2	UNIT 8 BALCONY	20.7 m <sup>2</sup>	Enticement Area
L2	ACCESS & SERVICE AREA	46.3 m <sup>2</sup>	Building Common Area
L2	STAIR	18.4 m <sup>2</sup>	Major Vertical Penetration
L2	STORE UF	2.5 m <sup>2</sup>	Store Area
L2	LIFT	3.3 m <sup>2</sup>	Major Vertical Penetration
L2	DUCT	10.9 m <sup>2</sup>	Building Common Area
L2	DUCT	13.0 m <sup>2</sup>	Building Common Area
L2-11			

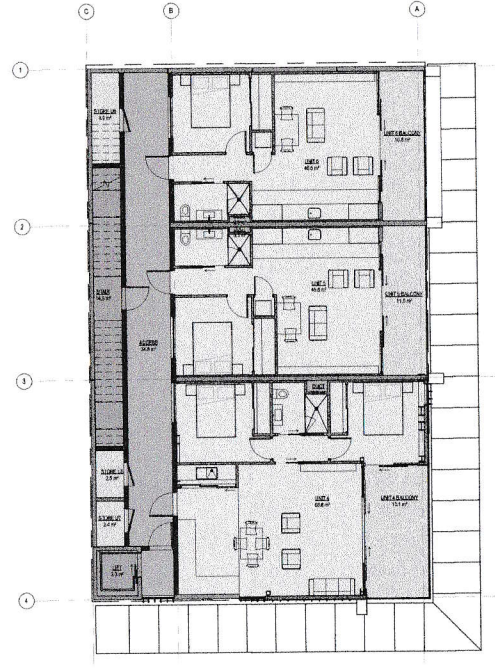
Rentable Area Legend  
 Building Common Area  
 Floor Area  
 Major Vertical Penetration  
 Store Area  
 Calculating...

Rentable Area Legend  
 Building Common Area  
 Enticement Area  
 Floor Area  
 Major Vertical Penetration  
 Store Area  
 Calculating...

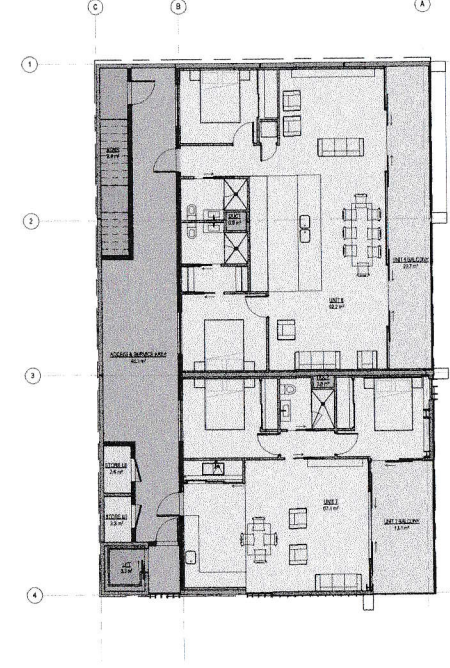
Rentable Area Legend  
 Building Common Area  
 Enticement Area  
 Floor Area  
 Major Vertical Penetration  
 Store Area  
 Calculating...



1 AREA PLAN LEVEL 0  
1:100



2 AREA PLAN LEVEL 1  
1:100



3 AREA PLAN LEVEL 2  
1:100

Revision Schedule		
Date	Rev. No.	Description

WORK IN PROGRESS

DATE:	11/20/17	SHEET No:	A1
SCALE:	1:100	Author:	JOB No: 6001
DRAWN:			
SHEET TITLE:	AREA PLAN		

A10.1  
of 22 Rev. A

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 DRAWING TITLE:  
**GREENWICH HOUSE - 221 MANCHESTER STREET PROJECT**

