

Report on a Publicly Notified Resource Consent Application

(Section 42A)

Application Reference:	RMA/2020/1877
Applicant:	Wilson's Parking Limited
Site address:	235 Manchester Street, Central Christchurch
Legal Description:	Part Section 688-697 Town of Christchurch
Proposal:	To establish freestanding offsite digital signage
Zoning:	Commercial Central City Business
Overlays and map notations:	Adjoining a Central City Local Distributor; Adjacent to Designation V4 "The Frame – North and East" [Otakaro Limited] Central City Building Height 28m Overlay Category 2: Lower Noise Level Entertainment and Hospitality Precincts Central City Core Overlay; Central City Inner Zone; and Liquefaction Management Area (LMA)
Activity status:	Discretionary
Submissions:	One in support Eight in opposition (Four of these submitters seek to be heard)
Date of Hearing:	1 March 2022
Recommendation:	Decline

Preamble

1. My name is Georgia Brown. I am employed as a Senior Planner with the Christchurch City Council. I have been employed by the Christchurch City Council since May 2021. I hold a Bachelor of Planning (Hons) from the University of Auckland. I am an intermediate member of the New Zealand Planning Institute and have eight years of experience working in the planning and resource management field.
2. In relation to this proposal, I note that I was not the s95 reporting officer. I have been involved with this application since the applicant confirmed they wished to proceed with public notification given the former reporting officer has now left the Council.
3. I am familiar with the application site and surroundings, I undertook a site visit on both 10 October 2021 and 27 January 2022.

4. This report has been prepared with advice from Council staff and consultants on behalf of the Council as detailed below. A copy of their reports has been attached in the appendices.

Officer	Position	Appendix
Mr. Hugh Nicholson	Urban Designer – Urban Shift	1a
Mr. Axel Downard-Wilke	Transport Planner – Via Strada	1b
Ms. Suzanne Richmond	Heritage Planner – Christchurch City Council	1c

3. This report reviews the application for resource consent and addresses the relevant information and issues raised. It should be emphasised that any conclusions reached or recommendations made in this report are not binding on the Commissioner. It should not be assumed that the Commissioner will reach the same conclusion or decision having considered all the evidence to be brought before him by the applicant and submitters.
4. Commissioner Mountfort also made the s95 decision for this application and therefore has been appointed to make the substantive decision.

Proposed activity

5. Town Planning Group has applied for land use consent on behalf of Wilsons Parking Limited to construct a free-standing billboard at 235 Manchester Street, Central Christchurch.
6. The proposal is outlined in detail on pages 10 of the application (**Appendix 2**) but in brief, the main features include:
- The structure will measure 9m (height) by 4m (width), with the digital screen measuring 6m (height) by 3m (width).
 - The structure will have a total area of 36m², with the screen encompassing 18m² of this. The structure, and sign, will be double-sided.
 - The structure will incorporate climbing landscaping around the digital screen.
 - The billboard will feature advertising that has no relationship to the site.
 - Advertising images will be static (no moving or flashing images proposed), and it will contain an inbuilt daylight sensor able to be calibrated to meet required luminance values for day and night time operation.
 - The applicant proposes a condition that the sign will result in no more than 10 lux spill of light when measured 2m within the boundary of any adjacent site.
 - Image duration is proposed to be 8 seconds.
 - The applicant proposes maximum luminance levels of 5000cd/m² at any time, and 175cd/m² between astronomical dusk and dawn.
 - The billboard will be located at least 40m south of the traffic signals for the Manchester Street/Gloucester Street intersection, and 50m north of the traffic signals for the Manchester Street/Worcester Street intersection.
 - The applicant has provided a list of volunteered conditions as part of their application.
7. **Figure 1** below details the elevations of the billboard and **Figure 2** provides a render of the billboard in the context of the surrounding environment. With respect to **Figure 2**, I note that the small 'Wilson's public parking sign' located at the vehicle entrance to the site (and similar in size to the one visible in Figure 2) has since been digitalised under resource consent RMA/2021/1935). Further comment is made on that in the 'Background' section of this report.

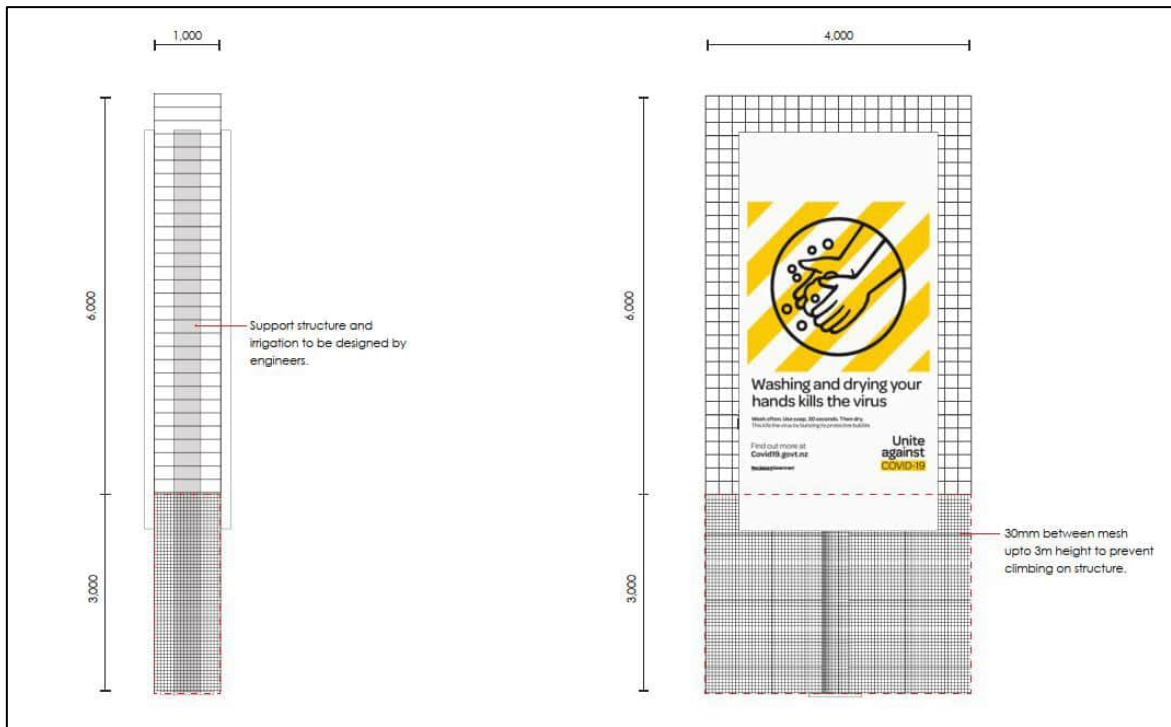


Figure 1: Proposed side and front elevations of the billboard structure



Figure 2: Proposed billboard as viewed from Manchester/Gloucester intersection (provided at page 10 of the applicants AEE)

Background

8. This application for resource consent was received on 28 August 2020. A decision under s95 of the RMA to publicly notify the application was made by Commissioner Mounfort on 4 March 2021 and the application was publicly notified on 10 October 2021 (refer **Appendix 3**). Public notification was delayed as the applicant placed the application on suspend whilst they decided how to proceed.

9. The submission period closed on Monday 8 November 2021. A total of nine submissions were received during this period – one in support and eight in opposition. These submissions are contained at **Appendix 4**. Four of these submitters wished to be heard.
10. The purpose of this hearing is to consider whether or not consent should be granted to this application.

Description of the site and existing environment

11. The application site is located on the western side of Manchester Street. Refer to the below zoning map, **Figure 3** of the application site and surrounding zoning.

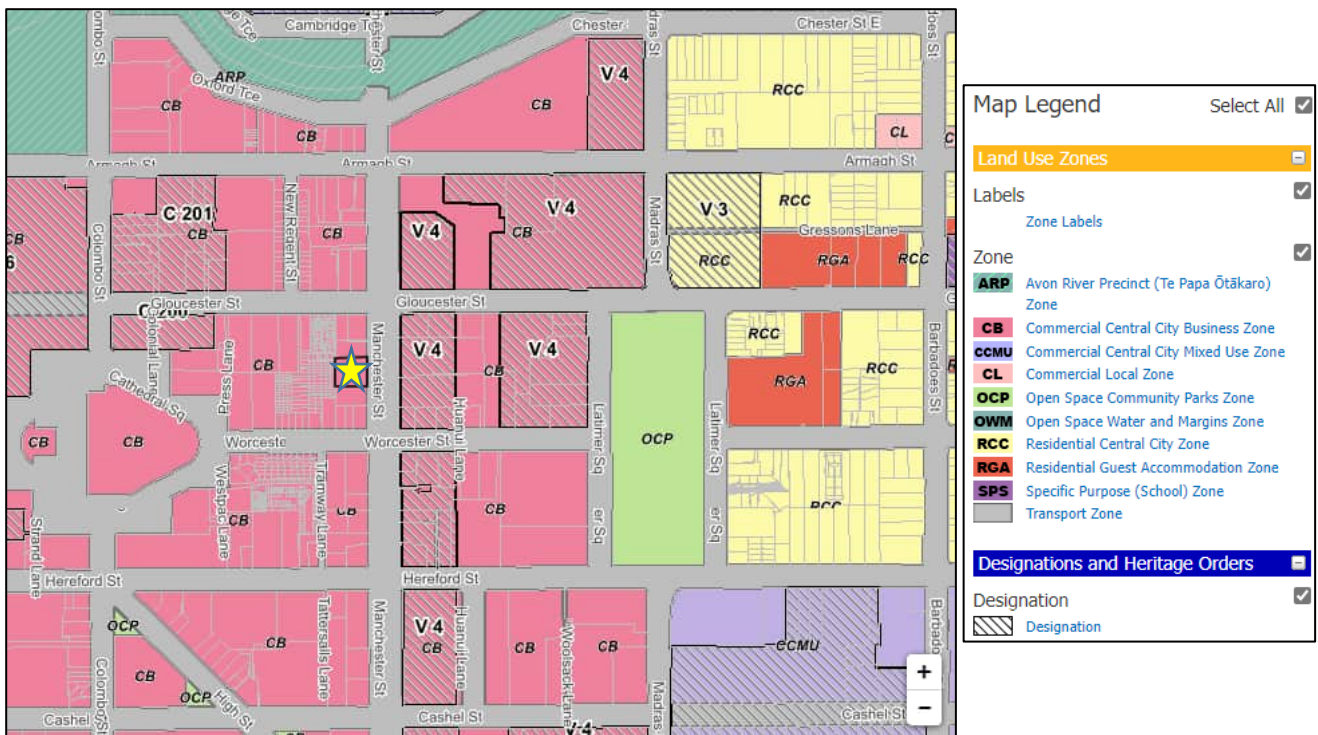


Figure 3: District Plan zoning map, with the application site depicted with a yellow star. The pink colouring shows the Commercial Central City Business zone

12. As part of the s95 decision, the reporting planner provided a detailed assessment of the application site and the surrounding environment. I consider this description accurate and for the purposes of efficiency consider that it should be read in conjunction with this report. Mr. Hugh Nicholson has also provided a detailed description of the receiving environment in his Urban Design Assessment (pages 2- 4), attached at **Appendix 1a**.
13. In addition, I note that since the s95 decision was made on this application, the applicant has obtained consent to erect a 2.64m² digital sign at the vehicle entrance to the site (ref: RMA/2021/1935). The proposed billboard will be located approximately 5m north of this existing sign. The site is still used as an at-grade carpark; the carpark activity is consented until 19 February 2024 (as per RMA/2018/1437).

14. With respect to the designation to the east of the site (V4 'The Frame – North and East'), the below image (**Figure 4**) depicts Fletcher Living Master Plan and some of the Superlots which form 'The Frame'. The application site is depicted with a yellow star. Superlots 3 and 4 have been developed with residential, however Superlots 11 and 12 are still vacant and awaiting development.



Figure 4: Master Plan of the East Frame showing the Super Lots (Fletcher Living), the application site is depicted by the yellow star.

15. I note that Superlot 11 and 12 were recently listed for sale to the private market in order to speed up development and implementation of the designation¹. Superlot 10 (184 Manchester St, to the south of Hereford Street) is currently under development, with earthworks commencing at the end of 2021 in preparation for the future residential development on the site (RMA/2021/644 – 63 apartments and townhouses). I understand that a pre-application meeting has been held for the development of Superlot 11 (132 Worcester Street), and a resource consent is likely to be lodged early February 2022. If further information comes to light an update can be provided at the hearing.
16. The designation 'V4 'The Frame – North and East' is due to lapse on 31 July 2022, whereby the land would revert to its underlying zoning Commercial Central City Business (CCBZ). Ōtākaro have confirmed that they will be seeking to apply to extend the designation for a further five years (refer to email correspondence in **Appendix 5**). They are currently working through what land will be included in the new application, however have confirmed that both Superlot 11 and 12 will form a part of the application. I understand that limited weight can be given to this, noting that no notice of requirement has been submitted at the time of writing this report. Notwithstanding, I consider it provides a clear direction that Ōtākaro are seeking to complete the development of the East Frame with its original purpose and intention. Further, I note that the CCBZ zoning provides for residential activity as a permitted activity.

¹ [High demand sees Crown offer land in Christchurch's east frame to more developers | Stuff.co.nz](https://www.stuff.co.nz/christchurch/news/125222221/high-demand-sees-crown-offer-land-in-christchurchs-east-frame-to-more-developers)

Therefore if the designation was to fall away, it would not be fanciful that residential activity wasn't developed on the eastern side of Manchester Street.

17. At 192 Gloucester Street (Superlot 12), directly opposite from the application site, a resource consent application has been recently lodged by Gap Filler to extend the use of the site as a temporary car park until September 2022 (ref: RMA/2022/8). The applicant states ‘ *The car park will be in place for a fixed timeframe until 30 September 2022 – and most likely just until end of March 2022 as the site is up for sale by Ōtākaro to developers*’.
18. Lastly, I note the adjacent site to the south 221 Manchester Street, previously obtained land use consent (ref: RMA/2017/467) for a three-storey mixed use building which incorporated a 55m² static billboard on the northern elevation and a 13m² static billboard on the western elevation of the building. This consent was granted on 9 June 2017. The owner of 221 Manchester Street has recently lodged a new resource consent application for their site (ref: RMA/2021/3727), seeking consent for an amended three-storey building with an 18m² digital billboard on the northern wall of the building. At the time of the drafting of this report, RMA/2021/3727 is still being processed and no decisions have been made.

District Plan – Relevant rules and activity status

Christchurch District Plan

19. The site is zoned Commercial Central City Business (CCCB) Zone under the District Plan. This zone provides for the consolidation of business activities while providing for a diverse mix of activities, and a vibrant place for residents, workers and visitors.
20. The objectives and policies for this zone are contained within Chapter 15 (Commercial). They generally seek that the Commercial Central City Business Zone re-developers as the principal commercial centre for Christchurch District which is attractive for businesses, residents, workers and visitors. A high standard of amenity is promoted, with activities which would have an adverse effect on the amenity values of the central city being discouraged. The framework also seeks to ensure compactness, convenience and an enhanced pedestrian environment that is accessible, pleasant, safe and attractive.
21. The provisions related to signage are contained in sub-chapter 6.8 of the District Plan. The objectives and policies are generally enabling of signage as an integral component of commercial areas, while seeking to ensure that the character and amenity of sensitive environments are protected from adverse visual and amenity effects from large areas or number of signs, and ensure that signs do not cause obstruction and/or distraction for motorists and pedestrians and other road users.
22. Key objectives and policies are listed within **Appendix 6**, and are discussed in detail in a later section of this report.
23. The proposal requires resource consent under the following rules in the District Plan:

Activity status rule	Standard not met	Reason	Matters of discretion
6.8.4.1.4 D1	-	The proposed billboard: a. Is not ‘provided for’ by: i. Rule 6.8.4.1.3 RD2 because it cannot meet the built form standard in Rule 6.8.4.2.6 (free standing signs).	Not applicable

Activity status rule	Standard not met	Reason	Matters of discretion
		ii. Rules 6.8.4.1.1 P11 or P15, 6.8.4.1.3 RD3 or RD5, or 6.8.4.1.5 NC1 because it does not meet the description in those rules; b. Is: i. An off-site sign that is not 'provided for' by Rule 6.8.4.1.1 P2, P3, P4, P5, P6, P12, P13, or P16 because it does not meet the descriptions in those rules; and ii. A digital sign with changing images.	
6.8.4.1.4 D2	6.8.4.1.3 RD2 Off-site digital billboard in a commercial zone which does not meet the relevant built form standards in Rule 6.8.4.2.6 (Free-standing signs).	Permitted: For signs relating to vehicle entrances in the CCCB zone: - 2m maximum width; - 9m ² maximum total area; and - 6m maximum height. Proposed sign: - 4m wide; - 9m high; and - 36m ² total area <i>Note: whilst the total area of sign measures 36m², the digital screen itself measures 18m².</i>	Not applicable

24. For completeness, none of the above rules include a notification clause.

25. Overall the proposal must be considered as a **discretionary activity** under the District Plan.

Submissions

26. Nine submissions were received on this application (one in support, eight in opposition). Copies of all submissions have been provided to the Commissioner and are included at **Appendix 4**.

27. The submission in support is summarised as follows:

- *No specific reason provided, although in support of the proposal the submitter does not consider that the billboard should be surrounded with the mesh and plants. Considers it should just be free-standing with no mesh or landscaping.*

28. The reasons for the submissions in opposition are summarised as follows:

- *Billboards are distracting and stop a driver from being present.*
- *Consider that they are inappropriate in the central city environment where a higher standard of amenity is expected compared to other commercial or industrial zones*
- *Billboards result in visual clutter, there are already too many in the city.*
- *Potential amenity effects, the billboard will be incongruous with the current environment, as well as with the planned future environment which will consist of high quality commercial and residential buildings with a strong urban design and high level of pedestrian interaction.*
- *Consider that the billboard will detract from the redevelopment that is occurring in the surrounding area.*
- *Concerned that the billboard will impact on bike and pedestrian priority in the area, making travel more risky.*

- *Cannot rely on measurements of luminance to be predictive of the overall effect on traffic safety.*
- *Concerned with the oversized dimensions of the sign and highly powered intermittent illumination.*
- *Consider it will be intrusive for residents and hotel guests at the Heritage Hotel (Old Government Building), especially at night.*
- *Do not consider the billboard to fit within the character of the surrounding precinct, where several historic buildings are being reprinted.*

29. One submitter also raised concern with the billboard and the distress it creates on people who suffer from migraines, PTSD, post-concussion health issues. They consider that billboards are not good for wellbeing or mental health. Another submitter comments in opposition that we should be consuming less, and therefore should be subjected to less advertising. Whilst these comments are acknowledged and appreciated, I note that they are outside the scope of resource management effects which I can consider.

Resource Management Act 1991

30. When considering an application for resource consent and any submissions received, the consent authority must have regard to the matters listed in Sections 104 and 104B of the Resource Management Act 1991. Subject to Part II of the Act, which contains the Act's purpose and principles, including matters of national importance, the consent authority shall have regard to:

- Any actual and potential effects on the environment of allowing the activity.*
- Any relevant provisions of a plan or proposed plan.*
- Any other matter the consent authority considers relevant and reasonably necessary to determine the application.*

31. It should be noted that other than giving pre-eminence to Part II, Section 104 gives no priority to other matters. They are all matters to have regard to and the consent authority must exercise its discretion as to the weight that it gives certain matters, depending on the circumstances of the case.

32. Under Section 104B, when considering an application for resource consent for a discretionary activity, a consent authority may grant or refuse the resource consent, and (if granted) may impose conditions under section 108.

33. Pursuant to Section 104(3)(a)(i) a consent authority must not have regard to trade competition when considering an application.

34. Section 104(3)(d) states that a consent authority must not grant a resource consent if the application should have been notified and was not. As this application was publicly notified, this subsection is not relevant. .

Actual and Potential Effects on the Environment (S.104 (1)(a))

35. As a discretionary activity the Council's assessment of this proposal is unrestricted and all actual and potential effects must be considered. Guidance as to the effects that require consideration is contained in the relevant objectives and policies, and any associated matters of discretion or control. The following matters of discretion are appropriate as a guide in the assessment of the discretionary activity.

6.8.5.1 All signs and ancillary support structures

- a. Whether the scale, design, colour, location and nature of the signage will have impacts on the architectural integrity, amenity values, character, visual coherence, and heritage values of:
 - i. the building and the veranda on which the signage is displayed and its ability to accommodate the signage;
 - ii. the surrounding area (including anticipated changes in the area);
 - iii. residential activities; and
 - iv. heritage items or heritage settings, open spaces, protected trees or areas possessing significant natural values.
- b. Whether the extent of the impacts of the signage are increased or lessened due to:
 - i. the design, dimensions, nature and colour of the sign or support structure;
 - ii. the level of visibility of the sign; and
 - iii. vegetation or other mitigating features.
- c. Whether the signage combines with existing signage on the building, the site or in the vicinity, to create visual clutter or set a precedent for further similar signage.
- d. Whether there are any special circumstances or functional needs relating to the activity, building, site or surroundings, which affect signage requirements, including:
 - i. operational, safety, directional, and functional requirements;
 - ii. its size, scale or nature; and
 - iii. the length of the road frontage.
- e. Whether the signage:
 - i. enlivens a space or screens unsightly activities;
 - ii. will result in an orderly and co-ordinated display; and
 - iii. relates to the business or activity on the site and the necessity for the business or activity to identify and promote itself.
- f. For small-scale, grouped poster signage, the nature and extent of any management and maintenance regime in place including keeping the posters current, and the posters and sites on which they are installed clean and free of graffiti.
- g. The potential of the signage to cause distraction or confusion to motorists and/or adversely affect traffic safety due to its location, visibility, and/or content, including size of lettering, symbols or other graphics.
- h. Where the site is within the Akaroa Heritage Area, the matters set out in [Rule 9.3.6.3](#).

6.8.5.2 Illuminated, moving, changing, flashing or retro-reflective displays

- a. Whether the extent of the impacts of the signage are increased or lessened due to:
 - i. the frequency and intensity of intermittent or flashing light sources, and the proposed periods of illumination and frequency of image changes;
 - ii. the prominence of the sign due to its illuminated or animated nature and ability to draw the eye;
 - iii. the nature of surrounding land use activities; and
 - iv. the proximity of the display to other properties and the likely effects of such intermittent or flashing lights or changing images upon those properties and their occupants.
- b. Where the site is within the Akaroa Heritage Area, the matters set out in [Rule 9.3.6.3](#).

6.8.5.3 Static and digital billboards

- a. Whether the scale, design, colour, location and nature of the billboard will have impacts on the architectural integrity, amenity values, character, visual coherence, and heritage values of:
 - i. the building and the veranda on which the billboard is displayed and its ability to accommodate the signage;
 - ii. the surrounding area (including anticipated changes in the area);
 - iii. residential activities; and
 - iv. heritage items or heritage settings, open spaces, protected trees or areas possessing significant natural values.
- b. Whether the extent of the impacts of the billboard are increased or lessened due to:
 - i. the design, dimensions, nature and colour of the sign or support structure;
 - ii. the level of visibility of the billboard; and
 - iii. vegetation or other mitigating features.
- c. Whether the billboard combines with existing signage on the building, the site or in the vicinity, to create visual clutter or set a precedent for further similar signage.

- d. Whether the billboard:
 - i. enlivens a space or screens unsightly activities; and
 - ii. will result in an orderly and coordinated display.
- e. Whether the extent of the impacts of the billboard are increased or lessened due to:
 - i. the frequency and intensity of intermittent or flashing light sources, and the proposed periods of illumination and frequency of image changes;
 - ii. the prominence of the billboard due to its illuminated or animated nature and ability to draw the eye;
 - iii. the nature of surrounding land use activities;
 - iv. the proximity of the display to other properties and the likely effects of such intermittent or flashing lights or changing images upon those properties and their occupants; and
 - v. The potential of the billboard to cause distraction or confusion to motorists in their observance of traffic conditions, directions or controls.

I have considered the relevant issues and it is my view that they fall broadly into the following categories:

- Amenity and character
- Light spill and luminance
- Traffic effects
- Heritage effects

Section 104(2) – Permitted baseline

36. Prior to undertaking an assessment of the effects of this proposal it is useful to consider discretion available under Section 104(2) of the Act (referred to as the “permitted baseline”) whereby a consent authority may disregard an adverse effect of an activity on the environment if the Plan or national environmental standard permits an activity with that effect. Case law has established that this relates to the effects of non-fanciful hypothetical activities which could be carried out as of right under the Plan. I note that the use of Section 104(2) is discretionary, however I see no reason why that discretion should not be exercised in this case.
37. The permitted baseline includes static signs associated with onsite activities measuring no greater than 9m² in area and situated at a height of no greater than 6m above ground level, pursuant to 6.8.4.1.1 P1 – and built form standard 6.8.4.2.6. Multiple signs can be established in association with the standard where there are multiple vehicle crossings and pedestrian entrances (one sign per each pedestrian entrance and one per each vehicle crossing). The application site includes a vehicle crossing and a pedestrian entrance, therefore enabling up to 11m² of permitted signage at the site. Such signage can be externally or internally illuminated. As evident, the difference between this application and the permitted baseline is the digital nature of the sign and its changing images, and the greater area of signage. As such, I consider this permitted baseline relevant to a limited extent only.
38. The applicant has also put forward a permitted baseline relating to the establishment of digital signage where it is located internal of the building. Whilst this is noted, I note that the applicant is not proposing a billboard affixed to the inside of a building. Further, there are no mechanisms available to the applicant to lawfully establish a new building in the zone due to Rule 15.10.1.2 C1 and 15.10.1.3 RD1 which regulate the construction of a new building in the Central City Core, visible from a publicly owned and accessible space, and which require consideration against the urban design matters at Rule 15.13.2.6. As such I do not consider this a valid permitted baseline and have not taken it into consideration as part of my assessment.

Policy context

39. The policy framework informing the below assessment is outlined within the s95 decision, I agree with and rely on that assessment and introduction. In relation to this, whilst I accept that the District Plan anticipates industrial and commercial environments will be more appropriate for (and by implication have a lower level of sensitivity to) off-site signage, I do not consider this equates to a *carte blanche* acceptance of effects of any size/height of off-site signage within any commercial or industrial context. Rather, the compatibility of the signage with the surrounding environment must still be assessed, and acknowledged that despite their underlying zoning, the quality and character of environments can vary considerably.

Visual amenity and character

40. The proposed sign has the potential to adversely affect the character and visual amenity of the city centre locality. The scale, design, digital display, changing and moving images and location combine to create this effect. Having regard to the policy framework, in particular Policy 6.8.2.1.3, signage is to be managed so that it does not detract from the character and amenity of the surrounding environment, is integrated within the façade of the building and enhances the central city.
41. I consider that the receiving audience will likely consist of persons in vehicles, pedestrians, cyclists, public transport (bus) users, occupiers of nearby hotels and serviced apartments (Rendezvous Hotel, Quest apartments), residential units within the East Frame, and wider visual catchment. Mr. Nicholson has provided a detailed description of the receiving environment, the viewing audience and visual catchment area in pages 2-4 of the Urban Design Assessment (**Appendix 1a**).
42. A number of submitters raised concern with the potential visual effects of the billboard, including visual clutter, and detracting from the surrounding environment which is being developed to a high standard of amenity. There were concerns raised that the billboard will not integrate within the surrounds, owing to the fact that it is free-standing and not integrated into a building. I consider these points relevant, and as noted within Mr. Nicholson's report, the submissions can be broadly characterised into three main themes; adverse visual effects, reduction in character and visual amenity of the surrounding area and reduction in residential amenity.
43. The residential activity that will need to be taken into consideration is that of the residential developments within the locality, that being the East Frame, to the immediate east of the application site.

Applicant's assessment

44. The application included a visual impact assessment prepared by Ms. Sophie Beaumont and Mr. David Compton-Moen, of DCM Urban (DCM). This assessment was updated following a request for further information and a final version submitted on 27 August 2020.
45. The report sets out the methodology used to consider the likely effects of the billboard. This includes an identification of the receiving environment and description of the existing urban character; an assessment of the proposal against the policies, objectives and rules of the Plan; and the effects of the proposal on visual amenity and people, evaluated against the character and quality of the existing visual catchment. DCM have also outlined relevant research, including the Boffa Miskell and Connectics report (October 2016).
46. DCM provide a detailed description of the existing urban character and surrounding environment. They note the site is located within an urban area, defined by significant amounts of roading, lighting and

infrastructure. The wider area is described as predominantly a mixture of commercial spaces, retail/hospitality with medium density residential development along the eastern edge of the East Frame with open space between that development and the site. They note that there are significant gaps in built form, with the surrounding environment lacking a cohesive architectural design or character. Reference is made to the East frame designation on the eastern side of Manchester Street and the future potential development along the eastern side of Manchester Street. They note the design or activity composition of these buildings is unknown at this time.

47. Section 3.2 provides an assessment of the proposal against the relevant objectives and policies of the Chapter 6.8 and 15 of the Plan. In summary, DCM consider the billboard to be consistent with the outcome sought by the policy provisions, as it will add to the vitality and recovery of the central city, supporting local businesses through the ability to advertise where their business may not be visible to passing persons. They consider the position of the sign to be positive as it will strengthen the built edge of the street where no buildings are currently present, the billboard will create a sense of enclosure and that it will not affect the character or form of any buildings nor prevent the development of a building on the site.
48. Section 3.3 of the report provides an assessment of the visual effects of the billboard from four main public view points, which include a number of spots within these viewpoints at varied distances from the billboard. These main viewpoints include:
- View south from 265 Manchester St
 - View north-west from 185 Manchester St
 - View north from 180 Manchester St
 - View north from High St – Manchester St intersection.
49. DCM have used the NZ Institute of Landscape Architecture (NZILA) seven point scale to assess the visual effects from each viewpoint. The below table, copied from DCM's report, assists in providing a consistency between the NZILA and RMA terms.

NZILA Rating	Extreme	Very High	High	Moderate			Low	Very Low	Negligible
				Moderate-High	Moderate	Moderate-Low			
RMA Effects Equivalent	Unacceptable	Significant		More than Minor		Minor	Less than Minor		Indiscernible

50. DCM considers the effects from each viewpoint listed above to be **low**, which equates to a less than minor adverse effect under the RMA scale of effects. DCM acknowledge that the billboard will be visible from all viewpoints, however they note that due to the current amenity of the area, the expectation that signs are part of commercial areas, and the fact that the central city will form a backdrop, the magnitude of change is considered to be low. DCM note that as the East Frame is developed, views will become intermittent and less prominent from the wider area. However, whilst they acknowledge this Frame will be developed they do not make any comment on the potential effects or views from the future anticipated development of the East Frame (Superlots 11 and 12).
51. At section 4 of the report DCM comment on the proposed green supporting structure which will act as mitigation for the billboard. They note the frame will be constructed with gabion baskets planted with a mix of climbers, vines and pots to minimise its visibility against the surroundings. The pots will be

attached at different levels to provide an 'instant' green whilst the plants establish. A dripline irrigation system is also proposed to be installed. They consider this will soften the structure and reduce its overall perceived scale.

52. Overall, DCM consider that the proposal is appropriate for the receiving environment and is located in an area which is not considered a sensitive location, as referred to in Policy 6.8.2.1.3. With respect to visual amenity, they consider any potential adverse effects will be less than minor with all sensitive receivers located at a sufficient distance from the proposal, or of a transient nature where any adverse effects are acceptable.

Council's assessment

53. As part of the s95 decision, the application was sent to Mr. Hugh Nicholson of Urban Shift, for specialist advice on behalf of Council. Mr. Nicholson's memo has subsequently been updated for the purposes of this report and is attached as **Appendix 1a**.
54. Mr. Nicholson also sets out his methodology for assessment, including an assessment of the existing environment, and importantly an assessment of the receiving environment. He has assessed both the magnitude of change and the nature of effects resulting from the proposal, using the same scale of effects as DCM. Mr. Nicholson notes that his assessment is based on the representative viewpoints identified in DCM's assessment and the potential 'audiences' or viewers.
55. Mr. Nicholson sets out an assessment of the receiving environment. He notes that Manchester St has been redeveloped to provide a high-quality environment that supports walking, cycling and public transport use. He notes the 'super-stop' located on the adjacent side of Manchester St which has been designed to provide priority for bus movements and to enhance the experience for people waiting for their buses. Mr. Nicholson provides a detailed description of the land to the immediate east of the application site, 192 Gloucester Street, and the likelihood that it will be developed for residential apartment buildings as part of Fletcher Living's One Central development.
56. In section 10 he reviews the seven viewpoints noted by DCM, noting the main audience from each viewpoint, and providing his own rating of the potential effects of the sign on those views.
57. Mr. Nicholson has provided a detailed assessment of the billboard against the assessment matters of the Plan, acknowledging that these have only been used as a guide due to the discretionary status of the application. For efficiency and to summarise, Mr. Nicholson considers the billboard would adversely affect the character and visual amenity of the surrounding public spaces and super stop, which have been upgraded to provide a high-quality environment for pedestrians, cyclists and bus patrons. He reaches this view as the billboard is far greater (600% larger and 150% higher) than that of a sign which would be anticipated to locate on the site. Mr. Nicholson does not consider the proposed planting surrounding the billboard will achieve a sufficient level of mitigation to reduce the adverse effects.
58. In Mr. Nicholson's view, the effects will be greatest in the south view of the billboard from users of Manchester Street, as well as from the super-stop on the adjacent side of Manchester Street (Viewpoints 1 and 5) and future uses at 192 Gloucester Street. I note the scale of effects used by Mr. Nicholson is based on the New Zealand Institute of Landscape Architecture (NZILA) draft Aotearoa New Zealand Landscape Assessment Guidelines. Recent case law² has established that a 'moderate' visual amenity effect on the scale referred to by Mr. Nicholson equates to a 'more than minor' effect in terms of RMA terminology.

² *Trilane Industries v Queenstown Lakes District Council (2020)*

59. Mr. Nicholson acknowledges that it is not realistic to expect that there will be no signage visible from the surrounding residential areas. I also agree and accept this point, acknowledging the permitted baseline and commercial zoning. However, the billboard (and its supporting structure) is to be digitalised and is significantly larger than that which is permitted and anticipated to locate on the site and in this zone. In my opinion the visual dominance will be increased due to the billboard being freestanding and not integrated with any building.
60. To summarise, Mr. Nicholson considers the proposed billboard will have high adverse effects on the character and amenity of the high quality public spaces that have been completed as part of the upgrade of Manchester Street between Gloucester and Worcester Streets. He also considers the proposal will have high adverse effects on the character and visual amenity of the residential units anticipated at 192 and 198 Gloucester Street. This equates to a significant adverse effect in relation to the RMA scale of effects.

Conclusion on visual amenity effects

61. It is clear that both the applicant and Mr. Nicholson have differing conclusions on the potential adverse effects of the proposal. I DCM's comments that the surrounding environment does currently lack a cohesive architectural design or character due to many sites still remaining vacant. However I do not consider the DCM assessment gives sufficient weight to the volume of work which has been undertaken to Manchester Street and the public realm in order to provide for a high-quality environment, nor to the future anticipated environment. To this extent, I consider the assessment of Mr. Nicholson to be more measured.
62. With respect to the potential effects on the 'anticipated environment', I acknowledge that it cannot be fully assumed that the future activity on the remaining vacant super lots (192 Gloucester Street and 132 Worcester St) will be residential. However, as stated within the s95 decision, it would be erroneous to disregard the ensemble of planning instruments that give effect to The Frame, the V4 designation, and the efforts of various stakeholders in this area. There is a significant volume of contextual information which points to the potential for residential activities to locate on these adjacent sites in a manner consistent with other locations in the East Frame. This site can therefore not be treated as a purely commercial environment, and consideration must be given to the designation which seeks residential and open-space with a high degree of visual amenity.
63. Correspondence from Ōtākaro (attached at **Appendix 5**) confirms the intention for the lapse date of the designation to be rolled over for another five years, allowing for the remaining super lots to be developed. Whilst this has limited weight, owing to no application being lodged with Council at the time of drafting this report, I consider it likely and important in the consideration of the potential effects of the billboard. Further, the fact that the Crown have sought to sell both Superlot 11 and 12 to private developers in order to speed up development, reinforces their desire for the remainder of the East Frame to be developed as intended.
64. I note also that the applicant considers the proposed billboard will *"serve to enliven the space, which is currently largely void of built form and used for car parking activities. The well designed and presented billboard will introduce a point of visual interest with a well-coordinated and orderly digital display"*. With respect, I do not share this view. Whilst the billboard will introduce a point of visual interest, I do not consider it an interest of such significance that would compensate for its effects in respect to visual coherence and dominance in this location, particularly given its freestanding nature

65. 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. I therefore conclude the effects of the billboard on the character and amenity of the surrounding environment will be unacceptable.

Light spill and luminance

66. Given the large area of the proposed billboard, there is the potential for the sign to have an effect on the surrounding environment and both temporary and permanent users in relation to luminance (brightness) and light spill. Council's Senior Environmental Health Officer, Ms. Isobel Stout, has confirmed that there is no major concern with regards to light spill, and the applicant's proposed condition that the sign shall result in no more than 10 lux spill when measured 2m within the boundary of an adjacent site is acceptable in the event that consent is granted.
67. The proposed sign will have a maximum luminance level of 5,000 cd/m² during the day and 175 cd/m² at night, with an 8 second image duration. Ms. Stout considers the key factor that must be in place to avoid undue brightness is an ambient light sensor which would ensure the brightness of the billboard will naturally adjust to ambient light levels regardless of the time of day. The applicant has volunteered a condition of consent requiring the sign to incorporate a lighting control which will adjust the brightness in line with ambient light levels.
68. Mr Nicholson also addresses luminance levels in section 11 of his assessment, noting that it is a contributing factor to the contrast of a sign within its surroundings and the degree of visual impact. In the event consent is granted he recommends lower luminance levels than those proposed in the application, and that the sign not operate between 12am and 6am, given the proximity of residential activities. He also recommends a condition requiring the sign to be removed when a final building inspection is granted for future residential development at 192 Gloucester Street. I concur with the recommendations of Ms Stout and Mr Nicholson.
69. Notwithstanding the above comments, I consider the billboard will have an unacceptable impact on amenity values of the surroundings in a wider sense, as discussed above.

Traffic effects

70. The proposed location of the digital billboard is adjacent to Manchester Street, a Central City Distributor Road with a speed limit of 30km/h. The billboard will also be in proximity to traffic signals, being located 40m south of the signalised intersection of Manchester/Gloucester Streets, and 50m north of the signalised intersection of Manchester/Worcester Streets. A number of submissions were received raising concerns with the billboard and traffic safety effects, including driver distraction and bike and pedestrian priority.
71. Clause 6.8.5.3 'Static and digital billboards' clause (e)(v) sets out the following matter of discretion for restricted discretionary billboard applications:

The potential of the billboard to cause distraction or confusion to motorists in their observance of traffic conditions, directions or controls.

72. Whilst I am not restricted to the above matter (due to the overall discretionary status of the application), I do consider it provides appropriate direction in considering traffic effects and aligns well with Policy 6.8.2.1.4 'Transport Safety' which is to 'ensure that signs do not cause obstruction and/or distraction for

motorists and pedestrians and other road users'. I consider the threshold in this policy to be relatively high due to the use of the word 'ensure'.

73. The application included an assessment of the proposal as it relates to traffic effects from the applicant's traffic specialist, Mr. Andy Carr. This assessment was peer-reviewed by Mr. Axel Downard-Wilke, of ViaStrada on behalf of the Council. As is outlined within the s95 decision, Mr. Downard-Wilke raised concern with the applicant's assessment, considering that there would be an adverse safety effect arising from the billboard given its proximity to the signalised intersection of Manchester and Worcester Street. I have summarised each assessment below.

Carriageway Consulting – applicant's original assessment

74. The applicant provided an Assessment of Transport Matters prepared by Mr. Andy Carr, Carriageway Consulting. The assessment includes a description of the surrounding transport environment including the roading layout, traffic flows, road safety and existing signage in the area. In brief, Manchester Street is classified a Local Distributor Road in the District Plan and is subject to a 30km/h speed limit. In the locality of the site, Manchester Street provides one traffic lane in each direction, with an additional intermittent bus lane. A super-stop bus stop is located on the eastern side of Manchester Street, directly adjacent the application site.
75. Approximately 50m north of the billboard is the signalised intersection of Gloucester Street and Manchester Street. The intersection approach has two traffic lanes with one departure lane. The intersection has pedestrian and cyclist crossing phases, the latter with separate traffic signals. Wide footpaths are located on either side of Manchester Street, the eastern footpath is shared between cyclists and pedestrians.
76. 70m south of the billboard is the signalised intersection of Worcester Street and Manchester Street. The intersection approach has one traffic lane, with right turn movements from Manchester Street (north and south) onto Worcester Street prohibited. The intersection also has pedestrian crossing phases.
77. Carriageway note that traffic flows on this part of Manchester Street have not been surveyed by the Council for some time. The most recent data (2017) suggests a daily traffic volume in the order of 5,500 vehicles per day.
78. On review of the NZTA Crash Analysis System, Carriageway note that four crashes were reported within 100m north and south of the proposed billboard location during 2015 – 2020, thereby encompassing the two signalised intersections. None of the crashes resulted in any injuries.
79. The assessment undertakes a further analysis of road safety issues at Section 4 of the report, including the overlap of traffic signals and the billboard. It considers the most critical part of the approach in terms of the potential for driver distraction is the decision zone, which represents the part of the approach where a driver will decide to stop or continue. This is essentially called the Approach Sight Distance (ASD). Carriageway have assessed the ASD as being 40m, based on an operating speed of 40km/h (10km/h above the speed limit of Manchester Street). Carriageway have plotted this ASD on a diagram, (Figure 9 in their report) which for reference I copy below, **Figure 5**. The area between the lines is the area where the billboard could potentially form the background to the signals and therefore result in confusion or distraction to motorists.

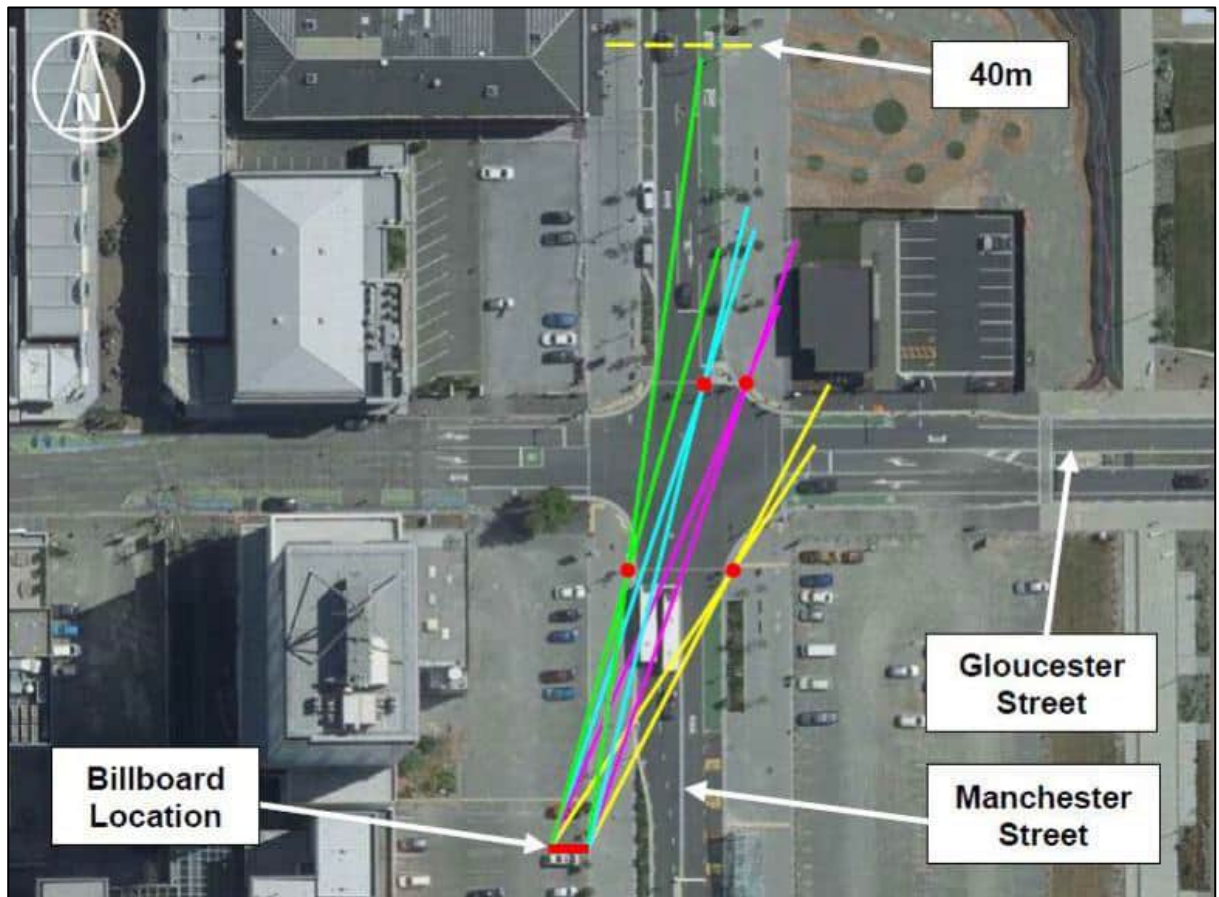


Figure 5: Carriageway diagram to show visual overlap

80. Carriageway note that the only overlap that occurs is for the secondary signal head (signal 5 on the SW corner of the intersection) and this arises between the stop line and 35m from the stop line. As the driver approaches the signals, there is no overlap for three of the four signals, and the driver is more likely to be looking ahead to the primary and overhead primary signals. They also note that this occurs in a location where the height difference between the signal and the drivers' eye means that there will be no overlap.
81. The secondary signal is located approximately 40m from the billboard. Carriageway consider that this difference means that as a driver approaches, the signal head will appear to move in relation to the billboard and the billboard is unlikely to cause confusion.
82. Carriageway have also provided an assessment of the potential overlap with the intersection of Worcester Street and Manchester Street. Due to the billboard being a further distance from this intersection and the ASD, there is minimal visual overlap for motorists approaching in this direction.
83. Carriageway conclude that in both cases, they consider drivers will have already made a decision as to whether to stop at the traffic lights or not. This is due to the decision point being 40m from the stop line and there being no overlap at that point or location.
84. In addition, Carriageway have provided a number of other examples where billboards form the backdrop of a traffic signal head. They have also recommended a number of conditions of consent which they consider to represent best practice. These are outlined in section 5 of their assessment.
85. Their assessment concludes that the digital billboard can be supported from a traffic and transportation perspective and will not result in driver distraction or confusion.

ViaStrada's preliminary comments

86. As part of the s95 notification decision ViaStrada Limited (ViaStrada) were commissioned by Council to undertake a peer review of the application. Mr. Axel Downard-Wilke, Director and Senior Transportation Engineer from ViaStrada, has prepared this assessment. This report has been updated again following the close of submissions and following a phone conversation between Mr. Downard-Wilke and the applicant's traffic specialist, Mr. Carr. ViaStrada's final report is attached as **Appendix 1b**.
87. Firstly, ViaStrada provide explanations of the key terms, the critical decision zone and approach sight distance. Their explanation is as follows:

Critical decision zone: It is considered that the most critical part of the approach in terms of the potential for driver distraction is the decision zone. This represents the part of the approach where a driver will decide to stop or continue.

The Approach Sight Distance (ASD) represents the distance travelled by a vehicle as driver observes, responds, and then brakes. ASD represents the last point where a driver can be expected to stop if the signal changed from green to amber.

Once a driver has travelled past the ASD line, they would normally continue through the signal even if they changed away from green. The area immediately prior to the ASD line could thus be termed a critical decision zone.

88. ViaStrada comment in regard to how Carriageway have calculated the ASD. They firstly note that the ASD used by Carriageway corresponds to an assumed reaction time (R_T) of 2.0 seconds. The Austroads Guide to Road Design Part 3 allows designers to choose between two reaction time values, depending on typical road conditions. 2.0 seconds is for 'higher speed urban areas' and 1.5 seconds for 'alert driving conditions', which have high expectancy of stopping due to traffic signals, restricted low speed urban areas etc. ViaStrada consider the reaction time of 1.5m seconds to be the correct value for this location; essentially this reduces the ASD to 34m.
89. In addition, ViaStrada note that 40km/h is the lowest speed design given in Table 3.1 in Austroads GRD Part 3. However, ASD's can also be computed with an equation in Part 4A of this design guide. As such, using a design speed of 30km/h (i.e. the speed limit of this part of Manchester Street) reduces the ASD to 22m. With a design speed of 35km/h, the ASD is 28m. ViaStrada note that these considerations matter as a reduced ASD means that drivers may be travelling in the critical decision zone while the billboard may form the background to one of the traffic signals they may be observing at that time.
90. ViaStrada at section 2.1.2, note that they disagree with Carriageway's statement that 'a driver is more than likely to be looking ahead to the primary and overhead primary signals'. They note drivers intending to turn right into Gloucester Street are more likely to look at signal pole 5 (referenced as 'the secondary signal' by Carriageway), or may look in a specific direction due to something catching their attention (i.e. an electronic billboard).
91. Section 2.1.3 of ViaStrada's memo comments on the parallax effect and colour blindness and the risk when billboards form the backdrop to traffic signal heads. The parallax effect is the difference in the apparent position of an object viewed along two different lines of sight. Carriageway note that 'it will be evident to a driver that the lantern of the signals is separate to the billboard', and ViaStrada disagree with this, and note that colour blindness is a common disability (affecting 1 in 12 men). They consider

there to be an inherent risk when electronic billboards form the backdrop to traffic signal heads and this risk is greatly increased for those who suffer from colour blindness. In ViaStrada's opinion, it should be avoided to have an electronic billboard form the backdrop to any traffic signal while a driver travels through a critical decision zone.

92. ViaStrada note that the Carriageway report focuses on the horizontal analysis of potential overlap between signal heads and the billboard. However ViaStrada's concern is the proposed billboard forming the backdrop for drivers travelling through the decision zone. They therefore consider a vertical overlap assessment is necessary to determine whether this is the case, as well as an additional horizontal assessment with different ASD calculations. Overall ViaStrada consider that there is overlap of the traffic signals and the proposed billboard for drivers in the critical decision zone for southbound drivers on Manchester Street. They consider that this may create risk with the most significant consequences arising from a driver not noticing the signals changing away from green. ViaStrada conclude that they cannot support the application.

Applicant's response

93. The applicant did not wish to provide a vertical overlap assessment, or updated horizontal assessment of the different speeds as recommended by ViaStrada. In response, the applicant noted:

The RFI requested a visual overlap was carried out for car drivers, truck drivers and bus drivers – all of which need a different assessment to be carried out. This was also requested for 30km/h, 35km/h and 40km/h speeds. This then means that 9 different vertical analyses are needed.

The report prepared by Carriageway Consulting set out that, even where there was overlap, this occurred for only one of the four signal heads and over a short distance, and that the driver would be unlikely to be solely looking at those signals with the overlap, and totally disregarding the other three. The report also set out that the signal head would appear to move visually as a driver approached, meaning that the driver would be very unlikely to confuse the billboard with the lanterns.

On that basis, we consider that the information provided demonstrates that the effects of any overlap are negligible.

94. As part of ViaStrada's updated report, they note that the main concern with the proposal is with regards to signal pole 5. Given the applicant did not provide an assessment for lower operating speeds, ViaStrada undertook the work themselves using an ASD of 22m.
95. From this assessment, ViaStrada concluded that there is no overlap of the signal pole 5 with the proposed billboard in the general traffic lane whilst drivers are traveling in the critical decision zone. A driver will have passed through the zone before overlap occurs. However, there is overlap (for 20m) of signal pole 5 with the proposed billboard for drivers in the kerbside lane whilst they are travelling in the critical decision zone.
96. This kerbside lane is used by bus drivers, all buses coming from the north and north-west travelling towards the bus interchange use the corridor and bus use is frequent. The lane is also used by all drivers turning left into Gloucester Street. When drivers at or near the intersection with Gloucester Street indicate a right turn, the following drivers intending to proceed straight ahead move into the kerbside lane to avoid having to wait behind the right turner.

97. ViaStrada consider whether drivers make use of the rule that they can use the last 50m of a bus lane legally or whether they move into the kerbside lane where the bus finishes is irrelevant. In either case, these drivers travel within the critical decision zone while there is signal overlap with the proposed billboard.
98. Lastly, and for completeness ViaStrada provide a brief outline of the design guidance of functions of various signal faces. The main functions for signal 5 (a secondary signal face) is for starting. Despite this, ViaStrada consider that it is important to differentiate between the use of the design guide for engineers, and the reality of drivers and the use of traffic signals. The role of the designer is to ensure the designs meet the functions per the guidance, however it would not be correct to assume that drivers would not use signal faces for other functions, particularly if something has caught a driver's attention.
99. ViaStrada conclude that their assessment shows there is horizontal overlap of the traffic signals and the proposed billboard in the critical decision zone for southbound drivers on Manchester Street. They consider that this may create risk, with the most significant consequences arising from a driver not noticing the signals changing away from green.

Conclusion on traffic effects

100. The applicant considered that *'even where there was overlap, this occurred for only one of the four signal heads and over a short distance, and that the driver would be unlikely to be solely looking at those signals with the overlap, and totally disregarding the other three. The report also set out that the signal head would appear to move visually as a driver approached, meaning that the driver would be very unlikely to confuse the billboard with the lanterns'*. The updated assessment and advice provided by ViaStrada concludes that there is a horizontal overlap and the proposed billboard has the potential to create risk for southbound drivers on Manchester Street. It is still unknown as to whether there is overlap on the horizontal overlap due to the outstanding vertical assessment.
101. On the basis of the advice provided by Mr. Downard-Wilke and the fact that the applicant has not at this time provided a 'vertical assessment' I am unable to conclude whether the location of the billboard will result in an acceptable or unacceptable traffic effect. As mentioned, digital billboards are specifically designed to attract people's attention, and therefore it is not just a matter of confusion, but also distraction.
102. To this extent, I accept ViaStrada's advice and must conclude that the proposal has the potential to result in adverse and unacceptable traffic safety effects.

Heritage effects

103. With respect to heritage effects, I acknowledge that there are a number of heritage listed buildings in the vicinity of the site. I also acknowledge one of the submissions from Heritage Christchurch which considered the proposal will be out of keeping with the surrounding area which includes a number of heritage buildings.
104. I have sought specialist advice from Council's Heritage Advisor, Ms. Suzanne Richmond. Her memo is attached as **Appendix 1a**. Ms. Richmond notes that there are an important group of scheduled heritage items on the south-west corner of Manchester and Worcester Streets. She notes that views of this group will be affected to some extent, and this will be highlighted by the digital nature of the billboard. However, whilst it will feature in some views, it will not feature in all views to the buildings on the south-western corner of Manchester/Worcester Street intersection. Furthermore, it is noted that the current

unobstructed views of the heritage buildings from the north are temporary and have only opened up since earthquake demolitions in the block containing the application site have occurred. To this extent, these views will no longer be possible once the block is redeveloped.

105. With respect to the comments raised by the submitter in relation to the impact on the historic character of the precinct, Ms. Richmond notes there is some separation of the proposed billboard from the hotel, and the significant north elevation of the hotel is only partially visible until reaching the Manchester/Worcester Street intersection from the north. Therefore the north of the billboard will be present in mid-range views in front of the sign to the east of the hotel's north elevation, however the billboard will be seen to the side rather than obscuring the elevation. Ms. Richmond notes that it will still be possible to stand south of the sign on the Manchester/Worcester Street corner to view the whole north elevation of the hotel. Additionally, it is anticipated the block containing the application site will be redeveloped in the long term, so visual effects are expected to be temporary.
106. Overall, Ms. Richmond considers the billboard would have no more than minor effects on heritage values for a temporary period. She recommends a condition of consent requiring the billboard to be removed after a period of five years.
107. I rely upon and accept Ms. Richmond's advice on the potential effects on heritage values. Overall I do not consider the effects to be unacceptable on heritage values of the surrounding environment.

Cumulative effects

108. Submissions received in opposition to the proposal raised concern that there is already too much signage in the city, and the proposal would result in visual clutter. With respect to there being too much signage within the City, I note that each application for signage must be assessed on its merits, and there is no 'threshold' as such to the volume of signage that is in the City. However, cumulative effects can be taken into consideration.
109. Section 3 of the Act defines the meaning 'effect' which includes any cumulative effect which arises over time or in combination with other effects. As noted in the introduction, the application site currently includes a 2.64m² digital sign, located at the vehicle entrance to the site. This sign is established as part of the car park activity on the site (thus is considered 'on-site advertising'). The sign operates in a manner consistent with a static sign, with infrequent image changes, no more than once a week.
110. The proposal and the existing digital sign would therefore result in a total 'digital area' of 20.64m² on the site. Whilst, the existing sign is related to the site activity, is of a smaller size and located closer to ground level, I consider the two screens would result in a cumulative effect on the amenity of the surrounding environment particular to pedestrians and cyclists on Manchester Street and users of the super stop.
111. There is another digital sign located on the eastern side of Manchester Street, at the super-stop (**Figure 6** below). This sign is a similar size to the existing digital sign of the application site, and is similar to that typically associated with bus shelter advertising. The sign displays off-site advertising.



Figure 6: Existing digital sign associated with the super stop on the eastern side of Manchester St.

112. I also note the site to the south, 221 Manchester Street, has an approved consent for a 55m² static billboard on the northern elevation of the building and a 13m² static billboard on the western elevation. This consent expires in June 2022 and whilst it has not yet been implemented there is still potential for works to commence on the site, or an extension of time sought to the lapse date of the consent under s125(1A). If this billboard was to be established this would have the potential to add to the level of signage, advertising and visual clutter, although this would only be in views when looking south along Manchester Street.
113. Despite the above, I acknowledge the underlying zoning (CCCBZ) and provisions which are generally enabling of signage in commercial areas. The two existing digital signs are small scale, located at human eye level and are generally not obtrusive or dominant. Whilst I acknowledge that the proposal would further add to the potential cumulative effects, I do not consider it to have reached the tipping point whereby it would result in an unacceptable level of visual clutter.

Positive effects

114. I do not consider there to be any material positive effects other than the generation of revenue for the applicant, who is also the owner of the application site.

Conclusion with respect to effects on the environment

115. In regard to traffic safety effects I rely on the advice of Mr. Downard-Wilke. As per the above assessment, I cannot conclude whether there is or is not a distraction or confusion to motorists and/or adversely affect traffic safety will be of a scale that cannot be managed by conditions of consent. As such, without this information I conclude that the proposal may have an adverse effect on traffic safety.
116. I consider the adverse effects of the proposal in respect to the character and amenity values of the surrounding environment, and visual coherence will be inappropriate in the context of the receiving environment. I reach this decision due to the scale of the billboard and it's freestanding, and digital nature. It will in my opinion adversely affect the surrounding environment, including the future development in the East Frame, as well as the high quality pedestrian environment. Manchester Street and the adjacent East Frame have been upgraded and developed to be a pedestrian focussed environment, and the signage is well in excess of what would be considered as a sign that would result in an acceptable level of effect on the character and amenity values of the surroundings. It will also have

an unacceptable visual effect on likely future residential development within superlot 11 and 12, although I give this less weight as the designation has not yet been extended.

117. There are no special circumstances or functional needs relating to the activity, site or surroundings, which in my opinion would support the establishment of the billboard. The sign proposed does not relate to the business or activity on the site and is not necessary for the business or activity to identify and promote itself.

Relevant Objectives, Policies, and other Provisions of a Plan or a Proposed Plan (S.104 (1)(b))
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118. Regard must be had to the relevant objectives and policies in the Christchurch District Plan. This includes those within Chapters 6.8 (Signs) and 15 (Commercial). These are set out in **Appendix 6**. I do not consider the Strategic Direction objectives to be relevant as they are very general and their discrete application on a case-by-case basis is not intended. I here follow the consistent view expressed by the Environment Court in *Fright v CCC*, *Pickering v CCC* and *Yaldhurst Quarries Joint Action Group v CCC*³

Chapter 6.8 – Signs

119. Sub-chapter 6.8 (Signs) objective and associated policies for signage generally seeks that signage contributes to Christchurch's vitality and recovery by supporting the needs of business, infrastructure and community activities; maintaining public safety; and enhancing the visual amenity values and character of the surrounding area, building or structures. Similarly, the supporting policies also seek to ensure that signs do not detract from and where possible contribute to, the character and visual amenity of the surrounding environment.
120. *Objective 6.8.2.1* seeks, generally, to support the needs of businesses, maintain public safety and to enhance the amenity and character of the area. This is given effect by supporting policies 6.8.2.1.1 to 6.8.2.1.6 to varying extents.
121. *Policy 6.8.2.1.1* is to enable signage in appropriate locations. My reading of this policy is that signs in each clause (i. and ii.), are separately enabled, rather than both requiring to be met before a sign is enabled. On that basis, clause (i) is applicable, with the sign being within a commercial environment (noting that in this policy, the word 'commercial' is not defined and therefore the plain and ordinary meaning is to be applied). Given this policy is very enabling, whether this clause is applicable or not seems of little consequence, however I am of the view that where Policy 6.8.2.1.1 is applicable, an assessment of the proposal against Policy 6.8.2.1.3 is also necessary.
122. *Policy 6.8.2.1.2* relates to signs located within residential, rural or open space zones. The application site is not within these zones.
123. *Policy 6.8.2.1.3* seeks to ensure that (inter alia) the size, height, location, design and appearance of signs do not detract from the character and visual amenity of the area and public realm, and are in proportion to the scale of buildings and size of the site and enhance the Central City. As discussed within my assessment, and based on Mr. Nicholson's advice, I consider the scale of the sign to be of such size and height that it will detract from the character and visual amenity of the surrounding area and in particular the high quality public realm (resulting from significant public investment in the upgrade of Manchester Street). Due to the absence of any built form on the site, I consider the sign will appear dominating and obtrusive when viewed by pedestrians and other users of Manchester Street. Due to its area, height and freestanding nature, the billboard is not considered to be consistent with the outcomes

³ *Fright v CCC* [2018] NZEnvC 111 at [63].

of this policy. The billboard will detract from the character and visual amenity of the surrounding area and public realm, and will not enhance the Central City in respect to the high quality urban design outcomes sought.

124. *Policy 6.8.2.1.4* relates to traffic safety.

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

125. I consider the threshold in this policy to be relatively high with the use of the word ‘ensure’. As discussed above, given the unknowns in respect to the potential impact of the sign on road user distraction, owing to its location and lack of any vertical assessment of the effects of the sign, it cannot be ensured that the sign will not cause distraction for motorists and pedestrians and other road users as ought by Policy 6.8.2.1.4. As such, on the basis of the available information, I consider the proposal to be inconsistent with this policy.

126. *Policy 6.8.2.1.6* seeks to ‘*limit off-site signage in the sensitive zones listed in Policy 6.8.2.1.2 and to enable such signage where it is in line with the matters at clause (i) – (iv)*’. It is my view that ‘*such signage*’ is in reference to all off-site signage, and not just that located in the ‘*sensitive zones*’. Therefore, this ‘*such signage*’ is to be enabled where it meets clause (i) – (iv). Clause (iv) notably, cross-references Policy 6.8.2.1.3 and also refers to context and clutter. I therefore consider this policy relevant.

127. I note that the reference to commercial or industrial context (*policy 6.8.2.1.6*) is not identified as being a defined term or terms, and also that ‘context’ is not the same as ‘zone’ in my view, i.e. that whilst the sign is within a commercially zoned site, the context is broader and in this instance also includes residential and open space. The billboard could be appropriately managed and currently would not contribute to visual clutter and/or other cumulative adverse effects. However, as has been discussed in the above assessment, the billboard is not considered compatible with the surrounding environment given the adverse effects on amenity and character of the locality that will result from the proposal. As above, I consider the proposal to be inconsistent with Policy 6.8.2.1.3. Therefore, I consider the proposal is also inconsistent with Policy 6.8.2.1.6.

128. Turning back to the objectives, *objective 6.8.2.1* has three clauses to it. Firstly, it seeks that signs contribute to Christchurch’s vitality and recovery, including (at clause (i)) by supporting the needs of businesses, infrastructure and community activities. This is given effect to by *policy 6.8.2.1.1* which seeks to enable signs as an integral component of commercial and industrial environments. I do not consider the proposal to have any material effect on vitality or recovery of Christchurch, however I accept that it is enabling of the applicant’s business and will provide advertising space for various other businesses, and potentially community activities also. The proposed billboard is consistent with the first clause of the objective.

129. *Objective 6.8.2.1(a)(ii)* seeks that signage will maintain public safety. As discussed within the assessment of effects, it cannot be concluded that the proposal will maintain public safety due to the inconclusive assessment of the traffic effects. As such, it cannot be determined that the proposal will be consistent with this clause of the objective.

130. *Objective 6.8.2.1(a)(iii)* seeks that signage enhances the visual amenity values and character of the surrounding area. This is supported by *Policy 6.8.2.1.3(a)(i)* and *(iv)* and *Policy 6.8.2.1.6(i)* and *(iii)*. The site and surroundings is zoned for commercial use, and includes a variety of commercial activities, where I acknowledge that signage and billboards are not out of character nor wholly unanticipated. However, the scale and freestanding nature of the billboard lead me to consider that it will not contribute to nor

enhance the visual amenity values of the surroundings. Due to the absence of any built form on the site, I consider the freestanding sign will appear dominating and obtrusive when viewed by pedestrians and other users of Manchester Street, and nearby residential activities. As a result of the context of the surrounding environment, and that of the anticipated sought after future development I am of the opinion that the proposed sign will detract from the character and visual amenity of the surrounding area and public form, and would not enhance the Central City.

131. Given the above, I conclude that the proposal will not be consistent with Objective 6.8.2.1, in particular clause (a)(ii) and (iii), Policy 6.8.2.1.3, in particular clauses (a)(i) and (a)(iv), as well as Policy 6.8.2.1.6, clauses (a)(i) and (iv) and Policy 6.8.2.1.4.

Chapter 15 - Commercial

132. Chapter 15 contains 11 objectives which relate to recovery, the centres based framework, particular zones and geographical areas, and urban form, scale and design outcomes. These objectives and policies generally seek that the Commercial Central City Business Zone re-develops as the principal commercial centre for Christchurch District which is attractive for businesses, residents, workers and residents.
133. Signage contributes to urban form and as such the form and scale of such signage should contribute to a visually attractive environment which responds positively to local character and context whilst managing adverse effects on the surrounding environment. As outlined by Mr. Nicholson, the surrounding area has been redeveloped to provide a high-quality environment that supports walking, cycling and public transport use. This includes a wide range of amenities for bus patrons, a shared pedestrian/cycle path, extensive street trees and rain gardens, and paved footpaths with street furniture. The proposed billboard will therefore be a visually dominant feature from the footpaths on Manchester Street, and from the super stop opposite the application site. The activity of the billboard is of a scale that will continuously draw attention away from this high quality environment.
134. As above, I consider the scale of the proposed billboard, and its freestanding nature to be inappropriate to the extent that the adverse effects on amenity values and character of the surrounding environment cannot be sufficiently managed. The proposal will not contribute to a visually attractive urban environment in this context.
135. Whilst I acknowledge and appreciate that signage can provide visual interest, the visual interest of the billboard will not contribute to the character and coherence of the locality given the off-site nature of the sign, which is not related to any of the business activities on the site. It is not related to a functional and operational requirement of activities and built form to be established on the site.
136. *Objective 15.2.6* and associated policies seeks that the Commercial Central City Business Zone redevelops as the principal commercial centre of Christchurch, and is attractive for businesses, residents, workers and visitors, consistent with the Strategic Direction outcomes for the built environment.
137. The proposal is not consistent with the Strategic Directions outcomes for the built environment as sought by *Objective 15.2.6* as it will not contribute to a high quality urban environment. Given the adverse impact the billboard will have on the character and amenity values of the urban environment, it would not be considered to be attractive to residents, workers, businesses or visitors. The proposal does not enable the high quality urban environment anticipated to be recognised and appropriately managed.

138. *Policy 15.2.6.3 (amenity)* seeks to discourage activities from establishing where they will have an adverse effect on the amenity values of the Central City. This is to be achieved through a range of options, including of relevance to this application by requiring an urban design assessment for activities within the zone and setting height limits to avoid overly dominant buildings on the street. The efficiency and safety of adjacent traffic networks is also to be protected.
139. The applicant provided a Visual Impact Assessment of the billboard, and in turn Mr. Nicholson has provided an urban design assessment on behalf of Council. Mr. Nicholson has raised concerns relating to significant adverse effects of the billboard on the amenity values of the Central City receiving environment, as well as the scale and prominence of the sign. On the basis of Mr. Nicholson's advice, I consider the proposed sign is one that should be discouraged from establishing as per *Policy 15.2.6.3*. In addition, as per the conclusions reached in the assessment of traffic effects, it cannot be concluded that the proposal will protect the safety of the adjacent traffic network, Manchester Street.

Summary of objectives and policies

140. Where the District Plan objectives and policies support economic prosperity and development, revitalising and recovery of the Central City and enabling the use of signs for businesses to promote their activities, these outcomes are balanced with the strong direction towards achieving a visually attractive high quality urban environment, which manages effects of activities, including those between incompatible activities. The provisions seek to balance these sometimes conflicting outcomes, rather than elevating the importance of one over the other. Any weighting of conflicting outcomes can be addressed with consideration of the specific circumstances of an application
141. The proposal is consistent with the objectives that provide for the outcomes regarding economic well-being directly by way of additional revenue for the landowner/developer, and indirectly through advertising.
142. However, the billboard is not considered to contribute to the revitalisation of the Central City where it seeks a high quality urban environment, having regard to the characteristics of the area, including those developing with on-going recovery of the Central City. The area, height, freestanding design and digital display with changing images cumulatively results in a sign that will have significant adverse effects on the character and amenity of the receiving environment. Furthermore, the scale of the signage is not related to any functional or operational need, on or off-site.
143. In this case, I conclude that the impact of the proposal on amenity and quality of the urban environment are unacceptable and cannot be managed or mitigated. Further, the application does not sufficiently demonstrate that the billboard will ensure a safe traffic environment remains.
144. After considering the relevant objectives and policies it is my opinion that in an overall sense, the proposal is not supported or enabled by the relevant objectives and policies of the District Plan.

Other relevant Statutory Documents (S.104 (1)(b))

145. The District Plan has been recently reviewed and gives effect to the higher order planning documents. As such, there is no need to address them specifically in this report. For completeness, it is noted that whilst the NPS – Urban Development was developed after the District Plan was prepared, and the NES for Assessing and Managing Contaminants in Soil to Protect Human Health sites alongside the Plan, neither have particular relevance in this instance.

Relevant Other Matters (S.104 (1)(c))

146. The Christchurch Central Recovery Plan (CCRP) is relevant to the proposal due to the location of the site within the Central City, its proximity to Manchester Street and the East Frame. An Accessible City is also of relevance, given it directed the upgrade of Manchester Street to form a boulevard providing a consolidated public transport route.
147. Section 60 of the Greater Christchurch Regeneration Act 2016 has now expired so there is no need to ensure decisions are not inconsistent with these plans. However, the CCRP still exist and have not been revoked, in this instance I consider it of relevance to the proposal.
148. The CCRP set the framework for the redevelopment of Central Christchurch, identifying key projects and directing the Council to update the District Plan to give effect to the Recovery Plan. Relevant to this application, the East Frame is a key project identified by the CCRP. The overarching vision of the CCRP is to ensure that the city recovers and progresses as a place for the community to be proud. In order to complement regenerated business in the city, the CCRP seeks to encourage central city living, and this is supported through the designation supporting the East Frame. It is considered the proposal, if consented, would reduce the quality of residential amenity for future residential occupiers of the East Frame, and thus not assist in supporting the intentions of the CCRP.
149. As discussed previously in this report, the V4 designation to the east of the site is relevance. There is the likelihood that Ōtākaro will seek to extend the timeframe of this designation for a further five years.
150. There are no relevant 'other matters' in my view.

Part 2 of the Act

151. The matters outlined previously are subject to Part 2 of the Act which outlines its purpose and principles.
152. The use, development and protection of resources is to be sustainably managed in a way that enables people and communities to provide for their social, economic and cultural wellbeing and their health and safety, while avoiding, remedying or mitigating any adverse effects of activities on the environment.
153. The Christchurch District Plan was reviewed relatively recently. Its provisions were prepared under the higher order planning documents and, through its preparation and the process of becoming operative, have been assessed against the matters contained within Part 2.
154. Taking guidance from recent case law⁴, the District Plan is considered to be the mechanism by which the purpose and principles of the Act are given effect to in the Christchurch District. It was competently prepared via an independent hearing and decision-making process in a manner that appropriately reflects the provisions of Part 2. Accordingly, no further assessment against Part 2 is considered necessary.

Conclusion

155. After considering the actual and potential effects on the environment of allowing the application, it is my conclusion that adverse effects on the environment will be more than minor as they relate to visual amenity and transport. Positive effects are limited, and do not, in my view, outweigh the unacceptable adverse effects

⁴ *R J Davidson Family Trust v Marlborough District Council* [2018] NZCA 316

156. In my opinion the proposal is inconsistent with the objectives and policies of the District Plan for reasons discussed previously.
157. Having considered all of the relevant matters under Sections 104, 104B, it is my opinion that consent should be declined.

Recommendation

158. I have assessed this application to establish a 36m² digital billboard at 235 Manchester Street, Central Christchurch. Having considered all the matters relevant to this application, I recommend that this application be **declined**.



Georgia Brown
SENIOR PLANNER, RESOURCE CONSENTS
CHRISTCHURCH CITY COUNCIL
1 FEBRUARY 2022

Reviewed by:

Catherine Elvidge
PRINCIPAL ADVISOR RESOURCE CONSENTS

APPENDIX 1a – Urban design assessment prepared by Mr. Hugh Nicholson

APPENDIX 1b – Traffic assessment prepared by Mr. Axel Downard-Wilke

APPENDIX 1c – Heritage memo prepared by Ms. Suzanne Richmond

APPENDIX 2 – Applicant's AEE

APPENDIX 3 – RMA/2020/1877 Section 95 decision

APPENDIX 4 – Summary of submissions

Appendix 5 – Email correspondence with Ōtākaro Limited

APPENDIX 6 – Key District Plan objectives and policies

**BEFORE HEARING COMMISSIONERS
FOR CHRISTCHURCH CITY COUNCIL**

UNDER the Resource Management
Act 1991

AND

IN THE MATTER RMA/2020/1877
Application for a freestanding
digital billboard at 235
Manchester Street

URBAN DESIGN AND LANDSCAPE - HEARING REPORT

**HUGH ANTHONY NICHOLSON
ON BEHALF OF CHRISTCHURCH CITY COUNCIL**

3RD FEBRUARY 2022

TABLE OF CONTENTS

1. INTRODUCTION..... 3

2. CODE OF CONDUCT 4

3. SCOPE..... 4

4. CONCLUSION AND PROPOSED CONDITIONS 5

5. DISTRICT PLAN STATUS 5

6. METHODOLOGY..... 6

7. RECEIVING ENVIRONMENT 6

8. PROPOSED DIGITAL BILLBOARD 9

9. LANDSCAPE VALUES 10

10. ASSESSMENT OF VISUAL EFFECTS..... 11

11. ASSESSMENT MATTERS 13

12. SUBMISSIONS 18

13. CONCLUSION 19

1. INTRODUCTION

- 1.1 My full name is Hugh Anthony Nicholson. I am a Director at UrbanShift which is an independent consultancy that provides urban design and landscape architecture advice to local authorities and private clients.
- 1.2 I hold a Post-Graduate Diploma of Landscape Architecture from Lincoln University and a Post-Graduate Certificate in Urban Design from the University of Sydney. I have more than twenty five years' experience in both the public and private sectors. I am a registered member of the New Zealand Institute of Landscape Architects (NZILA).
- 1.3 Prior to my current role, I worked as the Design Lead for the *Ōtākaro Avon River Regeneration Plan* for Regenerate Christchurch for two years, and as a Principal Urban Designer for Christchurch City Council for ten years. Before this I worked as an Urban Designer for the Wellington City Council for seven years.
- 1.4 I am a chair / member of the Nelson City / Tasman District Urban Design Panel and the Akaroa Design Review Panel. I was a member of the advisory panel for the development of the National Guidelines for Crime Prevention through Environmental Design (CPTED) for the Ministry of Justice, and a member of the Technical Advisory Group for the Wellington Waterfront.
- 1.5 My experience includes:
- (a) Project leader for the establishment of the Christchurch Urban Design Panel which reviews significant resource consent applications and significant Council public space projects (2008);
 - (b) Project leader for *Public Space Public Life Studies* in Wellington (2004) and Christchurch (2009) in association with Gehl Architects which surveyed how people used different public spaces around the city centre, and how the quality of these public spaces could be improved;

- (c) Steering group and design lead for *Share an Idea* and the Draft *Christchurch Central Recovery Plan* including associated draft district plan amendments to the central city zones which were subsequently reviewed and incorporated into the *Christchurch Central Recovery Plan*;
- (d) Expert urban design witness for Christchurch City Council to the Independent Hearings Panel for the Christchurch Replacement District Plan on the Strategic Directions and Central City chapters;
- (e) Design reviewer for more than fifty resource consent applications for major central city rebuilds for the Christchurch City Council including the Justice & Emergency Precinct, the Central Library, the Bus Interchange and the Christchurch Hospital Outpatients and Acute Services Buildings.

2. CODE OF CONDUCT

- 2.1 I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2014 and that I agree to comply with it. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise, except where I state that I am relying on the evidence of another person.

3. SCOPE

- 3.1 I have been asked by the Christchurch City Council to review an application to construct a freestanding double-sided digital billboard at 235 Manchester Street for off-site advertising. I have visited the site on the 6th November 2020 and 2nd February 2022. I have considered the application plans and the assessment of effects provided by the applicant. The applicant has provided revised photo-simulations for an 18m² digital billboard dated 22nd October 2020 Rev E. I have also reviewed the submissions received on the application.

4. CONCLUSION AND PROPOSED CONDITIONS

4.1 In my opinion the proposed freestanding double-sided digital billboard at 235 Manchester Street would create high adverse effects on the character and visual amenity of the high quality public spaces that have been completed as part of the upgrade of Manchester Street between Gloucester and Worcester Streets, and high adverse effects on the character and visual amenity of the residential units anticipated at 192 Gloucester Street. I note that there are lesser adverse effects on other surrounding areas.

4.2 If a consent is granted, I would recommend the following conditions:

- a. That a temporary consent is granted for a period of not more than five years, and;
- b. The digital sign shall be removed at the end of the five year period, or at the time that the final building inspection is granted by the Christchurch City Council for any residential development on the adjacent land to the east at 192 Gloucester Street whichever is the lesser;
- c. The consent holder shall monitor whether a final building inspection has been applied for, and provide documentation to the Council every six months from the commencement of the freestanding digital sign to confirm whether residential development is occurring on the site, and the status of any request for a final inspection;
- d. That the maximum luminance levels are 3,000 cd/m² during the day and 125 cd/m² during the night;
- e. That the hours of operation are from 6am to midnight and that there are no images between midnight and 6am.

5. DISTRICT PLAN STATUS

5.1 The site is in the Commercial Central City Business Zone and the activity status is discretionary.

6. METHODOLOGY

- 6.1 In order to assess the effects of the proposed digital billboard I have assessed the existing urban landscape or receiving environment, and identified the landscape values that may be affected drawing primarily on the desired outcomes identified in the Christchurch City Plan and the Christchurch Central Recovery Plan. I have then assessed both the magnitude of change and the nature of the effects resulting from this proposal, and evaluated the effects using a seven-point scale drawn from the New Zealand Institute of Landscape Architects (NZILA) guidelines. My assessment has been based on the representative viewpoints identified in DCM Urban's assessment and the potential 'audiences' or viewers.
- 6.2 I have not assessed the 'sensitivity to change' of the urban landscape since it is possible to assess the specific effects of this proposal rather than a generic attribute such as sensitivity to change. The NZILA's Aotearoa New Zealand Landscape Assessment Guidelines note that *"sensitivity' is relevant when considering District Plan controls or alternative sites but is not relevant when considering the effects of a proposal"*¹.

7. RECEIVING ENVIRONMENT

- 7.1 The site is on the western side of Manchester Street, on a temporary gravel carpark formed on the site of buildings demolished after the Canterbury earthquakes. Manchester Street is the eastern edge of the central city commercial zone.
- 7.2 Manchester Street was identified as the eastern edge of the commercial core and the primary north-south public transport route through the central city in the Christchurch Central Recovery Plan. It was increased to 30 metres wide through a designation process under the Canterbury Earthquake Recovery Act 2011.

¹ *Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines*, Final Draft subject to final editing, graphic design, illustrations, approved by Tuia Pito Ora / NZILA, 5 May 2021, paragraph 5.46.

- 7.3 Manchester Street has been redeveloped to provide a high-quality environment that supports walking, cycling and public transport use. Street upgrades have been completed and the new streetscape includes generous paved footpaths, extensive street trees and raingardens (which capture and filter stormwater runoff from the street), seats, rubbish bins and other street furniture, and a shared cycle / pedestrian path on the eastern side of the street. One of a pair of 'super stops' is sited opposite the application site on Manchester Street with extensive bus shelters and facilities for south bound public transport users. The super stops have been designed to provide priority for bus movements, and to enhance the experience for people waiting for buses.
- 7.4 The land to the east of Manchester Street was set aside in the Christchurch Central Recovery Plan for the 'East Frame', and subsequently compulsorily acquired by the Crown to establish a comprehensively-designed medium density residential development around a linear park. The Crown entered into a contractual public / private partnership with Fletcher Living, with the Crown developing the linear Rauroa Park and associated public spaces and Fletcher Living delivering 900 residential apartments as part of a staged comprehensive development. Recently Ōtākaro Limited has been negotiating with other developers to develop some of the superblocks.
- 7.5 The land at 192 Gloucester Street on the opposite side of Manchester Street is currently occupied by a temporary gravel carpark. It is part of Ōtākaro Limited's residential development and will be developed as a superblock in a future stage. The superblock at 198 Gloucester Street on the eastern side of Rauroa Park was completed in 2021 and is 115 metres from the site.
- 7.6 The application site is part of a temporary Wilsons carpark with a gravel surface and temporary planters along the Manchester Street edge. To the south there are two earthquake-damaged heritage buildings, the former Trinity Congregational Church and the former State Insurance Building. To the west there are concrete shear walls of the Rendezvous Hotels and Cathedral Junction with large scale murals and graffiti..



Photo1: Residential units under construction at 198 Gloucester Street



Photo 2: Wilsons carpark including application site at 235 Manchester Street

7.7 Windows from the Rendezvous Hotel, the Quest serviced apartments and the Heritage Christchurch Hotel overlook the site and the proposed digital billboard. While residential occupation of the Rendezvous and Heritage Hotel and some of the Quest serviced apartments is generally short term and the adverse effects of the digital billboard might be considered less significant, I note that some of the Quest serviced apartments and the Heritage Hotel units have long term tenancies and could be considered as residential activities. I have not been able to determine which windows facing the site are occupied by long or short term tenancies.

7.8 It is anticipated that both the application site and the site on the opposite side of Manchester Street, 192 Gloucester Street, will be rebuilt. In the medium-term the application site is likely to have commercial buildings rebuilt between two and seven stories tall. These would be built to the street edge with active uses on the ground floor. 192 Gloucester Street will be rebuilt with residential apartment buildings between two and four storeys high with potential commercial uses on the ground floor along Manchester Street.

8. PROPOSED DIGITAL BILLBOARD

8.1 The application for a digital billboard at 225 Manchester Street proposes a six metre by three metre digital billboard in a portrait orientation. The proposed support structure consists of single circular structural pole with a mesh frame surrounding the sign that is four metres wide and nine metres tall and intended to allow plants to climb around the structure. The lower three metres of the mesh frame has 30mm gaps to make it more difficult to climb.

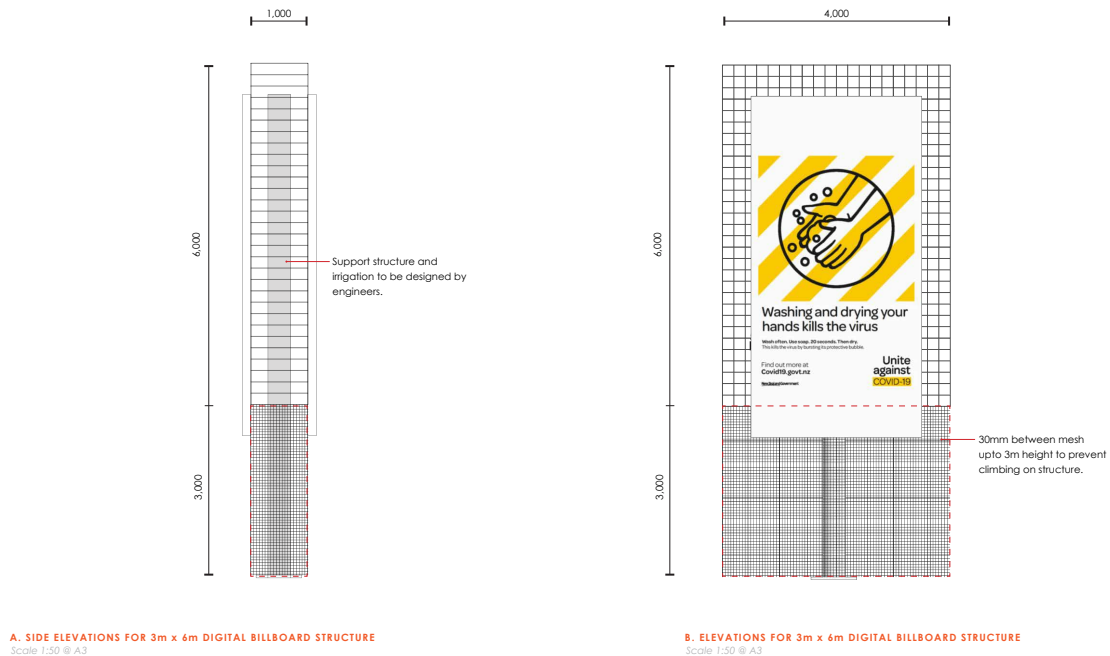


Figure 1: Illustration of proposed 6m x 3m digital billboard and the 9m x 4m x 1m supporting structure

9. LANDSCAPE VALUES

Christchurch Central Recovery Plan (CCRP)

- 9.1 While the Christchurch Central Recovery Plan (CCRP) is no longer a statutory document, it provided the vision for rebuilding central Christchurch after the Canterbury earthquakes, and gives a rationale for understanding the landscape values that were incorporated into the rebuild.
- 9.2 The Frame was identified in the CCRP as a means of “reducing the extent of the central city commercial area” and the East Frame was designated for “medium-density demonstration housing and long-term residential development” with the objective of providing “a greater choice of housing” and adding “visual and open space amenity”².
- 9.3 Manchester Street is identified in the Accessible City Chapter (ACC) of the CCRP as the key north-south transport route in the central city. The ACC directs that Manchester Street will be converted into a ‘boulevard’ to provide bus priority and to create a high-quality connection between the East Frame and the Core. A high-quality ‘super stop’ is identified on Manchester Street between Worcester and Gloucester Streets³.

Christchurch City Plan

- 9.4 Policy 6.8.2.1.2 - Controlling signage in sensitive locations in the Christchurch City Plan, seeks to protect the character and amenity values of residential areas from adverse visual and amenity effects from large areas or numbers of off-site signs. Similarly, Policy 6.8.2.1.3 - Managing the potential effects of signage seeks to ensure that the size, number, height and location of signs does not detract from the character and visual amenity of surrounding areas and the public realm.

² *Christchurch Central Recovery Plan*, Canterbury Earthquake Recovery Authority, 2012, pp. 35-36

³ *An Accessible City*, Replacement transport chapter, *Christchurch Central Recovery Plan*, Canterbury Earthquake Recovery Authority, 2013, p.13

9.5 These policies seek to control the adverse effects of signage on the character and amenity of residential areas and public spaces.

9.6 Policy 6.8.2.1.3 ii Managing the potential effects of signage seeks that signage does “not detract from, and where possible contribute to, the character and visual amenity of the surrounding area and public realm” and “maintain(s) the building as the primary visual element”.

10. ASSESSMENT OF VISUAL EFFECTS

10.1 I have used a seven point scale to assess the scale of effects drawn from the NZILA’s Aotearoa New Zealand Landscape Assessment Guidelines:

very low	low	mod-low	moderate	mod-high	high	very high
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After reviewing the seven viewpoints provided by DCM Urban I have noted the main audience from each viewpoint, made a brief comment about the view, and rated the potential effects of the proposed sign on the view.

Viewpoint	Audience	Comment	Effects
1 – View south from 265 Manchester Street (less than 50 metres)	Pedestrians, cyclists, bus users, private vehicles, office workers at UniMed Building	Billboard is visually dominant from upgraded footpath on western side of Manchester Street – the base of the sign is only slightly above eye level and location at the edge of the footpath places the sign centrally within the field of vision.	high
2 – View north-west from 185 Hereford Street	Users of Rauroa Park, pedestrians, cyclists, residents at 185 Hereford Street	Billboard is clearly visible to park users and residents - light and changing images would attract eye. Not visually dominant with central city background. View will be blocked by future residential development along east side of Manchester Street.	mod-low

3 – View north from 180 Manchester Street	Cyclists and pedestrians on shared path on east side of Manchester Street, future residents at 180 Hereford Street, bus patrons, private vehicles	Billboard is clearly visible and partly visible against the skyline. Not visually dominant but changing images and brightness will attract the eye. Affects users of super stop on west side of Manchester Street and future residents at 180 Hereford St.	mod-high
4 – View west from the East Frame	Users of Rauoa Park, pedestrians, cyclists, residents at 198 Gloucester Street	Scale of the visual impact varies with the angle of view in relation to the orientation of the sign. In short term visual impact on Rauoa Park and residential units under construction at 198 Gloucester Street. In longer term views will be blocked by future development at 192 Gloucester Street	moderate
5 – View north-west from Manchester Street super stop	Bus users at Super Stop and on board buses, future residents at 192 Gloucester Street, pedestrians, cyclists	As with Viewpoint 4 the scale of the visual impact varies with the angle of view in relation to the orientation of the sign. Views are generally less than 50m and impact both the character and visual amenity of the public spaces and future residential development at 192 Gloucester Street	high
6 – View south from Margaret Mahy Park	Users of Margaret Mahy Playground, pedestrians, cyclists, bus patrons, private vehicles	Clearly visible from entrance to Margaret Mahy Park but limited impact within the playground. Seen against backdrop of central city.	moderate
7 – View north from High / Manchester intersection	Pedestrians, cyclists, bus occupants, private vehicles, patrons of Pink Lady Bar	While this is a more distant view the billboard will still be clearly visible as a result of the size, brightness and moving images. Adverse visual effects are low.	low

11. ASSESSMENT MATTERS

11.1 While the proposal is a discretionary activity, I have used the restricted discretionary assessment matters identified in 6.8.5.3 as a guide to the issues that the City Plan may be concerned with.

6.8.5.3 *Static and digital billboards*

- a. *Whether the scale, design, colour, location and nature of the billboard will have impacts on the architectural integrity, amenity values, character, visual coherence, and heritage values of:*
- i. *the building and the veranda on which the billboard is displayed and its ability to accommodate the signage;*
 - ii. *the surrounding area (including anticipated changes in the area);*
 - iii. *residential activities; and*
 - iv. *heritage items or heritage settings, open spaces, protected trees or areas possessing significant natural values.*

11.2 In an environment such as Manchester Street where commercial and residential zones are in close proximity there will be some signage visible from residential areas. Freestanding static signs associated with onsite activities measuring no greater than 9m² and situated at a height no greater than six metres above ground level are permitted within the Commercial Central City Business zone. However, the proposed billboard is 18m² and situated up to nine metres above ground level, which is 200% larger and 150% higher than permitted. The proposed sign is also intended for off-site rather than on-site advertising.

11.3 The residential units at 198 Gloucester Street have extensive west-facing glazing looking over Rauroa Park towards the application site. Their view of the proposed digital billboard will be blocked when the residential development at 192 Gloucester Street is constructed. While designs for this have not been lodged with the Council, residential units at 192 Gloucester Street will be required to have windows overlooking Manchester Street for CPTED reasons and it is

likely that they will wish to take advantage of the westerly aspect and views of the city.

- 11.4 In my opinion the use of illuminated digital signage adjacent to residential areas where the content is off-site advertising and the images change every ten seconds would reduce the visual amenity of the quality of the outlook from the residential units. In particular the excessive size and illuminated nature of this proposal, and the 24-hour operation with image changes every ten seconds will continually draw the eye and distract from the visual enjoyment of the city views.
- 11.5 While there would be no 'moving images' and the maximum luminance would be set for day-time and night-time use, each advertising image uses different colours and each colour has a different luminance. The visual effect of changing images and associated changes in colour / luminance creates the illusion of movement as the images change.
- 11.6 In my opinion the proposed freestanding digital billboard would adversely affect the character and visual amenity of residential activities in adjacent areas at 192 and 198 Gloucester Street.
- 11.7 Manchester Street has been upgraded into an attractive boulevard with high-quality public spaces including a super stop with a wide range of amenities for bus patrons, a shared pedestrian / cycle path, extensive street trees and rain gardens, and paved footpaths with street furniture. The proposed billboard would be a visually dominant feature particularly from the footpaths on Manchester Street between Worcester and Gloucester Streets, and from the super stop opposite the application site on Manchester Street. It would be particularly visible and visually dominant for bus passengers travelling down Manchester Street due to their viewing height.
- 11.8 In my opinion the proposed billboard would adversely affect the character and visual amenity of the surrounding public spaces and super stop which have been upgraded to provide a high-quality environment for pedestrians, cyclists and bus patrons.



Photo 3: Photo simulation of an 6 x 3 metre digital sign (based on DCM Urban illustration)

- b. *Whether the extent of the impacts of the billboard are increased or lessened due to:*
- i. *the design, dimensions, nature and colour of the sign or support structure;*
 - ii. *the level of visibility of the billboard; and*
 - iii. *vegetation or other mitigating features.*
- c. *Whether the billboard combines with existing signage on the building, the site or in the vicinity, to create visual clutter or set a precedent for further similar signage.*

11.9 No detail has been provided regarding the planting medium into which the climbing plants would be planted, or the proposed irrigation system. Even with ideal growing conditions I consider it would be unlikely that the proposed plants would provide a full coverage of the mesh frame, and it would be likely that they would take more than three years to grow to the height of the

structure. Examples of similar proposals in Christchurch show only partial coverage of climbing structures (see photo 3).



Photo 3: Climbers growing up the northern façade of the Westend carparking building in July 2020

- 11.10 In terms of my assessment, I have not considered the framing element as a fully planted green element (such as a hedge for example) but have assessed it as a steel mesh frame with plants growing on it.
- 11.11 Approval of a digital billboard with off-site advertising in this location is likely to be used as a precedent for further digital billboards opposite residential areas.

d. *Whether the billboard:*

- i. *enlivens a space or screens unsightly activities; and*
- ii. *will result in an orderly and coordinated display.*

11.12 The proposed sign does not enliven the space or result in a more orderly or coordinated display. The surrounding area has two large scale murals and this is an additional sign with off-site advertising.

e. *Whether the extent of the impacts of the billboard are increased or lessened due to:*

- i. *the frequency and intensity of intermittent or flashing light sources, and the proposed periods of illumination and frequency of image changes;*
- ii. *the prominence of the billboard due to its illuminated or animated nature and ability to draw the eye;*
- iii. *the nature of surrounding land use activities;*
- iv. *the proximity of the display to other properties and the likely effects of such intermittent or flashing lights or changing images upon those properties and their occupants; and*

The potential of the billboard to cause distraction or confusion to motorists in their observance of traffic conditions, directions or controls.

11.13 The level of luminance of the digital sign creates the visual 'brightness' of the sign and the visual contrast with its surroundings. Establishing moderate levels of luminance during the day and at night help to reduce the adverse visual impacts and to reduce the contrast with its surroundings.

11.14 AS/NZS 4282:2019 Control of the obtrusive effects of outdoor lighting establishes maximum luminance standards of 5,000 cd/m² during the day and 250 cd/m² at night. The standard states that these levels are intended to avoid lighting "giving rise to excessive annoyance, discomfort, distraction or a reduction in the ability to see essential information"⁴, however, it goes on to say that this is "only one of a number of environmental and ecological considerations that will need to be addressed"⁵. In other words the maximum luminance standards are not appropriate in all circumstances. In sensitive locations it is appropriate for Councils to recommend different

⁴ AS/NZS 4282:2019: Control of the obtrusive effects of outdoor lighting, , Section 1.4 Definitions

⁵ AS/NZS 4282:2019: Control of the obtrusive effects of outdoor lighting, , Preface

luminance levels for outdoor signage in order to mitigate adverse effects or to complement a particular sense of place or character.

- 11.15 Christchurch City Council Practice Note - Billboards recommends mitigation measures for residential activities can include lower luminance values (eg. 3,000 cd/m² during day and 125cd/m² maximum at night), a slow dissolve of 0.5 second, and longer image dwell times (e.g. 2 or 5 minutes during the day and 15 minutes or no transition at night, depending on other factors within the surrounding environment)⁶. Given the residential activities in the receiving environment If this consent is approved I recommend the following conditions of consent are included:

Maximum luminance:	3,000 cd/m ² during the day 125 cd/m ² during the night
Hours of operation:	No images between 12am and 6am

12. SUBMISSIONS

- 12.1 I have reviewed the submissions received relating to urban design and visual matters. The submissions include:

1. *Opposes* – no reason given;
2. *Opposes* – finds digital billboards visually intrusive;
3. *Supports in part* – but opposes mesh surround and planting - no reason given;
4. *Opposes* – considers digital billboards create visual clutter and distraction;
5. *Opposes* – considers that digital billboards can create adverse visual effects particularly with regard to community mental health;
6. *Opposes* – considers that digital advertising detracts from quality of city views, and reduces amenity of Margaret Mahy Playground;

⁶ *Practice Note-Billboards*, Christchurch City Council, p. 11-12, Condition 9

7. *Opposes* – considers that digital billboards negatively affect visual and property values;
8. *Opposes* – considers that a digital billboard in this location will reduce residential amenity and be “intrusive for residents and hotel guests”. Considers that the sign is out of scale and does not fit into the character of the precinct where several historic buildings are being repaired;
9. *Opposes* – (adjacent land owner planning with plans to rebuild which include a digital billboard) – considers the stand-alone digital sign will reduce the quality of surrounding urban developments.

12.2 In summary eight of the nine submissions are opposed to application, and there are three main themes which can be broadly characterised as adverse visual effects, reduction in character and visual amenity of surrounding areas, and reduction in residential amenity. In general, I support the submissions in opposition and consider that these matters are largely addressed in my conclusions.

13. CONCLUSION

13.1 In my opinion the proposed freestanding double-sided digital billboard at 235 Manchester Street would create high adverse effects on the character and visual amenity of the adjacent public spaces between Gloucester and Worcester Streets that have been upgraded as part of the Manchester Street ‘boulevard’ designated in the Christchurch Central Recovery Plan including the south-bound ‘super stop’. I consider that the proposed sign would also create high adverse effects on the character and visual amenity of the residential units anticipated at 192 Gloucester Street. I note that there are lesser adverse effects on other surrounding areas.



Hugh Anthony Nicholson

February 2022

MEMORANDUM

To: Christchurch City Council
Attn: Georgia Brown
Date: 31 January 2022
Re: 235 Manchester St digital billboard application

Quality Assurance Statement	
<i>This document has been prepared for the benefit of Christchurch City Council. No liability is accepted by ViaStrada Ltd, or any of its employees or sub-consultants with respect to its use by any other person.</i>	Prepared by: Axel Downard-Wilke
	Reviewed by: John Lieswyn
	Project Number: 1077-86
	Project Name: 235 Manchester St digital billboard application
	Version: 02 – revised for hearing



1 Introduction

My full name is Axel Peter Carl Downard-Wilke. I hold the position of Director at ViaStrada Limited. I have been in this position since May 2007.

I hold a Bachelor of Engineering (Hons) – Civil Eng. (1997) and Master of Engineering (Civil Eng) (2003), both awarded by the University of Canterbury.

I have been active as a transport planner and traffic engineer in New Zealand since 1998. My specialisations include sustainable transportation, urban traffic engineering, traffic signals, and road safety. With a nation-wide focus, I have developed (and continue to develop) technical guidance, train my peers (since 2003), and was a member of the 2014 Cycling Safety Panel.

I was employed by Christchurch City Council from 1998 to 2005 and have been self-employed since (there are ten staff in our consultancy).

2 Background

Christchurch City Council has received an application to erect digital billboards at 235 Manchester Street, with one billboard facing south and the other facing north.

ViaStrada has been commissioned to peer review the applicant's Transport Assessment.

3 Review

ViaStrada has reviewed the application's Transport Assessment and considers the following points noteworthy.

3.1 Section 4.1 of the Transport Assessment

The proposed billboard is close to existing traffic signals:

- About 40 m south of the Gloucester Street signals
- About 50 m north of the Worcester Street signals

The Transport Assessment does not explain the underlying rationale for considering approach sight distance (ASD) in its section 4.1.2. The area leading up to the ASD lines shown in Figures 9 and 10 could be termed a "critical decision zone". For convenience, Figure 9 is reproduced as Figure 1 below.

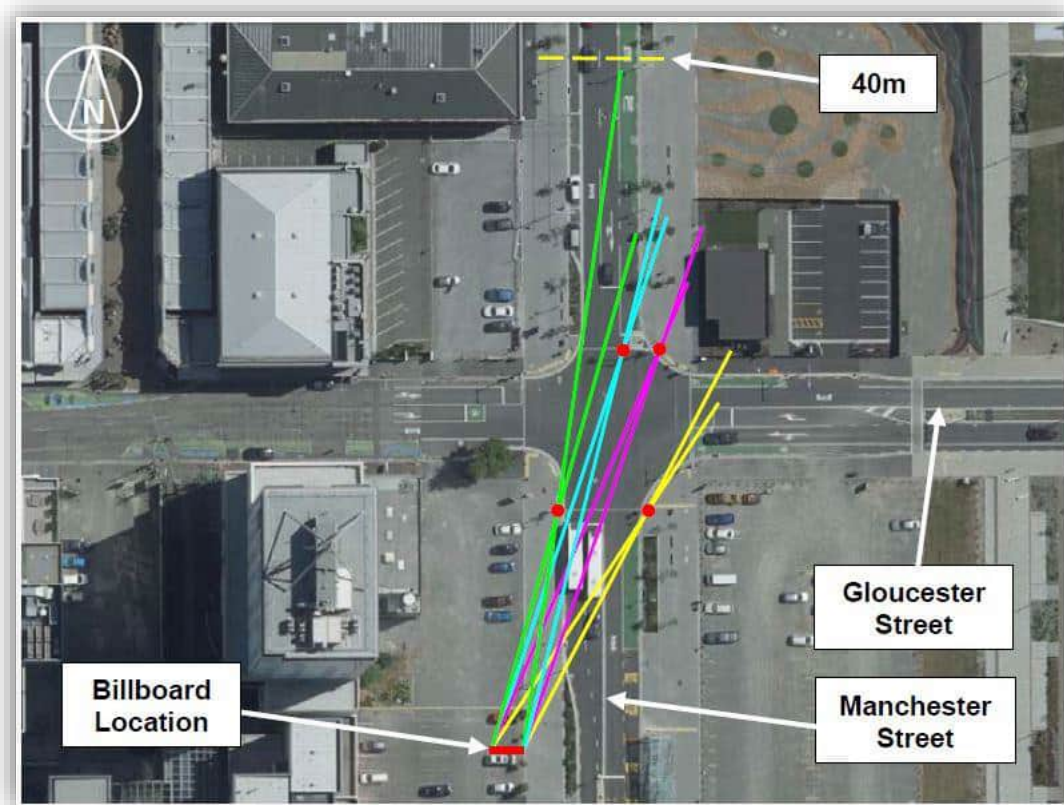


Figure 1: Reproduction of Figure 9 of the Transport Assessment

ViaStrada’s explanation of a critical decision zone is as follows:

It is considered that the most critical part of the approach in terms of the potential for driver distraction is the decision zone. This represents the part of the approach where a driver will decide to stop or continue.

The Approach Sight Distance (ASD) represents the distance travelled by a vehicle as driver observes, responds, and then brakes. ASD represents the last point where a driver can be expected to stop if the signal changed from green to amber.

Once a driver has travelled past the ASD line, they would normally continue through the signal even if they changed away from green. The area immediately prior to the ASD line could thus be termed a critical decision zone.

To further discuss these issues, the traffic signal plan for the Gloucester / Manchester streets intersection is reproduced in Figure 2. The green lines in Figure 1 pivot around signal pole 5. ViaStrada’s analysis concentrates on drivers travelling southbound towards Gloucester Street only; the equivalent issues for northbound drivers approaching Worcester Street do not exist. For clarity, our analysis concerns signal pole 5 only; there are no issues with any of the other signal heads.

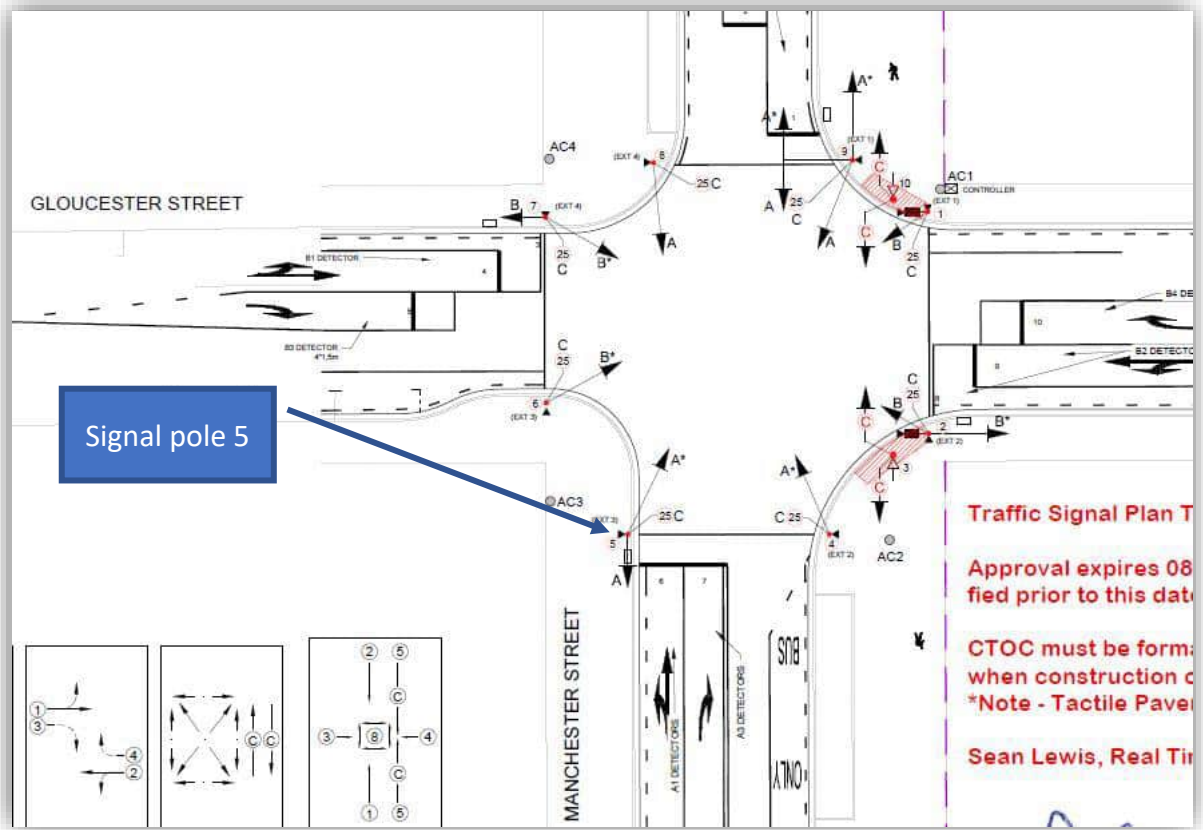


Figure 2: traffic signal plan for the Gloucester / Manchester streets intersection

There are several comments that need to be made to section 4.1 of the Transport Assessment.

3.1.1 Approach sight distance and critical decision zone

- It is stated that for a 40 km/h operating speed, the approach sight distance (ASD) to be used for analysis is 40 m.
- This distance comes from Table 3.1 in Austroads Guide to Road Design (GRD) Part 4A and corresponds to an assumed reaction time (R_T) of 2.0 seconds.
- Reaction times are discussed in Table 5.2 of Austroads Guide to Road Design Part 3, where designers can choose between two values for these “typical road conditions” in urban areas:
 - 2.0 sec: Higher speed urban areas, few intersections, high speed roads in urban areas ...
 - 1.5 sec: Alert driving conditions, e.g. high expectancy of stopping due to traffic signals, restricted low speed urban areas, built-up areas – high traffic volumes
- The correct value for reaction time for this location is thus 1.5 seconds.
- This reduces ASD to 34 m.
- Drivers may be travelling slower than the assumed operating speed of 40 km/h, for example during peak traffic.
- 40 km/h is the lowest design speed given in Table 3.1 in Austroads GRD Part 3.
- ASDs can also be computed with Equation 1 given in Austroads GRD Part 4A:
 - Using a design speed of 35 km/h, ASD is 28 m.
 - Using a design speed of 30 km/h, ASD is 22 m.

The reason these considerations matter is that by moving the dashed yellow line in Figure 9 of the Transport Assessment closer to the intersections, drivers may be travelling in the critical decision zone while the



electronic billboard may form the background to one of the traffic signals that they may be observing at that time.

3.1.2 Overlap of signal pole 5 and proposed billboard

Section 4.1.5 of the Transport Assessment clarifies that southbound drivers on Manchester Street approaching Gloucester Street may have an overlap between the signals of pole 5 with the billboard. The discussion above clarifies that this overlap may occur in the critical decision zone; this is a function of the speed that a driver is travelling at.

We do not agree with the notion that a “driver is more likely to be looking ahead to the primary and overhead primary signals”. For example, drivers intending to turn right into Gloucester Street are most likely to look at signal pole 5. Other drivers may look in a specific direction because something has caught their attention (e.g. an electronic billboard).

As the applicant has opted not to provide an assessment for lower operating speeds, we have undertaken this work ourselves; please refer to Figure 3. The following notes go with the various graphic elements on that figure:

- The proposed billboard has been placed as per the application (4 m wide; 7 m south of the section boundary)
- The position of the signal pole (the red dot) has been determined by zooming in
- The green visual overlay lines attach to the edges of the proposed billboard and pivot around the signal pole
- Lines have been drawn in the two southbound traffic lanes on Manchester Street 22 m back from the limit lines; as the limit lines are staggered at the intersection, so are the markers in the traffic lanes.
- These lines indicate the end of the critical decision zone.

The following can be seen from this assessment:

- There **is no overlap** of the pole 5 traffic signals with the proposed billboard for drivers in the general traffic lane while they are travelling in the critical decision zone. A driver will have passed through this zone before overlap occurs.
- There **is overlap** – for about 20 m – of the pole 5 traffic signals with the proposed billboard for drivers in the kerbside lane while they are travelling in the critical decision zone.

The kerbside lane where this overlap occurs is a bus lane. It is used as follows:

- The bus lane will be used by bus drivers. All buses coming from the north and north-west travelling towards the bus interchange use this corridor; bus use is thus frequent.
- This kerbside lane is used by all drivers turning left into Gloucester Street.
- When drivers at or near the intersection with Gloucester Street indicate a right turn, the following drivers intending to proceed straight ahead move into the kerbside lane to avoid having to wait behind the right turner. Note that their view of the billboard / pole 5 is not necessarily obstructed, for example if they have a higher seating position in an SUV.

Whether drivers make use of the rule that they can use the last 50 m of a bus lane legally or whether they move into the kerbside lane where the bus lane finishes is irrelevant; in either case these drivers travel within the critical decision making zone while there is signal overlap with the proposed billboard.

Having an overlap for 20 m when travelling at 30 km/h means 2.4 sec of travel time through this area.





Figure 3: overlap assessment by ViaStrada



3.1.3 Signal face functions

It should be noted that design guidance assigns functions to the various signal faces. Southbound drivers experience the following signal faces:

- Primary and overhead primary – mounted on pole 9
- Secondary – mounted on pole 5
- Tertiary – mounted on pole 4

The following is a table from Austroads for signal face functions:

Table 7.1 Signal face functions				
Location of Signal Face	Main Functions Performed			
	Warning	Stopping	Starting	Manoeuvring
Primary	Yes	Yes	No	No
Secondary	‡	‡	Yes	Yes
Tertiary	‡	‡	Yes	Yes
Dual Primary	Yes	Yes	No	No
Overhead Primary	Yes	Yes	No	No
Overhead Secondary	‡	‡	Yes	‡
Overhead Tertiary	‡	‡	Yes	‡

‡ These functions may also be provided depending on site geometry, topography and other conditions.

Figure 4: Table 7.1 from Austroads GTEP part 7

It is important to differentiate between the use of this design guidance for signal engineers and how drivers use traffic signals. The role of the designer is to ensure that designs meet the main functions as per the table. It is not correct, though, to say that drivers would not use signal faces for other functions as outlined in this table. For example, if something has caught a driver’s attention and their view is fixed in the direction of a secondary signal, that signal may need to be able to provide the functions of “warning” and “stopping” even though that is not the primary function of a secondary signal.

3.1.4 Parallax effect and colour-blindness

Section 4.1.6 of the Transport Assessment introduces the parallax effect, the difference in the apparent position of an object viewed along two different lines of sight. It contains the statement that “it will be evident to a driver that the lantern of the signals is separate to the billboard”; we disagree with this assessment for a variety of reasons.

Drivers may be distracted by a variety of environmental conditions, but the reason that they still react to a change in traffic signal status is that the stimulus coming from the change is high enough to get noticed. If a driver concentrates on an electronic billboard, with the traffic signal in the foreground, a signal change may create a stimulus through a combination of parallax (possibly a weak stimulus) and the colour change of the signals (potentially the much stronger stimulus). What happens, though, if the light change (e.g. from green to yellow) occurs at the same time as the dominant colour on the billboard changes from green to yellow as well?



In this context, it should be considered that colour-blindness is a common handicap. It affects one in twelve men (whilst it is an uncommon condition for women).¹ Fortunately, most colour-blind people retain blue–yellow discrimination, but the difference between the lights going from green to yellow is muted. The hue difference between the traffic signals and the billboard content may also be muted when both change at the same time, meaning that colour blindness may result in drivers not receiving a stimulus high enough when signal changes occur.

There is, therefore, an inherent risk when electronic billboards form the backdrop to traffic signal heads. This risk occurs when the lights and the billboard change at the same time, as the stimulus received from the traffic light change might be insufficient for it to register with the driver. This risk is greatly increased for those who suffer from colour blindness. In ViaStrada’s view, 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.

3.1.5 Unlikely driver confusion

We therefore do not concur with the statement in section 4.1.7: “..., even though there is overlap, it is considered that the billboard is unlikely to create driver confusion.”

3.1.6 Location of critical decision zone

Lastly, we cannot concur with the statement made in section 4.1.9. As our previous discussion has shown, the critical decision zone is closer to the intersection than what is stated in the Transport Assessment.

3.1.7 Vertical and horizontal assessment of overlap

The Transport Assessment has concerned itself with a horizontal analysis of potential overlap between signal heads and the proposed billboard. ViaStrada’s major concern is with the proposed billboard forming the backdrop for drivers travelling through the decision zone. It is possible, though, that viewed from as far back as the critical decision zone, a driver looking at a traffic light may look “over” the billboard.

The vertical overlap has not been assessed and should be added to the Transport Assessment. If it does get assessed, this analysis should be carried out for:

- Car drivers approaching in the traffic lane
- Truck drivers approaching in the traffic lane
- Bus drivers approaching in the bus lane

Different eye heights will apply to the different driver groups.

3.2 Section 4.2 of the Transport Assessment

The George Bolt Memorial Drive billboard is a good example of the point raised in section 3.1.7. ViaStrada is not certain that there is both a horizontal and vertical overlap between the primary signal shown in Figure 11 of the Transport Assessment and the billboard in the background. If drivers do not have the billboard as the backdrop when they travel through the critical decision zone, there may indeed be little reason for road safety concerns.

The same is true for the examples cited in Appendix A of the Transport Assessment. It is not known whether any of the traffic signals have any of the billboards as a backdrop when drivers travel through the critical decision zone.

3.3 Section 7.1 of the Transport Assessment

As outlined above, we see potential of the billboard to cause distraction to drivers in their observance of traffic signals. We therefore disagree with the Transport Assessment.

¹ National Eye Institute (2019) *Color Blindness*; available at <https://www.nei.nih.gov/learn-about-eye-health/eye-conditions-and-diseases/color-blindness> (retrieved 31 January 2022)

4 Recommendations

In our original report, we recommended that the applicant should provide additional information and provide additional analysis:

- A vertical assessment of overlap should be undertaken as discussed above.
- The assessment should be undertaken for lower operating speeds and a typical urban reaction time of 1.5 sec as discussed in our report, which brings the critical decision zone closer to the signals at Gloucester Street.

The point of undertaking the vertical assessment was to determine whether there is in fact overlap on the horizontal axis. This is a complicated assessment and this task remains outstanding.

The horizontal assessment for lower operating speeds, which is much simpler to do, has been undertaken by ViaStrada, and it showed that there is overlap of the signal face on pole 5 with the proposed electronic billboard while drivers proceed through the critical decision zone.

5 Conclusions

The assessment undertaken by ViaStrada has shown that there is horizontal overlap of the traffic signals and the proposed billboard in the critical decision zone for southbound drivers on Manchester Street. This may create risk, with the most significant consequences arising from a driver not noticing the signals changing away from green. ViaStrada cannot support the application.



Christchurch City Council

Heritage Team

Memorandum

Date: 26 January 2022

From: Suzanne Richmond, Heritage Advisor, Planning and Consents Unit

To: Georgia Brown, Senior Planner, Planning and Consents Unit

CC: Gareth Wright, Heritage Advisor, Planning and Consents Unit

RMA/2020/1877 - 235 Manchester Street - Heritage Assessment

Assessment

The proposed double-sided 18m² digital billboard at 235 Manchester Street is located in the vicinity of an important group of scheduled heritage items on the southwest corner of Manchester and Worcester Streets: the Former Trinity Congregational Church which anchors the corner, Shand's Emporium facing Manchester Street, Former State Insurance building facing Worcester Street, and the Former Government Buildings containing the Heritage Christchurch hotel to the west at 28 Cathedral Square, which has its north elevation to Worcester Street. The Former A W Smith and Son's Central Garage/Mayfair-Cinerama Theatre scheduled heritage building at 115 Worcester Street is located on the north side of Worcester Street approximately 58 metres west of the intersection of Manchester and Worcester Streets and opposite the above heritage buildings.

I am familiar with the application site, as I pass it regularly on my way to work.

I have assessed the proposal against the signage matters of discretion in clause 6.8.5.3 of the Christchurch District Plan. The relevant matters relate to the impact of the scale, design, illumination, animation, location and prominence of the billboard on the heritage values of the surrounding area (including anticipated changes in the area).

The views of this group of heritage buildings adjoining the Manchester/Worcester Street intersection currently enjoyed when looking towards them from the north along Manchester Street will be affected to some extent, and this will be highlighted by the digital nature of the billboard, however I consider this impact will not be significant.

There are scenarios where large signs can significantly impact on views of heritage buildings. For example the billboard originally proposed at 83 Victoria Street (declined under resource consent RMA/2013/2015) sat directly behind the Victoria Mansions and Victoria Clock Tower heritage buildings and served as a backdrop to all views to these buildings looking from the northwest along Victoria Street.

I do not consider that this will be the case for the 235 Manchester Street application. The proposed billboard would feature in some but not all significant views to the heritage buildings on the southwest corner of the Manchester/Worcester Street intersection. There is a separation distance of at least 75 metres between the proposed billboard and the heritage buildings, as the billboard is proposed to be located 50 metres north of the intersection, and the group of heritage buildings lie on the opposite southwest corner of the intersection. The billboard would be located in front of and to the side (rather than behind) the significant north elevations of Former Trinity Congregational Church, Former State Insurance, and Former Government Buildings. So while the billboard will be present in medium to long-range views of Former Trinity Congregational Church and Former State Insurance

from north of the billboard looking south (the Former Government Buildings is only partially visible until approaching the Manchester/Worcester Street intersection from the north), after passing the sign from the north it would be possible to obtain unobstructed close up views of the buildings from the corner of Manchester and Worcester Streets. Views of the significant east elevation of Former Trinity Congregational Church and the adjoining Shand's Emporium would be unaffected. There are no significant views of the group of heritage buildings clustered around the southwest corner of the intersection when approaching along Manchester Street from the south. The towering Former State Insurance building is visible at some distance from the south, but its principal elevation faces north. Therefore the south face of the billboard will have limited visual effects on these heritage items.

The proposed billboard may be visible in peripheral vision when viewing the Former A W Smith and Son's Central Garage/Mayfair-Cinera Theatre heritage building on the north side of Worcester Street from the Manchester/Worcester Street intersection, however due to the separation distance from the application site as the Mayfair building lies midblock, to the west of the intersection, views to this heritage building will not be notably affected. The Mayfair building is the second building heading west in the group of buildings on the north side of Worcester Street, and cannot be seen from the south until almost at the intersection.

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 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.

The transitional nature of the block containing the application site is recognised by a condition attached to resource consent RMA/2017/467 for the adjoining corner site at 221 Manchester Street (on the northwest corner of the Manchester/Worcester Street intersection and closer to the heritage buildings) which restricts the duration of the placement of a 55m² billboard on the north face of the building to 5 years.¹ I note also that Council's urban design advice recommends that if the subject application is granted, a condition would be appropriate to require removal of the billboard once the residential development at 192 Gloucester Street is completed.

I consider that the proposal is not inconsistent with the historic heritage objective and policies in chapter 9 of the Christchurch District Plan which seek to protect and conserve heritage values and the contribution of the historic heritage to the district's character and identity.

Response to Submissions

Heritage Christchurch's objections to the proposed billboard in their submission include the size and "impact on the historic character of the precinct". The Former Government Buildings containing the Heritage Christchurch hotel at 28 Cathedral Square is an iconic Highly Significant heritage item in the District Plan and forms part of the group of remaining heritage buildings on the southwest corner of Worcester and Manchester Streets.

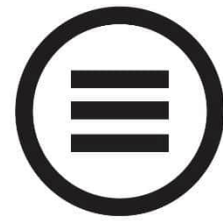
As discussed above, there is some separation of the proposed billboard from the hotel, and the significant north elevation of the hotel is only partially visible until reaching the Manchester/Worcester Street intersection from the north, so the north face of the billboard will be present in mid-range views in front of the sign to the east end of the hotel's north elevation, however the billboard will be seen to the side rather than obscuring the elevation. It will still be possible to stand south of the sign on the Manchester/Worcester Street corner to view the whole north elevation

¹ The RMA section 127 change of conditions application RMA/2021/3727 for 221 Manchester Street currently being processed by Council proposes a smaller 18m² billboard on the north face of the building than originally consented.

of the hotel. In addition, as noted above, it can be anticipated that the block containing the proposed billboard is likely to be redeveloped in the long-term and so visual impacts are expected to be temporary and can be restricted by a condition limiting the duration of the billboard.

Conclusion

In conclusion I can accept the construction of the billboard on a temporary basis as having no more than minor effects on heritage values, and would recommend a condition providing an end date for its removal. I suggest that removal after five years would be appropriate or, in line with Council's urban design advice, once the residential development at 192 Gloucester Street is completed.



TOWNPLANNING
GROUP

Application for Resource Consent to
the Christchurch City Council:

Wilsons Parking Limited

*Land use consent to establish and operate a free
standing digital billboard, 235 Manchester Street,
Central Christchurch*

27 August 2020

Document prepared by:

Town Planning Group (NZ) Limited

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Contents

1	Introduction	5
2	Background	6
2.1	Site Location and Legal Description	6
2.2	Surrounding area.....	7
3	Description of the Proposal	10
4	Statutory Provisions	11
4.1	Christchurch District Plan	11
4.1.1	Chapter 6.8 - Signs	11
4.2	National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health	12
5	Assessment of Effects	13
5.1	Existing & Receiving Environment	13
5.2	Permitted Baseline	13
5.3	Signs and Ancillary Support Structures.....	14
5.4	Static and Digital Billboards	15
5.5	Illuminated, moving, changing, flashing or retro-reflective displays.....	17
5.6	Positive Effects.....	18
5.7	Conclusion	18
6	Statutory Assessment	19
6.1	Section 104 (1) of RMA	19
6.2	Objectives and Policies	19
6.2.1	District Plan.....	19
6.3	Section 95 of RMA	20
6.3.1	Section 95A Assessment	20
6.3.2	Section 95B Assessment	20
6.4	Purpose and Principles of the RMA	21

Figures

Figure 1:	Site Location Plan (Source: Canterbury Maps 2020)	6
Figure 2:	Site location plan with subject site identified by red outline and surrounding sites and activities also identified (Source: Google Maps 2020).....	7
Figure 3:	Image of proposed billboard and support structure (Source: DCM Urban).....	10
Figure 4:	Site identified by black outline (Source: CCC District Plan Map Excerpt).....	11
Figure 5:	view of properties immediately west of the subject site	17

Supporting Information

- [A] Record of Title
- [B] Urban Design and Visual Impact Assessment
- [C] Visual Package
- [D] Record of Outline Plans Related to Designation V4
- [E] Proposed Conditions
- [F] LLUR Statement
- [G] RMA2017467



1 Introduction

Wilson Parking Limited (“**the Applicant**”) seeks land use consent to establish and operate an 18m² double sided free standing digital billboard at 235 Manchester Street, Central Christchurch (“**the application site**”).

The billboard will measure approximately 3m wide by 6m high (having a portrait format), with a ‘living’ support structure framing the billboard. The steel support structure will measure approximately 5m wide by 9m high, with a number of creeping plant species proposed around the frame. The Applicant proposes to operate the sign in accordance with a range of consent conditions commonly used for digital signage, with these conditions addressing matters in relation to lighting, glare and image selection.

The Applicant currently operates a temporary parking facility on the site which provides a mixture of long-term public and leased parking. The proposed digital billboard will add visual interest to the site and enable additional revenue to be generated until such time as the site is redeveloped.

The application site is located within the Commercial Central City Business Zone of the Christchurch District Plan (“**District Plan**”). Resource consent is required under the District Plan for a Discretionary Activity in accordance with Rule 6.8.4.1.4 D2 as the proposed sign exceeds the 6m height limit specified in Built Form Standard 6.8.4.2.6.

Overall, the proposal requires resource consent as a **Discretionary Activity**.

This Assessment of Environmental Effects (“**AEE**”) report considers the effects of the proposal and determines that the proposal will overall have less than minor adverse effects on the environment on account of the scale of the billboard, method of display, controls proposed and mitigation by way of planting. The proposed billboard will be entirely appropriate in the context of the receiving environment.

The proposal aligns with the key objectives and policies of the District Plan. The proposal achieves the purpose and principles of the RMA and accords with the definition of sustainable management under Part 2.

2 Background

2.1 Site Location and Legal Description

The application site is located at 235 Manchester Street and is legally identified as Part Section 689 Town of Christchurch as held in Record of Title CB366/79, a copy of which is appended as **Attachment [A]**.

Figure 1 below identifies the subject site in the context of the surrounding area. The site and surrounding area are also described in the Urban Design and Visual Impact Assessment (VIA) appended as **Attachment [B]** with the related visual diagrams appended as **Attachment [C]**.



Figure 1: Site Location Plan (Source: Canterbury Maps 2020)

The site is currently undeveloped with the former earthquake damaged buildings having been demolished. The Applicant currently operates the site as a temporary car parking facility in accordance with resource consent RMA/2018/143. The parking facility provides a mixture of leased and long stay public parking. Due to the temporary nature of the car parking facility, the site is currently unsealed. Landscaping has been established along the road boundary which serves as a visual buffer, enhancing the streetscape amenity of the site. The site has frontage to Manchester Street which is classified as a Central City Local Distributor Road.

2.2 Surrounding area

Figure 2 below identifies the subject site and the diverse range of activities undertaken in the surrounding area.

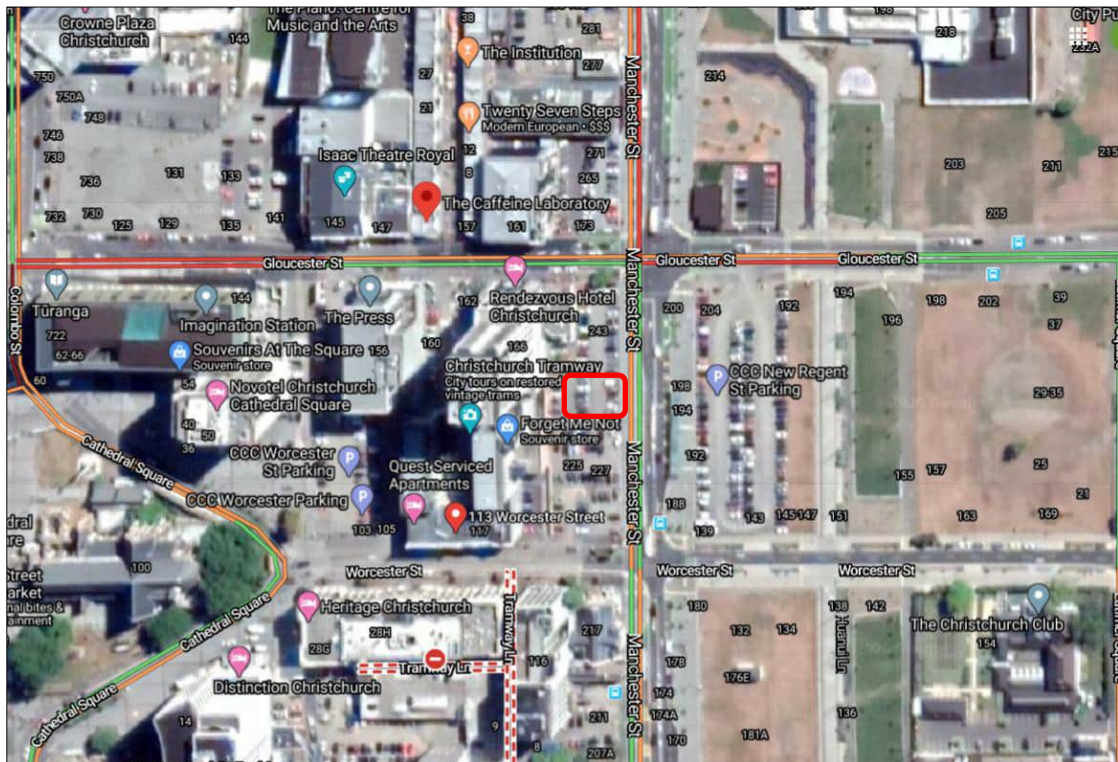


Figure 2: Site location plan with subject site identified by red outline and surrounding sites and activities also identified (Source: Google Maps 2020)

The surrounding area can be characterised as diverse with a mixture of land uses, amenities and building types present. However, due to earthquake damage, numerous buildings are disused. A 'Super Stop' bus transfer station is located immediately opposite the subject site on the eastern side of Manchester Street. The presence of the super stop encourages a high quantity of pedestrian traffic, with widened footpaths provided along Manchester Street. Traffic control devices are also located adjacent to the site entrance for the purposes of controlling south bound traffic along Manchester Street noting the presence of the Super Stop opposite the site; The traffic lights are located south of the proposed sign location.

The Applicant also owns and operates the adjoining site at 225-227 Manchester Street for car parking activities. To the south of 225-227 Manchester Street, are 127-135 Worcester Street and are operated as a private car parking facility independently of the Applicant; it is unknown whether these sites operate with resource consent. A resource consent has been approved for a three storey commercial and residential building on the corner at 221 Manchester/135 Worcester (RMA/2017/467) however, no construction has started. 239-245 Manchester Street is operated as a car park by the Applicant, but these sites are held in different ownership.



The subject site and surrounding area is currently in a state of redevelopment with a number of vacant sites and earthquake damaged buildings located in close proximity. Opposite the subject site to the east is Designation V4 (The Frame – North and East), with Ōtākaro Limited the Requiring Authority. The purpose of the Designation is to enable:

- Open space, park land;
- Family playground;
- Walking/cycling tracks;
- Stormwater management;
- Memorial sites;
- Residential units;
- Retail,/Food and beverage;
- Christchurch Club;
- Amenities;
- Temporary Activities;
- Public art;
- Leisure and recreational activities and facilities including gymnasium facilities;
- Ancillary activities including car parking.

The land directly opposite the subject site at 192 Manchester Street that falls within Designation V4 is currently undeveloped and is used for a mixture of car parking activities and open space park land, as managed by Christchurch City Council (CCC). Designation V4 lapses 31 July 2022 at which point the underlying zoning, Commercial Central City Business Zone will principally dictate future development potential. It is unknown if Ōtākaro have any intention to further develop the site. An audit of all outline plans submitted by Ōtākaro Network have been reviewed as supplied by Council on June 5th 2020 (**Attachment [D]**). The only potentially relevant outline plans lodged in relation to the East Frame are RMA/2016/2283 related to the Margaret Mahy Playground and RMA/2019/1327 as related to the erection of a sculpture at 142 Worcester Street; no applications have been lodged to undertake further development in relation to any of the points raised above.

Further south of the subject site along Worcester Street are a number of historical buildings in varying condition. Table 1 below lists the heritage item in question, its location and condition as well as heritage status.

Table 1: list of nearby heritage buildings

Heritage Item	Name	Heritage Status	Location	Condition
580	Former Trinity Congregational Church	Highly Significant	Worcester Street	Currently undergoing repair.
577	Former State Insurance Building	Highly significant	Worcester Street	Unoccupied – severe earthquake damage precludes all use. Subject to extensive vandalism.
576	Commercial Building Façade –	Significant	Worcester Street	Actively managed – currently occupied by a



Heritage Item	Name	Heritage Status	Location	Condition
	Former A W Smith and Son's Central Garage / Mayfair Cinerama Theatre			number of commercial tenancies.
575	Former Government Buildings	Highly Significant	Cathedral Square	Actively managed – well maintained and fully operational as a hotel with bar and restaurant facilities.

To the west of the subject site are a mixture of land uses consisting primarily of commercial and visitor accommodation activities as well as hospitality outlets. Land to the north of the subject site across Gloucester Street also consists of similar land uses. There are no digital or static billboards within close proximity to the subject site that can be seen in the same context as that proposed.

3 Description of the Proposal

Resource consent is sought to establish and operate an 18m² double sided free standing digital billboard measured as 3m wide by 6m high as identified in [Figure 3](#) below with detailed plans appended as **Attachment [C]**. The billboard will be mounted at a total height of 8.5m above ground with the base of the sign situated at 2.5m above ground. The sign will be used to display a mixture of off-site advertising that will be subject to the controls outlined in **Attachment [E]** which will also include relatively standard lighting and glare controls.

The billboard will be framed by a purpose-built support structure consisting of a steel lattice structure to be populated by a combination of climbing plant species inclusive of jasmine, wisteria floribunda and clematis paniculata. The total height of the structure will measure approximately 9m.



[Figure 3](#): Image of proposed billboard and support structure (Source: DCM Urban)

The billboard will be positioned against the Manchester Street site boundary and will be visible to north and southbound traffic travelling along Manchester Street.

The digital display will operate seven days per week 24 hours and will contain an inbuilt daylight sensor able to be calibrated to meet the required luminance values for day and night time operation. The maximum level of luminance will be limited to 500cd/m² during hours of darkness and 5,000cd/m² during daylight hours, as is common with other LED digital billboard installations.

4 Statutory Provisions

4.1 Christchurch District Plan

The subject site is located within the Commercial Central City Business Zone as identified in [Figure 4](#) below. The following overlays also apply to the subject site and surrounding area:

- Central City Building Height 28m;
- Category 2 Lower Noise Level Entertainment and Hospitality Precincts;
- Central City Core Overlay;
- Central City Inner Zone;
- Liquefaction Management Area;
- Adjacent to, but not within Designation V4 – Ōtākaro Network, The Frame North and East;



[Figure 4](#): Site identified by black outline (Source: CCC District Plan Map Excerpt)

Resource consent is required under the Christchurch District Plan as follows:

4.1.1 Chapter 6.8 - Signs

- Restricted Discretionary Activity under Rule 6.8.4.1.3 RD2 with the matters to which discretion is restricted to outlined under Rules 6.8.5.1, 6.8.5.2 and 6.8.5.3;
- Discretionary Activity under Rule 6.8.4.1.4 D2 as the proposed sign exceeds the 6m height limit specified in Built Form Standard 6.8.4.2.6 and is captured by Rule 6.8.4.1.3 RD2.

The proposal can comply with all other site standards related to signage.

Overall, the proposal requires resource consent as a **Discretionary Activity**.

4.2 National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health

The Resource Management (National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 ('NESCS') were gazetted on 13 October 2011 through an Order in Council, with the regulations taking effect 1 January 2012.

The NESCS are binding regulations that in this instance, replace District Plan rules relating to activities taking place on contaminated or potentially contaminated land. As well as prescribing a nationwide set of planning controls, the NESCS prescribes a mandated method for determining applicable standards for contaminants in soils, and a consistent approach to site investigations and reporting on contaminated or potentially contaminated land.

With respect to the present proposal, the site is not understood to have been used for any activities that would lead to the land becoming contaminated or potentially contaminated with a LLUR statement appended as **Attachment [F]**. To this end, the site is not considered a piece of land under Regulation 6(2) of the NESCS and its provisions are not considered applicable. In any event, no subdivision is proposed and any soil disturbance would be minor and achieve compliance under the NESCS.

5 Assessment of Effects

Section 88 of the RMA requires an assessment of any actual or potential effects on the environment that may arise from the proposal, and the ways in which any adverse effects may be avoided, remedied or mitigated. The status of the activity is Discretionary, however the assessment provided below draws on the restricted discretionary activity assessment matters outlined under Chapter 6 as they form a useful guideline for assessing the effects of the proposal.

This assessment is addressed under the following headings:

- Existing & receiving environment
- Permitted baseline
- Signs and ancillary support structures
- Static and digital billboards
- Illuminated, moving, changing, flashing or retroreflective displays
- Positive effects

A detailed VIA has been undertaken by DCM Urban; this has been relied on in undertaking our assessment.

5.1 Existing & Receiving Environment

The existing and receiving environment is detailed in section 2.0 of the VIA prepared by Dave Compton-Moen of DCM Urban.

5.2 Permitted Baseline

Sections 95D(b), 95E(2)(a) and 104(2) of the RMA provide discretion to Council (for the purposes of forming an opinion as to actual or potential effects) to disregard any adverse effects of the proposal on the environment (or on a person) if the National Environmental Standard permits an activity with that effect. There are no relevant National Environment Standards that apply to this proposal with the subject site not considered to meet the definition of a 'piece of land' under the NES for soil as identified above.

The permitted baseline provides guidance as to the effects of a proposal. In considering permitted signage within the zone, freestanding static signs associated with onsite activities measuring no greater than 9m² and situated at a height no greater than 6m above ground level are permitted within the zone. It is also worthy to note that multiple signs can be established in association with the standard where there are multiple vehicle crossings. Additionally, signage associated with vehicle crossings, does not have to be located directly adjacent to the crossing and can be located anywhere internal of the site. The primary difference between the present proposal and that

permitted is the off-site and digital nature of signage as well as total signage height with this assessed accordingly below.

Additionally, we note that digital signage is enabled under the District Plan provisions where it is located internal of the building with no limitations placed on the size or nature of display including image controls, luminance values, use of retroreflective material and the like, as signage of this type is not captured by the signage provisions by virtue of Advice note 4. to 6.8.3 of the District Plan.

Overall, it is considered that the above permitted baseline scenarios present a useful comparison as to the nature and scale of signage that could be erected on the site, and the associated actual or potential adverse effects. Such proposals are considered neither fanciful nor unreasonable and provide appropriate comparative assessments in this instance.

5.3 Signs and Ancillary Support Structures

6.8.5.1 All signs and ancillary support structures

- a. *Whether the scale, design, colour, location and nature of the signage will have impacts on the architectural integrity, amenity values, character, visual coherence, and heritage values of:*
 - i. *the building and the veranda on which the signage is displayed and its ability to accommodate the signage;*
 - ii. *the surrounding area (including anticipated changes in the area);*
 - iii. *residential activities; and*
 - iv. *heritage items or heritage settings, open spaces, protected trees or areas possessing significant natural values.*

No buildings are advanced under this proposal. As such, point (i) is not relevant.

The surrounding area described in the VIA and as outlined in Section 2 above can be characterised as redeveloping with a high prevalence of vacant sites, earthquake damaged and unoccupied buildings with some operational commercial sites providing retail and hospitality outlets. Over time, it can be expected that sites and buildings will be redeveloped and restored with land use in line with District Plan expectations for the Zone. Anticipated land use within Designation V4 is slightly harder to predict as the designation lapses in 2022 at which point the underlying Commercial Central City Business zoning will prevail.

Billboards are a feature commonly associated with commercial environments, inclusive of digital billboards which can be found in multiple locations within the Central City, both internal and external of buildings. Multiple examples can be found throughout the Central City including on the corner of 127 Manchester Street, 76 Manchester and 98, 145 and 171 Victoria Street. In this sense, signage is considered to be anticipated in this locality, and therefore the proposed billboard will be seen as compatible with the receiving environment, particularly as redevelopment progresses.

With respect to residential activity, the closest residential dwellings that may have views of the billboard are located at 197 Hereford Street behind the Canterbury Club. While

there are some residential apartments within The Heritage Hotel, due to the oblique angles of the building and adjacent buildings, views will only be possible from three windows, as concluded in the VIA, with any view contextualised in the wider landscape.

The dwelling located at Unit 1, 197 Hereford Street, some 200m south-east of the site, does not have views north towards the subject site and instead looks directly west. It is considered the distance between these dwellings and the digital billboard is sufficient to mitigate any potential adverse effects such that they are less than minor, with any views seen in the context of the wider commercial environment.

There are a number of heritage buildings situated within the locality in varying condition. An assessment of the proposed sign on these heritage items is provided in the VIA with the assessment concluding that the heritage buildings located along Worcester Street do not form a sensitive location as described in Policy 6.8.2.1.3. Overall, the VIA concludes that the effect of the billboard on these heritage items and heritage settings will be less than minor, as the billboard will not detract from the heritage setting and will contribute to the vibrancy and activity in the area. Further, any future redevelopment undertaken on adjacent sites fronting Worcester Street will inhibit views of the billboard in the same context as the heritage items, such as that approved by RMA/2017/467 (**Attachment [G]**).

An assessment of the proposed billboard in relation to open spaces is also provided in the VIA, with any adverse effect considered to be less than minor due to the distance between the billboard and open space areas, with the billboard seen in the context of the wider streetscape.

5.4 Static and Digital Billboards

- a. *Whether the scale, design, colour, location and nature of the billboard will have impacts on the architectural integrity, amenity values, character, visual coherence, and heritage values of:*
 - i. *the building and the veranda on which the billboard is displayed and its ability to accommodate the signage;*
 - ii. *the surrounding area (including anticipated changes in the area);*
 - iii. *residential activities; and*
 - iv. *heritage items or heritage settings, open spaces, protected trees or areas possessing significant natural values.*
- b. *Whether the extent of the impacts of the billboard are increased or lessened due to:*
 - i. *the design, dimensions, nature and colour of the sign or support structure;*
 - ii. *the level of visibility of the billboard; and*
 - iii. *vegetation or other mitigating features.*
- c. *Whether the billboard combines with existing signage on the building, the site or in the vicinity, to create visual clutter or set a precedent for further similar signage.*
- d. *Whether the billboard:*
 - i. *enlivens a space or screens unsightly activities; and*
 - ii. *will result in an orderly and coordinated display.*
- e. *Whether the extent of the impacts of the billboard are increased or lessened due to:*
 - i. *the frequency and intensity of intermittent or flashing light sources, and the proposed periods of illumination and frequency of image changes;*

- ii. *the prominence of the billboard due to its illuminated or animated nature and ability to draw the eye;*
- iii. *the nature of surrounding land use activities;.*
- iv. *the proximity of the display to other properties and the likely effects of such intermittent or flashing lights or changing images upon those properties and their occupants; and*
- v. *The potential of the billboard to cause distraction or confusion to motorists in their observance of traffic conditions, directions or controls.*

Those matters that fall for assessment under point a. have largely been assessed above in relation to residential dwellings, heritage settings and the surrounding area.

With regard to those matters listed under point b., effort has been made to reduce any potential adverse visual effects of the proposed billboard through the design of the support structure, plantings, orientation and size. The proposed structure and vegetation to grow up the support structure will assist to frame the sign and visually integrate the same with surrounding vegetation, and generally enhance the amenity of the structure and sign. As concluded in the VIA, the proposed structure design and landscape planting is considered to effectively mitigate the visual effects of the sign, such that any adverse effects will be less than minor.

There is limited existing signage onsite, with this compliant with the District Plan standards. In this regard, a number of signs are established at the site entrances in association with onsite car parking activities, and smaller poster signage established at the northern end of the site on the adjacent building wall. There are two public artworks located on the walls of adjacent buildings, but these are not considered to meet the definition of signage under the District Plan. Overall, as there is only limited signage presently established onsite, as restricted largely to site identification signage, the proposed billboard will not contribute to the appearance of visual clutter nor set a precedent for further similar signage within the Commercial Central City Business Zone.

As concluded in the VIA, the proposed billboard will serve to enliven the space, which is currently largely void of built form and used for car parking activities. The well designed and presented billboard will introduce a point of visual interest with a well-coordinated and orderly digital display.

With regard to those points raised under e. above, the frequency, intensity and proposed periods of illumination will largely be mitigated by those conditions proposed and appended as **Attachment [E]**. The prominence of the billboard will be mitigated by the proposed structure used to support and frame the billboard. The nature of surrounding land use has largely been discussed above. With regard to the adjacent Super Stop for public transport, the billboard will be visible to pedestrians and bus users, but as the super stop is located on the opposite side of the road, visual effects will be mitigated by distance, traffic and surrounding activity.

As concluded in the VIA, any potential adverse effects of the proposed billboard on surrounding properties will be less than minor as the majority of surrounding properties are either vacant, undeveloped, or have limited views in the direction of the subject site.

Some windows of the Rendezvous Hotel, as shown in [Figure 5](#), will look out onto the subject site but views of the billboard are likely to be minimal due to the oblique angles of the building and sign.



[Figure 5](#): view of properties immediately west of the subject site

Land to the east across Manchester Street is used for car parking activities by Christchurch City Council. As it is used for long stay parking, views of the sign from those car park users will be limited to their arrival in the morning and departure at night. The property to the north is also used for car parking activities, so will have similar effects as those described for users of the car parking facility on the eastern side of Manchester Street.

To the south of the subject site are the former Trinity Church and the State Building with both buildings heritage listed as 'Highly Significant' with the effects of the proposal on these heritage items assessed in the VIA.

Overall, based on the conclusions of the VIA, the effects of the illuminated and changing signage on these surrounding properties is considered to be less than minor (point e.iv).

Any adverse effects of the proposed billboard on surrounding road users will be mitigated through controls on the nature and intensity of the digital display including the luminance values, colours of images, types of images, length of image display and cross-dissolve. This will ensure the sign is not a distraction to motorists and will not be confused with traffic signals. Additionally, the road environment surrounding the subject site is slow speed, as limited to 30km/hr which in turn creates a safer traffic environment for road users. Overall, any adverse effects on the safety and efficiency of the surrounding road network are considered to be less than minor.

5.5 Illuminated, moving, changing, flashing or retro-reflective displays

6.8.5.2 Illuminated, moving, changing, flashing or retro-reflective displays

- a. *Whether the extent of the impacts of the signage are increased or lessened due to:*
- i. *the frequency and intensity of intermittent or flashing light sources, and the proposed periods of illumination and frequency of image changes;*
 - ii. *the prominence of the sign due to its illuminated or animated nature and ability to draw the eye;*
 - iii. *the nature of surrounding land use activities; and*

- iv. *the proximity of the display to other properties and the likely effects of such intermittent or flashing lights or changing images upon those properties and their occupants.*
- b. *Where the site is within the Akaroa Heritage Area, the matters set out in Rule 9.3.6.3.*

Points ii., iii., and iv. have been assessed in depth above and within the VIA appended as **Attachment [B]**, with any adverse effects of the proposed billboard in relation to these matters considered to be less than minor. Point b. is not relevant to the proposal.

With regards to point i., there will be no flashing light sources with conditions proposed to this effect. The proposed period of illumination will be controlled through in-built light sensors, and the frequency of image changes will be limited to 1 image/every 8 seconds with conditions also proposed to this effect.

5.6 Positive Effects

The proposal will give rise to a number of positive effects, including:

- Enabling a productive and profitable use of the site for a short duration.
- The billboard will support local business by advertising their activities.
- It will enliven and brighten the space that is currently used for temporary car parking.

5.7 Conclusion

The proposal has been considered against the relevant assessment matters of the District Plan to determine potential adverse effects on the surrounding environment. Overall, as a result of the mitigation proposed including the design of the support structure, use of vegetation and operational controls, any adverse effects are considered to be less than minor.

6 Statutory Assessment

6.1 Section 104 (1) of RMA

Section 104 (1) of the RMA requires that the consent authority must, subject to Part 2, have regard to a range of matters when considering an application.

PART 5 of this application addresses the matters contained in section 104(1)(a) and (ab). This section of the application considers those matters relevant under section 104 (1)(b) and (c).

6.2 Objectives and Policies

In this instance, the most relevant planning document is that of the Christchurch District Plan, noting that the proposal is for a site specific signage proposal within an established commercial environment.

6.2.1 District Plan

The Objectives and Policies in the District Plan that are of direct relevance to this Application are identified and discussed below.

Objective 6.8.2.1 recognises the positive potential of signage to support the needs of business, communicate important public messaging and its ability to enhance the visual amenity values and character of the surrounding area. The illuminated nature and vibrancy of the display will introduce visually interesting elements to a site presently used for temporary car parking activities. The proposed sign is able to operate in the manner intended and described by Objective 6.8.2.1 to support business and communicate effectively with the general public.

Policy 6.8.2.1.2 discusses the need to avoid signage in sensitive locations with these listed as being residential areas, open space and rural zones, excluding heritage sites or settings. There are no residential zones located in close proximity to the site that will be adversely affected by the proposal. Whilst there are residential areas located nearby, these residential units are within commercial zones where signage is anticipated.

Policy 6.8.2.1.3 outlines the matters to be considered when assessing the effects of new signage as related to size, number, height, location, design and appearance and standard of maintenance of signs. The policy also describes the desirable outcomes to be encouraged. Overall, the assessment provided above discusses how the proposed sign will not cumulatively contribute to visual clutter and will not adversely affect the character or visual amenity of the zone. Effort has been made to visually integrate the billboard with the surrounds by including a planted structure to frame the billboard and soften its appearance. Overall, the proposed sign will serve to enliven and enhance the site.



Through the use of lighting and image controls, no adverse effects are anticipated on transport safety (Policy 6.8.2.1.4).

Critically, Policy 6.8.2.1.6 directs the Council to enable off-site signage where it is compatible with the surrounding environment, is appropriately maintained, will not create cumulative adverse effects and where consistency with Policy 6.8.2.1.3 can be achieved. As demonstrated throughout this report, digital signage is an effective and tidy method of signage display, as is evident through the increasing prevalence of digital signage within the Central City. Due to the distance between the subject site and nearby sensitive activities, no adverse effects are anticipated on these receptors. The proposal is also consistent with 6.8.1.2.3. Overall, the proposal satisfies the criteria outlined in Policy 6.8.2.1.6 such that the sign is considered to be enabled by the District Plan policy framework.

6.3 Section 95 of RMA

6.3.1 Section 95A Assessment

Section 95A of the RMA considers the need for public notification and sets out four steps in a specific order to be considered in determining whether to publicly notify.

In terms of Step (1), public notification is not requested, Section 95C pertaining to notification in the event that further information is not provided under Section 92 is not applicable, and the application is not being made jointly with an application to exchange recreation reserve land under Section 15AA of the Reserves Act 1977.

In terms of Step (2), the proposal does not fall within any of the matters for which public notification is precluded.

Moving to Step (3), notification is not required by a rule in a Plan or a NES, and as demonstrated in Section 5 of this report, the likely adverse effects on the environment will be less than minor.

Lastly, in terms of Step (4) as no special circumstances are considered to apply public notification is not required under any of the pathways in Section 95A.

6.3.2 Section 95B Assessment

While public notification is not necessary, any effects of the proposal on the local environment and upon particular parties must still be considered. This is addressed through Section 95B of the RMA, which has four steps similar to Section 95A.

In terms of Step (1), there are no affected protected customary rights or customary marine title groups in terms of Subclause (2), nor is the proposed activity on or adjacent to, or may affect land that is the subject of a statutory acknowledgement made in accordance with an Act specified in Schedule 11 in terms of Subclause (3).

In terms of Step (2), none of the circumstances in Subsection (5) that would preclude limited notification apply. We therefore move to Step (3).

Step (3) requires the consent authority to determine, in accordance with Section 95E, whether there are any affected parties. Section 95E states that a person is an affected person if the consent authority decides that the activity's adverse effects on the person are minor or more than minor (but are not less than minor). There are not considered to be any affected persons in this instance for the reasons given in the above assessment of effects.

Overall, any actual or potential adverse effects of the proposed development are considered to be less than minor.

In terms of Step (4), no special circumstances exist therefore the application may be processed on a non-notified basis.

With respect to the above, in consideration of the conclusions of the AEE, it is concluded that the proposal will result in less than minor adverse effects on the environment, and there are no other circumstances requiring or warranting public or limited notification.

6.4 Purpose and Principles of the RMA

The purpose of the RMA, as set out under section 5(2) is to promote the sustainable management of natural and physical resources. The relevant matters in Sections 6, 7 and 8 of the RMA also require consideration. There are no matters of national importance under Section 6 that need to be recognised and provided for in this application.

The RMA specifies that regard must be had to the relevant matters listed in Section 7. The relevant matters include:

- (b) The efficient use and development of natural and physical resources.*
- (c) The maintenance and enhancement of amenity values.*
- (f) Maintenance and enhancement of the quality of the environment.*

On the whole, the proposal is considered to efficiently use the natural (land) and physical resources of the site. The proposal aligns with the outcomes anticipated within the Commercial Central City Business Zone and is compatible with the character and amenity of the zone. To this end, the proposal is considered to maintain and enhance amenity values and the quality of the environment.

There are no matters under Section 8 that require consideration with respect to this application. The subject site is not identified in the District Plan or otherwise known to be of any cultural significance.

For the reasons outlined in this report, the proposal is consistent with the purpose and principles under Section 5, and the associated matters under Part 2 of the RMA. The proposal represents an efficient use of natural and physical resources, and will be undertaken in a manner which avoids, remedies and mitigates potential adverse effects on the environment. It is considered that the proposal is consistent with the purpose and principles of the RMA and accords with the definition of sustainable management.



**RECORD OF TITLE
UNDER LAND TRANSFER ACT 2017
FREEHOLD**

Limited as to Parcels

**Guaranteed Search Copy issued under Section 60 of the Land
Transfer Act 2017**




R. W. Muir
Registrar-General
of Land

Identifier **CB366/79**
Land Registration District **Canterbury**
Date Issued 01 July 1925

Prior References

DI A/S 1880

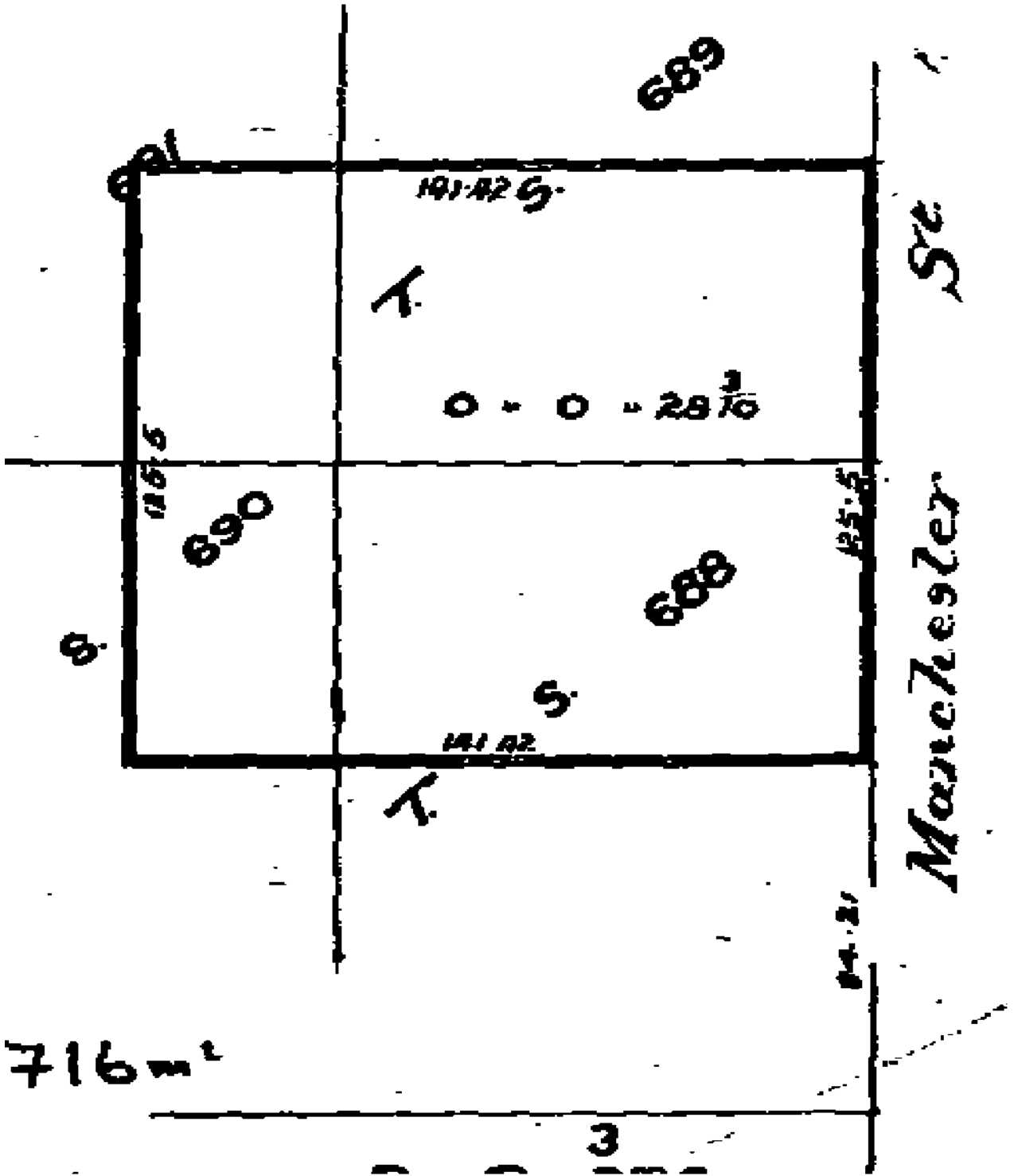
Estate	Fee Simple
Area	716 square metres more or less
Legal Description	Part Section 688-691 Town of Christchurch

Registered Owners

Wilson Parking New Zealand Limited

Interests

125027 (199/354) Conveyance creating party wall rights over part and appurtenant to the whole of the above described land



225 MANCHESTER STREET – DIGITAL BILLBOARD

WILSON PARKING

Urban Design and Visual Impact Assessment

Project No. 2020_049 | C

27 AUGUST 2020

225 MANCHESTER STREET – DIGITAL BILLBOARD

Project no: 2020_049
 Document title: Urban Design and Visual Impact Assessment

Revision: C
 Revision Date: 27 AUGUST 2020
 Original Date: 6 AUGUST 2020
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 File name: \\goose\storage\4_DCM - Projects\2020_049 Wilson_225 Manchester St
 Billboard UDVIA\3_Working Files\5_Word_2020_049 Wilsons_225
 Manchester St Billboard UDVIA_A

DOCUMENT HISTORY AND STATUS

REVISION	DATE	DESCRIPTION	BY	REVIEW	APPROVED
A	5/08/2020	UDVIA Report for Comment	SB/DCM	DCM	
B	6/08/2020	For Resource Consent	DCM	NR (TPG)	
C	27/8/2020	Additional plants and irrigation added	DCM	NR (TPG)	

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1. INTRODUCTION AND PROPOSAL

The following report is an Urban Design and Visual Impact Assessment for a proposed 6x3m double-sided, freestanding digital billboard sign at 225 Manchester Street, Christchurch. The proposed billboard will be located within the eastern boundary of the existing Wilsons carpark and is surrounded by a 'green frame' created using a mix of potted plants, climbers and vines. The structure is proposed to be 9m high with the billboard starting at 2.5m above ground level. It is anticipated that the structure will be 800-1200mm wide. The plants are supported by a steel mesh frame which 'hide' the main supporting structure. The billboard is designed to be located within carparks and positioned immediately abutting the road boundary to help define the street edge to Manchester Street.

The site is located in the Commercial Central City Business Zone and on the edge of Otakaro's East Frame (V4) Designation. The site has a Central City Active Frontage requirement and a requirement for a veranda. The area has a 28m maximum height overlay. A full description of the existing urban environment is described in Section 3.1 below. A mock-up of the proposal is shown in page 2 of the appendix. A series of photos and figures are attached in appendix one of this report along with details of the proposal.

2. METHODOLOGY

The urban design and visual impact assessment considers the likely effects of the proposal in a holistic sense. There are three components to the assessment:

1. Identification of the receiving environment and a description of the existing urban character;
2. The urban design assessment is an assessment of the proposal against the policies, objectives and rules of the relevant District Plan in regard to building style, land use activity, setbacks and active frontages, height, shading and signage (if relevant);
3. The visual impact assessment is primarily concerned with the effects of the proposal on visual amenity and people, evaluated against the character and quality of the existing visual catchment.

2.1 URBAN DESCRIPTION

To describe the character of the receiving urban environment a site visit is undertaken noting the character of existing buildings, their height, setbacks from street frontages and where there are any active frontages. The style and character of individual buildings are noted and grouped where possible, with particular emphasis placed on buildings with any heritage value. A combination of desktop and site analysis is used to determine the overall character of an urban area and what its 'Sensitivity to Change' may be. For example, an urban area which exhibits a high level of cohesion and uniformity may have a higher sensitivity to a proposal than an area which is more irregular and mixed.

As the proposal relates to signage, a broad-brush inventory of existing signage is undertaken within the receiving environment, noting their size, orientation, height, relationship to adjoining buildings and illumination. In many examples, corporate colours are considered to be signage and will be noted accordingly.

2.2 URBAN DESIGN ASSESSMENT

The urban design assessment component reviews the proposal against the policies, objectives and rules of

the District Plan which relate to Signage and Central City Urban Design matters. When assessing the proposal, the receiving environment is considered and whether the proposal will have an adverse effect on the existing urban character and amenity of a place, which is described above.

2.3 VISUAL ASSESSMENT METHODOLOGY

In response to section 7(c) of the RMA, an evaluation is undertaken to define and describe visual amenity values. As with aesthetic values, with which amenity values share considerable overlap, this evaluation was professionally based using current and accepted good practice rather than community-based methods. Amenity values are defined in the Act as *“those natural or physical qualities and characteristics of an area that contribute to people’s appreciation of its pleasantness, aesthetic coherence, and cultural and recreational attributes.”* The visual assessment looks at the sensitivity of receptors to changes in their visual amenity through the analysis of selected representative viewpoints and wider visibility analysis. It identifies the potential sources for visual effects resulting from the project and describes the existing character of the area in terms of openness, prominence, compatibility of the project with the existing visual context, viewing distances and the potential for obstruction of views.

2.3.1 BILLBOARD ANALYSIS

For the assessment of Billboards, the following research is a useful resource:

LED Billboard Research: Technical Review of Visual Effects, prepared by CCC, October 2016 by Boffa Miskell and Connectics.

The report states *‘Following an assessment of the potential sensitivity of the available viewing audience, the visual assessment then considers the potential change which will result from visibility of the Proposed Development. It should be remembered that views of a development do not necessarily equate to visual effects. Visual impact is not always negative and a change in view is not automatically wrong’.*

To assist further with the analysis of digital billboards we have visited several existing billboards, both digital and static, to determine their extent of influence or visual catchment of a billboard as well as to compare the brightness of a digital billboard versus an externally illuminated static billboard. Four different existing 6x3m billboards were observed during the day and night to assess the visibility of digital and static billboards in an urban environment during these times. During the day, the billboards were generally noticeable when standing further than 100m away from the structure but their content indiscernible. At night, both static (externally lit) and digital billboards had a higher level of visibility but did not necessarily have an adverse effect on the surrounding environment, depending on the character of the receiving environment. Between 100-200m away the billboards started to blend in with the surrounding light sources and activities, and with distances further away the boards are viewed in context with lights from houses, traffic lights and other illuminated signs. The billboards that were placed in front of or integrated into a building did not look out of context and tended to assimilate better than a free-standing sign. Again, this is dependent on context. Visual effects of these billboards when viewed from over 200m were generally not considered to be adverse in these urban environments, particularly when surrounded by a high level of ambient light and activity.

There was no apparent difference of visibility between a digital billboard and a static, externally lit billboard at night.

The visual assessment involves the following procedures:

- Identification of key viewpoints: A selection of key viewpoints are identified and verified for selection during the site visit. The viewpoints are considered representative of the various viewing

audiences within the receiving catchment, being taken from public locations where views of the proposal were possible, some of which would be very similar to views from nearby residential properties/apartments. The identification of the visual catchment is prepared as a desktop study in the first instance using Council GIS for aeriels and contours. This information is then ground-truthed on site to determine the key viewpoints and potential audience. Depending on the complexity of the project a 'viewshed' may be prepared which highlights the 'Theoretical Zone of Visual Influence' (TZVI) from where a proposal will theoretically be visible from.

- Assessment of the degree of sensitivity of receptors to changes in visual amenity resulting from the proposal: Factors affecting the sensitivity of receptors for evaluation of visual effects include the value and quality of existing views, the type of receiver, duration or frequency of view, distance from the proposal and the degree of visibility. For example, those who view the change from their homes may be considered to be highly sensitive. The attractiveness or otherwise of the outlook from their home will have a significant effect on their perception of the quality and acceptability of their home environment and their general quality of life.
- Those who view the change from their workplace are considered to be only moderately sensitive as the attractiveness or otherwise of the outlook will have a less important, although still material, effect on their perception of their quality of life. The degree to which this applies depends on whether the workplace is industrial, retail or commercial. Those who view the change whilst taking part in an outdoor leisure activity may display varying sensitivity depending on the type of leisure activity. For example, walkers in open country on a long-distance tramp are considered to be highly sensitive to change while other walkers may not be so focused on the surrounding landscape. Those who view the change whilst travelling on a public thoroughfare will also display varying sensitivity depending on the speed and direction of travel and whether the view is continuous or occasionally glimpsed.
- Identification of potential mitigation measures: These may take the form of revisions/refinements to the engineering and architectural design to minimise potential effects, and/or the implementation of landscape design measures (e.g. screen tree planting, colour design of hard landscape features etc.) to alleviate adverse urban design or visual effects and generate potentially beneficial long-term effects.
- Prediction and identification of the pre-mitigation and residual effects after the implementation of the mitigation measures.

2.4 EFFECTS ANALYSIS METHODOLOGY

Analysis of the existing urban and visual environment is focused upon understanding the functioning of how an environment is likely to respond to external change (the proposal). The assessment considers the resilience of the existing character, values or views and determines their capacity to absorb change, or sensitivity to change. The proposal is assessed in its 'unmitigated' form and then following proposed mitigation to determine the likely residual effects. The analysis identifies opportunities, risks, threats, costs and benefits arising from the potential change.

Assessing the magnitude of change (from the proposal) is based on the NZILA Best Practice Guide – Landscape Assessment and Sustainable Management (02.11.10) with a seven-point scale, being:

EXTREME / VERY HIGH / HIGH / MODERATE / LOW / VERY LOW / NEGLIGIBLE

In determining the extent of adverse effects, taking into account the sensitivity (low, medium, high) of the visual receptor, combined with the Magnitude of Change proposed, the level of effects is along a continuum to ensure that each effect has been considered consistently and in turn cumulatively. This continuum may include the following effects (based on the descriptions provided on the Quality Planning website (ref: <http://www.qualityplanning.org.nz/index.php/node/837> - Determining the Extent of Adverse Effects):

- **Indiscernible Effects** No effects at all or are too small to register.
- **Less than Minor Adverse Effects** Adverse effects that are discernible day-to-day effects, but too small to adversely affect other persons.
- **Minor Adverse Effects** Adverse effects that are noticeable but will not cause any significant adverse impacts.
- **More than Minor Adverse Effects** Adverse effects that are noticeable that may cause an adverse impact but could be potentially mitigated or remedied.
- **Significant Adverse Effects that could be remedied or mitigated** An effect that is noticeable and will have a serious adverse impact on the environment but could potentially be mitigated or remedied.
- **Unacceptable Adverse Effects** Extensive adverse effects that cannot be avoided, remedied or mitigated.

Identification of potential mitigation or offsetting measures: These may take the form of revisions/refinements to the engineering and architectural design to minimise potential effects, and/or the implementation of landscape design measures (e.g. screen tree planting, colour design of hard landscape features etc.) to alleviate adverse urban design or visual effects and/or generate potentially beneficial long-term effects. The following table assists with providing consistency between NZILA and RMA terms to determine where effects lie.

NZILA Rating	Extreme	Very High	Moderate			Low	Very Low	Negligible
			Moderate-High	Moderate	Moderate-Low			
RMA Effects Equivalent	Unacceptable	Significant	More than Minor	Minor	Less than Minor	Indiscernible		

The NZILA rating of 'Moderate' has been divided into 3-levels as a 'Moderate' magnitude of change to always result in either 'More than Minor' or 'Minor' effects but maybe one or the other depending on site conditions, context, sensitivity or receiving character and its degree of change. Identification of potential mitigation or offsetting measures: These may take the form of revisions/refinements to the engineering and architectural design to minimise potential effects, and/or the implementation of landscape design measures (e.g. screen tree planting, colour design of hard landscape features etc.) to alleviate adverse urban design or visual effects and/or generate potentially beneficial long-term effects.

Prediction and assessment identification of the residual adverse effects after the implementation of the mitigation measures. Residual effects are considered to be five years after the implementation of the proposed mitigation measures, allowing for planting to get established but not to a mature level.

3. ASSESSMENT OF EFFECTS

3.1 EXISTING URBAN CHARACTER

The proposed billboard is located within an urban area, defined by its significant amounts of roading, lighting and additional infrastructure. The site is located along Manchester Street, to the south of Gloucester Street and the north of Worcester Street. The wider area surrounding the proposed site is predominantly a mixture of commercial spaces and retail/hospitality, with medium density residential development located along the eastern edge of the East Frame Open space. However, there are significant gaps in built form with the receiving environment generally lacking a cohesive architectural design or character. Vacant sites dominant the built character of Manchester Street at present. Immediately to the south of the block containing the proposal are several heritage buildings, in various states of repair:

- Shands Emporium (heritage item 256) – originally located on Hereford Street prior to the earthquakes, this old timber, two storey structure is a Category 1 heritage building in the District Plan is located at 217 Manchester Street. The building is built up to the street edge but is not directly visible from the proposal site due to the Former Trinity Congregational Church's position immediately in front.
- At 117 Worcester Street (heritage item 577) is the former State Insurance building. The building was built in 1934-35 and has been used as an office building until the earthquakes in 2010/11. It is currently empty and awaiting repair. The building is 7 storeys high and is built up to the street frontage. This building, along with the former Trinity Church, the old Government building (housing the Heritage Hotel and apartments) and Cathedral Junction forms a largely intact heritage character street.
- The former Trinity Congregational Church on the corner of ((heritage item 577) at 124 Worcester Street and Manchester is a Highly Significant heritage building with a Category 1 Listing. It was extensively damaged in the 2010/11 earthquakes and is currently under repair. The building is of overall high significance to Christchurch and Banks Peninsula as a 19th century church that was used for Congregationalist worship for a century, then for the Pacific Island community in Christchurch, and later for its use by local community groups before becoming a well-known Christchurch restaurant and music venue.¹

Immediately to the west/northwest of the proposal site is the Rendezvous Hotel (approximately 70m in height), which is currently Christchurch's tallest building, and Sampan House. Sampan House is a two-storey commercial building fronting Gloucester Street but without any windows looking to the east. The wall is devoid of detail, currently hosting a large piece of street art. The Rendezvous Hotel has numerous windows overlooking the proposal site, starting at the third floor or 11.5m above the existing ground. Cathedral Junction (approximately 27m in height high and 10 storeys) is immediately to the southwest of the proposal site, sharing the western boundary. The building includes apartments with windows looking down on the proposal site. Windows start on the 3rd floor, set back approximately 5m from the internal boundary, with a 5m high blank concrete wall on the boundary.

Surrounding the site there is a balance between open space, vacant sites and built infrastructure. Roading and carpark infrastructure initially dominate the environment, with large green spaces bounding the site to

¹ <https://districtplan.ccc.govt.nz/Images/DistrictPlanImages/Statement%20of%20Significance/Central%20City/HID%20580.pdf>

the east. The pockets of open space and vegetation types found from Manchester Street through to Latimer Square, though some still in a juvenile state, provide a buffer between the residential outskirts and more built up commercial centre.

The East Frame designation on the eastern side of Manchester Street allows for future mixed-use development including a series of apartment buildings. A short video can be viewed on https://www.otakarold.co.nz/anchor-projects/the-east-frame/?gclid=EAlaIqobChMIorey_9WF6wIViH8rCh05Rwj6EAAYASAAEgIhrPD_BwE which shows the future potential development along the eastern side of Manchester Street. The buildings will, it is hoped, form a well-defined built edge along this frontage but will at the same time block views from the proposal site to the East Frame open space/park. It is anticipated these buildings will be 4-5 storeys in height but the exact bulk, location and design or their 'activity composition' of these buildings is unknown at this stage. It is possible these buildings will be a similar form to the recently completed Bedford Apartments which fronts Madras Street. The eastern side of Rauora Park (the East Frame) consists of residential terrace housing, varying between 2 and 3 storeys which have recently been built or are being built. These buildings form a strong edge to the park, and front onto this space with the closest dwellings being 116m from the proposal.

Throughout the wider site there are several existing signage types, spanning the length of Manchester Street and surrounding open space. These range in size, type and frequency but include digital free-standing signs, advertising pillars, information boards and posters.

Surrounding streets are characterised by wide footpaths and a high level of amenity given the relatively recent upgrade to paving, street tree planting and seating. New light poles have also recently been installed along with a significant amount of public transport infrastructure, shelters, signs and bus lanes. Traffic lights are located at each intersection along with a signalised pedestrian crossing immediately opposite the proposal site. However, given the lack of buildings along Manchester Street pedestrian numbers are relatively low. A series of viewpoints are discussed within section 3.3 of this report to assess the extent of the views of the proposal.

3.2 URBAN DESIGN ASSESSMENT

Located in the Commercial Central City Business (CB) Zone, the proposal has been assessed against the objectives, policies and rules of Chapters 15: Commercial and Chapter 6.8: Signs of the Christchurch City District Plan in regard to urban design matters:

CHAPTER 15 – COMMERCIAL CENTRAL CITY BUSINESS ZONE

15.2.6 Objective - Role of the Commercial Central City Business Zone

- a. *A Commercial Central City Business Zone that re-develops as the principal commercial centre for Christchurch District and is attractive for businesses, residents, workers and visitors, consistent with the Strategic Direction outcomes for the built environment.*

Response

The proposed sign adds vibrancy and activity to a site which is yet to be developed. Combined with the carpark it allows the revenue to be generated from the site without having an adverse effect on the visual amenity of the receiving environment or preventing future development of the site.

12.2.6.3 Policy - Amenity

- a. Promote a high standard of amenity and discourage activities from establishing where they will have an adverse effect on the amenity values of the Central City by:
 - i. requiring an urban design assessment within the Core of the Commercial Central City Business Zone;
 - ii. setting height limits to support the provision of sunlight, reduction in wind, avoidance of overly dominant buildings on the street and an intensity of commercial activity distributed across the zone;
 - iii. prescribing setback requirements at the boundary with any adjoining residential zone;
 - iv. ensuring protection of sunlight and outlook for adjoining residential zones;
 - v. setting fencing and screening requirements;
 - vi. identifying entertainment and hospitality precincts and associated noise controls for these and adjacent areas, and encouraging entertainment and hospitality activities to locate in these precincts;
 - vii. protecting the efficiency and safety of the adjacent transport networks; and
 - viii. recognising the values of Ngāi Tūāhuriri/ Ngāi Tahu in the built form, and the expression of their narrative.

Response

The proposed sign is temporary in nature. A green frame surrounds the billboard to provide amenity to the billboard structure, to create visual interest and to help strengthen the street edge along this segment of Manchester Street which is yet to be developed. The structure does not create any adverse effects from shading or wind. The proposal is over 300m away from any residential zones and will only be partially visible. Views are likely to be fully screened once the East Frame is developed.

CHAPTER 6.8 SIGNS

6.8.1 Objectives and Policies

6.8.2.1 Objective - Signage

- a. *Signage collectively contributes to Christchurch's vitality and recovery by:*
 - i. *supporting the needs of business, infrastructure and community activities;*
 - ii. *maintaining public safety; and*
 - iii. *enhancing the visual amenity values and character of the surrounding area, building or structures.*

Response

The proposed billboard and supporting structure are designed to add to the vitality and recovery of the central city. The billboard will support local businesses, through the ability to advertise where their business may not be visible to passing motorists, public transport users or pedestrians.

The proposed billboard and green frame are considered to add visual interest to a block which is otherwise devoid of activity or built form. The buildings along the western boundary of the site are also devoid of detailing on the first two floors. This is understandable as these are the 'side walls' which would have originally been 'hidden' by buildings fronting Manchester Street. The proposed position of the sign is considered positive to strengthen the built edge of the street where no buildings are currently present, to create a sense of enclosure. The proposal does not affect the character or form of any buildings or prevent the development of a building on the site.

6.8.2.1.1 Policy- Enabling signage in appropriate locations

- a. *Enable signage:*
 - i. *as an integral component of commercial and industrial environments, strategic infrastructure and*

community activities throughout the Christchurch District; and

- ii. that is necessary for public health and safety and to provide direction to the public.*

Response

The location of the billboard is considered appropriate, in a central commercial area where there are currently no billboards in close proximity. The viewshed has been prepared showing where the billboard will be visible from, noting the closest residential zone is over 300m from the development and that views will be blocked once the East Frame is developed to its full potential. The location is considered appropriate for the proposal.

6.8.2.1.2 Policy - Controlling signage in sensitive locations

- a. Ensure the character and amenity values of residential, open space and rural zones are protected from adverse visual and amenity effects from large areas or numbers of signs or off-site signs within these zones.*

Response

The viewshed prepared in the attached figures shows the closest residential zone being over 300m away to the northeast. At this distance the billboard is viewed in context of the central city where vibrant colours, lighting and signage is expected. Rauora Park and Margaret Mahy playground are considered part of the receiving environment, until the building proposed on the eastern side of Manchester Street is developed, but the billboard is not considered to adversely effect the character and amenity values of these spaces. The billboard and supporting structure will be viewed in context with the existing side walls along the western side of the proposal site (Rendezvous Hotel, Cathedral Junction and Sampan House), through the existing transport infrastructure (signs, bus stops and traffic lights) on Manchester Street.

The billboard is not considered to have an adverse effect on the heritage buildings on Worcester Street, being far enough away not to be viewed in the same context or to affect views of the buildings. The buildings are in varying states of disrepair with signs of vandalism and damage (from the earthquakes) still clearly visible. The Trinity Church is currently being repaired using a combination of concrete panels and a bluestone veneer compared to the original building which was constructed purely of bluestone. The former State Insurance building is unoccupied with no sign of any remedial work being started². In time, future buildings will be developed on the northwestern corner of Worcester and Manchester which will further separate the proposal from Worcester Street. In any case, the proposal is considered to add to the vibrancy and character of Manchester Street, which is largely devoid of any interest or sense of enclosure.

Overall, the site is not considered a sensitive location.

6.8.2.1.3 Policy- Managing the potential effects of signage

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

Response

² <https://www.stuff.co.nz/the-press/business/the-rebuild/119014561/christchurchs-dirty-30-derelict-sites-still-a-work-in-progress>

As outlined above, the sign is not considered to detract from the character or visual amenity of the surrounding area and public realm. It is not possible at this stage to integrate the sign with the building design but the proposed 'green frame' provides the potential for the billboard to be integrated into a structure, albeit in a temporary fashion.

When compared to existing buildings in the area, the proposal is of a relatively small scale and will not form part of the skyline when viewed from most locations. The heritage character of Worcester Street is not considered to be affected by the proposal, being approximately 70m away from the closest heritage building. The corner of the Heritage Hotel is visible from the site but is viewed in context with the large coloured mural which is on the eastern wall of an adjacent building. The three east most windows of the building will be able to see the billboard until a building is developed on 129-135 Worcester Street.

6.8.2.1.6 Policy - Managing off-site signage

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

Response

As outlined above, the site is not considered a sensitive location with the proposal being compatible with the surrounding environment, in a commercial context. It is considered the proposal is consistent with the outcomes sought in Policy 6.8.2.1.3.

3.3 VISUAL EFFECTS

3.3.1 VISUAL CATCHMENT AND AMENITY

The following table outlines the potential visual effects likely to be experienced by Visually Sensitive Receivers in the receiving environment. To assist with determining effects, a series of public viewpoints were visited, considered representative of views that may be experienced from surrounding businesses, residences and public spaces (including footpaths). These were as follows:

1. View South From 265 Manchester Street
2. View North-West From 185 Hereford Street
3. View North From 180 Manchester Street
4. View north from High – Manchester Street Intersectio

3.3.2 TABLE OF VISUAL EFFECTS

The following table outlines the potential visual effects each Visually Sensitive Receptor might receive:

Table 1: Assessment of Effects on Visually Sensitive Receptors

Viewpoint	Visually Sensitive Receptors (VSR)	Distance from Proposal (m)	Type of View (open, partial, screened)	Description of existing view	Sensitivity of VSR	Magnitude of Change	Effects	Description of Effects
1 – View south from 265 Manchester Street	Pedestrians / Cyclists along Manchester Street / Gloucester Street	50m	Open	Views from this location are open, with much of the view being dominated by carparking, existing lighting and intersection infrastructure at the intersection of Gloucester and Manchester Street. The view is framed by existing established planting along the street edge and existing signage. Urban development varies in architectural style, set back and is openly visible.	Medium	Low	Less than Minor	The proposed billboard will be visible from Manchester Street to the north of the site, Urbanz Accommodation and from parts of Margaret Mahy Playground. As the East Frame is developed views from the playground will become more intermittent. At almost 200m distance, and given the amount of existing lights, signs and movement, any magnitude of change to the current view is considered Low, resulting in Less than Minor effects.
	Users of Margaret Mahy Playground	190m	Open		Medium			
	Visitors to Urbanz Accommodation	130m	Open		Medium			
	Officer workers in the UniMed Building, 166 Gloucester Street	80m	Partial	Partial views are available from the upper floors of this building, looking to the south across the top of Sampan House towards Manchester Street, until Manchester Street is developed.	Medium	Low	Less than Minor	Partial views are available over Sampan House but will generally be looking across or down onto the proposal. While the sign will be visible, workers are considered to be less sensitive to signs (in a commercial area) with the magnitude of change considered to be low.
2 – View North-West from 185 Hereford Street	Pedestrians / Cyclists along Huanui Lane	200m	Open	Views from this point look across open space from Hurunui Lane to Manchester Street. The view is open, with much of the view dominated by urban development varying in architectural style and height. Existing vegetation is juvenile in state and dominates the foreground of the view, while not yet providing screening. Lighting infrastructure and existing signage are openly visible.	Medium	Low	Less than Minor	Existing vegetation will provide partial screening of the proposed billboard, combined with the intervening distance effects are considered to be less than minor. The billboard will be viewed against existing buildings and will not form part of the skyline.
	Residents of Latimer Terraces				High			
3 – View North from 180 Manchester Street	Pedestrians / Cyclists along Manchester Street / Worcester Street	80m	Open	The viewpoint is dominated by existing urban infrastructure along Manchester Street. Large infrastructure breaks into the skyline, such as traffic lights and light poles are highly visible, as well as built forms of varying architectural styles, set back and heights. Existing signage in carparks and bus shelters is openly visible from the view, as well as street art on building faces.	Medium	Low	Less than Minor	When looking north along Manchester Street, the billboard and frame will form the western edge of the street reserve. At present the frontage lacks a sense of enclosure or definition which will not be achieved until the block is developed. The sign will be openly visible, but given the current visual amenity of the area and the expectation to see signs in a commercial area, the magnitude of change is considered to be low.
	Vehicle Users along Manchester Street / Worcester Street				Low			

4 – View west from the East Frame	Future residents of the East Frame	40m	Open	Open views will be available looking towards the site. Currently open views are available of the carpark and the side walls of Cathedral junction, the Rendezvous Hotel and Sampan House. All of these buildings have blank walls at lower levels, along cadastral boundaries, with windows generally restricted to be above the 2 nd floor.	High	Low	Less than Minor	The proposed billboard will be viewed against the backdrop of existing commercial buildings. The proposed billboard will not be viewed against the sky nor will it form part of the existing or future built skyline from this location.
	Users of the bus stops on Manchester St	20m	Open	Open views are possible from the bus stops on Manchester Street looking across to the proposal site, Rendezvous Hotel, Cathedral Junction and Sampan House.	Medium	Low	Less than Minor	The sign will be viewed on an angle from this location and against the side wall of Cathedral Junction and Rendezvous Hotel and their associated artworks. While the views are relatively close, the billboard will be viewed against these buildings and will not form part of the skyline.
5 – View east from Cathedral Junction and Rendezvous Hotel	Residents and guests at the hotel and apartments	35m	Open	Open views are available to the east looking down onto the proposal site, Manchester Street and East frame. Higher floors have views further afield to the proposed stadium site and towards the cluster of development in the Innovation precinct.	High	Very Low	Less than Minor	Angled views will be possible of the proposed billboard, looking down onto the proposal. The billboard will not block any views from this location and will be viewed in context with Manchester Street and its associated public transport infrastructure. In all cases, the billboard will appear as a small part of the wider view. The magnitude of change is considered low with less than Minor adverse effects.

4. MITIGATION MEASURES

The following mitigation measures are suggested to either avoid, remedy, or mitigate any potential effects on visual amenity:

MM1 GREEN SUPPORTING STRUCTURE

The framework of the billboard is to be constructed with gabion baskets planted with a mix of climbers, vines and pots to minimise its visibility against the existing built infrastructure and street side planting. This will soften the structure and reduce its overall perceived scale, ensuring it is in keeping with the character of the urban environment. The proposed species are, but not limited to:

- Jasmine (*Trachelospermum jasminoides* – exotic climber),
- Wisteria floribunda 'Alba', (exotic climber) and
- Clematis paniculata (native climber)
- *Astelia fragans*, *kakaha* - (Native – potted)
- *Anthropodium cirratum*, *rengarenga* (Native – potted)
- *Parthenocissus insertia* (exotic - False Virginia creeper (vine))

Pots will be attached at different levels up the structure to provide 'instant' green while the climbers and vines establish to cover the structure. A dripline irrigation system will be installed.

5. CONCLUSIONS

The proposed digital billboard and supporting structure are considered to be appropriate for the receiving urban environment, located in an area which is not considered a sensitive location under Policy 6.8.2.1.3. The proposal is not considered to detract from the heritage character and setting of Worcester Street, and will provide vibrancy and activity, to a block which is largely devoid of any activity at present. The proposal does not prevent future development of the site

In visual amenity terms, the largest adverse effects are considered to be Less than Minor with all sensitive receivers located at a sufficient distance from the proposal or of a transient nature where any adverse effects are acceptable. This also accounts for the quality of existing views in the area.



APPENDIX ONE - URBAN DESIGN AND VISUAL IMPACT ASSESSMENT

DIGITAL BILLBOARD PROPOSAL - WILSON CARPARK, MANCHESTER STREET
FOR WILSON PARKING

06 August 2020
Project no. 2020_049
REVISION C



WILSONS CARPARK, MANCHESTER STREET DIGITAL BILLBOARD PROPOSAL

Project no: 2020_049
Document title: URBAN DESIGN AND VISUAL IMPACT ASSESSMENT
Revision: C
Date: 06 August 2020
Client name: WILSON PARKING

Author: David Compton-Moen | Sophie Beaumont | Will Todd

File name: 2020_049_Wilsons_225 Manchester Street _Billboard UDVIA_A

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B	06/08/2020	Viewshed Illustration	WT	DCM	
C	06/08/2020	Additional viewpoint	DCM		



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CONTENTS

DIGITAL BILLBOARD PROPOSAL - MOCK UP	1
DISTRICT PLANNING MAP	2
CONTEXT - VISUAL CATCHMENT	3
CONTEXT - VIEWPOINT LOCATIONS	4
VIEWSHED ILLUSTRATION	5
PLAN AND ELEVATIONS	6
CONTEXT - RECEIVING URBAN CHARACTER	7
CONTEXT - RECEIVING URBAN CHARACTER (2)	8
VP1 - VIEW SOUTH FROM 265 MANCHESTER STREET	9
VP2 - VIEW NORTH-WEST FROM 185 HEREFORD STREET	10
VP3 - VIEW NORTH FROM 180 MANCHESTER STREET	11
VP4 - VIEW NORTH FROM HIGH-MANCHESTER STREET INTERSECTION	12



A. IMAGE LOCATION

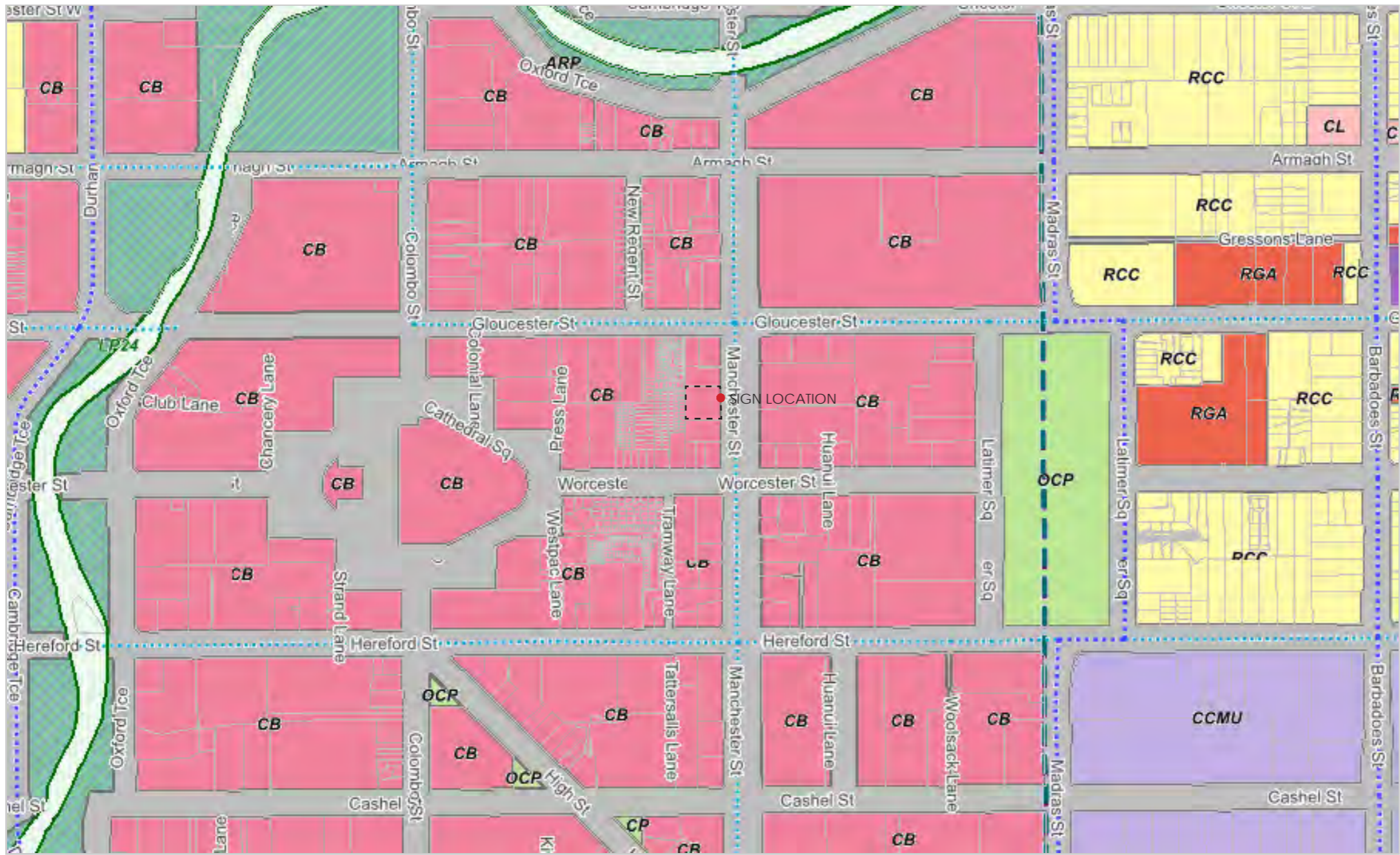


B. EXISTING VIEW

The proposal is to establish a 6x3m portrait format, double-sided digital billboard fronting Manchester Street. The billboard is surrounded by a steel frame and a mix of climbers and plants to establish a green frame.



C. ILLUSTRATION SHOWING THE PROPOSED DIGITAL BILLBOARD WITH CLIMBERS



Map Legend

- Land Use Zones**
- Labels
- Zone Labels
- Zone
- ARP** Avon River Precinct (Te Papa Ōtākaro) Zone
 - CB** Commercial Central City Business Zone
 - CCMU** Commercial Central City Mixed Use Zone
 - CSF** Commercial Central City (South Frame) Mixed Use Zone
 - CL** Commercial Local Zone
 - OCP** Open Space Community Parks Zone
 - OWM** Open Space Water and Margins Zone
 - RCC** Residential Central City Zone
 - RGA** Residential Guest Accommodation Zone
 - SPS** Specific Purpose (School) Zone
 - Transport Zone

Other Notations

- Road Hierarchy
- Collector
 - Major Arterial
 - Minor Arterial
 - Central City Local Distributor
 - Central City Main Distributor

A. DISTRICT PLAN MAP SHOWING PROPOSED SIGN LOCATION

Map / image source: Christchurch City Council - District Plan

URBAN DESIGN AND VISUAL IMPACT ASSESSMENT

DISTRICT PLANNING MAP

DIGITAL BILLBOARD PROPOSAL - 225 MANCHESTER STREET, CHRISTCHURCH





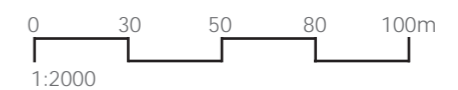
A. AERIAL PHOTO SHOWING THE PROPOSED SIGN LOCATION

Map / image source: Canterbury Maps

URBAN DESIGN AND VISUAL IMPACT ASSESSMENT

CONTEXT - VISUAL CATCHMENT

DIGITAL BILLBOARD PROPOSAL - 225 MANCHESTER STREET, CHRISTCHURCH



LEGEND

VIEWPOINT LOCATIONS

- 1 VP1 - VIEW South from 265 Manchester Street
- 2 VP2 - VIEW North-West from 185 Hereford Street
- 3 VP3 - VIEW North from 180 Manchester Street

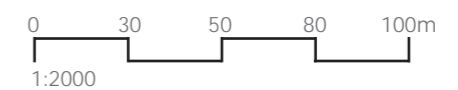


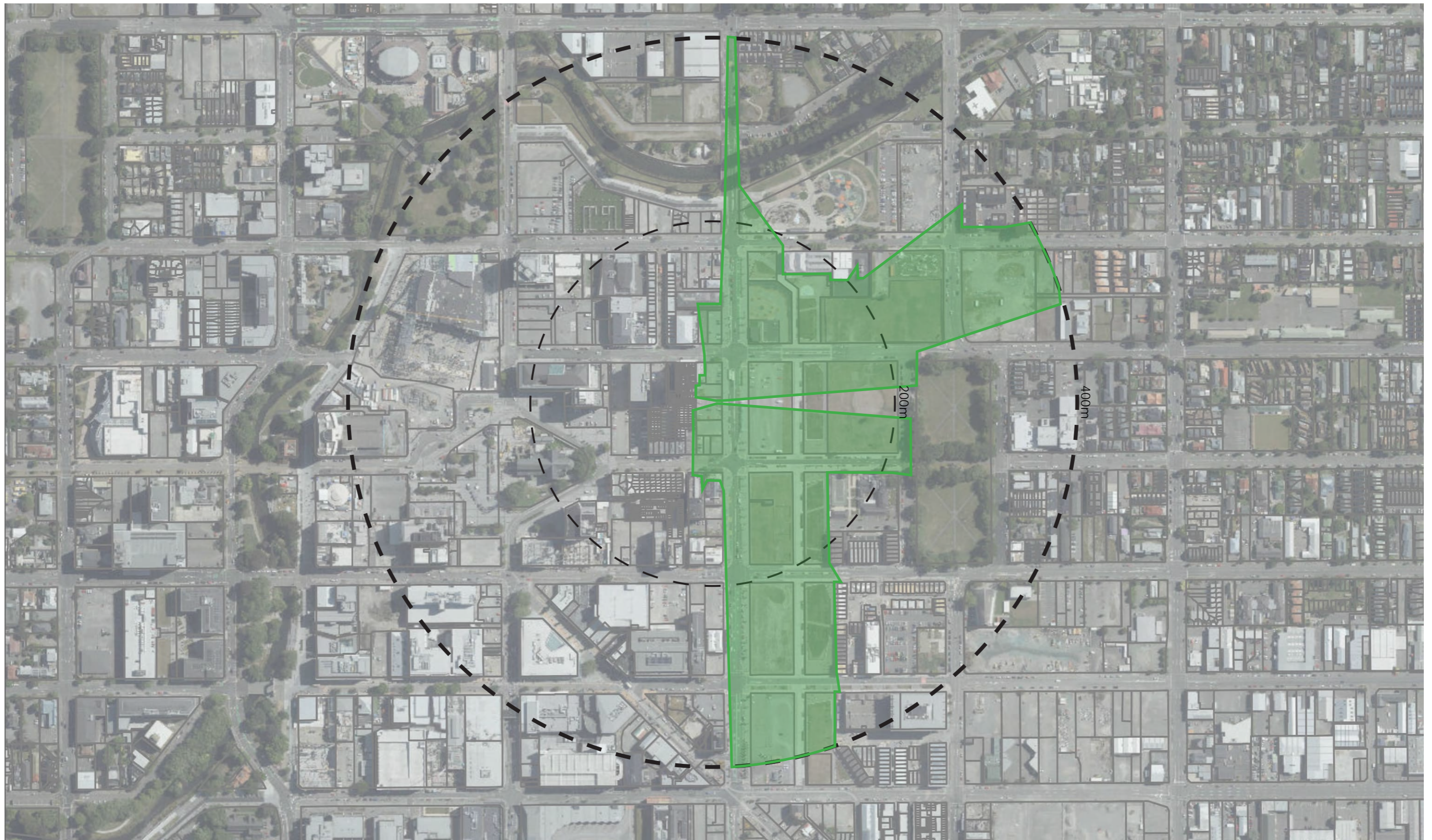
Map / image source: Canterbury Maps

URBAN DESIGN AND VISUAL IMPACT ASSESSMENT

CONTEXT - VIEWPOINT LOCATIONS

DIGITAL BILLBOARD PROPOSAL - 225 MANCHESTER STREET, CHRISTCHURCH





A. VIEWSHED PLAN FOR 3m x 6m DIGITAL BILLBOARD

Map / image source: Canterbury Maps Scale 1:4000 @ A3

URBAN DESIGN AND VISUAL IMPACT ASSESSMENT

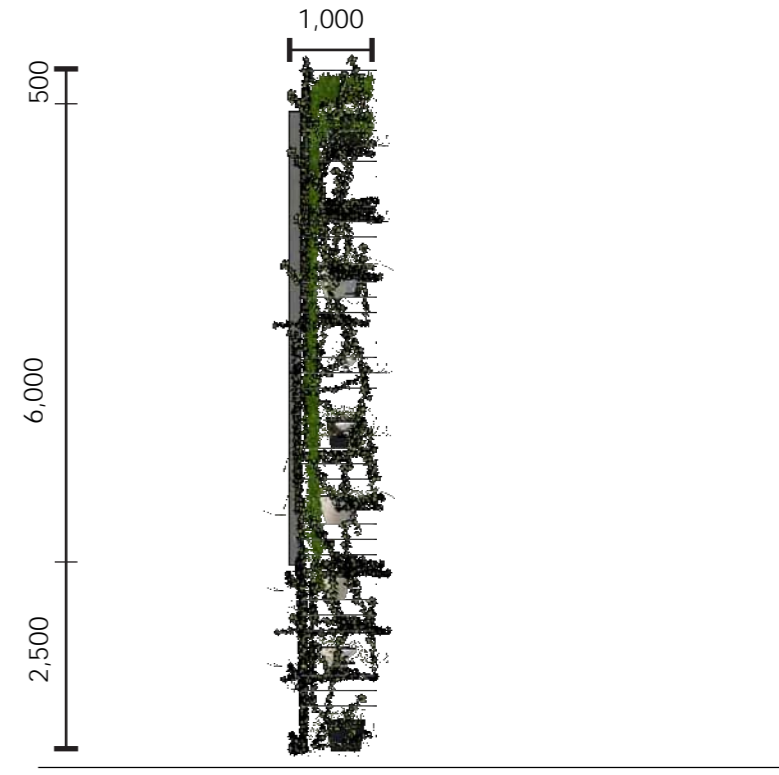
PROPOSED BILLBOARDS VIEWSHED ILLUSTRATION

DIGITAL BILLBOARD PROPOSAL - 225 MANCHESTER STREET, CHRISTCHURCH





A. PLAN FOR 6m X 3m DIGITAL BILLBOARD
 map / image source: Canterbury Maps - Scale 1:200 @ A3



B. SIDE ELEVATIONS FOR 3m x 6m DIGITAL BILLBOARD
 Scale 1:100 @ A3



C. ELEVATIONS FOR 4m x 6m DIGITAL BILLBOARD
 Scale 1:100 @ A3

Client / project name: WILSONS / 225 MANCHESTER STREET DIGITAL BILLBOARD
 Drawing name: **PLAN AND ELEVATIONS**
 Designed by: Dave Compton-Moen / Will Todd
 Drawn by: WILL TODD
 Original issue date: 31 JULY 2020
 Scales: As Shown

Revision no:	Amendment	Approved	Date
A	DRAFT	DCM	31.07.2020
B	Viewshed Illustration	DCM	06.08.2020



DCM URBAN DESIGN LIMITED
 3/329 DURHAM STREET NORTH
 CHRISTCHURCH 8013
 WWW.DCMURBAN.COM

Project no / drawing no: 2020_049 / 0006

Revision: B



A View from the the proposed site looking down Manchester Street towards the historic Trinity Congregational Church, a site now owned by the Chrsitchurch Heritage Trust due to earthquake damage.



B View from the proposed site looking across Manchester Street towards public transport stop and all day parking location. Manchester Street is a significant route among central city public transport, and has many carparks due to its central location. 4-5 storey mixed use buildings are proposed along the eastern edge of Manchester Street but the timing of these building is unknown. Once the buildings are developed though, the East Frame will be totally screened from this viewpoint.



C View from adjacent greenspace of multi-storey buildings (Rendevous Hotel, earthquake damaged Kaplan Centre and Trinity Congregation Church, and Cathedral Junction Appartments), all have a view above the proposed site to the greenspace.



D View of the site owned by the Christchurch Heritage Trust (historic Trinity Congregational Church). The building has been stabilised and is being preserved after experiencing significant earthquake damage, currently cordoned off with temporary fencing. This listed as a heritage item (580), the Shands building (256) has been relocated into the site to the left of the church (behind the church), and the Former State Insurance Building at 116 Worcester Street (577).



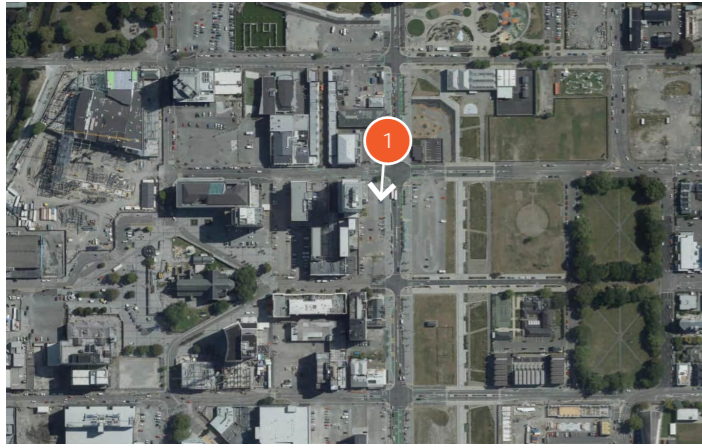
E View of the buildings which are located to the west of the proposed site. The vacant buildings along Manchester Street display murals/street art, post earthquake, and now play a role in the urban character of Christchurch CBD.



F View from New Regent Street showing the proximity of the tram route to the proposed location. In addition to this, the Rondvous Hotel and Cathedral Junction entrances are pictured identifying this is an area of higher use by the public.



G View of Latimer Terraces, terraced housing located at 197 Hereford Street. The West facing terraces (pictured) have a view across green space towards multi-storey buildings (Hereford Street Parking Building, Rondvous Hotel, and vacant earthquake damaged buildings).



A. IMAGE LOCATION

PROPOSED LOCATION

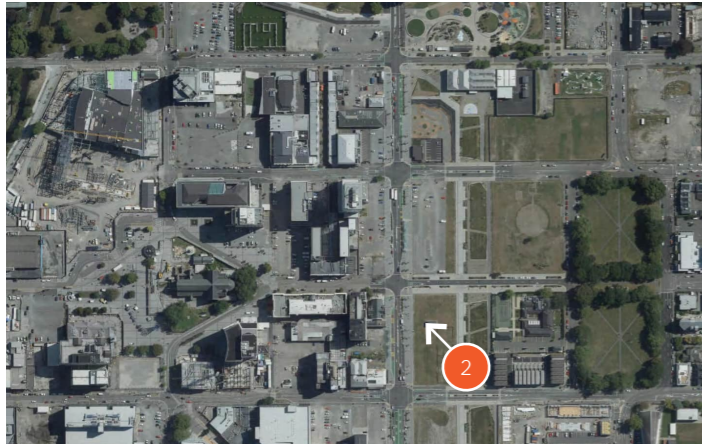


A. EXISTING VIEW

URBAN DESIGN AND VISUAL IMPACT ASSESSMENT

1 VP1 - VIEW SOUTH FROM 265 MANCHESTER STREET
DIGITAL BILLBOARD PROPOSAL - 225 MANCHESTER STREET, CHRISTCHURCH

Image captured on Apple iPhone XS
Focal length of 24mm.
Date: 16th June 2020 at 11:14 am.
Height of 1.7 metres
43°31'46.87"S 172°38'22.29"E
Altitude of 8.38



A. IMAGE LOCATION

PROPOSED LOCATION



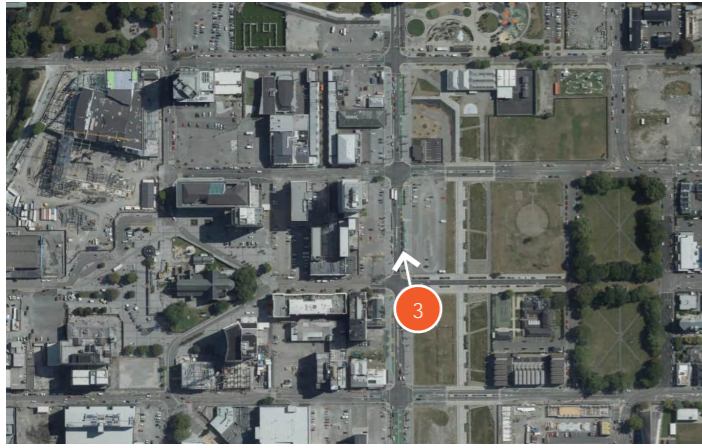
A. EXISTING VIEW

URBAN DESIGN AND VISUAL IMPACT ASSESSMENT

2 VP2 - VIEW NORTH-WEST FROM 185 HEREFORD STREET

DIGITAL BILLBOARD PROPOSAL - 225 MANCHESTER STREET, CHRISTCHURCH

Image captured on Apple iPhone XS
Focal length of 24mm.
Date: 5th June 2020 at 11:49 am.
Height of 1.7 metres
43°31'53.99"S 172°38'27.18"E
Altitude of 9.51



A. IMAGE LOCATION

PROPOSED LOCATION



A. EXISTING VIEW

URBAN DESIGN AND VISUAL IMPACT ASSESSMENT

3 VP3 - VIEW NORTH FROM 180 MANCHESTER STREET

DIGITAL BILLBOARD PROPOSAL - 225 MANCHESTER STREET, CHRISTCHURCH

Image captured on Apple iPhone X
Focal length of 24mm.
Date: 16th June 2020 at 11:11 am.
Height of 1.7 metres
43°31'51.66"S 172°38'23.06"E
Altitude of 7.75



A. IMAGE LOCATION

PROPOSED LOCATION



A. EXISTING VIEW

URBAN DESIGN AND VISUAL IMPACT ASSESSMENT

4 VP4 - VIEW NORTH FROM HIGH - MANCHESTER STREET INTERSECTION

DIGITAL BILLBOARD PROPOSAL - 225 MANCHESTER STREET, CHRISTCHURCH

Image captured on Apple iPhone X
Focal length of 24mm.
Date: 16th June 2020 at 11:04 am.
Height of 1.7 metres
43°32'3.79"S 172°38'22.29"E
Altitude of 7.61

APPENDIX [D] - RECORD OF OUTLINE PLANS RELATED TO DESIGNATION V4

Issued / Received	Application Number	Status	Received Date	Issued Date	Address	Applicant	Description	Application Type	Application Sub Type	Process Type	Responsible Officer	Activity Class	Proposal Type	Land Use	Zone	Outcome	Decision Authority	Commissioner Name	Pre Application Meeting	Notification Meeting	PMO Application	S37 Extension	Suburb	Ward	Fee Required
Issued	RMA/2011/1125	Processing complete	31/08/2011	3/02/2012	85 Armagh Street Central City	WSP New Zealand Limited	APPLICATION FOR OUTLINE PLAN - Historical Reference RMA92018680	OUP		Simple	Erina Metcalf					Outline plan accepted							CENTRAL CITY	Central	
Issued	RMA/2012/869	Processing complete	12/06/2012	25/06/2012	85 Armagh Street Central City	Dept For Courts Environment Court	To partially demolish the Family Court Annex building as a result of earthquake damage - Historical Reference RMA92020231	OUP		Simple	Clare Dale					Outline plan accepted							CENTRAL CITY	Central	
Issued	RMA/2012/1015	Processing complete	4/07/2012	9/07/2012	66 Chester Street West Central City	Ministry of Justice, WSP New Zealand Limited	Waiver to the Outline Plan - Christchurch Law Courts Staff Courtyard Area - Historical Reference RMA92020387	OPW		Simple	Clare Dale					Outline plan accepted							CENTRAL CITY	Central	
Issued	RMA/2012/1583	Processing complete	8/10/2012	25/10/2012	510 Hagley Avenue Central City	Ministry Of Education	OUTLINE PLAN WAIVER - Demolition of an existing classroom, the erection of a replacement classroom and other related works - Historical Reference RMA92020995	OPW		Simple	Robert Skinner			Education activity - Secondary/comp osite school		Outline plan accepted							CENTRAL CITY	Central	
Issued	RMA/2013/367	Processing complete	5/03/2013	12/03/2013	Lytelton Line between Wilsons North and Waltham	Tranz Rail Ltd	Waiver of Outline Plan - Install Diesel Tank - Historical Reference RMA92021960	OPW		Simple	Robert Skinner					Outline plan accepted							CENTRAL CITY	Central	
Issued	RMA/2013/657	Processing complete	15/04/2013	16/05/2013	91 Hereford Street Central City	Telecom New Zealand Limited	Outline Plan for the construction of a new structure over the essential services at the rear of the site - Historical Reference RMA92022265	OUP		Simple	Liz Sutton			Utility - General		Outline plan accepted							CENTRAL CITY	Central	
Issued	RMA/2013/1102	Processing complete	20/06/2013	19/07/2013	200 Tuam Street Central City	Canterbury Earthquake Recovery Authority	5 level office building, basement carpark, single level utility building - Historical Reference RMA92022748	OUP		Simple	Debbie Laffey					Outline plan accepted							CENTRAL CITY	Central	
Issued	RMA/2013/2710	Processing complete	11/12/2013	12/12/2013	243 Cambridge Terrace Central City	Canterbury Earthquake Recovery Authority	SPREAD TOPSOIL OVER THE SITES AND WILL THEN BE GRASSED - Historical Reference RMA92024440	OPW			Sean Ward					Outline plan accepted							CENTRAL CITY	Central	
Issued	RMA/2014/285	Processing complete	11/02/2014	14/02/2014	154 Worcester Street Central City	Canterbury Earthquake Recovery Authority	OUTLINE PLAN WAIVER - TOPSOILING AND RE-GRASSING - Historical Reference RMA92024890	OPW			Sean Ward					Outline plan accepted							CENTRAL CITY	Central	
Issued	RMA/2014/1093	Processing complete	7/05/2014	11/06/2014	656 Colombo Street Central City	Canterbury Earthquake Recovery Authority	Outline Plan - Bus Interchange - Historical Reference RMA92025734	OUP			Ruth Markham-Short					Outline plan accepted							CENTRAL CITY	Central	
Issued	RMA/2014/988	Processing complete	28/04/2014	13/06/2014	243 Cambridge Terrace Central City	Canterbury Earthquake Recovery Authority	WORKS WITHIN THE NORTH AND EAST FRAME - Historical Reference RMA92025626	OUP			Sean Ward					Outline plan accepted							CENTRAL CITY	Central	
Issued	RMA/2014/2326	Processing complete	5/09/2014	13/10/2014	154 Worcester Street Central City	The Christchurch Club	WORKS WITHIN THE AREA DESIGNATED FOR 'THE FRAME - NORTH AND EAST' - Historical Reference RMA92027010	OUP			Ruth Markham-Short			Other activity		Outline plan accepted							CENTRAL CITY	Central	
Issued	RMA/2015/3338	Processing complete	1/12/2015	1/03/2016	2 Ash Street Central City	Canterbury Earthquake Recovery Authority, CERA - Departmental Resource	Outline Plan - Construction of South Frame Public Realm - Historical Reference RMA92031739	OUP			Sean Ward				Commercial Central City (South Frame) Mixed Use	Outline plan accepted	Commissioner	David Mountfort					CENTRAL CITY	Central	
Issued	RMA/2016/1035	Processing complete	20/04/2016	2/05/2016	91 Hereford Street Central City	Spark New Zealand Trading Limited	Outline Plan - Install Fuel Tanks - Historical Reference RMA92033141	OUP			Ryan Brosnahan					Outline plan accepted							CENTRAL CITY	Central	
Issued	RMA/2016/811	Processing complete	1/04/2016	16/05/2016	Addington Line between Annex and Matiao	KiwiRail Limited	Outline Plan - Locomotive Wash Facilities - Historical Reference RMA92032908	OUP			Lizzie Spencer					Outline plan accepted							CENTRAL CITY	Riccarton	
Issued	RMA/2016/1832	Processing complete	30/06/2016	25/07/2016	144 Armagh Street Central City	Otakaro Limited	Temporary public realm	OPW			Sean Ward		Non-residential			Granted	Delegated officer						CENTRAL CITY	Central	
Issued	RMA/2016/1688	Processing complete	21/06/2016	26/07/2016	218 Manchester Street Central City	Land Information New Zealand, Orion New Zealand Limited	Outline Plan Waiver - Orion Substation	OPW			Sean Ward		Non-residential		Commercial Central City Business zone	Granted	Delegated officer						CENTRAL CITY	Central	Fee Required
Issued	RMA/2016/2105	Processing complete	1/08/2016	25/08/2016	40 Lichfield Street Central City	Ministry of Justice	Outline Plan - Christchurch Justice and Emergency Services Precinct	OUP			Ruth Markham-Short			Office - General	Commercial Central City Business zone	Outline plan accepted	Commissioner	Janette Dovey					CENTRAL CITY	Central	Invoice on completion
Issued	RMA/2016/2168	Processing complete	8/08/2016	25/08/2016	109 Hereford Street Central City	Aurecon New Zealand Limited - Tauranga, Spark New Zealand Trading Limited	Outline Plan Waiver - Site Upgrades	OPW		Simple	Jo McAfee		Non-residential			Granted	Delegated officer						CENTRAL CITY	Central	Fee Required
Issued	RMA/2016/2283	Processing complete	18/08/2016	30/08/2016	177 Armagh Street Central City	Otakaro Limited	Outline Plan Waiver - Shading and BBQ Area Margaret Mahy Playground	OPW		Simple	Sean Ward		Non-residential			Granted	Delegated officer						CENTRAL CITY	Central	Fee Required
Issued	RMA/2016/2324	Processing complete	24/08/2016	17/10/2016	218 Manchester Street Central City	Fletcher Residential Limited	Outline Plan Waiver - Alterations to existing building for use as an information Kiosk	OPW		Simple	Sean Ward		Non-residential	Other activity		Granted	Commissioner	Ken Lawn					CENTRAL CITY	Central	Fee Required
Issued	RMA/2016/3653	Processing complete	20/12/2016	30/01/2017	40 Lichfield Street Central City	Ministry of Justice	Installation of exterior signage at the Precinct on the periphery and inside the complex	OUP			Scott Blair		Non-residential			Outline plan accepted	Delegated officer				Ministry of Justice		CENTRAL CITY	Central	Invoice on completion
Issued	RMA/2017/110	Processing complete	19/01/2017	15/02/2017	375 Manchester Street Central City	WSP New Zealand Limited	Replacement Classroom	OUP			Amy Maxwell		Non-residential	Education Activity - General		Outline plan accepted	Delegated officer						CENTRAL CITY	Central	
Issued	RMA/2016/3517	Processing complete	8/12/2016	17/02/2017	Heathcote / Opawaho River, Radley Street to Brougham Street 5361	KiwiRail Holdings Limited	Outline Plan to replace Bridge 7 on Main South Line	OUP			Ryan Brosnahan		Non-residential			Outline plan accepted	Delegated officer	Ken Lawn					CENTRAL CITY	Linwood	Fee Required
Issued	RMA/2017/346	Processing complete	17/02/2017	22/03/2017	62 Ferry Road Central City	Catholic Diocese of Christchurch	Outline Plan Waiver - Marian College CEBUS Relocation	OPW		Simple	Luke Wignall		Non-residential	Education activity - Secondary/comp osite school	Specific Purpose (School) zone	Granted	Delegated officer						CENTRAL CITY	Central	Fee Required
Issued	RMA/2017/840	Processing complete	18/04/2017	24/05/2017	62 Ferry Road Central City	Catholic Diocese of Christchurch, Ministry Of Education	Outline Plan - Installation of relocateable classroom	OUP			Alison McLaughlin		Non-residential	Education activity - Secondary/comp osite school	Specific Purpose (School) zone	Changes requested to Outline Plan	Delegated officer						CENTRAL CITY	Central	Fee Required
Issued	RMA/2017/840	Processing complete	18/04/2017	24/05/2017	62 Ferry Road Central City	Catholic Diocese of Christchurch, Ministry Of Education	Outline Plan - Installation of relocateable classroom	OUP			Alison McLaughlin		Non-residential	Education activity - Secondary/comp osite school	Specific Purpose (School) zone	Outline plan accepted	Delegated officer						CENTRAL CITY	Central	Fee Required
Issued	RMA/2017/795	Processing complete	10/04/2017	27/07/2017	767 Colombo Street Central City	Otakaro Limited	Outline Plan - Develop Christchurch Convention & Exhibition Centre	OUP			Sean Ward		Non-residential	Other activity	Commercial Central City Business zone, Transit zone	Outline plan accepted	Commissioner	Ken Lawn		Yes		Yes	CENTRAL CITY	Central	Fee Required
Issued	RMA/2017/868	Processing complete	20/04/2017	27/07/2017	50 St Asaph Street Central City	Otakaro Limited	Outline Plan Application for the Metro Sports Facility	OUP			Sean Ward		Non-residential	Recreation activity-Sports field, clubroom, lights	Commercial Central City Mixed Use zone	Outline plan accepted	Commissioner	K Lawn				Yes	CENTRAL CITY	Central	Fee Required
Issued	RMA/2017/1890	Processing complete	7/08/2017	21/08/2017	122 Barbadoes Street Central City	Ministry Of Education	To construct a veranda roof over existing deck	OPW			Matthew Klomp		Non-residential	Residential - Additions/alterations	Commercial Central City Mixed Use zone	Granted	Delegated officer						CENTRAL CITY	Central	Fee Required

Issued	RMA/2017/2354	Processing complete	26/09/2017	4/10/2017	245 Madras Street Central City	Otakaro Limited	Outline Plan Waiver - Disturbance and removal of contaminated soil	OPW		Simple	Luke Wignall		Non-residential	Earthworks - Filling and excavation	Commercial Central City Business zone, Commercial Central City Mixed Use zone	Granted	Delegated officer						CENTRAL CITY	Central	Fee Required
Issued	RMA/2017/2584	Processing complete	20/10/2017	27/11/2017	106 Manchester Street Central City	Otakaro Limited	Outline Plan Waiver - Laneway	OPW		Simple	Sean Ward		Non-residential	Access, driveway	Commercial Central City (South Frame) Mixed Use zone	Granted	Delegated officer						CENTRAL CITY	Central	Fee Required
Issued	RMA/2018/1406	Withdrawn	13/06/2018	29/06/2018	Lytelton Line between Chapmans and Curries	Ewing Construction Limited	To Erect a Temporary Shed	OUP			Debbie Laffey		Non-residential	Accessory building - Non-residential	Industrial Heavy zone	Withdrawn	Applicant						CENTRAL CITY	Heathcote	Fee Required
Issued	RMA/2018/1564	Processing complete	29/06/2018	26/07/2018	243 Cambridge Terrace Central City	Otakaro Limited	Resizing of the development area and reduction of open space	OPW			Debbie Laffey		Non-residential	Public amenity (toilets, visitor centre, memorial)	Commercial Central City Mixed Use zone	Granted	Delegated officer						CENTRAL CITY	Central	Invoice on completion
Issued	RMA/2018/1628	Processing complete	6/07/2018	27/07/2018	232 Tuam Street Central City	Otakaro Limited	Installation of infrastructure, paving, lighting and Landscaping	OPW			Debbie Laffey		Non-residential	Public amenity (toilets, visitor centre, memorial)	Commercial Central City (South Frame) Mixed Use zone	Granted	Delegated officer			40005217			CENTRAL CITY	Central	Fee Required
Issued	RMA/2018/1579	Processing complete	3/07/2018	14/08/2018	62 Ferry Road Central City	Ministry Of Education	Establish a relocated classroom block onto the site	OUP			Kristin McKee		Non-residential	Education activity - Primary/intermediate school	Specific Purpose (School) zone	Outline plan accepted	Delegated officer						CENTRAL CITY	Central	Fee Required
Issued	RMA/2018/2486	Processing complete	12/10/2018	7/11/2018	184 Hereford Street Central City	Otakaro Limited	To Cap Subject Site with Soil/Grass	OPW			Erina Metcalf		Non-residential	Earthworks - Land Repair	Commercial Central City Business zone	Granted	Delegated officer						CENTRAL CITY	Central	Fee Required
Issued	RMA/2018/2116	Processing complete	31/08/2018	13/12/2018	50 St Asaph Street Central City	Otakaro Limited	To Construct the Metro Sports Facility	OUP			Sean Ward		Non-residential	Recreation activity - General	Commercial Central City Mixed Use zone	Changes requested to Outline Plan	Delegated officer	Ken Lawn					CENTRAL CITY	Central	Fee Required
Issued	RMA/2017/3034	Withdrawn	5/12/2017	12/02/2019	510 Hagley Avenue Central City	Hagley Community College	Outline Plan Waiver - Glass windbreak fence	OPW			Kate Graham		Non-residential	Education activity - Secondary/comp site school	Specific Purpose (School) zone	Withdrawn	Applicant						CENTRAL CITY	Central	Fee Required
Issued	RMA/2018/3017	Withdrawn	10/12/2018	12/02/2019	127 St Asaph Street Central City	Otakaro Limited	Installation of Pedestrian Pathway	OPW			Shona Jowett		Non-residential	Road	Commercial Central City (South Frame) Mixed Use, Open Space Community Parks zone,	Withdrawn	Applicant						CENTRAL CITY	Central	Fee Required
Issued	RMA/2019/20	Processing complete	8/01/2019	28/02/2019	115 Lichfield Street Central City	Christchurch City Council, Fairfax Media Events PTY Limited, Otakaro Limited	To Operate Temporary Outdoor Cinema, including Catering, Bar, Toilets, Cold Room and Projection Shed.	OPW			Kasuni Thewarapperuma		Non-residential	Entertainment activity - Cinema, theatre	Commercial Central City Business zone, Transport zone	Granted	Commissioner	Ken Lawn					CENTRAL CITY	Central	Fee Required
Issued	RMA/2019/785	Withdrawn	10/04/2019	2/05/2019	62 Ferry Road Central City	Ministry Of Education	Outline Plan for Administration Building	OUP			Emma Chapman		Non-residential	Office - General	Specific Purpose (School) zone	Withdrawn	Applicant						CENTRAL CITY	Central	Fee Required
Issued	RMA/2019/1023	Processing complete	10/05/2019	6/06/2019	Lytelton Line between Waltham and Gasson	KiwiRail Limited	Wash building / brake inspection pit / carriage servicing area	OUP			Andrew Long		Non-residential	Earthworks - Excavation only, Industrial Activity - Heavy industry	Transport zone	Outline plan accepted	Delegated officer						CENTRAL CITY	Central	
Issued	RMA/2019/595	Withdrawn	20/03/2019	17/06/2019	142 Worcester Street Central City	Otakaro Limited	V4 Designation for the Vaka 'A Hina Sculpture	OPW			Erina Metcalf		Non-residential	Public artwork	Commercial Central City Business zone	Withdrawn	Applicant						CENTRAL CITY	Central	Fee Required
Issued	RMA/2019/1007	Processing complete	10/05/2019	25/06/2019	40 Lichfield Street Central City	Ministry of Justice	Outline Plan Waiver	OPW			Kate Askew		Non-residential	Accessory building - Non-residential, Fence /Retaining wall	Commercial Central City Business zone, Transport zone	Granted	Delegated officer						CENTRAL CITY	Central	
Issued	RMA/2019/1327	Processing complete	17/06/2019	12/07/2019	142 Worcester Street Central City	Otakaro Limited	Vaka 'A Hina Sculpture	OUP			Erina Metcalf		Non-residential	Entertainment activity - Cultural, museum, gallery	Commercial Central City Business zone	Outline plan accepted	Delegated officer	Ken Lawn					CENTRAL CITY	Central	Fee Required
Issued	RMA/2019/1970	Processing complete	29/08/2019	20/09/2019	763 Colombo Street Central City	Carter Group Limited	To Develop a Hotel Complex with Associated Landscaping, Car Parking and Vehicle Circulation	OUP			Sean Ward		Non-residential	Guest accomm - Motel/hotel	Commercial Central City Business zone, Transport zone	Changes requested to Outline Plan	Hearings Panel	David Mountfort					CENTRAL CITY	Central	Fee Required
Issued	RMA/2019/2258	Processing complete	2/10/2019	12/11/2019	311 Gloucester Street Central City	Ministry Of Education	To Redevelop the Christchurch East School Site	OUP			Shona Jowett		Non-residential	Education activity - Primary/intermediate school	Specific Purpose (School) zone	Outline plan accepted	Delegated officer						CENTRAL CITY	Central	Fee Required
Issued	RMA/2019/2356	Processing complete	14/10/2019	18/11/2019	40 Lichfield Street Central City	Ministry of Justice	Outline Plan to change testing hours for emergency generators	OUP			Scott Blair		Non-residential	Emergency service facility	Commercial Central City Business zone, Transport zone	Outline plan accepted	Delegated officer						CENTRAL CITY	Central	Fee Required
Issued	RMA/2019/2699	Processing complete	20/11/2019	26/11/2019	2 Riccarton Avenue Central City	Ministry Of Health	Outline Plan Waiver - Covered walkway	OPW			Marilyn Regnault		Non-residential	Health care facility - Hospital	Specific Purpose (Hospital) zone	Granted	Delegated officer						CENTRAL CITY	Central	Fee Required
Issued	RMA/2020/20	Processing complete	8/01/2020	28/01/2020	40 Lichfield Street Central City	Ministry of Justice	Modification of existing architectural seat feature at the Justice and Emergency Services Buildings	OPW			Marilyn Regnault		Non-residential	Community facility, Emergency service facility	Commercial Central City Business zone, Transport zone	Granted	Delegated officer						CENTRAL CITY	Central	Fee Required
Issued	RMA/2020/21	Processing complete	8/01/2020	10/02/2020	51 Cathedral Square Central City	Otakaro Limited	Signage and external art works	OPW			Scott Blair		Non-residential	Conference/function facility	Commercial Central City Business zone, Transport zone	Granted	Delegated officer						CENTRAL CITY	Central	Fee Required
Issued	RMA/2020/169	Processing complete	30/01/2020	24/02/2020	184 Hereford Street Central City	Otakaro Limited	Temporary outdoor cinema event	OPW			Kasuni Thewarapperuma		Non-residential	Temporary activity - Event	Commercial Central City Business zone	Granted	Delegated officer			Kasuni Thewarapperuma			CENTRAL CITY	Central	Fee Required
Issued	RMA/2020/1002	Processing complete	19/05/2020	20/05/2020	50 St Asaph Street Central City	Otakaro Limited	Outline plan waiver - cladding	OPW			Sean Ward		Non-residential		Commercial Central City Business zone	Granted	Delegated officer						CENTRAL CITY	Central	Fee Required
Issued	RMA/2020/714	Processing complete	3/04/2020	25/05/2020	91 Hereford Street Central City	Spark New Zealand Trading Limited	Outline plan of works for building strengthening	OUP			Matthew Klomp		Non-residential	Outline Development Plan	Commercial Central City Business zone	Outline plan accepted	Delegated officer			40007594			CENTRAL CITY	Central	Fee Required

APPENDIX [E] - PROPOSED CONDITIONS

1. The sign shall not exceed the following luminance values:
 - (i) 5,000 cd/m² at any time, and;
 - (ii) 175cd/m² between astronomical dusk (being at the time at which the sun is 18 degrees below the horizon in the evening and no longer illuminates the sky) and astronomical dawn (being the time at which the sun is 18 degrees below the horizon in the morning and the sky is no longer completely dark).
2. The sign shall result in no more than 10.0 lux spill (horizontal or vertical) of light when measured or calculated 2 meters within the boundary of any adjacent site.
3. The consent holder shall provide a letter of compliance prepared by an appropriately qualified lighting engineer/designer for certification to the Head of Resource Consents, or nominee, of the Christchurch City Council (By email to rcmon@ccc.govt.nz) within 7 days of the operation of the sign commencing.
This letter shall certify the following:
 - (a) Demonstration of compliance with the maximum luminance levels required by Condition 1(i) and (ii);
 - (b) Demonstration of compliance with the maximum lux spill as set out under Condition 2;The letter shall be submitted to Christchurch City Council within 48 hours of the audit being completed.
4. The sign shall incorporate a lighting control which will adjust the brightness in line with ambient light levels.
5. Only still images shall be displayed with a minimum duration of 8 seconds.
6. The sign shall not contain any of the following on the display screen:
 - (a) Live broadcast or pre-recorded video;
 - (b) Images that include movement, animation or other dynamic effects;
 - (c) Flashing images or reflective/retro-reflective materials;
 - (d) A split sign (more than one advertisement on the screen at the same time);
 - (e) Any sequential or linked images linked over two or more images i.e. where the meaning of an image is dependent upon or encourages viewing of the immediately following image;
 - (f) Images that use graphics, colours, or shapes in combination in such a way that they would resemble or cause confusion with a traffic control device;
 - (g) Images that invite or direct a driver to take a driving action;
7. Any content displayed on the screen shall comply with the Advertising Standards Authority Advertising Code of Practice and the Broadcasting Act 1989.
8. There shall be no transitions between still images apart from an immediate change or a cross-dissolve of a maximum of 0.5 seconds.
9. There shall be no sound associated with the sign and no sound equipment is to be installed as part of the sign.
10. The sign shall be operated with a 'fail-safe' feature where in the event of a malfunction, the images will be replaced by a solid black colour until the malfunction is resolved.

11. Following the granting of this consent, each year for a period of five years and within three months of the anniversary of the sign commencing operation, the consent holder shall provide to the Christchurch City Council Head of Resource Consents (email: rcmon@ccc.govt.nz), a review, prepared by a suitably-qualified traffic engineer, of the injury crashes recorded in the New Zealand Transport Agency Crash Analysis System that have been reported within 50m of the 'stop' lines of the Durham Street southbound approach to the intersection with Tuam Street over the preceding year. Where any injury crashes have occurred, the following shall be identified:
 - (i) Whether there have been any changes in traffic management at the intersection;
 - (ii) Whether one or more of the road users could see the image on the sign at the location of the crash;
 - (iii) Whether the type of crash could be influenced by road user distraction;
 - (iv) Whether the written description on the police record indicates that distraction from the billboard was a factor;
 - (v) Whether there has been an increase in this type of crash (of all severities) compared to the previous five years;
 - (vi) Whether, taking all of these factors into account, the sign is likely (in the opinion of a suitably-qualified traffic engineer) to have been a contributing factor and if so, to what degree.
 - (vii) Where, in the opinion of the suitably-qualified traffic engineer, the sign is likely to have been a contributing factor the applicant shall, within 20 working days of being advised of this pattern, propose to Council's Senior Transport Planner Asset Planning, measures considered suitable by a suitably-qualified traffic engineer, that will be undertaken to avoid, remedy or mitigate the cause of the contributing factor of digital sign-related crashes. Such measures might include adjustments to the daytime and/or night time luminance levels; and/or adjustments to the transition time; and/or adjustments to the dwell time of each image at particular times of the day; and/or controls on image content. The nature and extent of measures to be applied must be to the satisfaction of Council's Head of Resource.
13. In accordance with s.128 of the Resource Management Act 1991, the Christchurch City Council may serve notice on the Consent Holder of its intention to review, in whole or in part, the conditions of this consent, to deal with any adverse effect on the environment which may arise from the exercise of the consent and which it is appropriate to deal with at a later stage for the following purposes:
 - a) An injury crash that occurs subsequent to the timeframes set out in (12) above where distraction from the sign and/or surrounding sign equipment is assessed to be a contributory factor.
 - b) A major upgrade/change to the adjacent route and/or intersection around the sign location occurs.
13. The consent holder shall, at least 5 working days prior, inform the Christchurch City Council's Environmental Monitoring Team (envresourcemonitoring@ccc.govt.nz) of the date of commencement of operation of the billboard.



Customer Services
P. 03 353 9007 or 0800 324 636

PO Box 345
Christchurch 8140

P. 03 365 3828
F. 03 365 3194
E. ecinfo@ecan.govt.nz

www.ecan.govt.nz

Dear Sir/Madam

Thank you for submitting your property enquiry in regards to our Listed Land Use Register (LLUR) which holds information about sites that have been used, or are currently used for activities which have the potential to have caused contamination.

The LLUR statement provided indicates the location of the land parcel(s) you enquired about and provides information regarding any LLUR sites within a radius specified in the statement of this land.

Please note that if a property is not currently entered on the LLUR, it does not mean that an activity with the potential to cause contamination has never occurred, or is not currently occurring there. The LLUR is not complete, and new sites are regularly being added as we receive information and conduct our own investigations into current and historic land uses.

The LLUR only contains information held by Environment Canterbury in relation to contaminated or potentially contaminated land; other information relevant to potential contamination may be held in other files (for example consent and enforcement files).

If your enquiry relates to a farm property, please note that many current and past activities undertaken on farms may not be listed on the LLUR. Activities such as the storage, formulation and disposal of pesticides, offal pits, foot rot troughs, animal dips and underground or above ground fuel tanks have the potential to cause contamination.

Please contact and Environment Canterbury Contaminated Sites Officer if you wish to discuss the contents of the LLUR statement, or if you require additional information. For any other information regarding this land please contact Environment Canterbury Customer Services.

Yours sincerely

Contaminated Sites Team

Property Statement from the Listed Land Use Register

Visit www.ecan.govt.nz/HAIL for more information about land uses.

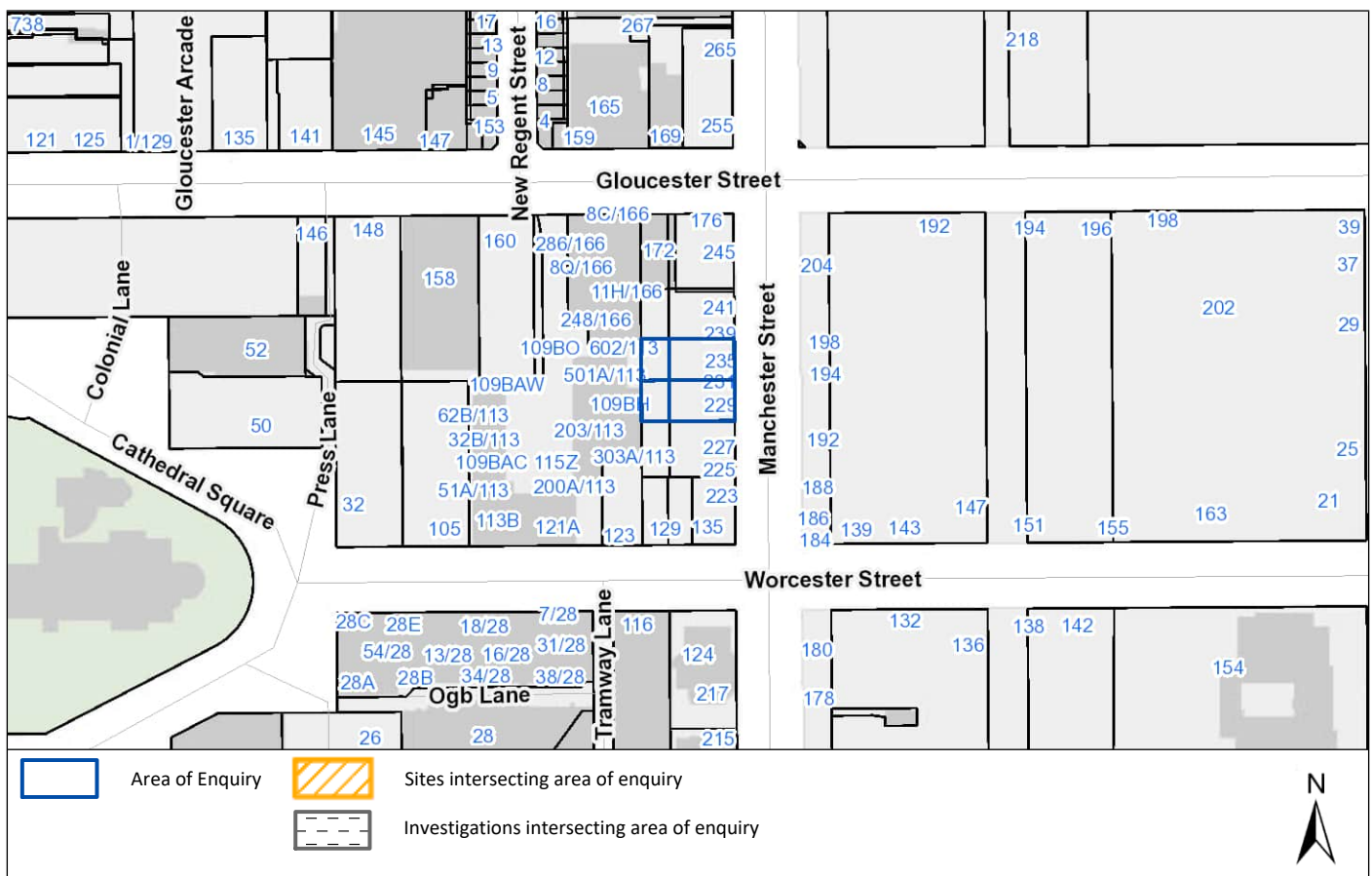
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Date:	20 August 2020	
Land Parcels:	Part Section 689 TN OF Christchurch	Valuation No(s): 2270020300
	Part Section 688 TN OF Christchurch	Valuation No(s): 2270020300
	Part Section 690 TN OF Christchurch	Valuation No(s): 2270020300
	Part Section 691 TN OF Christchurch	Valuation No(s): 2270020300



The information presented in this map is specific to the property you have selected. Information on nearby properties may not be shown on this map, even if the property is visible.

Summary of sites:

There are no sites associated with the area of enquiry.

Information held about the sites on the Listed Land Use Register

There are no sites associated with the area of enquiry.

Information held about other investigations on the Listed Land Use Register

For further information from Environment Canterbury, contact Customer Services and refer to enquiry number ENQ261804.

Disclaimer: *The enclosed information is derived from Environment Canterbury's Listed Land Use Register and is made available to you under the Local Government Official Information and Meetings Act 1987 and Environment Canterbury's Contaminated Land Information Management Strategy (ECan 2009).*

The information contained in this report reflects the current records held by Environment Canterbury regarding the activities undertaken on the site, its possible contamination and based on that information, the categorisation of the site. Environment Canterbury has not verified the accuracy or completeness of this information. It is released only as a copy of Environment Canterbury's records and is not intended to provide a full, complete or totally accurate assessment of the site. It is provided on the basis that Environment Canterbury makes no warranty or representation regarding the reliability, accuracy or completeness of the information provided or the level of contamination (if any) at the relevant site or that the site is suitable or otherwise for any particular purpose. Environment Canterbury accepts no responsibility for any loss, cost, damage or expense any person may incur as a result of the use, reference to or reliance on the information contained in this report.

Any person receiving and using this information is bound by the provisions of the Privacy Act 1993.

Listed Land Use Register

What you need to know



What is the Listed Land Use Register (LLUR)?

The LLUR is a database that Environment Canterbury uses to manage information about land that is, or has been, associated with the use, storage or disposal of hazardous substances.

Why do we need the LLUR?

Some activities and industries are hazardous and can potentially contaminate land or water. We need the LLUR to help us manage information about land which could pose a risk to your health and the environment because of its current or former land use.

Section 30 of the Resource Management Act (RMA, 1991) requires Environment Canterbury to investigate, identify and monitor contaminated land. To do this we follow national guidelines and use the LLUR to help us manage the information.

The information we collect also helps your local district or city council to fulfil its functions under the RMA. One of these is implementing the National Environmental Standard (NES) for Assessing and Managing Contaminants in Soil, which came into effect on 1 January 2012.

For information on the NES, contact your city or district council.

How does Environment Canterbury identify sites to be included on the LLUR?

We identify sites to be included on the LLUR based on a list of land uses produced by the Ministry for the Environment (MfE). This is called the Hazardous Activities and Industries List (HAIL)¹. The HAIL has 53 different activities, and includes land uses such as fuel storage sites, orchards, timber treatment yards, landfills, sheep dips and any other activities where hazardous substances could cause land and water contamination.

We have two main ways of identifying HAIL sites:

- We are actively identifying sites in each district using historic records and aerial photographs. This project started in 2008 and is ongoing.
- We also receive information from other sources, such as environmental site investigation reports submitted to us as a requirement of the Regional Plan, and in resource consent applications.

¹The Hazardous Activities and Industries List (HAIL) can be downloaded from MfE's website www.mfe.govt.nz, keyword search HAIL

How does Environment Canterbury classify sites on the LLUR?

Where we have identified a HAIL land use, we review all the available information, which may include investigation reports if we have them. We then assign the site a category on the LLUR. The category is intended to best describe what we know about the land use and potential contamination at the site and is signed off by a senior staff member.

Please refer to the Site Categories and Definitions factsheet for further information.

What does Environment Canterbury do with the information on the LLUR?

The LLUR is available online at www.llur.ecan.govt.nz. We mainly receive enquiries from potential property buyers and environmental consultants or engineers working on sites. An inquirer would typically receive a summary of any information we hold, including the category assigned to the site and a list of any investigation reports.

We may also use the information to prioritise sites for further investigation, remediation and management, to aid with planning, and to help assess resource consent applications. These are some of our other responsibilities under the RMA.

If you are conducting an environmental investigation or removing an underground storage tank at your property, you will need to comply with the rules in the Regional Plan and send us a copy of the report. This means we can keep our records accurate and up-to-date, and we can assign your property an appropriate category on the LLUR. To find out more, visit www.ecan.govt.nz/HAIL.



My land is on the LLUR – what should I do now?

IMPORTANT! Just because your property has a land use that is deemed hazardous or is on the LLUR, it doesn't necessarily mean it's contaminated. The only way to know if land is contaminated is by carrying out a detailed site investigation, which involves collecting and testing soil samples.

You do not need to do anything if your land is on the LLUR and you have no plans to alter it in any way. It is important that you let a tenant or buyer know your land is on the Listed Land Use Register if you intend to rent or sell your property. If you are not sure what you need to tell the other party, you should seek legal advice.

You may choose to have your property further investigated for your own peace of mind, or because you want to do one of the activities covered by the National Environmental Standard for Assessing and Managing Contaminants in Soil. Your district or city council will provide further information.

If you wish to engage a suitably qualified experienced practitioner to undertake a detailed site investigation, there are criteria for choosing a practitioner on www.ecan.govt.nz/HAIL.



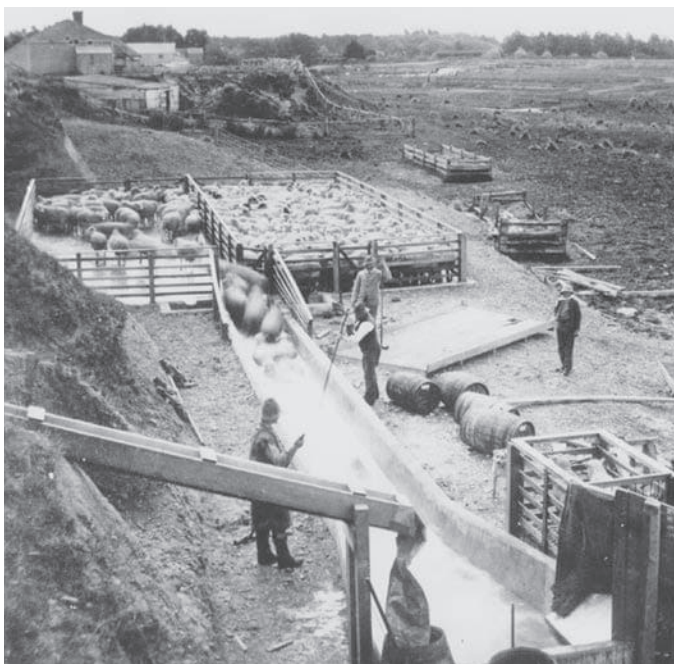
I think my site category is incorrect – how can I change it?

If you have an environmental investigation undertaken at your site, you must send us the report and we will review the LLUR category based on the information you provide. Similarly, if you have information that clearly shows your site has not been associated with HAIL activities (eg. a preliminary site investigation), or if other HAIL activities have occurred which we have not listed, we need to know about it so that our records are accurate.

If we have incorrectly identified that a HAIL activity has occurred at a site, it will be not be removed from the LLUR but categorised as Verified Non-HAIL. This helps us to ensure that the same site is not re-identified in the future.

IMPORTANT!

The LLUR is an online database which we are continually updating. A property may not currently be registered on the LLUR, but this does not necessarily mean that it hasn't had a HAIL use in the past.



Sheep dipping (ABOVE) and gas works (TOP) are among the former land uses that have been identified as potentially hazardous. (Photo above by Wheeler & Son in 1987, courtesy of Canterbury Museum.)

Contact us

Property owners have the right to look at all the information Environment Canterbury holds about their properties.

It is free to check the information on the LLUR, online at www.llur.ecan.govt.nz.

If you don't have access to the internet, you can enquire about a specific site by phoning us on (03) 353 9007 or toll free on 0800 EC INFO (32 4636) during business hours.

Contact Environment Canterbury:

Email: ecinfo@ecan.govt.nz

Phone:

Calling from Christchurch: (03) 353 9007

Calling from any other area: 0800 EC INFO (32 4636)



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Promoting quality of life through balanced resource management.

www.ecan.govt.nz

E13/101

Listed Land Use Register

Site categories and definitions

When Environment Canterbury identifies a Hazardous Activities and Industries List (HAIL) land use, we review the available information and assign the site a category on the Listed Land Use Register. The category is intended to best describe what we know about the land use.

If a site is categorised as **Unverified** it means it has been reported or identified as one that appears on the HAIL, but the land use has not been confirmed with the property owner.

If the land use has been confirmed but analytical information from the collection of samples is not available, and the presence or absence of contamination has therefore not been determined, the site is registered as:

Not investigated:

- A site whose past or present use has been reported and verified as one that appears on the HAIL.
- The site has not been investigated, which might typically include sampling and analysis of site soil, water and/or ambient air, and assessment of the associated analytical data.
- There is insufficient information to characterise any risks to human health or the environment from those activities undertaken on the site. Contamination may have occurred, but should not be assumed to have occurred.

If analytical information from the collection of samples is available, the site can be registered in one of six ways:

At or below background concentrations:

The site has been investigated or remediated. The investigation or post remediation validation results confirm there are no hazardous substances above local background concentrations other than those that occur naturally in the area. The investigation or validation sampling has been sufficiently detailed to characterise the site.

Below guideline values for:

The site has been investigated. Results show that there are hazardous substances present at the site but indicate that any adverse effects or risks to people and/or the environment are considered to be so low as to be acceptable. The site may have been remediated to reduce contamination to this level, and samples taken after remediation confirm this.

Managed for:

The site has been investigated. Results show that there are hazardous substances present at the site in concentrations that have the potential to cause adverse effects or risks to people and/or the environment. However, those risks are considered managed because:

- the nature of the use of the site prevents human and/or ecological exposure to the risks; and/or
- the land has been altered in some way and/or restrictions have been placed on the way it is used which prevent human and/or ecological exposure to the risks.

Partially investigated:

The site has been partially investigated. Results:

- demonstrate there are hazardous substances present at the site; however, there is insufficient information to quantify any adverse effects or risks to people or the environment; or
- do not adequately verify the presence or absence of contamination associated with all HAIL activities that are and/or have been undertaken on the site.

Significant adverse environmental effects:

The site has been investigated. Results show that sediment, groundwater or surface water contains hazardous substances that:

- have significant adverse effects on the environment; or
- are reasonably likely to have significant adverse effects on the environment.

Contaminated:

The site has been investigated. Results show that the land has a hazardous substance in or on it that:

- has significant adverse effects on human health and/or the environment; and/or
- is reasonably likely to have significant adverse effects on human health and/or the environment.

If a site has been included incorrectly on the Listed Land Use Register as having a HAIL, it will not be removed but will be registered as:

Verified non-HAIL:

Information shows that this site has never been associated with any of the specific activities or industries on the HAIL.

Please contact Environment Canterbury for further information:

(03) 353 9007 or toll free
on 0800 EC INFO (32 4636)
email ecinfo@ecan.govt.nz

Report / Decision on a Non-notified Resource Consent Application

(Sections 95A, 95B and 104 / 104C)

Application Number:	RMA/2017/467
Applicant:	Williams Specialised Property Ltd
Site address:	221 Manchester Street
Legal Description:	Lot 3 DP 2184
Zoning:	Proposed Replacement District Plan: Commercial Central City Business
Overlays and map notations:	Central City Core; Central City Active Frontage and Veranda; 28m Height Limit; Category 2: Lower Noise Level Entertainment and Hospitality Precincts; Liquefaction Management Area
Activity Status:	Proposed Replacement District Plan: Restricted Discretionary Christchurch District Plan: Restricted Discretionary
Description of Application:	Three storey mixed use commercial and residential building

Introduction

Consent is sought to construct a three storey building to house commercial activities on the ground floor (food and beverage and retail activities) and residential apartments on the first and second floors.

It is also proposed to erect a 55m² billboard on the northern elevation of the building and a 13m² billboard on the western elevation of the building. The applicant has advised that they are happy to accept a limited duration of five years for these proposed billboards.

Planning Framework

The operative Christchurch district plans are under review. The Independent Hearings Panel has made the majority of decisions on the Proposed Replacement District Plan. The majority of the rules are fully operative or treated as operative pursuant to section 86F of the Resource Management Act. The rules applicable to this proposal have been assessed and the breaches are identified below. Relevant objectives and policies are discussed in a later section of this report.

Christchurch Replacement District Plans

The site is zoned Commercial Central City Business in the Proposed Christchurch Replacement District Plan. This zone comprises the principal employment and business centre for the City and wider region and is intended to become the primary destination for a wide range and scale of activities including comparison shopping, dining and night life, entertainment activities, guest accommodation, events, cultural activities, tourism activities and high density residential activity.

The proposal requires resource consent under the following rules in the Proposed Christchurch Replacement District Plan:

- *Rule 15.10.1.3 Restricted discretionary activities (RD1) - Any new building within the Core shall be a restricted discretionary activity with the Council's discretion restricted to matters relating to urban design.*
- *Rule 15.10.1.3 Restricted discretionary activities (RD4) - Any residential activity listed in Rule 15.10.1.1 P13 that does not meet one or more of the activity specific standards.*

Units 5 and 6 are provided with 9m² balconies instead of the required 10m².

- *Rule 6.1.6.2.9 Sensitive activities in the Central City - Sensitive activities in the Central City shall meet a minimum external to internal noise reduction as outlined in the rule for Category 2 Precincts. Any*

activity not complying with the activity standards for this rule will be a restricted discretionary activity (RD1) under Rule 6.1.6.1.2.

No information has been supplied to demonstrate compliance with this standard.

- *Rule 6.1.7.2.1 Sensitive activities near roads and railways - Any new building intended for a sensitive activity located within 40 metres of the edge of the nearest marked traffic lane of a Local Distributor road shall either achieve a minimum external to internal noise reduction as outlined in the rule or meet the indoor sound levels specified in the rule. Any activity not complying with the activity standards for this rule will be a restricted discretionary activity (RD1) under Rule 6.1.7.1.2.*

No information has been supplied to demonstrate compliance with this standard.

- *Rule 7.4.2.2 - Cycle parking facilities shall be supplied in accordance with Appendix 7.2. Any activity not complying with this rule shall be a restricted discretionary activity (RD1) under Rule 7.4.1.3.*

The proposed cycle parking has a spacing of 0.57m between cycle spaces instead of the 0.65m required by Appendix 7.2.

The application must be considered as a restricted discretionary activity under this plan.

Operative District Plan

The signage rules under subchapter 6.8 are fully operative and therefore form part of the Operative District Plan. The proposal requires resource consent under the following rules:

- *Rule 6.8.4.3 Restricted discretionary activities (RD1) - Any sign listed in Rule 6.8.4.1.1 P1 - P15 (other than P7, P8, P9 or P15), that does not meet one or more of the activity specific standards.*

The maximum permitted area of signs for this building is 16.87m². The applicant proposes a 55m² (northern façade) and a 13m² billboard (western façade).

- *Rule 6.8.4.3 Restricted discretionary activities (RD2) – Off-site signs in Commercial zones are a restricted discretionary activity.*

Two off-site billboard signs are proposed.

Building identification signage proposed complies with the activity specific standards of P8 in Rule 6.8.4.1.1.

The existing environment

The application site is located on the corner of Manchester Street and Worcester Street, a key corner site as an entry to Cathedral Square and adjacent to a cluster of heritage buildings, including the Former Trinity Congregational Church directly opposite, the Former State Insurance building adjacent to that, the Former Government Buildings (the Heritage Hotel) and the commercial building façade on Cathedral Junction. Sites immediately to the west and north of the application site are currently vacant with no building or resource consent applications for new buildings having been received by Council to date.

Written approvals [Sections 95D, 95E(3)(a) and 104(3)(a)(ii)]

Rule 15.10.1.3 requires that applications arising from Rule 15.10.1.3 RD1 and RD4 shall not be limited or publicly notified. Rule 6.8.4.3 requires that applications arising from Rule 6.8.4.3 RD1 shall not be limited or publicly notified.

No written approvals have been provided with the application.

Effects on the environment and adversely affected persons [Sections 95A, 95B, 95E(3) and 104(1)(a)]

As a restricted discretionary activity the Council's assessment of the effects of this proposal is limited to matters relating to urban design, on-site residential amenity, noise, impacts of signage and cycle facilities.

Urban Design

New buildings within the Central City Core are required to undergo an urban design assessment. The Council's discretion in undertaking this assessment is limited to the matters listed in Clause 15.13.2.7 Commercial Central City Business Zone urban design, which are the extent to which the building:

- i. recognises and reinforces the context of a site, having regard to the identified urban form for the Commercial Central City Business Zone, the grid and diagonal street pattern, natural, heritage or cultural assets, and public open spaces;*
- ii. in having regard to the relationship of Ngai Tūāhuriri/ Ngai Tahu with Ōtautahi as a cultural element, consideration should be given to landscaping, the use of Te Reo Maori, design features, the use of locally sourced materials, and low impact design principles as is appropriate to the context.*
- iii. in respect of that part of the building or use visible from a publicly owned and accessible space, promotes active engagement with the street, community safety, human scale and visual interest;*
- iv. takes account of nearby buildings in respect of the exterior design, materials, architectural form, scale and detailing of the building;*
- v. is designed to emphasise the street corner (if on a corner site);*
- vi. is designed to incorporate Crime Prevention Through Environmental Design (CPTED) principles, including encouraging surveillance, effective lighting, management of public areas and boundary demarcation; and*
- vii. incorporates landscaping or other means to provide for increased amenity, shade and weather protection.*

The proposal has been assessed against these matters of discretion by Josie Schroder, Council's Principal Advisor Urban Design, whose comments are attached as Appendix 1 to this report.

Ms Schroder considers that the building design does not respond well to the surrounding building context, in particular the significant heritage buildings, although it does effectively activate the ground floor to each street frontage and the corner location of the site. She noted that while the design of the building does not take into account the materials and detail of surrounding buildings, design clues have been drawn on to some extent, such as the vertical elements, activity at the ground floor and modulation of the building, from buildings within the area.

No consideration has been given to cultural values in terms of landscaping and design features and Ms Schroder noted that further consideration of these matters should be given throughout the design process, for example through incorporating Te Reo Maori in the signage proposed for the building.

Ms Schroder considers that the building provides for active engagement through the incorporation of ground floor activity and glazing and balconies above. Variation in materials, use of vertical and horizontal definition and the inclusion of verandas contribute to human scale and visual interest.

With respect to CPTED matters Ms Schroder noted that visual interaction is provided at the ground floor level and that amendments to the application after lodgement resulted in some improvement to the residential entry and service area. It is noted that there is no western wall to the building and Ms Schroder had concerns regarding the safety of access and CPTED issues for residents. The applicant has proposed fencing to secure this area and while Ms Schroder is not supportive of this layout and design solution, she considers it to be adequate.

In terms of landscaping Ms Schroder notes that no landscaping has been incorporated and therefore some planting in the form of planter boxes should be required on the residential balconies. She has recommended a condition to that effect.

Ms Schroder concluded the following:

"I do not consider that this proposal presents a high quality central city building for a key corner location and or that it reflects the heritage context of the area. This corner location deserves a visually strong well designed building. The signage proposed has the potential to further diminish the quality of the building and its location.

However, the building does provide for mixed use activity within a central city and identifies the corner location through the façade treatment and positioning and façade treatment of the ground floor

commercial use. In addition the residential activity above will add activity and life to this location. As such I consider that that overall the effects are no more than minor based on the following conditions:

- *The proposed signage including billboards are integrated within the design of the building and are not illuminated nor comprise LEDs, with the exception of ground floor signage related to the commercial use within the building.*
- *The north and west facing signage are temporary and limited to a period of 5 years.*
- *Planters are included on residential balconies to contribute to the landscape quality of the building, once the units are occupied."*

I accept Ms Schroder's advice on the proposal, noting her concerns regarding the overall quality of the building and the design. I consider that the proposal, whilst not fully supporting each matter of discretion, has just managed to achieve a standard at which the effects could be considered no more than minor and on that basis just reaches the level of acceptable urban design outcome.

Residential Amenity (Outdoor Living)

Units 5 and 6 are provided with 9m² of outdoor living, instead of the required 10m². Council's discretion in this regard is limited to the extent to which the reduction in outdoor living space and/or its location will adversely affect the ability of the site to provide for the outdoor living needs of likely future residents of the site.

I note that the balconies provided are directly accessible from the living area of the apartments and meet the minimum dimension requirement. The units are small, with only one bedroom. Ms Schroder has reviewed this non-compliance and considers it an acceptable outcome. I concur with this assessment and consider that the balconies proposed for these two units will be adequate to provide for the outdoor living requirements of the one or two occupants of each unit.

Any adverse effects in this regard are considered to be less than minor.

Residential Amenity (Noise)

The applicant has not provided information to confirm that the activity will be able to comply with the internal noise reductions required for sensitive activities within the Central City and sensitive activities in proximity to busy roads. The reason for this is that detailed design and selection of final construction products has not yet been undertaken but will be done prior to the lodgement of a building consent.

The applicant is confident that the building will be able to achieve compliance with these rules and I concur that careful design with acoustic performance in mind will allow compliance to be achieved. The applicant is willing to accept a condition requiring confirmation to be provided from a qualified acoustic consultant that the design will achieve the relevant standards, prior to construction commencing. I consider that, subject to the imposition of this condition, no adverse noise effects on residential amenity or in terms of reverse sensitivity to other permitted or established activities will arise.

Impacts of Signage

The applicant proposes a 55m² billboard on the northern building façade and a 13m² billboard on the western building façade. A condition is proposed limiting the duration of these signs to no more than five years. I also note that if buildings are proposed and constructed on the adjoining sites within the five year timeframe from when the billboards are established, they will be effectively blocked from view and become redundant.

Council's discretion is limited to the following matters:

- *Whether the scale, design, colour, location and nature of the signage will have impacts on the architectural integrity, amenity values, character, visual coherence, and heritage values of:*
 - i. the building and the veranda on which the signage is displayed and its ability to accommodate the signage;*
 - ii. the surrounding area (including anticipated changes in the area);*
 - iii. residential activities; and*
 - iv. heritage items or heritage settings, open spaces, protected trees or areas possessing significant natural values.*
- *Whether the extent of the impacts of the signage are increased or lessened due to:*
 - i. the design, dimensions, nature and colour of the sign or support structure;*
 - ii. the level of visibility of the sign; and*

iii. vegetation or other mitigating features.

- *Whether the signage / billboard combines with existing signage on the building, the site or in the vicinity, to create visual clutter or set a precedent for further similar signage.*
- *Whether there are any special circumstances or functional needs relating to the activity, building, site or surroundings, which affect signage requirements including:*
 - i. operational, safety, directional, and functional requirements;*
 - ii. its size, scale or nature; and*
 - iii. the length of the road frontage.*
- *Whether the signage:*
 - i. enlivens a space or screens unsightly activities;*
 - ii. will result in an orderly and co-ordinated display; and*
 - iii. relates to the business or activity on the site and the necessity for the business or activity to identify and promote itself.*
- *The potential of the signage to cause distraction, or confusion to motorists and/or adversely affect traffic safety due to its location, visibility, and/or content including size of lettering, symbols or other graphics.*
- *Whether the extent of the impacts of the billboard are increased or lessened due to:*
 - i. the frequency and intensity of intermittent or flashing light sources, and the proposed periods of illumination and frequency of image changes;*
 - ii. the prominence of the billboard due to its illuminated or animated nature and ability to draw the eye;*
 - iii. the nature of surrounding land use activities;.*
 - iv. the proximity of the display to other properties and the likely effects of such intermittent or flashing lights or changing images upon those properties and their occupants; and*

In response to these matters I consider that the signage will not detract from the architectural features or visual coherence of the building itself and will not, on a temporary basis, detract from the amenity values, character and visual coherence of the locality. The smaller billboard sign on the western façade would, on its own, be compliant and I note that it is not possible to view both signs at the same. The large billboard is located on the façade facing away from the cluster of heritage buildings on Worcester Street. I do not consider that a temporary billboard on the northern façade, albeit a large one, will detract from the values of these heritage buildings.

The large billboard will be very visible when looking south along Manchester Street. It will to a certain extent enliven an otherwise blank façade which will exist until such time as a new building is constructed to the north. At this current point in time the application site is in proximity to a number of vacant sites, particularly to the north and east, which somewhat reduces the visual effects due to a reduced number of people living and working in the receiving environment. I note that this will not be the case forever – buildings and activities will over time re-establish on these sites. This reinforces the need for particularly the larger sign to be temporary.

The signs are not located in proximity to traffic signals or in such a way as to confuse or distract motorists. The applicant has not applied for LED billboards and I consider a condition should be imposed to ensure the signage is not illuminated, moving, changing, flashing or retro-reflective.

Ms Schroder has assessed the proposed signage and considers the adverse effects to be no more than minor on the condition that the billboard signs are not illuminated nor comprise LEDs, are temporary and limited to a period of 5 years.

I accept this advice and concur with Ms Schroder's assessment of the impacts of the proposed signage. I consider the adverse effects of the signage to be acceptable on a temporary basis, for a maximum duration of five years. I consider the adverse effects to be no more than minor on the wider environment, including pedestrians and motorists using the road network on Manchester Street and Worcester Street. I do not consider any persons to be directly affected for the purposes of s95 of the Act.

I further note that the applicant needs to be aware that any additional signage related to the ground floor tenancies other than that shown on the approved elevation plans will require resource consent due to the signage allowance for this site being exhausted by the proposed billboards.

Cycle Facilities

The applicant has noted a non-compliance with the required space between cycle parks but has also noted that there is adequate space to widen these cycle parks to a complying spacing of 0.65m. I have recommended a condition to require compliance with this rule. Subject to the imposition of this condition, no adverse effects relating to cycle parking are anticipated.

Conclusion on Effects

For the reasons outlined above I consider the design and layout of the building itself to constitute a marginal but on balance acceptable urban design outcome and the adverse effects in terms of the other matters of discretion to be no more than minor. I do not consider any persons to be adversely affected by the temporary billboard signage for the purposes of s95E.

Relevant objectives, policies, rules and other provisions of the Plan and proposed Plan [Section 104(1)(b)(vi)]

Regard must be had to the relevant objectives and policies in the Operative District Plan, and those in the Proposed Replacement District Plan. Of particular note, Chapter 3 of the Operative Christchurch District Plan contains a number of high level strategic objectives to guide the recovery and future development of the City.

Non-notification of this application is consistent with strategic Objective 3.3.2 of the Christchurch District Plan which states that requirements for notification and written approval are to be minimised when implementing the Plan.

In my opinion the application is consistent with the other relevant objectives and policies in the operative and proposed plans, as the proposal will:

- Contribute to the recovery of commercial activity and of the Central City;
- Achieve an acceptable urban design outcome by:
 - o encouraging pedestrian activity and amenity along streets;
 - o providing a principal street facing façade of visual interest;
 - o adequate incorporation of CPTED principles;
 - o providing adequate indoor and outdoor living spaces for residential activities;
- Manage noise effects by achieving compliance with indoor sound levels through sound insulation;
- Enable signage (including off-site signage) in an appropriate location on a temporary basis;
- Ensure the signage does not unduly detract from the character and visual amenity of the surrounding area and public realm.

Recovery Plans and Regeneration Plans

Section 60(2) of the Greater Christchurch Regeneration Act 2016 requires that decisions and recommendations on resource consent applications are not inconsistent with Recovery Plans and Regeneration Plans. For restricted discretionary activities, Section 60(5) states that such plans are a matter over which discretion is restricted.

The Christchurch Central Recovery Plan (CCRP) is relevant to this proposal as the site is located within the Central City Core. Granting consent is not considered to be inconsistent with the CCRP.

There are no Regeneration Plans in place at this time.

Relevant provisions of a National Environmental Standard, National Policy Statement, Regional Plan, Regional Policy Statement or Coastal Policy Statement [Section 104(1)(b)]

Environment Canterbury and Council records indicate that the application site has not been used for an activity on the Hazardous Activities and Industries List (Ministry for the Environment) therefore the National Environmental Standard for managing contaminants in soil to protect human health does not apply.

Part II of the Resource Management Act and any other relevant matters [Section 104(1) and 104(1)(c)]

I consider the proposal to be in keeping with Part II of the Act as it will maintain amenity values and the quality of the surrounding environment.

General notification provisions [Sections 95A(1), 95A(4) and Section 104(3)(d)]

There are no special circumstances or other aspects of the application that warrant public notification of this application.

Recommendations

That, for the above reasons:

- A. The application be processed on a **non-notified** basis in accordance with Sections 95A - 95F of the Resource Management Act 1991.
- B. The application **be granted** pursuant to Sections 104, 104C, and 108 of the Resource Management Act 1991, subject to the following condition:
 1. The development shall proceed in accordance with the information and plans submitted with the application, including the further information/amended plans submitted on 30 May 2017. The Approved Consent Documentation has been entered into Council records as RMA/2017/467 (17 pages).
 2. The cycle parking area shall be laid out to ensure a minimum spacing of 0.65m between each cycle park (as per Figure 7.2 in Appendix 7.2 of the District Plan).
 3. The billboards on the northern and western building façades shall only be in place for a maximum of five years from the date of first occupancy of any of the commercial or residential units in the building. After this time the billboards shall be removed.
 4. The two billboards shall not comprise illuminated, moving, changing, flashing or retro-reflective displays.
 5. Planter boxes containing landscape planting shall be established and maintained on the residential balconies to contribute to the landscape quality of the building, prior to the units being occupied.
 6. Prior to any construction work commencing on the site, the consent holder shall supply to the Council (via email to envresourcemonitoring@ccc.govt.nz) a report from a suitably qualified acoustic consultant confirming that the construction will achieve the requirements of Rule 6.1.6.2.9 (Sensitive activities in the Central City) and Rule 6.1.7.2.1 (Sensitive activities near roads and railways).

Advice Notes:

- The Council will require payment of its administrative charges in relation to monitoring, as authorised by the provisions of section 36 of the Resource Management Act 1991. The current monitoring charges are:
 - (i) A monitoring fee of \$272 to cover the cost of setting up a monitoring programme and carrying out a site inspection to ensure compliance with the conditions of this consent; and
 - (ii) Time charged at an hourly rate of \$118.50 incl. GST for certification of conditions and any additional monitoring, including non-compliance with conditions.
- The consent holder is advised to consider incorporation of Ngai Tuahuriri/Ngai Tahu or associated cultural values including Te Reo Maori into the detailed design, planting and/or signage for the building. Further information on these matters can be obtained from Mahaanui Kurataiao, mkt.admin@ngaitahu.iwi.nz.
- This site may be an archaeological site as declared by Heritage New Zealand Pouhere Taonga. Under Section 43 of the Heritage New Zealand Pouhere Taonga Act 2014, an archaeological site may be any place that was associated with human activity in or after 1900, and provides or may be able to provide, through investigation by archaeological methods, significant evidence relating to the historical and cultural heritage of New Zealand. **Please contact Heritage New Zealand Pouhere Taonga on infosouthern@heritage.org.nz or (03) 357 9629 before commencing work on the land.**

The consent holder is also directed to the Accidental Discovery Protocol set out in Appendix 3 of the Mahaanui Iwi Management Plan: <http://mkt.co.nz/mahaanui-iwi-management-plan/>

DEVELOPMENT CONTRIBUTIONS ASSESSMENT – RMA/2017/467 – 221 MANCHESTER STREET

Development Contributions have been assessed in accordance with the Development Contributions Policy 2015, which has been established under the Local Government Act 2002. Full details of the policy are available at <http://www.ccc.govt.nz/consents-and-licences/development-contributions/>.

Payment of Development Contributions can be made at any time following the issue of this consent. Payment in full must be made before either commencement of the Resource Consent activity, issue of Code Compliance Certificate for a building consent, issue of section 224 Certificate for a subdivision consent, or authorisation of a service connection.

Development Contribution Summary as at 7 March 2017:

DEVELOPMENT CONTRIBUTIONS SUMMARY			PIM or Consent Ref:		RMA/2017/467			
Customer Name	Williams Specialised Property Limited				ASSESSMENT			
Project Address	221 Manchester Street							
Assessment Date	7/03/2017							
Assessment Summary								
		HUE Credits						
		Current	Assessed	Discounts	Assessed HUE After Discount	Change	DC Rate (incl GST)	DC Charge (incl GST)
Location:								
Cathedral Square								
Activity	Catchment	HUE A	HUE B	C	HUE D	HUE E	G	F= E x G
Network Infrastructure								
Water supply	District-wide	3.66	4.60	0%	4.60	0.94	\$2,395.45	\$2,254.12
Wastewater collection	District-wide	3.66	4.60	0%	4.60	0.94	\$6,349.15	\$5,974.55
Wastewater treatment and disposal	District-wide	4.04	4.69	0%	4.69	0.66	\$2,904.90	\$1,911.42
Stormwater & flood protection	Avon	0.00	0.00	0%	0.00	0.00	\$798.10	\$0.00
Road network	Central City	8.51	5.83	0%	5.83	0.00	\$907.35	\$0.00
Active travel	District-wide	8.51	5.83	0%	5.83	0.00	\$425.50	\$0.00
Public transport	District-wide	8.51	5.83	0%	5.83	0.00	\$717.60	\$0.00
Total Community and Network Infrastructure								\$10,140.09
Reserves								
Regional parks	District-wide							\$0.00
Garden and heritage parks	District-wide							\$0.00
Sports parks	District-wide							\$0.00
Neighbourhood parks	Central City							\$0.00
							15.00%	\$1,322.62
Total Development Contribution								\$10,140.09

Reconsideration and/or objection

A request for reconsideration of development contributions or an objection to development contributions may be made if you have grounds to believe:

- the development contribution was incorrectly calculated or assessed under the territorial authority's development contributions policy; or
- the territorial authority incorrectly applied its development contributions policy; or
- the information used to assess the person's development against the development contributions policy, or the way the territorial authority has recorded or used it when requiring a development contribution, was incomplete or contained errors.

A Request for Reconsideration Form must be lodged with Council within 10 working days of receiving this notice. A Request for Reconsideration form can be found at www.ccc.govt.nz.

An Objection to Development Contributions form must be lodged with Council within 15 working days of receiving this notice. An Objection to Development Contributions form can be found at www.ccc.govt.nz.

Notes:

- This assessment is valid for 24 months from the decision date. Reassessment of this development contribution assessment will occur after 24 months only when an invoice is generated, and this original assessment (or subsequent reassessment) has expired.
- This assessment supersedes any estimate you may have received on a Project Information Memorandum (PIM) or Development Check.

3. If you have any queries regarding the Development Contribution please contact our Development Contributions Assessors on ph. 03 941-8999.


Reported and recommended by: *Emma Chapman, Senior Planner*

Date: 9 June 2017

Decision

That the above recommendations be adopted for the reasons outlined in the report.

Delegated officer:



Stapleton, Kathryn
09/06/2017 4:34 PM
Planning Team Leader

APPENDIX 1 – Urban Design Assessment

Dear Emma

Please find below my urban design assessment in regard to the above application.

Urban Design Assessment

The above proposal is for a three storey mixed use building containing retail, hospitality and residential development within the Central City Business (Core) Zone. The proposal is located on the corner of Manchester Street and Worcester Street, a key corner site as an entry to Cathedral Square and within a cluster of heritage buildings, including the Former Trinity Congregational Church directly opposite, the Former State Insurance building adjacent to that, the Former Government Buildings aka the Heritage Hotel and the commercial building façade on Cathedral Junction.

Following lodgement of the consent application, quite a number of changes have been made to the proposal including changes to the façade treatment, storage areas for residential and commercial use, identification of the location of plant, increased width of the residential/service entry, additional signage including a billboard (with limited information about this). Further information is still to be received in regard to the treatment of the western façade in respect to potential CPTED matters, and the functionality of the ground floor residential entry, service and storage area.

The key urban design provisions in respect to District Plan against which this assessment has been undertaken are:

- 15.10.1.3 RD1: requires assessment against 15.13.2.7
- 15.10.1.3 RD4: Units 5 and 6 do not meet the 10m² outdoor living space, rather 9m² is provided. I consider that given the location, in combination with the open access of the outdoor living to the internal living, that the reduction in outdoor living space by 1m² is no more than minor.

I have undertaken the assessment in respect to 15.10.13.2.7

- i. The proposal is located on a corner site and responds to each street through the façade treatment and activity located on the ground floor to each street. However, while there are some vertical elements that may be said to reflect the heritage context of the locale, the building does not effectively reinforce the materiality or quality of materials, rhythms, or complexity of the heritage values of the area.
- ii. Regard has not been given to the relationship to Ngai Tuahuriri/Ngai Tahu or associated cultural values. No landscaping is incorporated on the site nor has Te Reo Maori, design features locally sourced materials or low impact design principles been incorporated into the building. Consideration could be given at least to the use of Te Reo Maori in the signage proposed for the building. In addition further detailing that incorporates cultural references should be considered as the building is progressed.
- iii. The building provides for active engagement through the incorporation of ground floor activity and glazing and balconies above. Variation in materials, use of vertical and horizontal definition and the inclusion of verandas contribute to human scale and visual interest.
- iv. While the design of the building does not take into account the materials and detail of surrounding building, design clues have been drawn on to some extent, such as the vertical elements, activity at the ground floor and modulation of the building, from buildings within the area.
- v. The design does reflect the corner site location.
- vi. Visual interaction is provided at the ground floor level. Post lodgement further consideration was given to CPTED matters particularly in respect to the residential entry and service area. I consider further work is required to ensure that the ground floor area is secure for residents accessing the building and apartments above, and that an areas of entrapment that are unsafe for residents are avoided. Effective lighting and security is also required in respect to the residential access/service area.
- vii. No landscaping has been incorporated, but should be considered in respect to residential balconies.

Conclusion

I do not consider that this proposal presents a high quality central city building for a key corner location and or that it reflects the heritage context of the area. This corner location deserves a visually strong well designed building. The signage proposed has the potential to further diminish the quality of the building and its location.

However, the building does provide for mixed use activity within a central city and identifies the corner location through the façade treatment and positioning and façade treatment of the ground floor commercial use. In

addition the residential activity above will add activity and life to this location. As such I consider that that overall the effects are no more than minor based on the following conditions:

- The proposed signage including billboards are integrated within the design of the building and are not illuminated nor comprise LEDs, with the exception of ground floor signage related to the commercial use within the building.
- The north and west facing signage are temporary and limited to a period of 5 years.
- Planters are included on residential balconies to contribute to the landscape quality of the building, once the units are occupied.

Kind regards

Josie Schroder

Principal Advisor Urban Design
Urban Design Team
DDI 03 941 8076
Email josie.schroder@ccc.govt.nz
Web www.ccc.govt.nz

Christchurch City Council
Rebuild Central, 663 Colombo Street, Christchurch
PO Box 8154, Christchurch, 8154
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TOWNPLANNING GROUP

2 November 2020

OUR REF: 2416-20

Robbie Ordelleide
Planner
Christchurch City Council
CHRISTCHURCH

VIA EMAIL: robert.ordelleide@ccc.govt.nz

Dear Robert,

RESPONSE TO FURTHER INFORMATION REQUEST RMA/2020/1877 – 235 MANCHESTER STREET, CENTRAL CITY

This letter is in response to your email dated 17 September 2020 in which you requested further information (“RFI”) in relation to the above application. This letter addresses each of the matters raised in the RFI using the same number format.

1. The proposed digital billboard is essentially a freestanding billboard with a central support post anchored within the ground by way of concrete foundation, in the same way as any other freestanding digital billboard. The ‘green frame’ is essentially a wire lattice structure placed around the freestanding billboard so that the two features appear wholly integrated as one structure. The lattice frame structure will be anchored to the ground and structurally tied to the digital billboard structure, with detailed engineering and electrical design addressing matters relating to foundations, structural elements, signage control considered to be most appropriately undertaken as part of the building consent, should resource consent be granted.

In terms of irrigation, it is expected that a basic drip irrigation system will be established using the existing water connection afforded to the site, however detailed irrigation design will be undertaken by an engineer in conjunction with a landscape architect should resource consent be granted.

Offices in Queenstown, Christchurch and Auckland

Website: www.townplanning.co.nz | **Postal:** PO Box 35, Christchurch | **Phone:** 0800 224 470

For security purposes and to prevent people from climbing the structure, the diameter of the wire lattice structure will be limited to 30mm, up to a height of 3m. This proposed diameter is too small for people to insert fingers and feet to climb the structure but is still of sufficient size to allow plants to populate the frame.

- 2-4 Site photos and visual simulations using a focal length of 50mm have been prepared and are appended as **Attachment [A]**, with these including a scaling feature. In addition, the visual simulations have been prepared from selected viewpoints as seen in **Attachment [A]**.
5. The photos contained in the visual package contain a number of new selected viewpoints that take into account the views available to pedestrians and cyclists, car park users and future residential apartment buildings in the east frame, as requested. The viewpoints provided illustrate a billboard that is well-integrated with the surrounding environment and is almost unnoticeable from some locations, including the East Frame residential areas. Overall, the billboard adds vibrancy and enlivens a space that is otherwise largely grey, with this largely being the colour of the surrounding built form and streetscape.
6. Should the site be redeveloped at some point in the future, it is not certain that the billboard would need to be removed, noting that the billboard may be able to be integrated into a future site development and not necessarily obstruct development on the site. If the billboard is required to be relocated on the site as part of future development, a variation to the resource consent would be required, with Council afforded an opportunity to consider the effects of the same. If the billboard is required to be removed completely the Applicant could simply surrender the consent, or choose to no longer exercise it. To this end, we do not consider it necessary to propose a condition requiring the removal of the billboard should the site be redeveloped.

We trust this additional information will afford you further clarity with respect to the proposal. If you have any queries or concerns with the above, please do not hesitate to contact the undersigned.

Yours sincerely,
Town Planning Group



Natalie Reeves
Planner

Encl. [A]: Urban Design and Visual Impact Assessment





APPENDIX ONE - URBAN DESIGN AND VISUAL IMPACT ASSESSMENT

DIGITAL BILLBOARD PROPOSAL - WILSON CARPARK, MANCHESTER STREET
FOR WILSON PARKING

22 October 2020
Project no. 2020_049
REVISION E



WILSONS CARPARK, MANCHESTER STREET DIGITAL BILLBOARD PROPOSAL

Project no: 2020_049
Document title: URBAN DESIGN AND VISUAL IMPACT ASSESSMENT
Revision: E
Date: 22 October 2020
Client name: WILSON PARKING

Author: David Compton-Moen | Sophie Beaumont | Will Todd

File name: 2020_049_Wilsons_225 Manchester Street _Billboard UDVIA_A

DOCUMENT HISTORY AND STATUS

REVISION	DATE	DESCRIPTION	BY	REVIEW	APPROVED
A	31/07/2020	UDVIA Report	SB	DCM	
B	06/08/2020	Viewshed Illustration	WT	DCM	
C	06/08/2020	Additional viewpoint	DCM		
D	12/10/2020	RFI	WT	DCM	
E	22/20/2020	RFI	WT	DCM	



DCM URBAN DESIGN LIMITED

Level 3, 329 Durham Street North
Christchurch 8013

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CONTENTS

DIGITAL BILLBOARD PROPOSAL - MOCK UP	1
DISTRICT PLANNING MAP	2
CONTEXT - VISUAL CATCHMENT	3
CONTEXT - VIEWPOINT LOCATIONS	4
VIEWSHED ILLUSTRATION	5
PLAN AND ELEVATIONS	6
STRUCTURE ELEVATIONS	7
CONTEXT - RECEIVING URBAN CHARACTER	8
CONTEXT - RECEIVING URBAN CHARACTER (2)	9
VP1 - VIEW SOUTH FROM 265 MANCHESTER STREET	10
VP2 - VIEW NORTH-WEST FROM 185 HEREFORD STREET	11
VP3 - VIEW NORTH FROM 180 MANCHESTER STREET	12
VP4 - VIEW WEST FROM EAST FRAME - FUTURE RESIDENTS	13
VP5 - VIEW NORTH WEST FROM MANCHESTER STREET BUS STOP	14
VP6 - VIEW SOUTH FROM MARGARET MAHY PARK	15
VP7 - VIEW NORTH FROM HIGH-MANCHESTER STREET INTERSECTION	16



A. IMAGE LOCATION

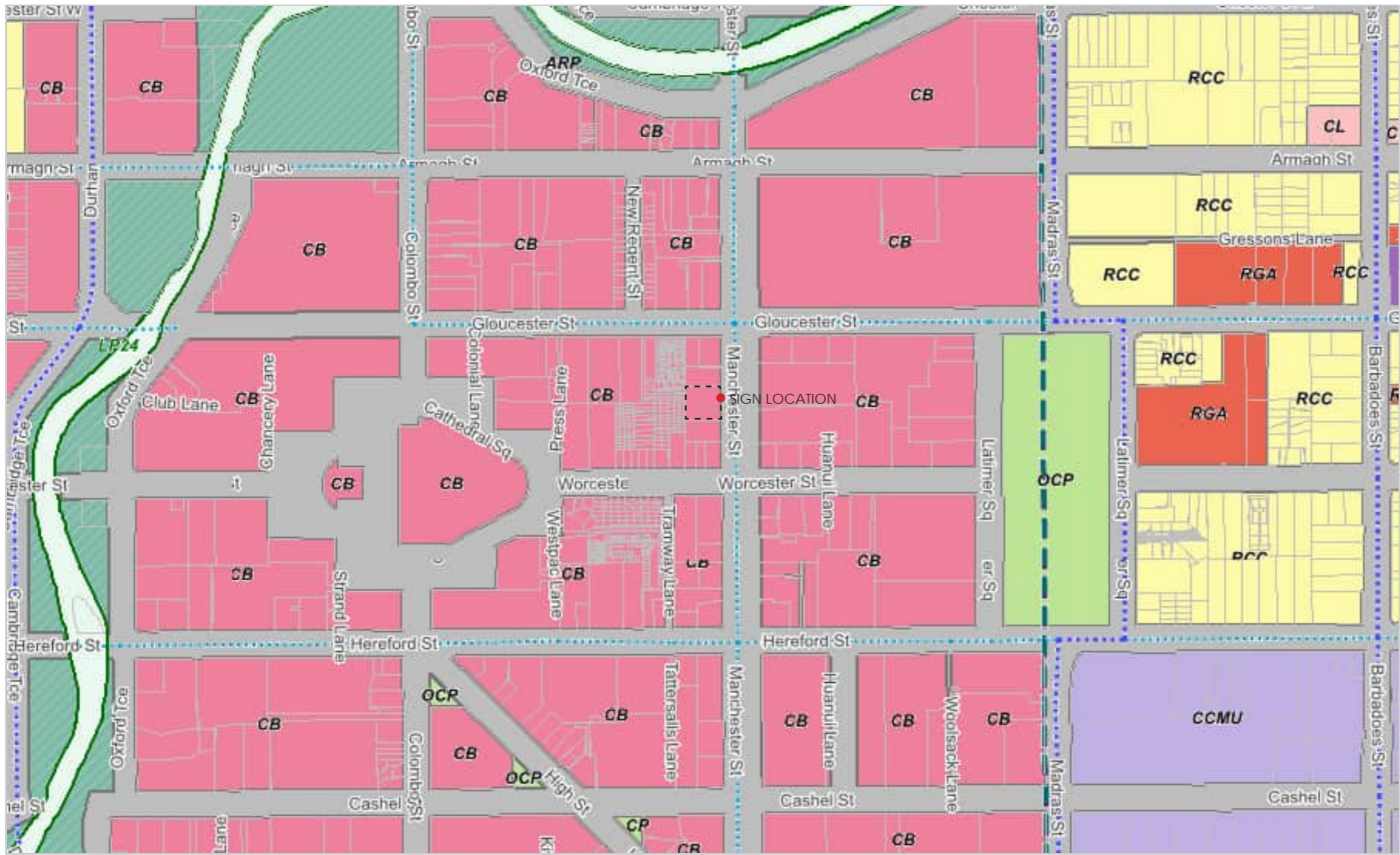


B. EXISTING VIEW

The proposal is to establish a 6x3m portrait format, double-sided digital billboard fronting Manchester Street. The billboard is surrounded by a steel frame and a mix of climbers and plants to establish a green frame.



C. ILLUSTRATION SHOWING THE PROPOSED DIGITAL BILLBOARD WITH CLIMBERS



Map Legend

Land Use Zones

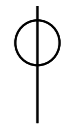
- Labels
- Zone Labels
- Zone
- ARP** Avon River Precinct (Te Papa Ōtākaro) Zone
 - CB** Commercial Central City Business Zone
 - CCMU** Commercial Central City Mixed Use Zone
 - CSF** Commercial Central City (South Frame) Mixed Use Zone
 - CL** Commercial Local Zone
 - OCP** Open Space Community Parks Zone
 - OWM** Open Space Water and Margins Zone
 - RCC** Residential Central City Zone
 - RGA** Residential Guest Accommodation Zone
 - SPS** Specific Purpose (School) Zone
 - Transport Zone

Other Notations

- Road Hierarchy
- Collector
 - Major Arterial
 - Minor Arterial
 - Central City Local Distributor
 - Central City Main Distributor

A. DISTRICT PLAN MAP SHOWING PROPOSED SIGN LOCATION

Map / image source: Christchurch City Council - District Plan





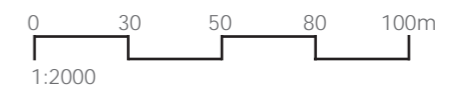
A. AERIAL PHOTO SHOWING THE PROPOSED SIGN LOCATION

Map / image source: Canterbury Maps

URBAN DESIGN AND VISUAL IMPACT ASSESSMENT

CONTEXT - VISUAL CATCHMENT

DIGITAL BILLBOARD PROPOSAL - 225 MANCHESTER STREET, CHRISTCHURCH



LEGEND

VIEWPOINT LOCATIONS

- 1 VP1 - VIEW South from 265 Manchester Street
- 2 VP2 - VIEW North-West from 185 Hereford Street
- 3 VP3 - VIEW North from 180 Manchester Street
- 4 VP4 - VIEW West from East Frame - Future Residents
- 5 VP5 - VIEW North-West from Manchester Street Bus Stop
- 6 VP6 - VIEW South from Margaret Mahy Park
- 7 VP7 - VIEW North from High - Manchester Street Intersection

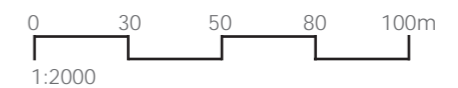


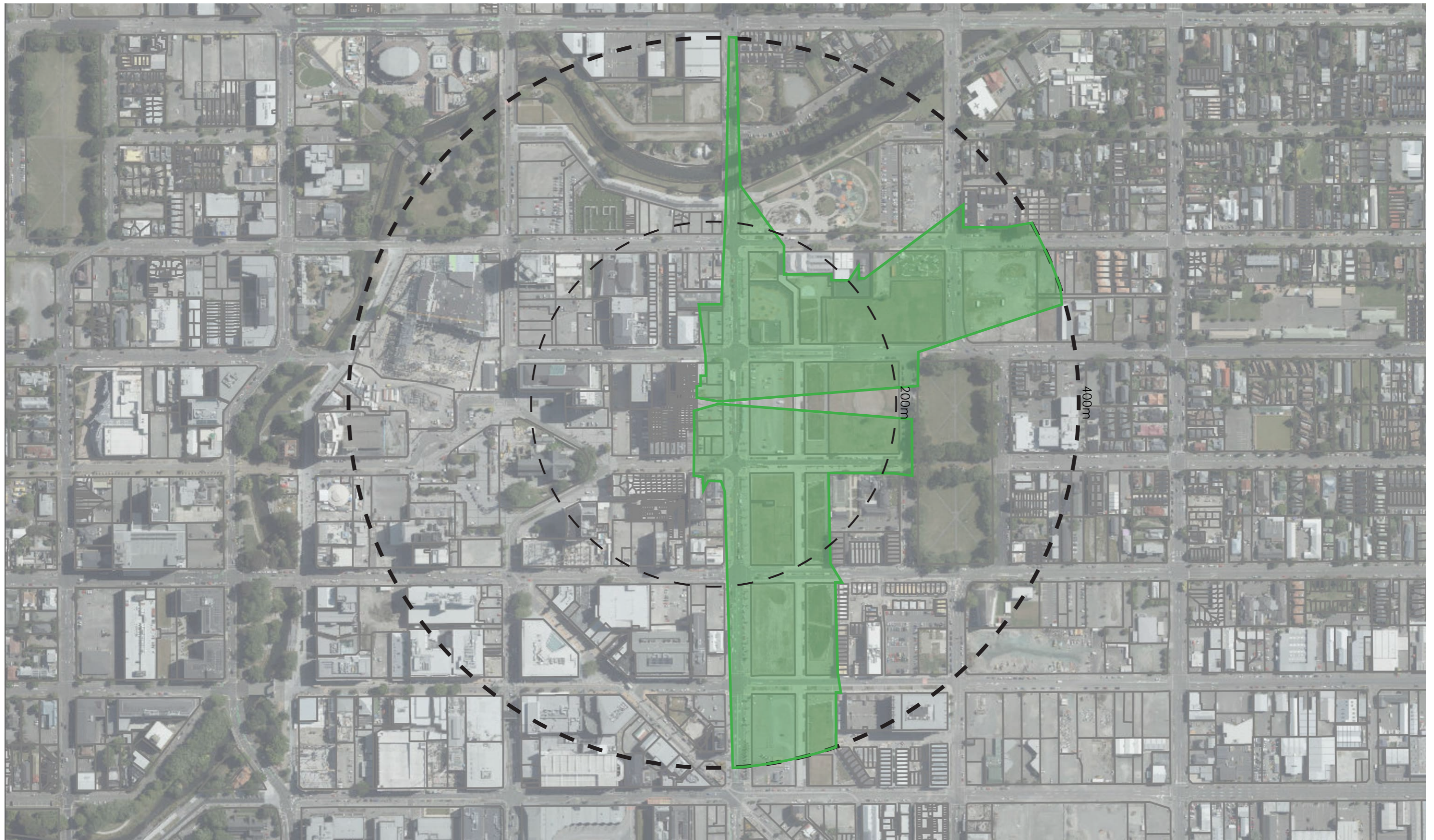
Map / image source: Canterbury Maps

URBAN DESIGN AND VISUAL IMPACT ASSESSMENT

CONTEXT - VIEWPOINT LOCATIONS

DIGITAL BILLBOARD PROPOSAL - 225 MANCHESTER STREET, CHRISTCHURCH





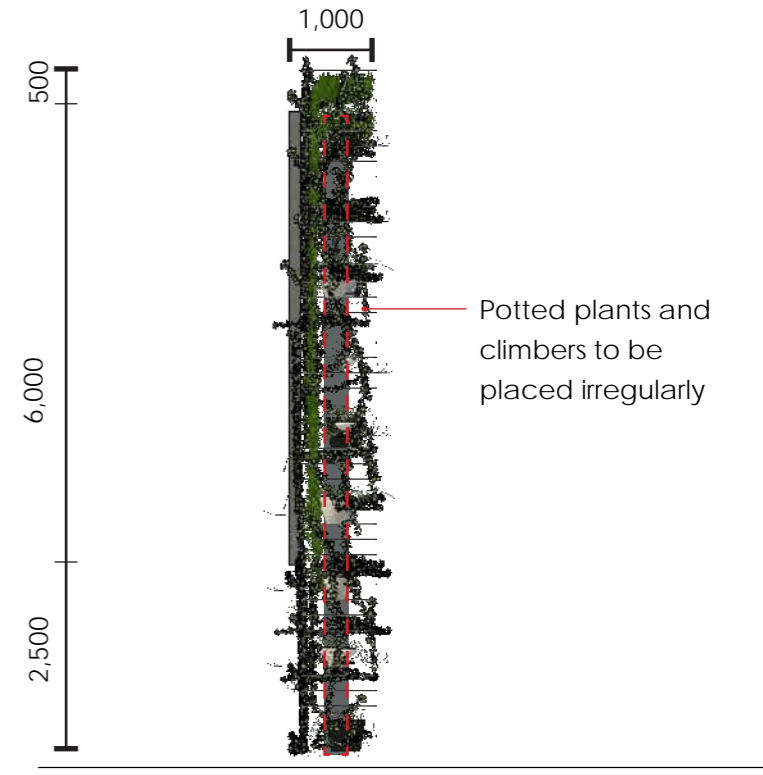
A. VIEWSHED PLAN FOR 3m x 6m DIGITAL BILLBOARD

Map / image source: Canterbury Maps Scale 1:4000 @ A3





A. PLAN FOR 3m X 6m DIGITAL BILLBOARD
 map / image source: Canterbury Maps - Scale 1:200 @ A3



B. SIDE ELEVATIONS FOR 3m x 6m DIGITAL BILLBOARD
 Scale 1:100 @ A3



C. ELEVATIONS FOR 3m x 6m DIGITAL BILLBOARD
 Scale 1:100 @ A3

Client / project name: WILSONS / 225 MANCHESTER STREET DIGITAL BILLBOARD
 Drawing name: **PLAN AND ELEVATIONS**
 Designed by: Dave Compton-Moen / Will Todd
 Drawn by: WILL TODD
 Original issue date: 31 JULY 2020
 Scales: As Shown

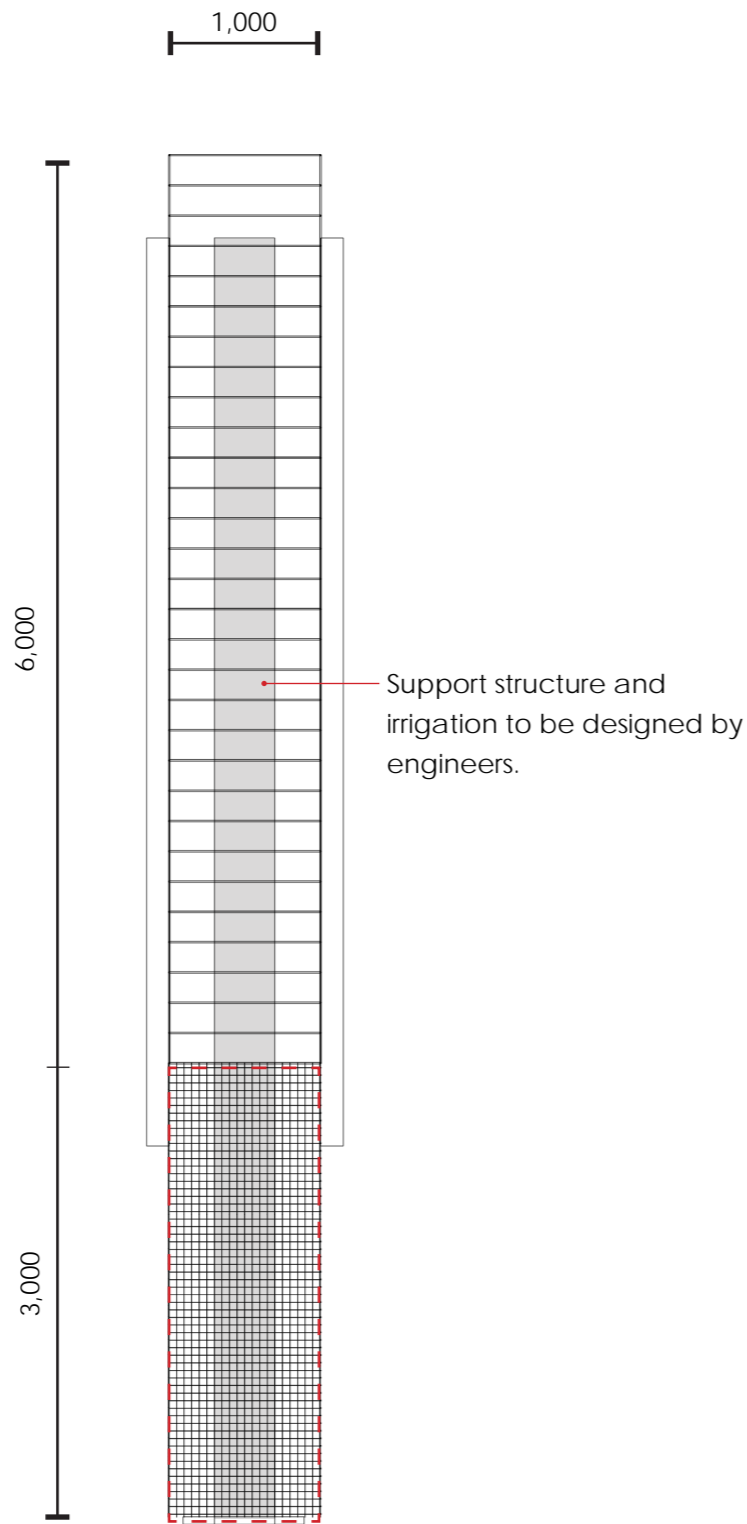
Revision no:	Amendment	Approved	Date
A	DRAFT	DCM	31.07.2020
B	Viewshed Illustration	DCM	06.08.2020
C			
D	RFI	DCM	12.10.2020
E	RFI	DCM	22.10.2020



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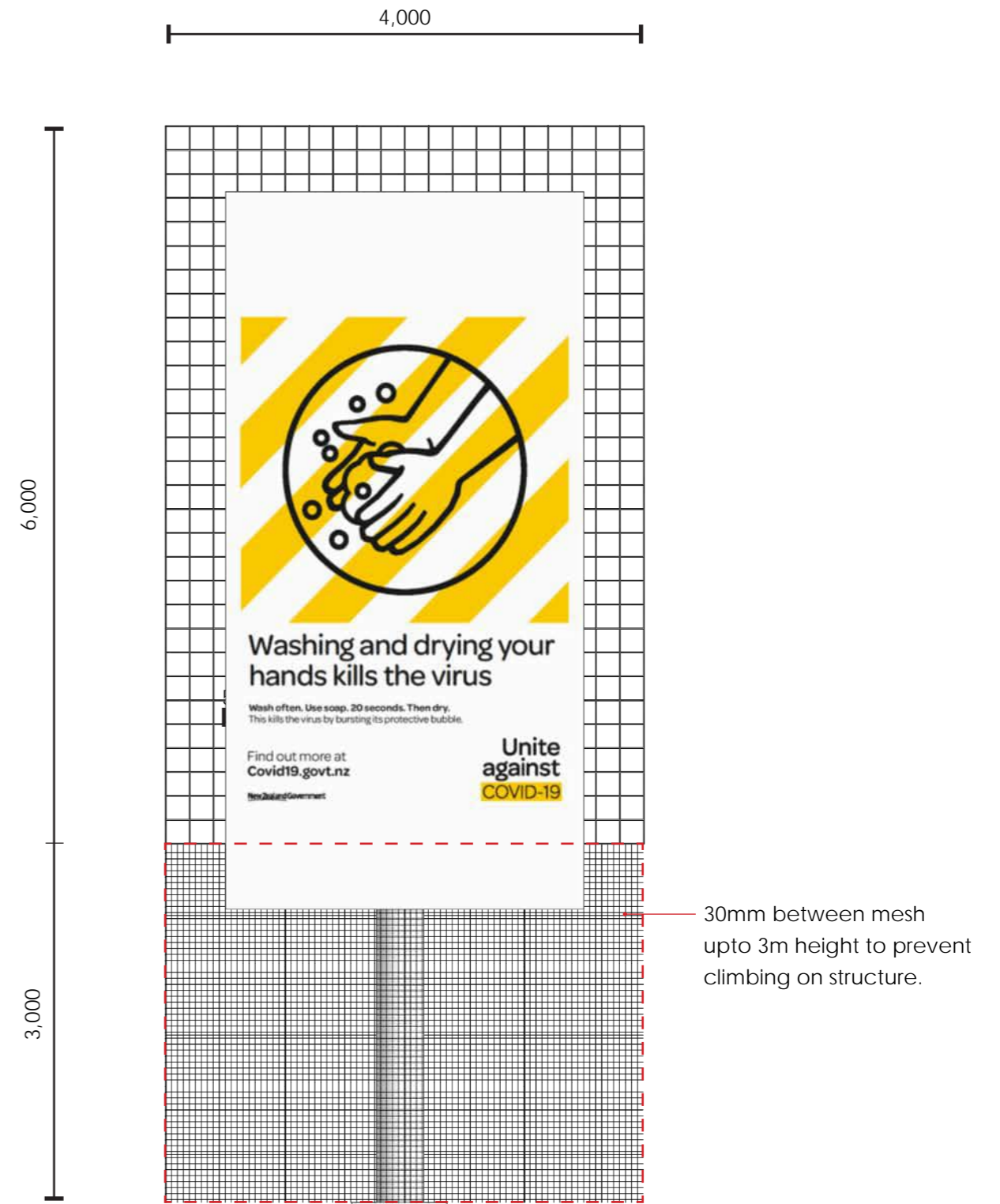
Project no / drawing no: 2020_049 / 0006

Revision: E



A. SIDE ELEVATIONS FOR 3m x 6m DIGITAL BILLBOARD STRUCTURE

Scale 1:50 @ A3



B. ELEVATIONS FOR 3m x 6m DIGITAL BILLBOARD STRUCTURE

Scale 1:50 @ A3

Client / project name: WILSONS / 225 MANCHESTER STREET DIGITAL BILLBOARD
 Drawing name: **PLAN AND ELEVATIONS OF STRUCTURE**
 Designed by: Dave Compton-Moen / Will Todd
 Drawn by: WILL TODD
 Original issue date: 31 JULY 2020
 Scales: 1:50

Revision no:	Amendment
A	DRAFT
B	Viewshed Illustration
C	
D	RFI
E	RFI

Approved	Date
DCM	31.07.2020
DCM	06.08.2020
DCM	12.10.2020
DCM	22.10.2020



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Project no / drawing no: **2020_049 / 0007**

Revision: **E**



A View from the the proposed site looking down Manchester Street towards the historic Trinity Congregational Church, a site now owned by the Chrsitchurch Heritage Trust due to earthquake damage.



B View from the proposed site looking across Manchester Street towards public transport stop and all day parking location. Manchester Street is a significant route among central city public transport, and has many carparks due to its central location. 4-5 storey mixed use buildings are proposed along the eastern edge of Manchester Street but the timing of these building is unknown. Once the buildings are developed though, the East Frame will be totally screened from this viewpoint.



C View from adjacent greenspace of multi-storey buildings (Rendevous Hotel, earthquake damaged Kaplan Centre and Trinity Congregation Church, and Cathedral Junction Apartments), all have a view above the proposed site to the greenspace.



D View of the site owned by the Christchurch Heritage Trust (historic Trinity Congregational Church). The building has been stabilised and is being preserved after experiencing significant earthquake damage, currently cordoned off with temporary fencing. This listed as a heritage item (580), the Shands building (256) has been relocated into the site to the left of the church (behind the church), and the Former State Insurance Building at 116 Worcester Street (577).



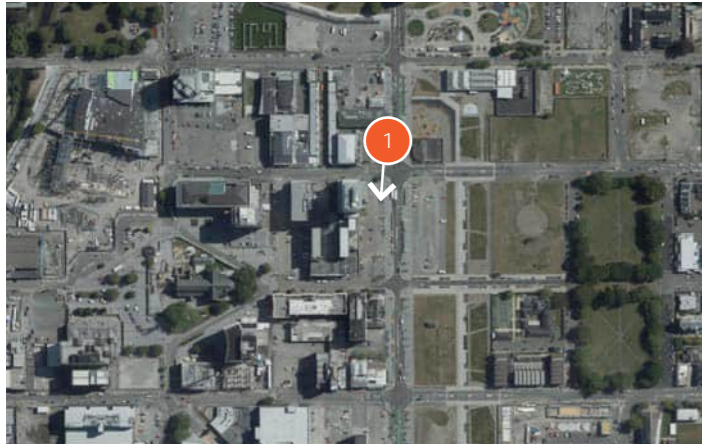
E View of the buildings which are located to the west of the proposed site. The vacant buildings along Manchester Street display murals/street art, post earthquake, and now play a role in the urban character of Christchurch CBD.



F View from New Regent Street showing the proximity of the tram route to the proposed location. In addition to this, the Rondvous Hotel and Cathedral Junction entrances are pictured identifying this is an area of higher use by the public.



G View of Latimer Terraces, terraced housing located at 197 Hereford Street. The West facing terraces (pictured) have a view across green space towards multi-storey buildings (Hereford Street Parking Building, Rondvous Hotel, and vacant earthquake damaged buildings).



A. IMAGE LOCATION

VISUALLY SENSITIVE RECEPTORS:

- Pedestrians / Cyclists along Manchester Street / Gloucester Street
- Users of Margaret Mahy Playground
- Visitors to Urbanz accommodation
- Office workers in the UniMed Building, 166 Gloucester Street

PROPOSED BILLBOARD



B. EXISTING VIEW



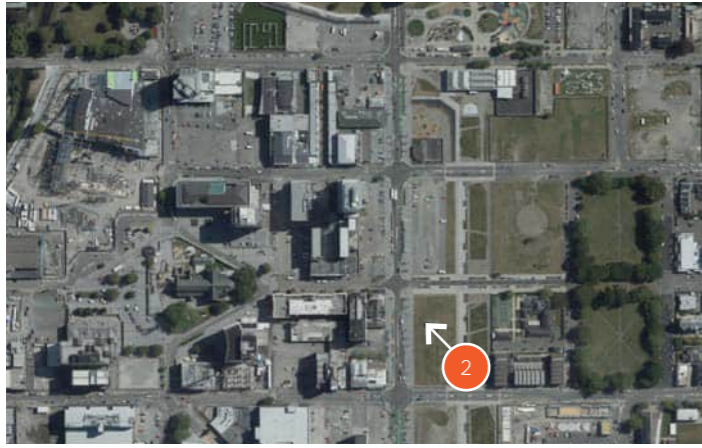
C. ILLUSTRATION - VIEW WITH PROPOSED BILLBOARD

URBAN DESIGN AND VISUAL IMPACT ASSESSMENT

1 VP1 - VIEW SOUTH FROM 265 MANCHESTER STREET

DIGITAL BILLBOARD PROPOSAL - 225 MANCHESTER STREET, CHRISTCHURCH

Image captured on Sony a6000
 Focal length of 50mm.
 Date: 01 October 2020 at 01:23 pm
 Height of 1.7 metres
 Photos merged in Photoshop CS to create panorama



A. IMAGE LOCATION

VISUALLY SENSITIVE RECEPTORS:

- Pedestrians / Cyclists along Huanua Lane
- Residents of Latimer Terraces



B. EXISTING VIEW



C. ILLUSTRATION - VIEW WITH PROPOSED BILLBOARD

PROPOSED BILLBOARD



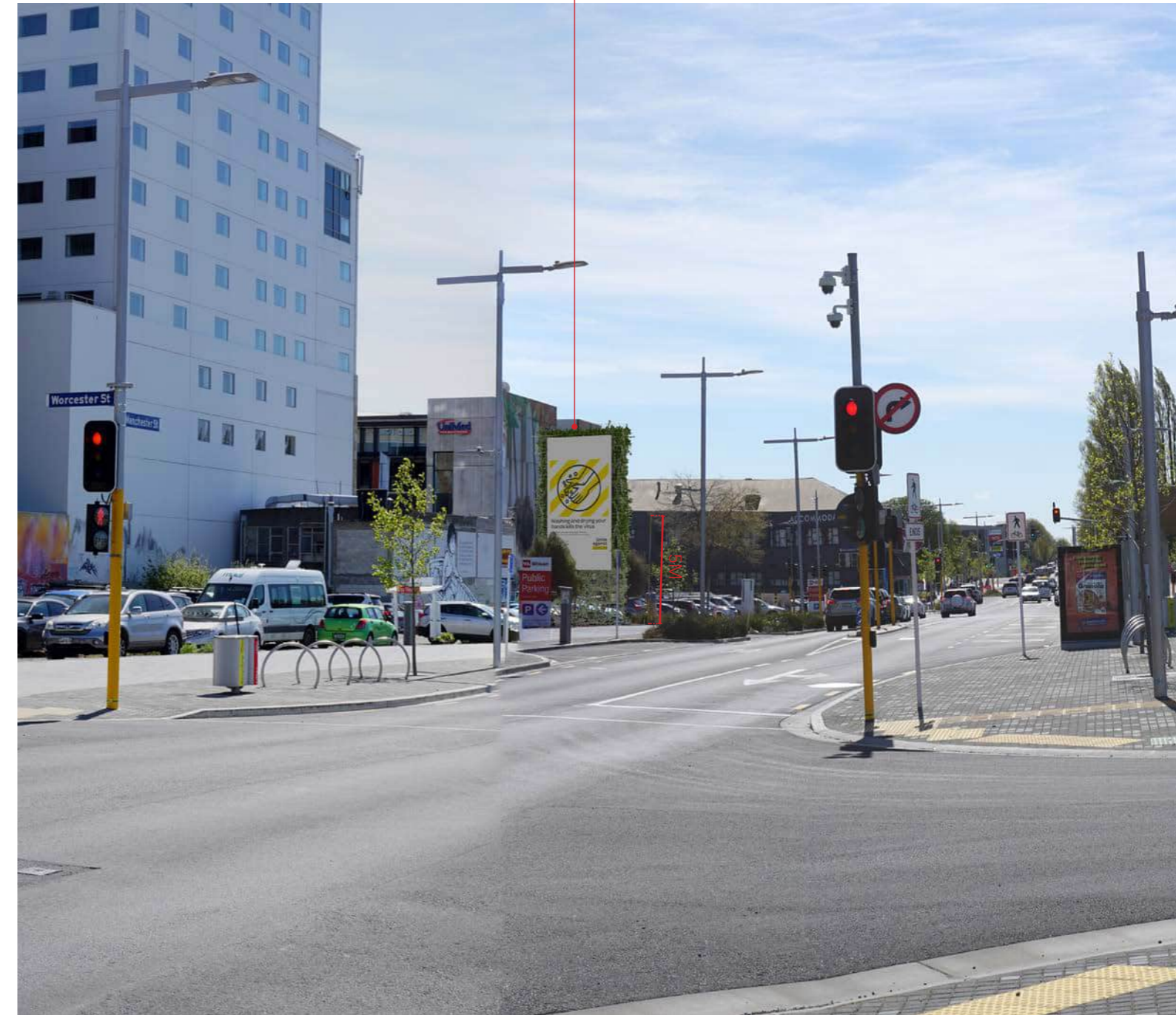
A. IMAGE LOCATION

VISUALLY SENSITIVE RECEPTORS:

- Pedestrians
- Cyclists along Manchester Street / Worcester Street
- Vehicle Users along Manchester Street / Worcester Street



B. EXISTING VIEW



C. ILLUSTRATION - VIEW WITH PROPOSED BILLBOARD

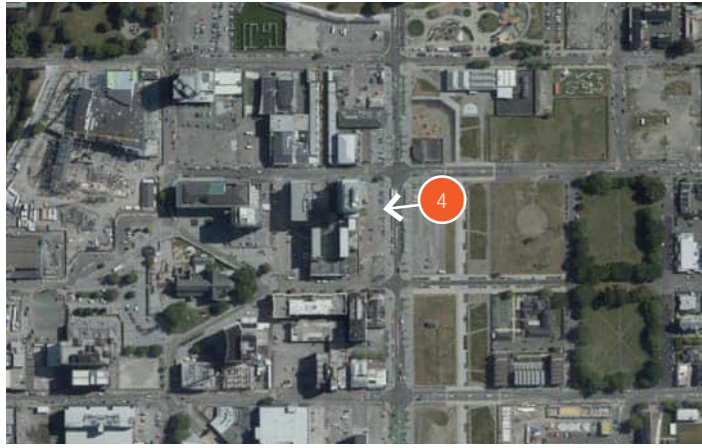
PROPOSED BILLBOARD

URBAN DESIGN AND VISUAL IMPACT ASSESSMENT

3 VP3 - VIEW NORTH FROM 180 MANCHESTER STREET

DIGITAL BILLBOARD PROPOSAL - 225 MANCHESTER STREET, CHRISTCHURCH

Image captured on Sony a6000
 Focal length of 50mm.
 Date: 01 October 2020 at 01:18 pm
 Height of 1.7 metres
 Photos merged in Photoshop CS to create panorama



A. IMAGE LOCATION

VISUALLY SENSITIVE RECEPTORS:

- Pedestrians / Cyclists along Huanua Lane
- Future Residents of East Frame Terraces



B. EXISTING VIEW



C. ILLUSTRATION - VIEW WITH PROPOSED BILLBOARD

PROPOSED BILLBOARD



A. IMAGE LOCATION

VISUALLY SENSITIVE RECEPTORS:

- Pedestrians / Cyclists along Manchester Street
- Bus Stop users
- Carpark users

PROPOSED BILLBOARD



B. EXISTING VIEW



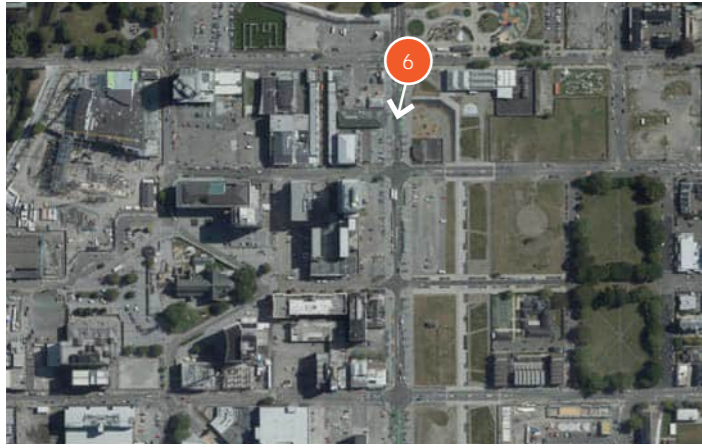
C. ILLUSTRATION - VIEW WITH PROPOSED BILLBOARD

URBAN DESIGN AND VISUAL IMPACT ASSESSMENT

5 VP5 - VIEW NORTH WEST FROM MANCHESTER STREET BUS STOP

DIGITAL BILLBOARD PROPOSAL - 225 MANCHESTER STREET, CHRISTCHURCH

Image captured on Sony a6000
 Focal length of 50mm.
 Date: 22 October 2020 at 09:12 am
 Height of 1.7 metres
 Photos merged in Photoshop CS to create panorama



A. IMAGE LOCATION

VISUALLY SENSITIVE RECEPTORS:

- Pedestrians / Cyclists along Manchester Street
- Margaret Mahy Park



B. EXISTING VIEW



C. ILLUSTRATION - VIEW WITH PROPOSED BILLBOARD

PROPOSED BILLBOARD



A. IMAGE LOCATION

VISUALLY SENSITIVE RECEPTORS:

- Pedestrians / Cyclists along Manchester Street



B. EXISTING VIEW



PROPOSED BILLBOARD

Image captured on Apple iPhone X
 Focal length of 24mm.
 Date: 16th June 2020 at 11:04 am.
 Height of 1.7 metres
 43°32'3.79"S 172°38'22.29"E
 Altitude of 7.61



TOWNPLANNING GROUP

25 November 2020

Our Ref: 2416-20

Robert Ordelleide
Planner
Christchurch City Council
CHRISTCHURCH

VIA EMAIL: robert.ordelleide@ccc.govt.nz

Dear Robert,

RMA/2020/1877 – FURTHER ASSESSMENT

This letter is in response to further email correspondence between ourselves and Council following the issue of Mr Hugh Nicholson's urban design review on behalf of Council. Based on the assessment of Mr Nicholson, the Council has advised that they consider public notification of the application to be the most appropriate course of action.

We do not agree that public notification is required and have prepared the following information for the purposes of assisting future discussions with Council to resolve the differences in our views.

1 Clarifications about the proposal

The report of Mr Nicholson notes that no plant species have been proposed nor description of how they may be irrigated or maintained. As outlined in the application and the visual impact assessment, the plant species proposed include clematis, jasmine and wisteria floribunda, astelia fragrans, anthropodium cirratum and parthenocissus insertia.

In relation to how the plants will be secured and irrigated is a matter to be resolved by the engineer if approval is obtained. In the interim, the assessment of effects should assume the proposed mitigation can be achieved because the mitigation is reasonable and feasible. We see no major impediment to achieving the outcomes described in the application. Examples of hanging gardens are common throughout the Central City and water is available at the site to

provide irrigation. To assume the plants will die or cannot feasibly be planted is incorrect both in approach and assumed outcomes.

2 Urban Design Assessment of Proposed Digital Billboard at 235 Manchester Street – Report of Mr Hugh Nicholson

We note that Mr Nicholson has provided his own independent assessment of the proposal and has not referred to or analysed in any way, the report prepared by David Compton-Moen of DCM Urban. On this basis, the Council has before them two different reports for their consideration that present two different perspectives of the surrounding environment and actual or potential effects. Some of the key differences we would like to highlight are set out below.

2.1 RESIDENTIAL ACTIVITY

The essential premise of Mr Nicholson’s assessment relies heavily on the assumption that the intended future land use opposing the site at 192 Gloucester Street will be entirely residential. We note that the zoning of this land parcel (192 Gloucester Street) is Central City Commercial Business. The site is currently subject to a designation – Designation V4. The purpose of the designation is to provide for:

- Open space and park land;
- Family playgrounds;
- Walking/cycling tracks;
- Stormwater management;
- Memorial sites;
- Residential units;
- Retail/Food and beverage;
- Christchurch Club;
- Amenities;
- Temporary activities;
- Public Art;
- Leisure and recreational activities and facilities including gymnasiums facilities;
- Ancillary activities including car parking

Of the activities listed above, residential activity is only one of the anticipated land uses. A copy of all resource consents for 192 Gloucester Street was requested from Council with this revealing that no resource consents have been sought in relation to residential development at this site. We also requested a copy of all outline plans lodged by Ōtākaro Limited, the requiring authority in relation to Designation V4, and note that no outline plans have been submitted seeking to undertake residential development at the same site, 192 Gloucester Street. On this basis, we consider that it is incorrect to assume that the anticipated land use will be entirely residential.

Fletcher Living have prepared a master plan for development across the East Frame, inclusive of 192 Gloucester Street, which does suggest the intended land use is residential. However, as no resource consents have been issued in relation to the master plan, it cannot be relied upon for the purposes of the assessment of effects in relation to the proposed activity.



We also note that Designation V4 is set to lapse in July 2022 at which point the underlying zoning will take effect – Commercial Central City Business Zone (“**CCCBZ**”). Objective 15.2.6 defines the role of the CCCBZ as the principal commercial centre for Christchurch District, and is attractive for businesses, residents, workers and visitors. The supporting Policy 15.2.6.1 ensures the CCCBZ provides for the widest range of activities and the greatest concentration and scale of built development. Residential activity will likely form part of this development; however, the form of residential development will be highly urban and surrounded by a concentration of other commercial activities and public facilities. This location is not a quiet suburban residential environment and must not be assessed as such. It is also worth noting that the presence of the bus Super Stop means the area will be well lit during evening hours to ensure the safety of public transport users. The overall vision for the CCCBZ in the District Plan is an intensely developed built form and concentration of various activities, which will result in noise, light, traffic and activity throughout the day and night

We also wish to draw attention to the objectives and policies contained within Chapter 6 in relation to signage which are generally supportive of signage in commercial zones as evidenced in Policy 6.8.2.1.1. Subsequent Policy 6.8.2.1.2 refers to the need to control signage in sensitive locations however, neither the subject site nor 192 Gloucester Street opposing the site, are zoned residential, open space or rural as referred to in this policy. Both sites are commercial business with the overlaying Designation V4 listing residential activity as only one of 13 anticipated land uses. In comparison, we note that residential activity is also permitted within the Central City Commercial Business Zone where signage is well established which is demonstrative that the two activities are compatible, provided the effects on character and amenity of the surrounding area are appropriately managed.

Lastly, we note that 192 Gloucester Street is presently operated as a car park with resource consent recently lodged by Gap Filler to extend the operation of the site for car parking activities until December 2021. It is acknowledged that the proposed land use is only temporary however, it is also indicative that there is no intention to develop the site until at least 2022.

On the basis of the above, we consider the assessment of Mr Nicholson is based on an incorrect assumption that the anticipated land use at 192 Gloucester Street will be entirely residential, for which there is presently little evidence. We also consider that he has not placed sufficient weight on the highly urban nature of the surrounding environment, which forms part of the outlook from any future residential units to be constructed.

2.2 ASSESSMENT OF EFFECTS

Importantly and consistently throughout the report of Mr Nicholson, no reference is made to the New Zealand Institute of Landscape Architecture (NZILA) seven point scale developed for landscape assessment and sustainable management, nor is reference made to the scale of effects described in the Resource Management Act (1991) (RMA) of less than minor, minor or more than minor.



The NZILA seven point scale is the principle guiding document used by landscape architects to guide such assessments of visual effects and is considered industry best practice. The scale roughly translates into the scale of effects described in the RMA as described by Mr Compton Moen in his visual impact assessment. Mr Nicholson's report uses neither scale and instead simply states that the application "... should be declined due to the potential adverse effects on the residential amenity of residential units anticipated at 192 Gloucester Street and under construction at 198 Gloucester Street."

In contrast, the assessment provided by Mr Compton-Moen is consistent with industry best practice and provides an appropriate framework that can be relied upon by the Council in reaching their overall determination.

2.3 SURROUNDING ENVIRONMENT

As described by Mr Compton-Moen, the surrounding environment consists of a range of land uses commensurate with a Central City still recovering from the damage of the earthquakes, with some buildings still being repaired, some sites vacant and some sites under construction or fully operational. The range of activities in the surrounding area are diverse consisting of hospitality, retail, residential as well as some hotels.

The intention of the billboard is to target pedestrian and vehicle traffic with a Super Stop bus stop located immediately opposite the subject site along Manchester Street. In order to target the intended audience, the billboard has been orientated in a north-south direction, which ensures only oblique views are available to nearby sensitive activities located at the Rendezvous Hotel and residential land uses anticipated at 198 Gloucester Street. We also note that the Manchester Street Super Stop will further impede views of the proposed billboard at both 198 and 192 Gloucester Street as the shelter serves as a physical obstruction. Rauora Park also serves as a visual buffer separating and mitigating any oblique views gained of the billboard from 198 Gloucester Street.

Mr Nicholson's assessment does not appear to consider the effect of these mitigating factors.

2.4 OFFSITE VERSUS ONSITE SIGNAGE

The purpose of the differentiation between off-site and on-site signage in the District Plan is to control and prevent the proliferation of signage across the District, particularly in sensitive locations, primarily residential zones. There is no difference in effects on the surrounding environment between on-site and off-site signage with this the position of Council expert witness Ms. Janet Reeves in relation to the independent hearings for the Christchurch District Plan¹. The report of Mr Nicholson refers in several locations to the adverse effects of off-site

¹ Reeves, J (2016). *Statement of Evidence on Behalf of Christchurch City Council 6.8 Signs – Urban Design*. Source: [3723-CCC-Evidence-of-Janet-Reeves-Urban-Design-signs-4-2-2016.pdf](https://www.ihp.govt.nz/3723-CCC-Evidence-of-Janet-Reeves-Urban-Design-signs-4-2-2016.pdf) (ihp.govt.nz)



signage, particularly in relation to residential activities. We consider such an assessment to be erroneous and irrelevant.

2.5 PRECEDENCE

The discussion provided by Mr Nicholson in relation to precedence ignores the resource consent requirements outlined in the District Plan. In accordance with Rule 6.8.4.1.3 RD2 all signs with changing images outside of industrial zones i.e. digital signs, trigger resource consent requirements with the Councils discretion restricted to those matters outlined under rules 6.8.5.1 – 6.8.5.3. Accordingly, the Council is afforded the ability to consider each application on its merits and is able to accept or decline any application where the adverse effects are inappropriate in relation to the surrounding environment.

To state that this application will set a precedent for further signage applications in the Central City is incorrect given that the District Plan is relatively enabling of signage in commercial zones where related to onsite activities. The triggers for resource consent are in relation to off-site signage and digital signage. As previously stated, controls are placed on off-site signage to prevent proliferation of signage, not because there is any material difference in adverse effects. In relation to static or illuminated signage, there are distinct differences in adverse effects with assessment matters outlined to guide the assessment of effects for such applications. Accordingly, controls have been proposed in the application to mitigate the effects of changing and illuminated signage.

If anything, this application may limit further off-site digital signage in the local area. There are no other digital billboards in the subject location. Any future applications will need to consider the cumulative effects of the billboard subject of this application (should it be granted) as well as any future billboards.

2.6 POLICY 6.8.2.1.3

On page 5 of Mr Nicholson's report, he refers to Policy 6.8.2.1.3(ii) to provide context to his assessment and describe what is anticipated in the District Plan in relation to signage. This policy refers to signage on buildings however, this sign is not mounted on a building and is essentially freestanding. On this basis, point (iii) of the policy is more relevant which requires that signs are in proportion to the scale of buildings and the size of the site. As described in the application, the scale of the proposed sign is appropriate in relation to surrounding built form and the size of the site.

Mr Nicholson does touch on the scale of buildings in relation to the size of the sign in the same section of his report, page 5. He comments that the size of any residential building to be constructed across the street at 192 Gloucester will only be 7m tall and 4m wide thus the proposed billboard will be larger than anticipated residential development. Again, Mr Nicholson's is incorrect to assume that future activity at 192 Gloucester will be residential and has ignored the maximum permitted building heights for the zone, 28m, and the height of residential development to date of other developments in the East Frame which are typically



three storeys high (approximately 10-12m). We also note that the NPS for Urban Development sets the minimum number of floors for any new development at six, which will easily exceed the height of the proposed sign. As such, the proposed is consistent with the scale of built form both at present and likely in the future.

3 MITIGATION

The Applicant is amenable to considering alternative forms of mitigation to address Council concerns. Such mitigation could include:

- Changing the orientation of the billboard to landscape instead of portrait which will reduce the overall height of the sign;
- Installing fake plants as opposed to real ones which will ensure the amenity of the sign is instantly improved and resolves the issues of irrigation and plant establishment;
- Using a timber frame or some other form of framing to provide context to the sign and mitigate the effects thereof.

4 SUMMARY

We trust this additional information will afford you further clarity with respect to the proposal. We again reiterate that the Council has before them two different reports presenting two different views, one which uses industry best practices to formulate the assessment and accurately describes the environment as it exists at the time of application. The other report, of Mr Nicholson, does not use industry best practice methodologies and draws conclusions founded on assumed future land uses for which there is little supporting evidence and ignores key planning controls outlined in the District Plan. The discussion above is intended to shed light on these factors so that a fair assessment of the proposal can be gained.

We welcome the opportunity to meet with you to further discuss solutions in order to progress this application. If you have any queries or concerns with the above, please do not hesitate to contact the undersigned.

Yours sincerely,
Town Planning Group



Natalie Reeves
Planner





TOWNPLANNING GROUP

10 February 2021

Our Ref: 2416-20

Robert Ordelleide
Planner
Christchurch City Council
CHRISTCHURCH

VIA EMAIL: robert.ordelleide@ccc.govt.nz

Dear Robert,

RMA/2020/1877: APPLICATION TO ERECT AN 18M² DIGITAL BILLBOARD, 235 MANCHESTER STREET, CENTRAL CITY

The purpose of this letter is to consolidate the information submitted to the Council in support of the present application and clarify the applicable planning provisions. We request that this letter be supplied to the Commissioner presiding over the notification decision for RMA/2020/1877.

1 SUMMARY OF APPLICATION

The Applicant seeks to erect an 18m² double sided free standing digital billboard, measuring 6m high by 3m wide, at 235 Manchester Street, Central Christchurch. The measurement of the size of the billboard is in accordance with standard 6.8.4.2.1. The billboard will be placed perpendicular to the eastern site boundary facing north and south bound traffic as mounted on a freestanding post with the base of the sign situated at 2.5m above ground level to elevate the billboard above any visual obstructions. Framing the billboard will be a steel lattice structure measuring 9m high and 6m wide. The structure is to be planted with a mixture of fast growing native and exotic climbing plant species including jasmine, wisteria floribunda, clematis paniculata, astelia fragrans, anthropolium cirratum and parthenocissus insertia. These species will be inserted into the structure at short intervals to reduce the number of 'gaps' and reduce the total time required to populate / grow over the structure. Irrigation will also be inserted into the structure with this to be designed by an engineer, should the structure be approved. We can confirm water is available at the site to ensure irrigation is feasible.

Offices in Queenstown, Christchurch and Auckland

Website: www.townplanning.co.nz | Postal: PO Box 35, Christchurch | Phone: 0800 224 470

A number of controls have been proposed in relation to the operation of the billboard in accordance with conditions commonly used by Christchurch City Council (CCC) to mitigate adverse visual effects on amenity and transport safety with these appended to the application as **Attachment [E]**.

The proposed billboard is located within the Commercial Central City Business Zone where such signage is anticipated as can be evidenced by similar signage found throughout the CCBZ with signage being an integral component of commercial business activities. The overall Status of the activity is Discretionary in accordance with Rule 6.8.4.1.4 D2 as the sign is captured by Rule 6.8.4.1.3 RD2 but cannot comply with Built Form Standard 6.8.4.2.6 as the billboard exceeds the permitted height and size limit for freestanding signs within the CCBZ.

Our rule assessment differs from that of Mr Ordelheide who contends that the proposal is not captured under Rule 6.8.4.1.3 RD2 and therefore falls within the 'catch all' rule of 6.8.4.1.4 D1¹. Whilst the status of the activity remains the same between the two assessments, the differentiation in the pathway followed is important as it is a significant departure from how other similar resource consents have been assessed and follows through to Mr Ordelheide's conclusion that "...it [the proposed billboard] falls outside the zone by which billboards are anticipated to locate hence its discretionary status."

We have copied Rule 6.8.4.1.3 RD2 below for ease of reference:

The following signs in all commercial and industrial zones (other than the Commercial Banks Peninsula Zone) and in the Specific Purpose (Airport) Zone, other than signs provided for in Rule 6.8.4.1.1 P11 or P15, or Rule 6.8.4.1.5 NC1:

- a. Off-site signs, other than those provided for in Rule 6.8.4.1.1 P2, P3, P4, P5, P6, P12, P13, or P16;*
- b. Flashing or intermittently illuminated signs;*
- c. Signs with moving components;*
- d. Signs with changing images / digital signs; and*
- e. Captive balloons or blimps;*

Which meet the relevant built form standards.

We confirm that the above rule is relevant to the proposed activity on the basis that:

- The site is within a commercial zone, the Commercial Central City Business Zone;
- The sign is not provided for under Rule 6.8.4.1.1 P11 which refers to small off-site signs and specifically excludes the Commercial Central City Business Zone;

¹ Ordelheide, R. 12/01/2021. Email correspondence received from Mr Odelheide in which his assessment of the activity status is laid out as follows: "For clarity, your proposal is being assessed as Rule 6.8.4.1.4 D1 as a) it is not provided for by Rule 6.8.4.1.1 P15, b) it is not provided for under Rule 6.8.4.1.3 RD2 as it is not specifically captured by any of the relevant built form standards in Rule 6.8.4.2, and c) because it is not captured by any of the relevant built form standards in Rule 6.8.4.2, Rule 6.8.4.1.4 D2 is not applicable."



- The sign is not provided for under Rule 6.8.4.1.1 P15 which refers to static and digital display billboards on sites fronting arterial and collector roads within the Commercial Retail Park Zone, the Commercial Mixed Use Zone, the Specific Purpose Airport Zone and all industrial zones except the Industrial Park Zone (Memorial Avenue).
- The sign is not provided for under Rule 6.8.4.1.5 NC1 as it is not located within the Industrial Park Zone or the Specific Purpose (Otakaro Avon River Corridor) Zone.

The relevance of Rule 6.8.4.1.3 RD2 is pertinent to the Application as it demonstrates that digital signage is anticipated in the Commercial Central City Business Zone and that the establishing of such signage is not in any way limited based on adjacent land uses or zones. The reason why the proposal does not otherwise lie within this rule is because it cannot satisfy built form standard 6.8.4.2.6 relative to freestanding signs which limits the size of such signs to a maximum area of 9m², a total height of 6m above ground level and the number of signs is limited by the number of vehicle entrances; if there were two vehicle entrances, then two 9m² signs could be established. In the case of the present application, there is only one vehicle entrance so only one 9m² sign can be established under Rule 6.8.4.1.3 RD2 whereas a single 18m² billboard is proposed with a maximum height of 8.5m above ground level. We confirm that the proposal otherwise complies with all other built form standards.

It is important to draw a relationship here between the relevance of Rule 6.8.4.1.3 RD2 and Policy 6.8.2.1.2 – Controlling signage in sensitive locations. This policy is repeated below for ease of reference:

Ensure the character and amenity values of residential, open space and rural zones are protected from adverse visual and amenity effects from large area or numbers of signs, or off-site signs within these zones.

The above policy provides clear guidance on where signage is not considered appropriate or where it should be strictly controlled, on account of the different amenity values present within the *zones* cited. The policy does not at any point indicate that controls should be imposed on account of signage potentially being incompatible with the *activities* undertaken within these zones.

In considering the present proposal, signage is entirely appropriate within the Commercial Central City Business Zone with there being no residential, open space or rural zones adjoining the subject site or in close proximity that require consideration. In consideration of residential and other sensitive activities, these are permitted within the Commercial Central City Business Zone, provided they can comply with the relevant built form and activity standards outlined. It is important to note that the amenity values of the Commercial Central City Business Zone are reflective of the commercial activities contained therein, inclusive of extensive signage. There are no provisions included in the District Plan requiring that signage or any other commercial activities take into consideration the effects on sensitive activities that may be anticipated or already established on adjacent land parcels. The permitted nature of sensitive activities within



the Commercial Central City Business Zone is demonstrative that such activities are compatible and that signage should not otherwise be inhibited on account of adjacent sensitive land uses.

On the basis of the above, we confirm that the proposal should be captured under Rule 6.8.4.1.4 D2 as it is otherwise captured by Rule 6.8.4.1.3 RD2, with the primary matters of consideration being the size and height of the billboard and those matters of discretion captured under Rule 6.8.4.1.3 RD2 which are as follows:

- a. *All signs and ancillary support structures - Rule 6.8.5.1;*
- b. *Illuminated, moving, changing, flashing or retro-reflective displays – Rule 6.8.5.2;*
- c. *Static and digital billboards – Rule 6.8.5.3.*

We confirm that the proposal has been assessed in accordance with the above provisions, inclusive of an assessment of the breach in size and height, with the following section detailing all information submitted in support of the proposal. Overall, any actual or potential effects of the proposed billboard will be less than minor and is consistent with the objectives and policies of the District Plan.

2 INFORMATION SUBMITTED TO DATE

The following information has been submitted to Council in support of the present application:

- Resource consent application as dated 27/08/2020 and accompanying documents:
 - Attachment [A] – Record of Title
 - Attachment [B] – Urban Design and Visual Impact Assessment
 - Attachment [C] – Visual Landscape Assessment
 - Attachment [D] – Record of Outline Plans Related to Designation V4
 - Attachment [E] – Proposed Conditions
 - Attachment [F] – LLUR Statement
 - Attachment [G] – RMA2017467
- Response to Further Information Request dated 2 November 2020 and accompanying document:
 - Attachment [A] – Urban Design and Visual Impact Assessment
- Further Assessment dated 25 November 2020 as sent to Council following the receipt of the urban design and visual impact assessment as prepared by Mr Hugh Nicholson on the behalf of Council and in relation to notification of the application.
- Transport Assessment as prepared by Mr Andy Carr and presented to Council on February 2nd 2021. The transport assessment concludes that the proposed billboard does not pose any risk to the safe and efficient operation of the adjacent transport network.



3 SUMMARY

We trust this additional information will afford you further clarity with respect to the proposal. If you have any queries or concerns with the above, please do not hesitate to contact the undersigned.

Yours sincerely,
Town Planning Group

A handwritten signature in blue ink that reads "Reeves".

Natalie Reeves
Planner



Proposed Digital Billboard 235 Manchester Street, Christchurch

Assessment of Transportation Matters





Table of Contents

Main Report		Page
1	Introduction	1
2	Current Transportation Environment	3
2.1	Roading Layout	3
2.2	Traffic Flows	5
2.3	Road Safety	5
2.4	Existing Signage in the Area	6
3	Overview of Road Safety Implications of Billboards	7
3.1	NZTA Traffic Control Devices Manual (Part 3) Advertising Signs	7
3.2	Overseas Research	8
3.3	Prevailing Road Safety Records	9
3.4	Conclusions	10
4	Further Analysis of Road Safety Issues	11
4.1	Overlap of Traffic Signals and Billboard	11
4.2	Proximity of Traffic Signals and Billboard	12
4.3	Assessment of Existing Crashes	13
7	Proposed Conditions of Consent	14
6	Compliance with NZTA Recommendations	15
6.1	Billboard Location	15
6.2	Signface	15
6.3	Summary of Compliance	16
7	Compliance with City Plan Requirements	17
7.2	Assessment of Rule 6.8.5.3	17
8	Conclusions	19



Figures

1	Location of Proposed Billboard	1
2	Specific Location of Proposed Billboard (Extract from DCM Urban Drawing)	1
3	Mock-Up of Proposed Billboard, Looking South (Extract from DCM Urban Drawing)	2
4	Mock-Up of Proposed Billboard, Looking North (Extract from DCM Urban Drawing)	2
5	Manchester Street Southbound Adjacent to Billboard	3
6	Raised Island on Manchester Street Looking South	4
7	Manchester Street Looking South to Gloucester Street (Billboard Location on Far Right)	4
8	Manchester Street Looking North to Worcester Street (Billboard Location on Far Left)	5
9	Areas of Potential Visual Overlap between Traffic Signals and Billboard at Gloucester Street Intersection	11
10	Areas of Potential Visual Overlap between Traffic Signals and Billboard at Worcester Street Intersection	12
11	Digital Billboard at the George Bolt Memorial Drive / Tom Pearce Drive Intersection	13

Annexure A: Comparison of Crash Rates Before and After Billboard Installation

CCL file reference	14711-ta final
Status	Final
Issued	2 February 2021

1. Introduction

- 1.1. Wilson Parking Limited proposes to install a digital billboard at 235 Manchester Street, Christchurch. The digital billboard will be double-sided and therefore face both north and south.

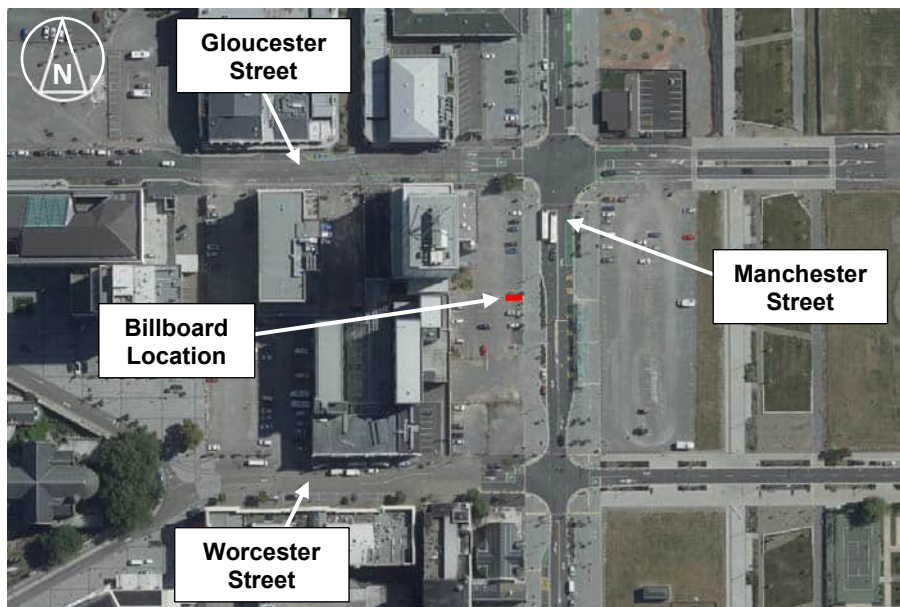


Figure 1: Location of Proposed Billboard

- 1.2. The billboard will be free-standing and be 4m wide and 6m high, mounted 2.5m about the surrounding ground level. The site is zoned as Commercial Central City Business Zone under the Christchurch City District Plan (“*District Plan*”).

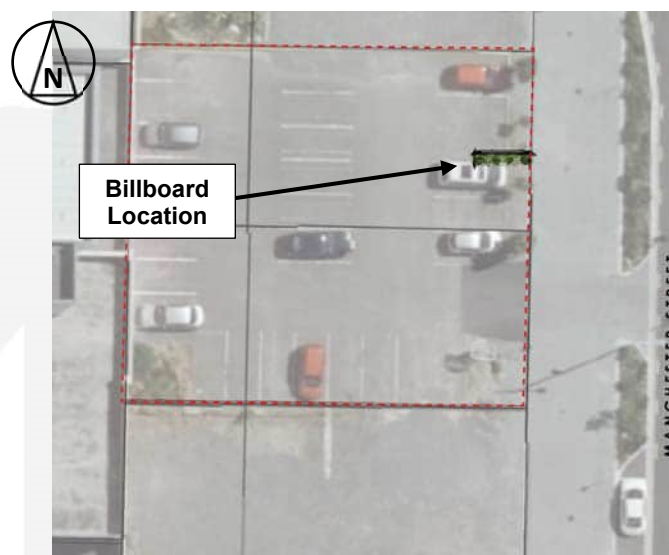


Figure 2: Specific Location of Proposed Billboard (Extract from DCM Urban Drawing)

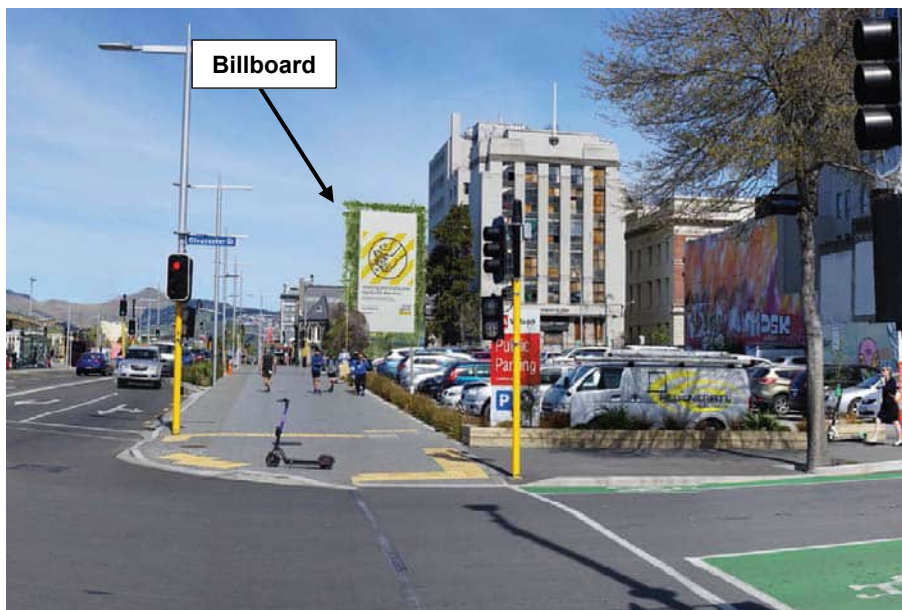


Figure 3: Mock-Up of Proposed Billboard, Looking South (Extract from DCM Urban Drawing)

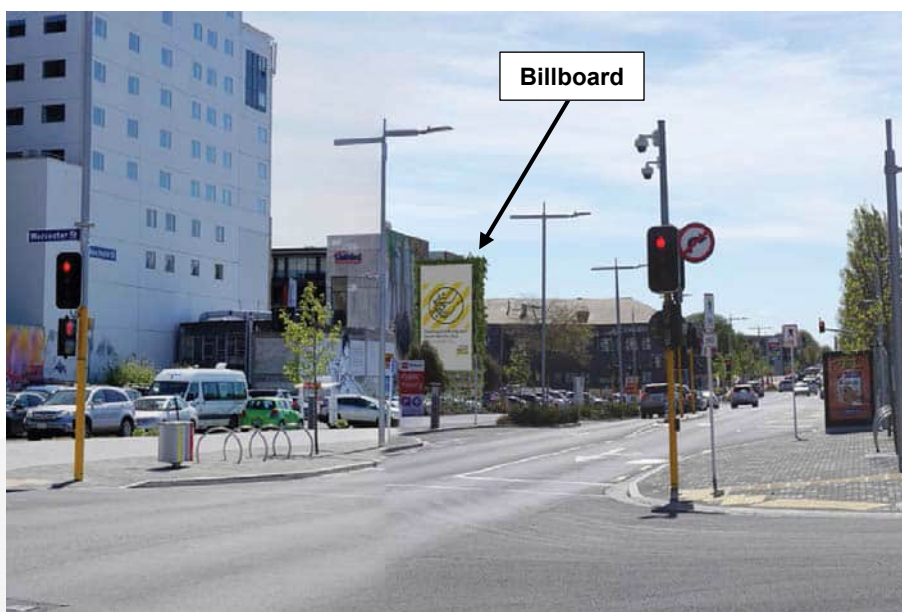


Figure 4: Mock-Up of Proposed Billboard, Looking North (Extract from DCM Urban Drawing)

- 1.3. This report considers the transportation aspects of the proposed digital billboard, including the potential effects on road safety.



2. Current Transportation Environment

2.1. Roading Layout

- 2.1.1. Manchester Street is a Local Distributor Street under the District Plan and is subject to a 30km/h speed limit. In this location it provides one traffic lane in each direction, with an additional intermittent bus lane. The alignment of the road is flat and straight.
- 2.1.2. Of particular note is that there are bus stops on the eastern side of the road, associated with a super-stop. This provides three bus stops, with a large shelter. The bus stops are recessed such that southbound through traffic is not obstructed by stationary buses. There are also two P60 car parking spaces on the western side of the road but for the most part, there is no parking permitted and the area is instead used for a widened footpath and landscaping (on the western side of the road).



Figure 5: Manchester Street Southbound Adjacent to Billboard

- 2.1.3. There is a central raised island on Manchester street located directly opposite the bus stops. This has north-facing traffic signals mounted on it, and it is understood that the purpose of this is to stop southbound traffic while buses emerge from the stops.



Figure 6: Raised Island on Manchester Street Looking South

- 2.1.4. Approximately 50m to the north of the billboard location (measured along the road centrelines), Gloucester Street meets Manchester Street at a signalised intersection. The intersection approaches each have two traffic lanes with one departure lane, and the intersection has pedestrian and cyclist crossing phases (the latter with separate traffic signals).



Figure 7: Manchester Street Looking South to Gloucester Street (Billboard Location on Far Right)

- 2.1.5. Approximately 70m to the south of the billboard location (measured along the road centrelines), Worcester Street meets Manchester Street at a signalised intersection. The Manchester Street approaches each have just one traffic lane, and the right turn movements from Manchester Street (north and south) onto Gloucester Street are prohibited. The signals include pedestrian crossing phases.



Figure 8: Manchester Street Looking North to Worcester Street (Billboard Location on Far Left)

2.1.6. There are wide footpaths on each side of Manchester Street. The eastern path is formally marked as a shared surface between cyclists and pedestrians.

2.2. Traffic Flows

2.2.1. Although Christchurch City Council undertakes a regular programme of traffic counts within the city, the traffic flows on this part of Manchester Street have not been surveyed for some time. The most recent data suggests a daily traffic volume in the order of 5,500 vehicles per day, although this survey was carried out in 2017.

2.3. Road Safety

2.3.1. The NZTA CAS database has been used to review the reported crashes on the roading network for 100m north and south of the proposed billboard location. This area therefore encompasses the intersections of Manchester Street with Gloucester Street and Worcester Street. Over the past five years (2015 to 2020), just 4 crashes have been reported, and none resulted in any injuries:

- One crash occurred on Manchester Street mid-way between the proposed billboard location and Gloucester Street, when a northbound driver suffered a medical event and left the road.
- Three crashes occurred at the Manchester Street / Gloucester Street intersection:
 - One crash occurred when a westbound driver on Gloucester Street failed to stop at a red signal, and struck a northbound vehicle on Manchester Street.
 - One crash occurred when a southbound emergency services vehicle was responding to an incident and passed through a red traffic signal, and was then struck by an eastbound vehicle on Gloucester Street that had the green signal.
 - One crash occurred when a southbound driver on Manchester Street failed to stop at a red signal, and struck a westbound vehicle on Gloucester Street.

2.3.2. Overall, it is considered that the roading network in the vicinity of the billboard has a good road safety record. There are no evident clusters of crashes nor common contributing factors, and no injury crashes have been recorded (likely due to the low-speed environment).



2.4. Existing Signage in the Area

2.4.1. Based on site visits, there are several permanent regulatory and warning signs within 100m of the billboard location:

- At the Manchester Street / Gloucester Street intersection:
 - The traffic signal lanterns
 - Variant of R3-5.3 facing north, instructing that the left-lane is only for the left-turn movement except for buses. Located immediately north of the intersection
 - RG26-C 'shared path', facing north, on southeastern quadrant of intersection
 - Variant of RG-35 'bus lane', facing north, worded as "bus only" with a supplementary RG-26.1 "begins" plate below, on southeastern quadrant of intersection
- Mid-block on Manchester Street between Gloucester Street and Worcester Street
 - RP-5 'Bus stop' sign, located on eastern side of road
 - RG-17 and RG17.1 'keep left' signs at end of raised island
 - North-facing lanterns on the raised island
- At the Manchester Street / Worcester Street intersection:
 - The traffic signal lanterns
 - RG-7 'no right turn' signs on northeast and southwest signal poles, facing north
 - RG-7 'no right turn' signs on northeast and southwest signal poles, facing south

2.4.2. As the roading environment of Manchester Street is characterised by retail and commercial land uses, there are also various roadside advertising signs on the roads, defined by the NZTA Traffic Control Devices Manual Part 3 (*Advertising Signs*) as "*all advertising signs and devices which can or are intended to be seen by all road users*". There are also pieces of public artwork along Manchester Street, including murals and sculptures.



3. Overview of Road Safety Implications of Billboards

3.1. NZTA Traffic Control Devices Manual (Part 3) Advertising Signs

3.1.1. The NZTA Traffic Control Devices Manual addresses various aspects of roadside advertising signs (which as set out above means signs, including those that are within private property that are intended to be seen by road users) and it includes billboards. Importantly, the manual sets out that each particular installation should be treated on its own merits having regard to its purpose, nature and location, and with an expectation that sound judgement is used to ensure they are effective but without compromising safety. It also notes that there is no reason why an off-site advertising sign should have more of an adverse effect than a similar on-site sign, provided that suitable controls are in place to avoid signage proliferation.

3.1.2. At a general level, any advertising sign must not:

- contain reflective material if it is likely to reflect the light from the lamps of any vehicle on the road, or fluorescent or phosphorescent material if it is likely to mislead or distract drivers from traffic signs installed in the vicinity, or mask those signs;
- be capable of being mistaken for a traffic control device, including use of red, green, orange, white or yellow in combinations of colours, or shapes which may be mistaken for a traffic control device;
- use red, green, orange, white or yellow colours in a location where it is likely to form the foreground or background to or appear alongside a traffic control device of similar colour when viewed by approaching motorists;
- contain large areas of red, green or orange displayed on illuminated signs which at night are likely to cause confusion with traffic control signals or tail lights of vehicles;
- give instructions to motorists that could conflict with any traffic sign or traffic control device; or
- compete with existing direction signs.

3.1.3. There are controls on the brightness of illuminated signs, and for a sign with more than 10sqm of illuminated area within an area with street lights, such as is proposed in this instance, a maximum 800cd/sqm is permitted.

3.1.4. To help avoid safety issues, the Manual sets out that advertising signs on urban roads (defined as where a speed limit is less than 70km/h) should not be located within 100m of intersections and permanent regulatory or warning signs, although it also sets out that there are many advertisements close to intersections or traffic control devices that apparently cause no problems.

3.1.5. The recommended visibility for signs relates to the vehicle speeds, with signs on roads with higher speeds needing to be visible from a greater distance, and within a narrowed angle of view for the driver. Figure 5.1 of the manual shows that at where there is a speed limit of 50km/h (being the lowest speed considered, rather than the 30km/h on Manchester Street), a 55 degree angle of vision is appropriate on either side of the road, and an additional 15 degrees can be added to allow for the driver moving their head. Minimum (unrestricted) forward sight distances of 105m are also appropriate for a posted 50km/h speed limit, and adjacent roadside advertising signs are recommended to be at least 50m apart. No details are provided for speeds lower than this.

3.1.6. In respect of the legibility of the sign itself, suitable controls are required in terms of letter size, style, colours and contrast. At a posted speed limit of 50km/h, the minimum letter height size



is 90mm, with the primary message being at least 175mm in height. Again, there are no provisions on the manual for speed limits of 30km/h, as is the case here.

- 3.1.7. Specific care is also required when considering animated, flashing and variable message signs for advertising, with regard to location and visibility distraction to motorists. Animation and flashing signs should not be used where the speed of passing traffic is more than 70km/h, and variable message signs require “*careful assessment*” where sited close to an intersection or where vehicles merge/diverge. Notably, the manual sets out that such signs should have static displays, change display over a timeframe of less than two seconds, and have a minimum time for separate displays of more than five seconds.

3.2. Overseas Research

- 3.2.1. In a 2001 report (*‘Research Review of Potential Safety Effects of Electronic Billboards on Driver Attention and Distraction’*) the Federal Highway Administration (“*FHWA*”) set out that there were three generic ways in which a digital billboard could give rise to road safety effects:

- Distraction of the driver: through diverting the drivers’ attention from the primary task of driving;
- Display conspicuity: particularly any motion, illumination and the complexity of the message; and
- Display legibility: because a message that is displayed in a less legible manner takes the driver longer to read and comprehend.

- 3.2.2. A 2003 study undertaken by the Virginia Tech Transportation Institute (*‘Driving Performance in the Presence and Absence of Billboards’*) involved drivers travelling along a predetermined route in a vehicle that was equipped with cameras to record the forward view from the vehicle and also the driver’s face and eyes. The route included a variety of driving conditions (urban and suburban, motorway and arterial roads) and had a number of billboards of different types. The results showed that:

- Driver visual distraction was not significantly affected by billboards or other forms of advertising compared to on-premises advertisements and other roadside items;
- Drivers did not reduce speeds to look at billboards or other forms of advertising; and
- The position of the vehicle within the traffic lane when a driver was able to look at a billboard was no different to what was considered to occur during normal driving conditions.

- 3.2.3. Overall, the study concluded that the presence of billboards did not cause a change in driver behaviour in terms of visual behaviour, speed maintenance, or lane keeping, and that even when the billboards that were considered to be the most visually attractive were examined, there was no relationship between glance location and billboard location.

- 3.2.4. A further study was carried out by Virginia Tech Transportation Institute in 2007. This analysed the accident data at seven billboard locations in the 12 months before they were converted from a static display to a digital display, and the data for the 12 months after conversion. This concluded that there was no statistically significant differences between the accident records. The study also compared the accident rates on routes with billboards and routes without, and found no differences between the data sets.

- 3.2.5. The American Association of State Highway and Transportation Officials (AASHTO) commissioned a research study in 2009 to develop guidance in respect of digital billboards. The study was based on an extensive literature review (and over 150 reference sources are



cited) but the study concluded that there were inherent difficulties with many of the studies undertaken to date, including differences in the signs examined (such as the use or otherwise of animation), different durations over which the message was displayed, and potentially different effects during daytime compared to night-time. Ultimately this meant that the experience of each passing driver could be different and not easily compared to the experiences of others. The study concluded that advertisements per se attracted driver attention but that digital billboards attracted greater attention because of their different luminance to the background. It also noted that it was difficult to demonstrate that digital billboards “caused” accidents although there was data available which suggested that such billboards meant that drivers were distracted from their driving task to a greater extent than with passive billboards or the natural environment. The report also pointed to a FHWA study (which at the time was underway) as potentially providing further assistance.

- 3.2.6. The FHWA has published a number of studies regarding digital billboards, including “*Driver Visual Behavior in The Presence of Commercial Electronic Variable Message Signs (CEVMS)*” in 2011. The study carried out primary research on drivers using a vehicle that was equipped with an eye tracking system which, coupled with cameras recording the view ahead, was able to evaluate the amount of time that a driver spent looking at a digital billboard compared to other advertisements and other aspects of the built environment. The billboards were selected to ensure that they did not contain any dynamic elements (that is, animations). The research showed that drivers spent approximately the same amount of time looking at the road ahead in each scenario, although they did spend more time looking at digital billboards than at static billboards. However the study also drew on earlier research that indicated that glances away from the forward roadway of more than 2 seconds was an indicator of an increased risk of crashes¹, and noted that no glances of this duration were observed. However the study also indicated that as the overall visual complexity of the environment increased, drivers tended to focus less on the road ahead and pay greater attention to those other elements.
- 3.2.7. There is little published data that has comprehensively investigated the traffic safety effects of animation on digital billboards. In part this may be because the term ‘animation’ covers a spectrum of effects from fully moving graphics to minor changes in the part of the image or a graphic. There appears to be a common consensus that significant amounts of animation are highly distracting to drivers, but there is very little information regarding more subtle animation. It could be argued that small amounts of animation are no different in terms of the potential for driver distraction to the motion of an advertising flag or even the ‘dissolve’ from one static image to another. On this basis, there may be a case that minor amounts of animation may be acceptable in terms of the effects on road safety.

3.3. Prevailing Road Safety Records

- 3.3.1. In evaluating the potential of billboards to result in adverse road safety effects, the current incidence of reported crashes in Christchurch has been reviewed where driver distraction due to advertisements (driver factor code 356 in CAS) was noted as a contributing factor.
- 3.3.2. None of the crashes reported on this section of Manchester Street (described above) were recorded as having driver distraction as a contributing factor. However the search was extended to cover the whole of Christchurch between 2015 to 2020 and this showed that just

¹ In 2006, the National Highway Traffic Safety Administration found that “*eye-glances away from the forward roadway, especially those that do not involve checking rear-view mirrors, may be contributing factors to a high percentage of crashes*” (“*The Impact of Driver Inattention on Near Crash / Crash Risk*”). The report concluded that when a driver took their eyes off the road in front for more than 2 seconds, then there was an increased risk of an accident or near-miss.



three crashes were reported as being related to distraction from advertisements. In one case through, the police report notes that the driver was looking for directional signs rather than advertising signs. In the remaining two cases, the police crash record does not explain why advertisements were a distraction (but the type of crashes are commensurate with a distracted driver).

- 3.3.3. The data also shows that these crashes occurred in different locations. There were no clusters present in locations where advertising signs are more prevalent.
- 3.3.4. By way of comparison, in the same area and timeframe, there was a total of 10,715 crashes and of these, 1,289 were recorded as being a type of distraction. With just 2 crashes recorded to distraction to advertisements, this represents just 0.2% of the total crashes due to distraction. However, of the total, 95 crashes occurred when the driver was distracted by scenery (7.4%), 103 crashes when distracted by passengers (8.0%), 27 crashes when distracted by an animal or insect in the vehicle (2.1%), and 78 crashes occurred when the driver was eating or drinking (6.1%).
- 3.3.5. Consequently, there is no evidence of a road safety effect associated with billboards. Even if there was to be under-reporting of advertisements as a factor contributing to crashes, it is evident that distraction due to advertising signs is not a significant road safety issue.

3.4. Conclusions

- 3.4.1. Based on this review, the available literature is sometimes contradictory. However, it appears that digital billboards attract driver attention to a greater extent than static billboards, but that the extent of this increase is not sufficient to result in a significant increase in distraction such that there is then a consequential increase in the accident rate. That is, digital billboards distract drivers but not to the extent that a road safety problem arises.
- 3.4.2. The crash record in Christchurch supports a conclusion that distraction due to advertisements is not a significant issue, with very few crashes recorded and no clusters in locations where advertising is the most concentrated.

4. Further Analysis of Road Safety Issues

4.1. Overlap of Traffic Signals and Billboard

- 4.1.1. The proposed digital billboard is within 100m of the traffic signals at the Manchester Street / Gloucester Street and Manchester Street / Worcester Street intersections, and so an assessment has been carried out of whether any traffic signal heads visually overlap with the traffic signal heads for approaching drivers.
- 4.1.2. The Austroads Guide to Road Design Part 4A (Unsignalised and Signalised Intersections), describes Approach Sight Distance as being the distance travelled by a vehicle between the time when driver receives a stimulus signifying a need to stop, and the time the at which the vehicle comes to rest. For a 40km/h operating speed (that is, the speed limit of Manchester Street plus 10km/h), this distance is 40m. Under the Guide, this distance has to be provided at traffic signals so that drivers are able to perceive the layout of the intersection.
- 4.1.3. The locations of the traffic signal heads have been plotted with regard to each approach lane on Manchester Street to identify the points at which the traffic signal heads overlap. The results are shown below. In this Figure, two lines are shown for each signal head, one drawn from each side of the billboard and passing through the signal head. The area between the lines is the area from where the billboard could potentially form the background to the signals. Also shown on the Figure is a distance of 40m from the stop line.

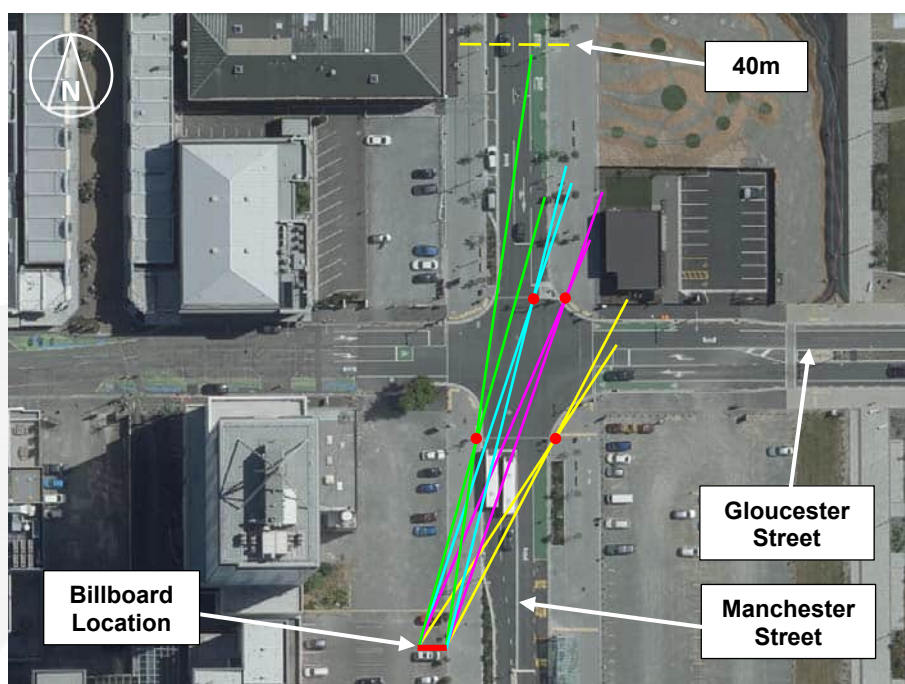


Figure 9: Areas of Potential Visual Overlap between Traffic Signals and Billboard at Gloucester Street Intersection

- 4.1.4. It can be seen that there is no overlap for the primary and tertiary signals. While very minimal overlap for the overhead primary signal is shown, in practice this occurs in a location where the height difference between the signal and the drivers' eye means that there will be no overlap.
- 4.1.5. The only overlap therefore occurs for the secondary signal head, and this arises between the stop line and 35m from the stop line. However as the driver approaches the signals, there is

no overlap for three of the four signals, and the driver is more likely to be looking ahead to the primary and overhead primary signals.

- 4.1.6. The secondary signal is located around 40m from the billboard. This difference means that as a driver approaches, the signal head will appear to move in relation to the billboard (parallax). As such, it will be evident to a driver that the lantern of the signals is separate to the billboard.
- 4.1.7. On this basis, even though there is overlap, it is considered that the billboard is unlikely to create driver confusion.

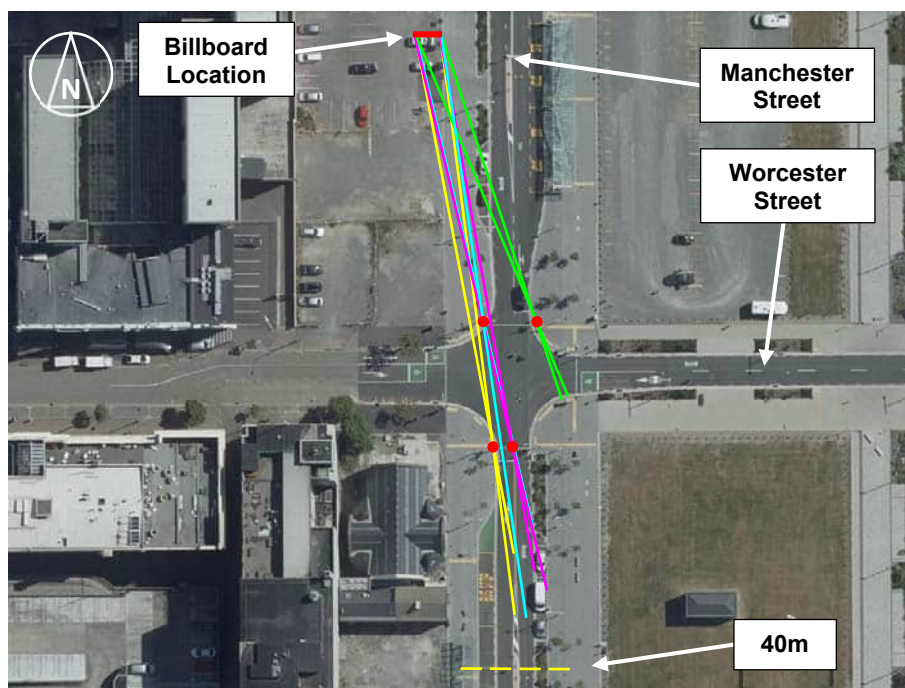


Figure 10: Areas of Potential Visual Overlap between Traffic Signals and Billboard at Worcester Street Intersection

- 4.1.8. It can be seen that there is no overlap for the overhead primary and secondary signals. While very minimal overlap for the primary and tertiary signals is shown, in practice this occurs in a location where the height difference between the signal and the drivers' eye means that there will be no overlap. Moreover, as noted above, the distance between the overlapping signal heads and the billboard means that as a driver approaches, the signal head will appear to move in relation to the billboard and it will be evident to a driver that the lantern of the signals is separate to the billboard.
- 4.1.9. Finally, in both cases, by the time that any overlap occurs, drivers will have already made the decision as to whether to stop at the traffic lights or not, because that decision point is some 40m from the stop lines and there is no overlap at that location.
- 4.1.10. For clarity, there is no overlap with the traffic signals located on the raised median island on Manchester Street adjacent to the billboard location.

4.2. Proximity of Traffic Signals and Billboard

- 4.2.1. A considerable number of consents have been granted where traffic signals are in close proximity to digital billboards. An evaluation has been undertaken of other known locations where digital billboards are provided, where the billboard has been established for some considerable time.

- 4.2.2. As an example, one such location is at the George Bolt Memorial Drive / Tom Pearce Drive intersection near Auckland Airport. At this location, the digital billboard forms the background to the traffic signal heads. As the primary access to the airport, George Bolt Memorial Drive in this location carries around 40,000 vehicles per day (two-way) meaning that at least 20,000 southbound drivers will have sight of the digital billboard each day, which is greater than would see the proposed billboard at Manchester Street. However no crashes have been recorded at this location due to drivers being distracted by advertising signs over the past ten years.



Figure 11: Digital Billboard at the George Bolt Memorial Drive / Tom Pearce Drive Intersection

- 4.2.3. Annexure A to this report sets out an assessment of 'before and after' crash rates at digital billboard locations, many of which are close to traffic signals. The report shows that there is no evidence of any increase in crashes after digital billboards are installed.
- 4.2.4. Accordingly, it is not considered that there is any reason to anticipate that the installation of the digital billboard will result in driver confusion or any adverse safety-related effects.

4.3. Assessment of Existing Crashes

- 4.3.1. With regard to the existing road safety record in the vicinity of the billboard, the historic crashes involving driver distraction are very unlikely to have been influenced by the proposed digital billboard if it was in place at the time due to the driver. One crash arose from a sudden medical event, and in two instances the 'at-fault' driver would not have been able to see the billboard. In one case the driver could have seen the billboard, but the crash arose when a southbound driver failed to stop at a red traffic signal at Gloucester Street, but as set out above, the billboard is visually distinct from three of the four sets of traffic signals in this location.



5. Proposed Conditions of Consent

- 5.1. Although a number of digital billboards have been consented in Christchurch, all have associated conditions of consent in respect of their operation. In each case, these are required to ensure compliance with the NZTA Traffic Control Devices Manual, and/or supported by research regarding the safe operation of digital billboards, and so it is expected that they will be offered as part of this application also.
- 5.2. The conditions of consent have been refined and improved over time, and so the following is considered to represent best practice:
- The transition from one image displayed to the next shall be via a 0.5 second dissolve.
 - The display time for each image displayed shall be a minimum of 10 seconds.
 - Each image displayed shall be static. No image shall contain any animation or emit flashing lights.
 - Images shall not be linked to impart a single advertising message across two or more sequential images.
 - Images shall not incorporate the predominant use of graphics, colours or shapes that could cause confusion or conflict with any traffic control device.
 - Images shall not invite or direct a driver to undertake an action.
 - The billboard shall be operated with a 'fail-safe' feature where in the event of a malfunction, the messages will be replaced by a solid black colour, or freeze (provided that any part of the image shall not flash) until the malfunction is resolved.
- 5.3. Based on the review of the available research, it is considered that these provisions will ensure that the signfaces and the operation of the billboard meet best practice and thus minimise the potential for driver confusion or distraction.



6. Compliance with NZTA Recommendations

6.1. *Billboard Location*

- 6.1.1. The sign will be on private property beyond the edge of Manchester Street and as noted above, the road alignments in the area are flat and straight. Consequently the billboard will not present a hazard in terms of physically blocking the visibility of any road signs for approaching drivers.
- 6.1.2. Manchester Street in this location is subject to a 30km/h speed limit. Consequently there is a recommendation to have a 100m separation between a sign and any intersections, but this is not achieved since the billboard is within this distance of the traffic signals at the Manchester Street / Gloucester Street and Manchester Street / Worcester Street intersections. This matter has been specifically assessed above, and it is not considered that adverse road safety effects will arise.
- 6.1.3. For a prevailing speed limit of 50km/h, the billboard needs to be visible for at least 80m on the immediate approach. The speed limit is lower on Manchester Street, but forwards sight distances in excess of 80m are achieved as the road alignment over this distance is flat and straight.
- 6.1.4. There is also a recommendation that billboards should be placed as close as possible to drivers' lines of sight. It is evident from Figures 3 and 4 above that approaching drivers need to turn their head very little to see the billboard.
- 6.1.5. Finally, under the Manual, roadside advertising signs are recommended to be a minimum of 50m apart although it is recognised that this may not be achievable in many circumstances. In this instance, Manchester Street is within a city centre environment where drivers frequently encounter advertising signs (such as shop signage and other billboards), and so the proposed billboard would not be unexpected to drivers. Consequently, it is considered that in this respect, the proposed digital billboard does not introduce any new safety risk into the prevailing environment.

6.2. *Signface*

- 6.2.1. Controls (through conditions of consent) are proposed to be put in place to ensure that the images displayed on the billboard are not capable of being mistaken for a traffic control device or which could be misconstrued as providing instruction to drivers. Similarly, the surface of the sign can be constructed from materials that do not reflect light from the lamps of any vehicle on the road and the brightness of the sign can also be suitably controlled.
- 6.2.2. With regard to the images displayed, the Traffic Control Devices Manual sets out the minimum sizes for lettering to enable it to be seen by drivers. However the vast majority of images on (any) billboard include graphics, text that is expected to be read, and text that is not expected to be read. The latter is typically required for legal reasons and is usually displayed at a very small size that makes it, in effect, illegible to passing drivers.
- 6.2.3. By way of example, a home loan advertisement is likely to have the bank logo and corporate colours, the interest rate in larger letters, and the terms and conditions under which the loan is offered in small print. The intent is that the viewer sees the bank name and rate, but does not attempt to review the terms and conditions.
- 6.2.4. The same applies to the types of font used. Many fonts that are used for the name of companies are difficult to read in and of themselves (such as Coca Cola, Starbucks, and



Johnson & Johnson). However, viewers do not read the wording as such, but rather, recognise the image that is created by the combination of the font and the words.

- 6.2.5. As set out above, research shows that in complex driving situations, drivers reduce the time that they spend on non-essential driving tasks (such as glancing at billboards). However, even disregarding this, the average glance time at a billboard is less than a second². This is not sufficient for a driver to read each individual word on a displayed image, but rather, just to see and assimilate the overall image and/or core information. Put another way, information that cannot easily be read is simply ignored.
- 6.2.6. Taking this into account, it is not considered that there is any need to specify fonts or font sizes for the image shown on the billboard.
- 6.2.7. With regard to the use of animation, as set out above minor changes in the displayed images are unlikely to have adverse road safety effects. The research in this area is limited however, and therefore it is considered that any animation should be used cautiously. Given the difficulties in defining what constitutes 'light' or 'minor' animation, it is more straightforward to simply prohibit animation, as is proposed.

6.3. Summary of Compliance

- 6.3.1. Overall, it is considered that the billboard can (or is able to) comply with the majority of the NZTA recommendations, although suitable conditions of consent are to be put in place to provide certainty in respect of colour of displays, font sizes, animation, display time, and time of transition to the next image.
- 6.3.2. The exception to compliance relates to the separation of the billboard from the intersection and this issue is discussed previously in this report.

² 3 Samsa, C. (2015) "Digital billboards 'down under': are they distracting to drivers and can industry and regulators work together for a successful road safety outcome?" Proceedings of the 2015 Australasian Road Safety Conference 14 – 16 October, Gold Coast, Australia



7. Compliance with District Plan Requirements

7.1. Assessment of Rule 6.8.5.3

7.1.1. Christchurch City Council has identified that the billboard is within 50m of a signalised intersection and therefore an assessment is required under Rule 6.8.5.3. There are two relevant matters in respect of traffic issues:

Whether the extent of the impacts of the billboard are increased or lessened due to:

- (i) the frequency and intensity of intermittent or flashing light sources, and the proposed periods of illumination and frequency of image changes;*
- (v) The potential of the billboard to cause distraction or confusion to motorists in their observance of traffic conditions, directions or controls.*

7.1.2. In respect of the first matter, no flashing images will be permitted, and the frequency of image change is aligned with other digital billboards around the country where there is no evidence of any adverse safety issues arising.

7.1.3. In respect of the second matter, the critical elements are 'distraction' and 'confusion'. Further in this particular instance, it is not unreasonable that the most important aspect is whether any such distraction or confusion arises in respect of the proximity of the traffic signals.

7.1.4. By way of background, plain English definitions³ of these key words are:

- 'Distraction': a thing that prevents someone from concentrating on something else; and
- 'Confusion': uncertainty about what is happening, intended, or required.

7.1.5. However 'distraction' is not the same as 'attraction'. A useful definition (Young, K.L. and M.A. Regan, Driver distraction: A review of the literature in Distracted driving. I.J. Faulks, et al., Editors. 2007, Australasian College of Road Safety: Sydney, NSW. p. 379-405) is that distraction occurs "*when a driver's attention is diverted away from the driving task by an object, activity, event, or other person, to such a degree that the driver no longer is capable of performing the driving task in a safe manner*". That is, under this definition, a driver may have their attention attracted by something but unless this means that they are no longer able to drive in a safe manner, it is not distraction.

7.1.6. So in plain English, the matter of discretion is seeking an assessment regarding whether the proposed billboard will prevent a motorist from concentrating on, or becoming uncertain about the observance of traffic conditions, directions or controls to the extent that they are no longer able to drive in a safe manner.

7.1.7. With regard to the first of these matters, the prevention of concentration, there are conditions of consent proposed that require a minimum length of time for the images to be displayed and preclude animation. These conditions mean that there are no reasons why a driver would become distracted to the point that they are unable to concentrate on the roading environment.

7.1.8. In respect of the observance of traffic conditions, directions and controls, the conditions of consent preclude images and colours that that could cause an impact on traffic safety and in particular any confusion with traffic signals. A detailed assessment of any potential interference between the signals and the billboard is set out above, which concludes that in general terms, there is no evidence to indicate that digital billboards in close proximity to

³ Google dictionary



signalised intersections generates an increase in crashes, and in this case specifically, the overlapping of the signals with the billboard is minimal.

7.1.9. Overall then, it is considered that the requirements of Rule 6.8.5.3(e)(i) and (v) are met by the proposed digital billboard.





8. Conclusions

- 8.1. This report has identified, evaluated and assessed the various transport and safety elements of a proposed digital billboard at 235 Manchester Street, Christchurch. Based on the analysis, it is considered that the billboard will not present any particular road safety concerns provided that suitable controls are put in place in respect of the images displayed. The proposed conditions of consent are appropriate for this.
- 8.2. The location of the billboard meets the recommendations of the Traffic Control Devices Manual (Part 3, Advertising Signs), other than in respect of the proximity to the traffic signals at the Gloucester Street and Worcester Street intersections. This matter has been specifically addressed and it is considered very unlikely that adverse safety-related effects would arise, especially as overlapping of the signal heads and the billboard is minimal.
- 8.3. An assessment has also been carried out under Rule 6.8.5.3 of the District Plan due to the proximity to the two intersections. Again, the results of this show that it is very unlikely that adverse safety-related effects would arise.
- 8.4. Overall, and subject to the preceding comments, the proposed digital billboard can be supported from a traffic and transportation perspective and it is considered that there are no traffic and transportation reasons why consent could not be granted.

Carriageway Consulting Limited
February 2021



Annexure A

Comparison of Crash Rates Before and After Billboard Installation



CARRIAGEWAY
CONSULTING

traffic engineering | transport planning



Table of Contents

Main Report		Page
1	Introduction	1
2	Stanley Street (State Highway 16) / Alten Road, Auckland	2
	2.1 Background	2
	2.2 Traffic Flows	3
	2.3 Road Safety Records	3
3	Queen Street / Wakefield Street, Auckland	4
	3.1 Background	4
	3.2 Traffic Flows	5
	3.3 Road Safety Records	6
4	Broadway / Remuera Road, Auckland	6
	4.1 Background	6
	4.2 Traffic Flows	7
	4.3 Road Safety Records	7
5	Karangahape Road / Ponsonby Road, Auckland	8
	5.1 Background	8
	5.2 Traffic Flows	9
	5.3 Road Safety Records	9
6	Khyber Pass Road / Symonds Street, Auckland	11
	6.1 Background	11
	6.2 Traffic Flows	12
	6.3 Road Safety Records	12
7	Khyber Pass Road / Southern Motorway, Auckland	13
	7.1 Background	13
	7.2 Traffic Flows	13
	7.3 Road Safety Records	14
8	Khyber Pass Road / Broadway, Auckland	15
	8.1 Background	15
	8.2 Traffic Flows	16
	8.3 Road Safety Records	16
9	Fanshawe Street / Nelson Street, Auckland	17
	9.1 Background	17
	9.2 Traffic Flows	18
	9.3 Road Safety Records	18
10	Victoria Street / Hobson Street, Auckland	19
	10.1 Background	19
	10.2 Traffic Flows	20
	10.3 Road Safety Records	20



11	Tom Pearce Drive / George Bolt Memorial Drive, Auckland	21
11.1	Background	21
11.2	Traffic Flows	22
11.3	Road Safety Records	22
12	Green Lane West / ASB Showgrounds, Auckland	23
12.1	Background	23
12.2	Traffic Flows	23
12.3	Road Safety Records	24
13	Colombo Street / Moorhouse Avenue, Christchurch	25
13.1	Background	25
13.2	Traffic Flows	26
13.3	Road Safety Records	26
14	Victoria Street / Bealey Avenue, Christchurch	27
14.1	Background	27
14.2	Traffic Flows	27
14.3	Road Safety Records	28
15	Main South Road (Sockburn Roundabout), Christchurch	29
15.1	Background	29
15.2	Traffic Flows	29
15.3	Road Safety Records	29
16	Discussion	31
17	Conclusions	33

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1. Introduction

- 1.1. Digital billboards are increasing in popularity within New Zealand, but in some cases, road controlling authorities (“RCAs”) have raised potential road safety concerns associated with driver distraction as a reason for declining resource consent. The particular concerns of RCAs appear to be in relation to the placement of billboards at locations where drivers are required to make a decision and determine an action in respect of their driving behaviour, such as in close proximity to an intersection.
- 1.2. One such example is set out in a report commissioned by Christchurch City Council and produced by consultants MWH. This notes that *“the location of signs relative to traffic signals and other decision points should be considered based on crash history and potential for crashes if the sign goes in...if a sign is installed close to a decision point it should ideally be situated outside the cone of visibility (COV) so that less drivers (sic) are likely to glance at the sign.”*
- 1.3. This report specifically addresses the matter of road safety at digital billboards through evaluating the prevailing conditions at existing installations within New Zealand. In each case, the location of the billboard is assessed in respect of whether it is close to a decision point and/or in the drivers’ cone of vision, and the prevailing traffic environment is also briefly described. The NZTA Crash Analysis System (“CAS”) has been used to identify the traffic flows on the frontage roads where drivers are able to see the signs, and then to assess whether any changes in the number of type of accidents have arisen since the billboard has been installed.



2. Stanley Street (State Highway 16) / Alten Road, Auckland

2.1. Background

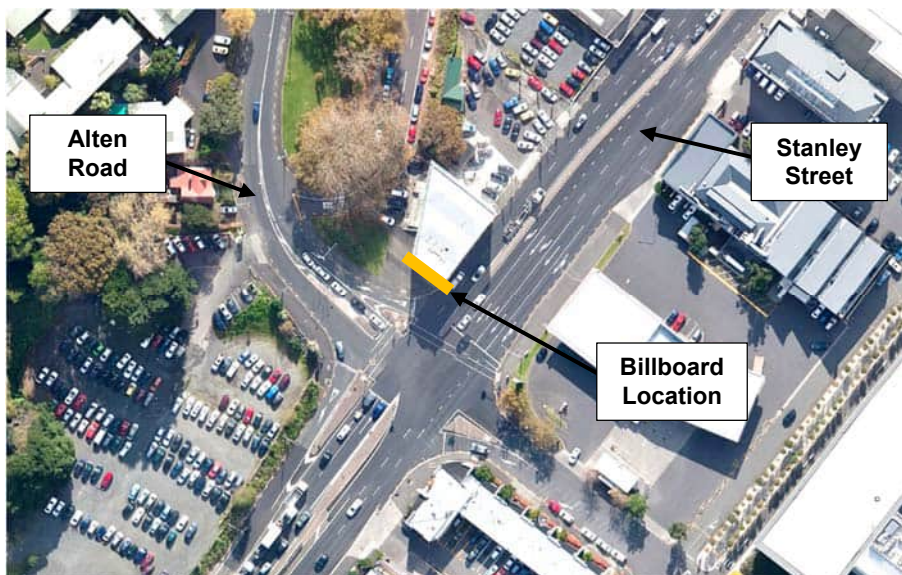


Figure 1: Aerial View of Billboard Location (Image ©2016 Google)

2.1.1. The billboard is affixed to the southern side of a three-storey building, at the first floor level, as shown below. It was installed in July 2014.



Figure 2: Billboard Location (Image ©2016 Google)

2.1.2. The billboard is directly within the cone of vision for northbound drivers on the state highway, and also forms a backdrop to the adjacent traffic signals. Since it is located immediately adjacent to an intersection, it is sited at a 'decision point'.



Figure 3: Billboard Forms Backdrop to Traffic Signals (Image ©2016 Google)

2.2. Traffic Flows

2.2.1. The traffic flows on the frontage roads are set out below.

Road	Traffic Volumes (Daily, Two-way)
Alten Road	12,000
Stanley Street (north)	43,300
Stanley Street (south)	43,650

Table 1: Traffic Flows on the Frontage Roads

2.2.2. Not all of these drivers will be able to see the billboard but rather, it is considered that it will be visible only to those drivers that are travelling northbound on Stanley Street, towards the billboard. This traffic flow is in the order of 18,550 vehicles per day.

2.3. Road Safety Records

2.3.1. CAS has been used to identify the road safety records at the intersection for the five-year period immediately prior to the installation of the billboard (that is, July 2009 to June 2014). In this period there were six accidents recorded on Stanley Street northbound involving vehicles travelling towards the billboard location (an average of 1.2 accidents per year).

2.3.2. CAS has also been used to identify the road safety records at the intersection for the period immediately following the installation of the billboard (that is, July 2014 to present). In this period there was one accident recorded on Stanley Street northbound, involving vehicles travelling towards the billboard (an average of 0.6 accidents per year).

2.3.3. No accidents have been recorded where distraction due to objects outside the vehicle was noted as a contributing factor.

3. Queen Street / Wakefield Street, Auckland

3.1. Background

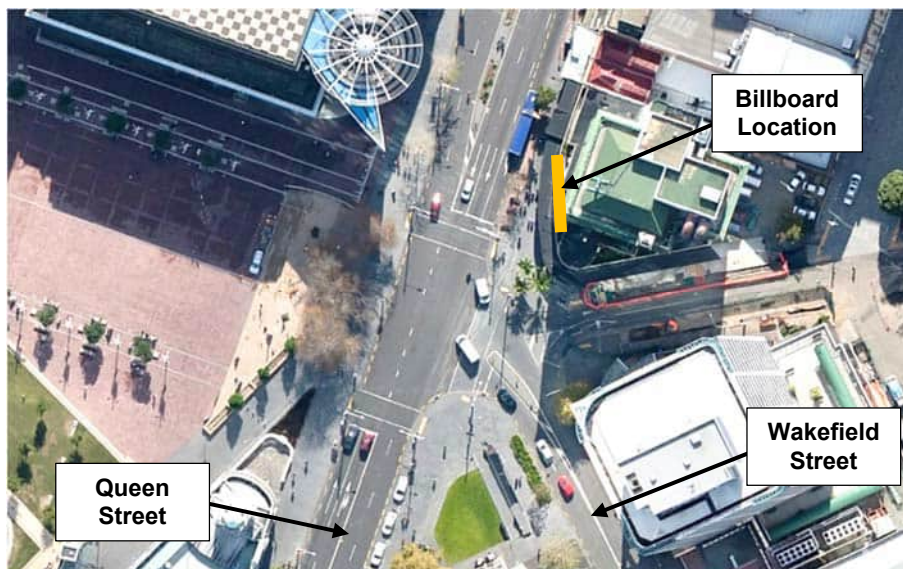


Figure 4: Aerial View of Billboard Location (Image ©2016 Google)

3.1.1. The billboard is affixed to the western side of a multi-storey building, at the first floor level, as shown below. It was installed in July 2013.

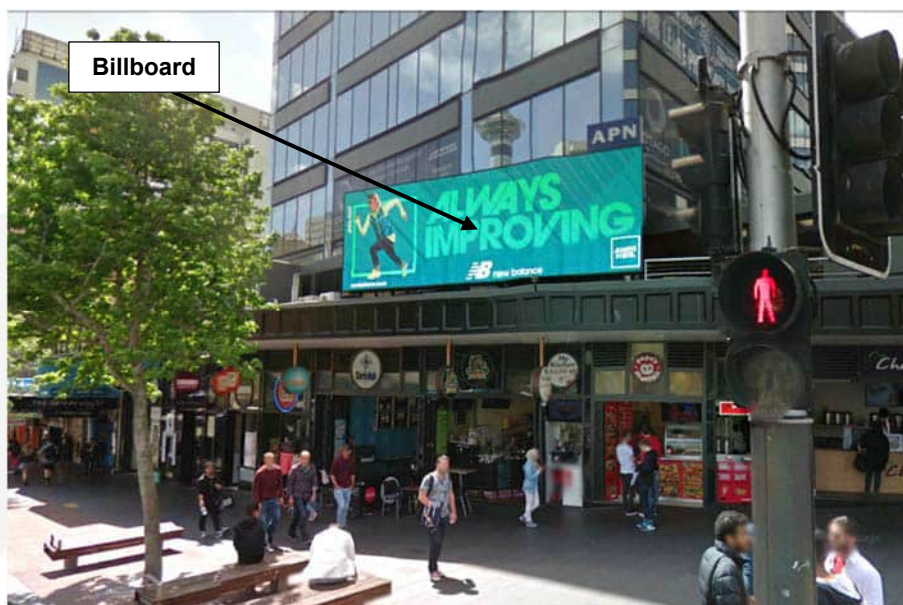


Figure 5: Billboard Location (Image ©2016 Google)

3.1.2. The billboard is within the cone of vision for northbound drivers on Queen Street. Since it is located immediately adjacent to an intersection, it is sited at a 'decision point'.

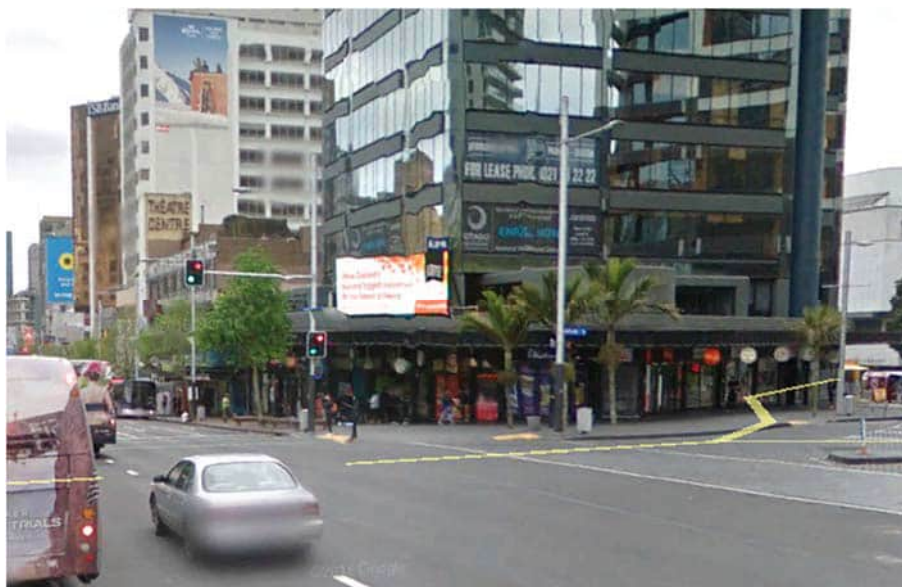


Figure 6: Billboard Within Driver Cone of Vision (Image ©2016 Google)

3.2. Traffic Flows

3.2.1. The traffic flows on the frontage roads are set out below.

Road	Traffic Volumes (Daily, Two-way)
Queen Street (south)	22,000
Queen Street (north)	22,000
Wakefield Street	12,000

Table 2: Traffic Flows on the Frontage Roads

3.2.2. Not all of these drivers will be able to see the billboard but rather, it is considered that it will be visible only to those drivers that are travelling northbound on Queen Street towards the billboard. This traffic flow is in the order of 11,000 vehicles per day.

3.3. Road Safety Records

3.3.1. CAS has been used to identify the road safety records at the intersection for the five-year period immediately prior to the installation of the billboard (that is, July 2008 to June 2013). In this period there were nine accidents recorded on Queen Street northbound involving vehicles travelling towards the billboard location (an average of 1.8 accidents per year).

3.3.2. CAS has also been used to identify the road safety records at the intersection for the period immediately following the installation of the billboard (that is, July 2013 to present). In this period there were four accidents recorded on Queen Street northbound involving vehicles travelling towards the billboard (an average of 1.5 accidents per year).

3.3.3. No accidents have been recorded where distraction due to objects outside the vehicle was noted as a contributing factor.

4. Broadway / Remuera Road, Auckland

4.1. Background

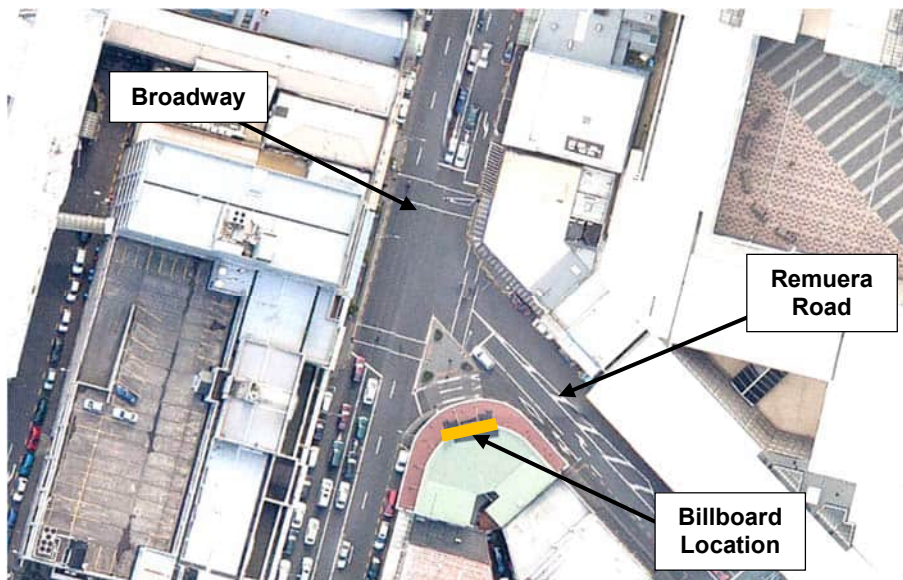


Figure 7: Aerial View of Billboard Location (Image ©2016 Google)

4.1.1. The billboard is mounted on the top of a two-storey building, as shown below, facing north. It was installed in December 2014.

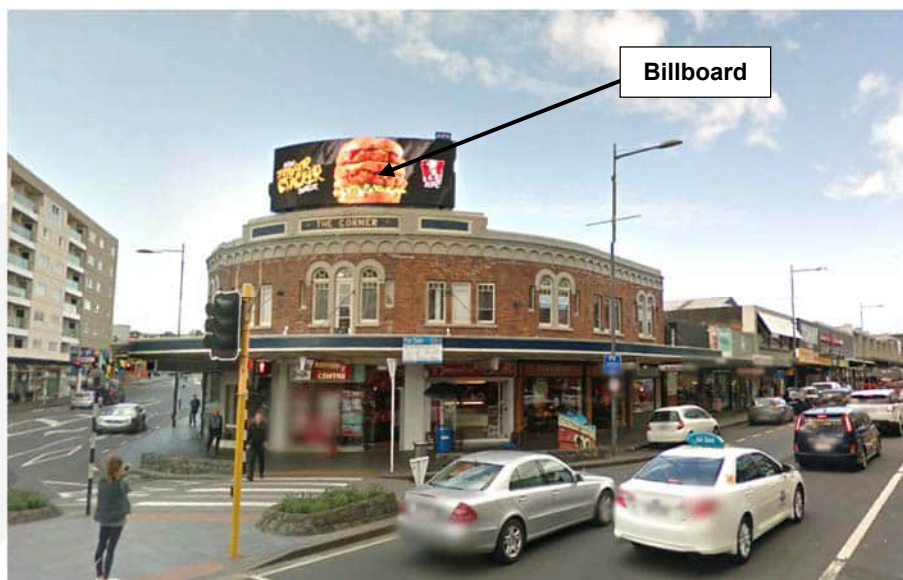


Figure 8: Billboard Location (Image ©2016 Google)

4.1.2. The billboard is directly within the cone of vision for southbound drivers on Broadway, and also forms a backdrop to the adjacent traffic signals. Since it is located immediately adjacent to an intersection, it is sited at a 'decision point'.



Figure 9: Billboard Forms Backdrop to Traffic Signals (Image ©2016 Google)

4.2. Traffic Flows

4.2.1. The traffic flows on the frontage roads are set out below.

Road	Traffic Volumes (Daily, Two-way)
Broadway (north)	25,000
Broadway (south)	25,000
Remuera Road	19,000

Table 3: Traffic Flows on the Frontage Roads

4.2.2. Not all of these drivers will be able to see the billboard but rather, it is considered that it will be visible only to those drivers that are travelling southbound on Broadway, towards the billboard. This traffic flow is in the order of 12,500 vehicles per day.

4.3. Road Safety Records

4.3.1. CAS has been used to identify the road safety records at the intersection for the five-year period immediately prior to the installation of the billboard (that is, December 2009 to November 2014). In this period there were nine accidents recorded on Broadway southbound involving vehicles travelling towards the billboard location (an average of 1.8 accidents per year).

4.3.2. CAS has also been used to identify the road safety records at the intersection for the period immediately following the installation of the billboard (that is, December 2014 to the present). In this period there was one accident recorded on Broadway southbound involving vehicles travelling towards the billboard (an average of 0.9 accidents per year).

4.3.3. No accidents have been recorded where distraction due to objects outside the vehicle was noted as a contributing factor.

5. Karangahape Road / Ponsonby Road, Auckland

5.1. Background

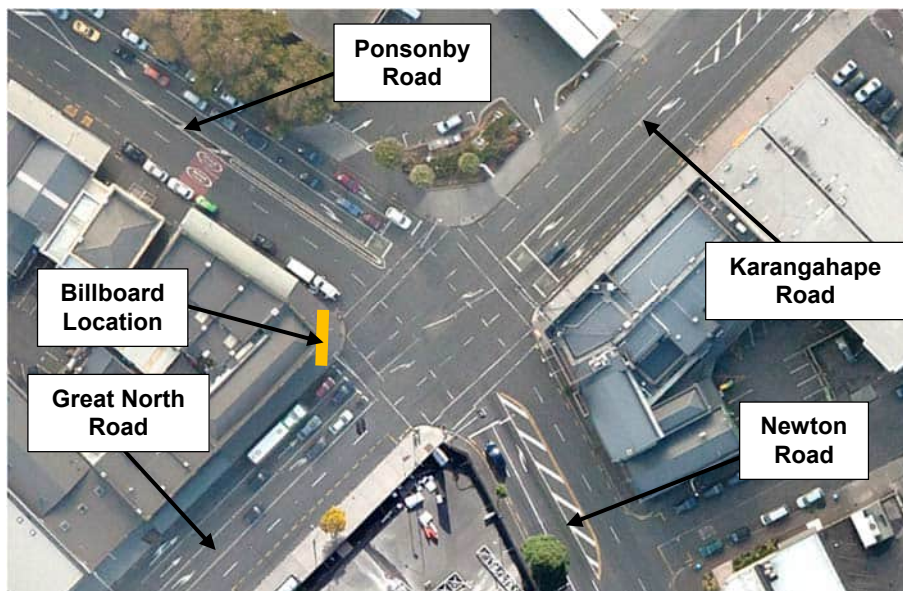


Figure 10: Aerial View of Billboard Location (Image ©2016 Google)

5.1.1. The billboard is mounted at the top of a two-storey building. The billboard is split into three parts (adjacent to one another), as shown below which wrap around the corner. It was installed in July 2014.



Figure 11: Billboard Location (Image ©2016 Google)

5.1.2. The billboard is directly within the cone of vision for northbound drivers on Newton Road and southbound drivers on Karangahape Road, and also forms a backdrop to the adjacent traffic signals for both traffic streams. Since it is located immediately adjacent to an intersection, it is sited at a 'decision point'.



Figure 12: Billboard Forms Backdrop to Traffic Signals (Image ©2016 Google)

5.2. Traffic Flows

5.2.1. The traffic flows on the frontage roads are set out below.

Road	Traffic Volumes (Daily, Two-way)
Ponsonby Road	25,000
Karangahape Road	25,000
Newton Road	19,000
Great North Road	22,000

Table 4: Traffic Flows on the Frontage Roads

5.2.2. Not all of these drivers will be able to see the billboard but rather, it is considered that it will be visible only to those drivers that are travelling southbound on Karangahape Road and westbound on Newton Road, towards the billboard. These traffic flows are in the order of 12,500 and 9,500 vehicles per day respectively.

5.3. Road Safety Records

5.3.1. CAS has been used to identify the road safety records at the intersection for the five-year period immediately prior to the installation of the billboard (that is, July 2009 to June 2014). In this period there were nine accidents recorded on Karangahape Road southbound and Newton Road westbound involving vehicles travelling towards the billboard location (an average of 1.8 accidents per year).

5.3.2. CAS has also been used to identify the road safety records at the intersection for the period immediately following the installation of the billboard (that is, July 2014 to present). In this period there were two accidents recorded on Karangahape Road southbound and Newton Road westbound involving vehicles travelling towards the billboard (an average of 1.2 accidents per year).

5.3.3. Two accidents have been recorded where distraction due to objects outside the vehicle was noted as a contributing factor. One accident occurred when a driver was distracted by a passing pedestrian and ran into the rear of a vehicle in front, and one occurred when a driver



was distracted by the flashing lights of a police car (which was attending an accident which had already occurred at the Karangahape Road / Ponsonby Road intersection).



6. Khyber Pass Road / Symonds Street, Auckland

6.1. Background

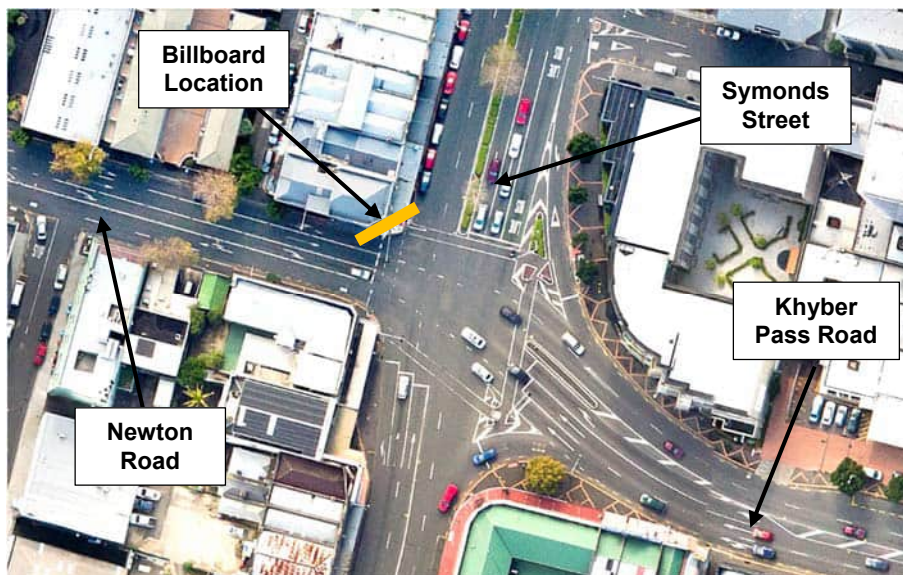


Figure 13: Aerial View of Billboard Location (Image ©2016 Google)

6.1.1. The billboard is affixed to the top of a three-storey building as shown below, and is in three parts that wrap around the corner. It was installed in July 2014.



Figure 14: Billboard Location (Image ©2016 Google)

6.1.2. The billboard is directly within the cone of vision for northbound drivers on Symonds Street and westbound vehicles on Khyber Pass Road. Since it is located immediately adjacent to an intersection, it is sited at a 'decision point'.



Figure 15: Billboard Within Driver Cone of Vision (Image ©2016 Google)

6.2. Traffic Flows

6.2.1. The traffic flows on the frontage roads are set out below.

Road	Traffic Volumes (Daily, Two-way)
Symonds Street (north)	45,000
Symonds Street (south)	30,000
Khyber Pass Road	25,000
Newton Road	13,000

Table 5: Traffic Flows on the Frontage Roads

6.2.2. Not all of these drivers will be able to see the billboard but rather, it is considered that it will be visible only to those drivers that are travelling northbound on Symonds Street and westbound on Khyber Pass Road, towards the billboard. These traffic flows are in the order of 15,000 and 12,500 vehicles per day respectively.

6.3. Road Safety Records

6.3.1. CAS has been used to identify the road safety records at the intersection for the five-year period immediately prior to the installation of the billboard (that is, July 2009 to June 2014). In this period there were seven accidents recorded on Symonds Street northbound and Khyber Pass Road westbound involving vehicles travelling towards the billboard location (an average of 1.4 accidents per year).

6.3.2. CAS has also been used to identify the road safety records at the intersection for the period immediately following the installation of the billboard (that is, July 2014 to the present). In this period there were two accidents recorded on Symonds Street northbound and Khyber Pass Road westbound involving vehicles travelling towards the billboard (an average of 1.2 accidents per year).

6.3.3. No accidents have been recorded where distraction due to objects outside the vehicle was noted as a contributing factor.

7. Khyber Pass Road / Southern Motorway, Auckland

7.1. Background

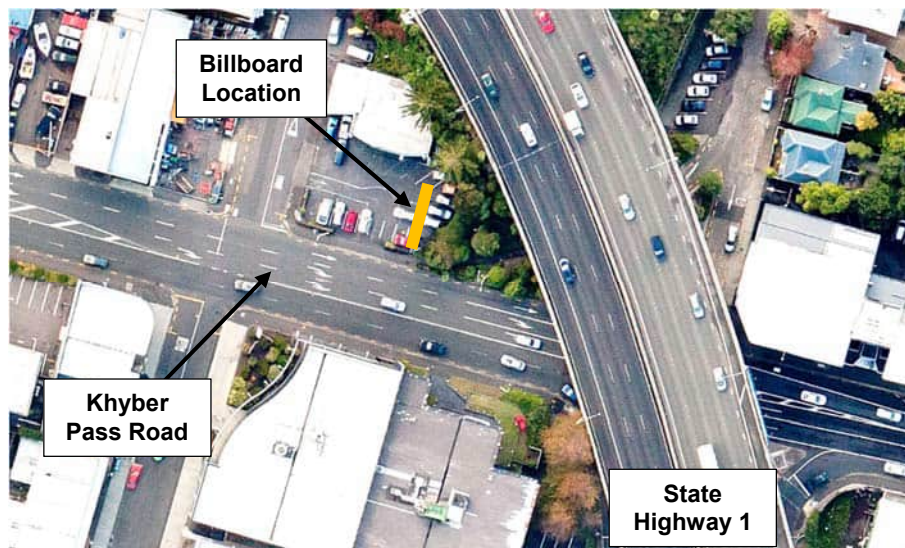


Figure 16: Aerial View of Billboard Location (Image ©2016 Google)

7.1.1. The billboard is free standing and faces west. It was installed in August 2015.



Figure 17: Billboard Location (Image ©2016 Google)

7.2. Traffic Flows

7.2.1. The traffic flows on the frontage roads are set out below.

Road	Traffic Volumes (Daily, Two-way)
Khyber Pass Road	30,000

Table 6: Traffic Flows on the Frontage Roads



7.2.2. Not all of these drivers will be able to see the billboard but rather, it is considered that it will be visible only to those drivers that are travelling eastbound on Khyber Pass Road, towards the billboard. This traffic flow is in the order of 15,000 vehicles per day.

7.3. Road Safety Records

7.3.1. CAS has been used to identify the road safety records in the vicinity of the billboard for the five-year period immediately prior to the installation of the billboard (that is, August 2010 to July 2015). In this period there was one accident recorded on Khyber Pass Road eastbound involving vehicles travelling towards the billboard location (an average of 0.2 accidents per year).

7.3.2. CAS has also been used to identify the road safety records in the vicinity of the billboard for the period immediately following its installation (that is, July 2015 to present). In this period, no accidents have been recorded on Khyber Pass Road eastbound involving vehicles travelling towards the billboard.

7.3.3. No accidents have been recorded where distraction due to objects outside the vehicle was noted as a contributing factor.



8. Khyber Pass Road / Broadway, Auckland

8.1. Background

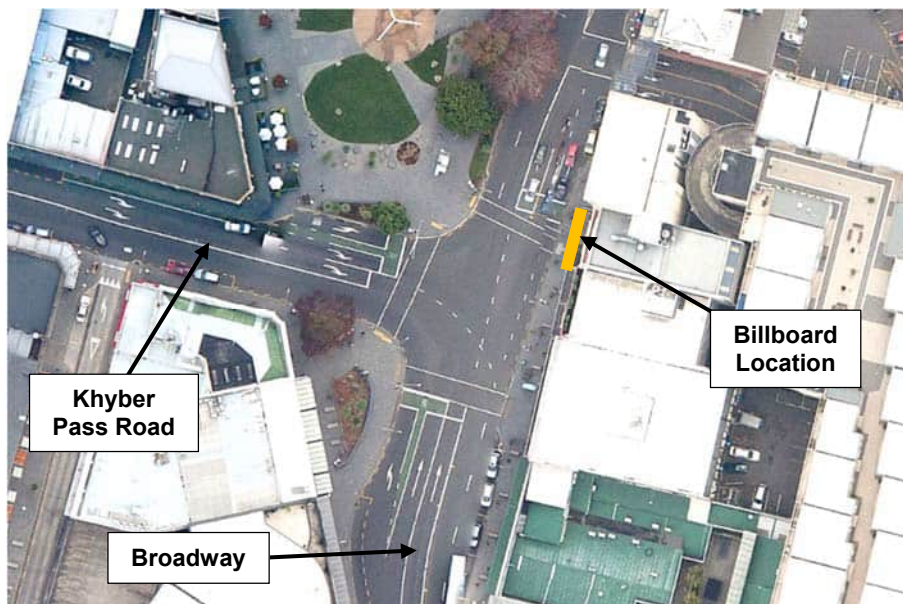


Figure 18: Aerial View of Billboard Location (Image ©2016 Google)

8.1.1. The billboard is affixed to the western side of a multi-storey building, at the first floor level, as shown below. It was installed in August 2015.

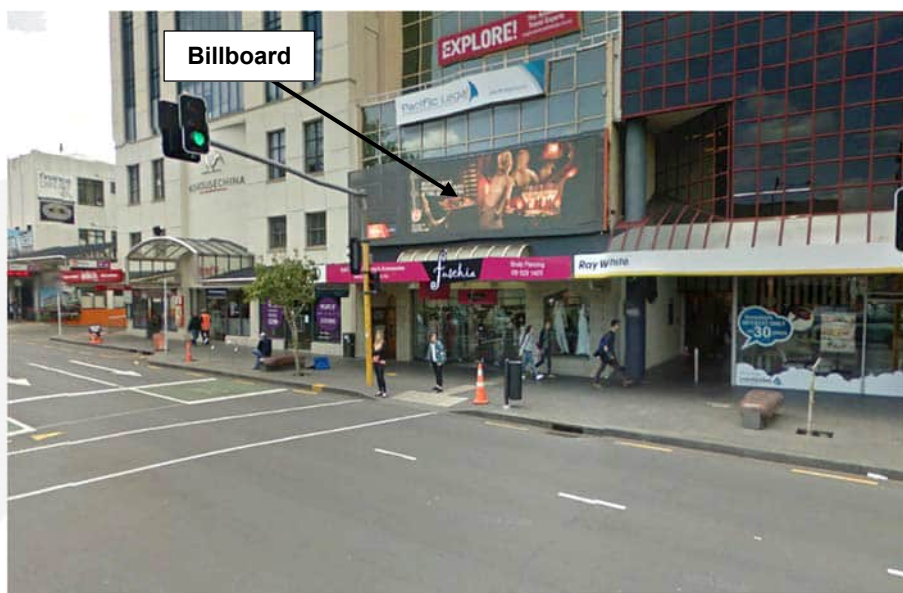


Figure 19: Billboard Location (Image ©2016 Google)

8.1.2. The billboard is directly within the cone of vision for eastbound drivers on Khyber Pass Road, and also forms a backdrop to the adjacent traffic signals. Since it is located immediately adjacent to an intersection, it is sited at a 'decision point'.

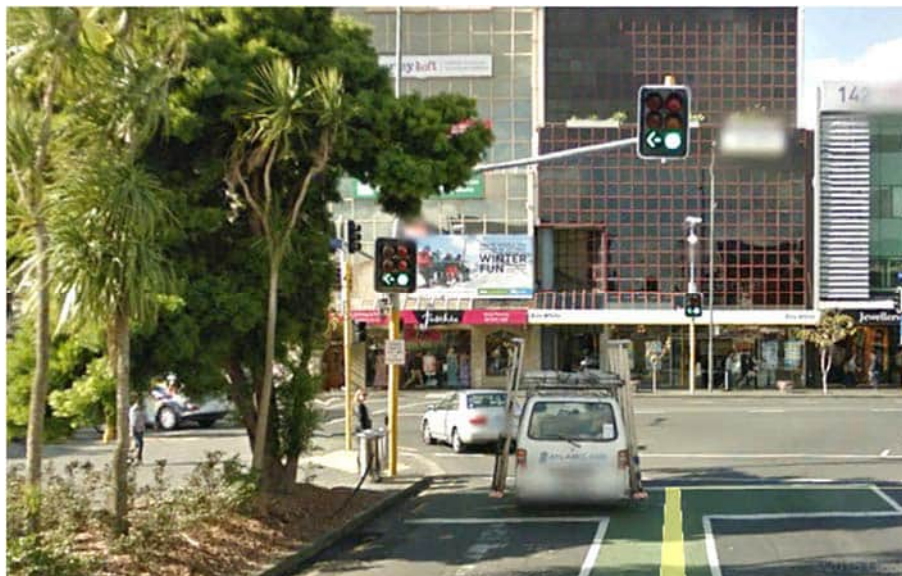


Figure 20: Billboard Forms Backdrop to Traffic Signals (Image ©2016 Google)

8.2. Traffic Flows

8.2.1. The traffic flows on the frontage roads are set out below.

Road	Traffic Volumes (Daily, Two-way)
Broadway (north)	6,850
Broadway (south)	25,000
Khyber Pass Road	25,000

Table 7: Traffic Flows on the Frontage Roads

8.2.2. Not all of these drivers will be able to see the billboard but rather, it is considered that it will be visible only to those drivers that are travelling eastbound on Khyber Pass Road, towards the billboard. This traffic flow is in the order of 12,500 vehicles per day.

8.3. Road Safety Records

8.3.1. CAS has been used to identify the road safety records at the intersection for the five-year period immediately prior to the installation of the billboard (that is, August 2010 to July 2015). In this period there were five accidents recorded on Khyber Pass Road eastbound involving vehicles travelling towards the billboard location (an average of 1.0 accidents per year).

8.3.2. CAS has also been used to identify the road safety records at the intersection for the period immediately following the installation of the billboard (that is, August 2015 to present). In this period there were no accidents recorded on Khyber Pass Road eastbound involving vehicles travelling towards the billboard.

8.3.3. No accidents have been recorded where distraction due to objects outside the vehicle was noted as a contributing factor.

9. Fanshawe Street / Nelson Street, Auckland

9.1. Background



Figure 21: Aerial View of Billboard Location (Image ©2016 Google)

9.1.1. The billboard is affixed to the western side of a multi-storey building as shown below. It was installed in February 2016.

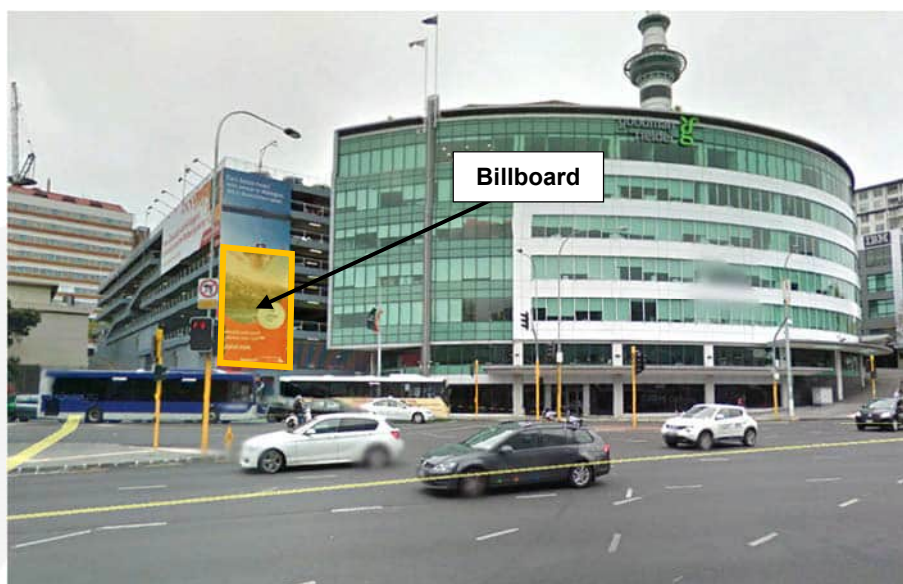


Figure 22: Approximate Billboard Location (Image ©2016 Google)

9.1.2. Of particular note is that the billboard is directly within the cone of vision for eastbound drivers on Fanshawe Street.

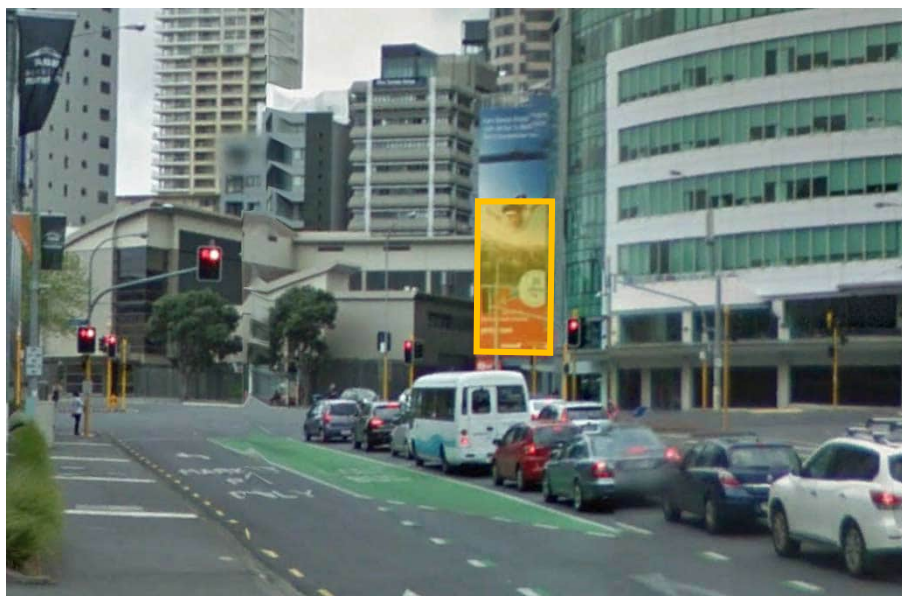


Figure 23: Billboard Within Driver Cone of Vision (Image ©2016 Google)

9.2. Traffic Flows

9.2.1. The traffic flows on the frontage roads are set out below.

Road	Traffic Volumes (Daily, Two-way)
Fanshawe Street (east)	38,700
Fanshawe Street (west)	35,000
Nelson Street	30,000
Market Square	1,000

Table 8: Traffic Flows on the Frontage Roads

9.2.2. Not all of these drivers will be able to see the billboard but rather, it is considered that it will be visible only to those drivers that are travelling eastbound on Fanshawe Street, towards the billboard. This traffic flow is in the order of 19,350 vehicles per day.

9.3. Road Safety Records

9.3.1. CAS has been used to identify the road safety records at the intersection for the five-year period immediately prior to the installation of the billboard (that is, February 2011 to January 2016). In this period there were five accidents recorded on Fanshawe Street eastbound involving vehicles travelling towards the billboard location (an average of 1.2 accidents per year).

9.3.2. CAS has also been used to identify the road safety records at the intersection for the period immediately following the installation of the billboard (that is, February 2016 to present). In this period there were no accidents recorded on Fanshawe Street eastbound involving vehicles travelling towards the billboard.

9.3.3. No accidents have been recorded where distraction due to objects outside the vehicle was noted as a contributing factor.

10. Victoria Street / Hobson Street, Auckland

10.1. Background



Figure 24: Aerial View of Billboard Location (Image ©2016 Google)

10.1.1. The billboard is affixed to the western side of a multi-storey building and is considerably elevated above the nearby roads. It was installed in September 2015.

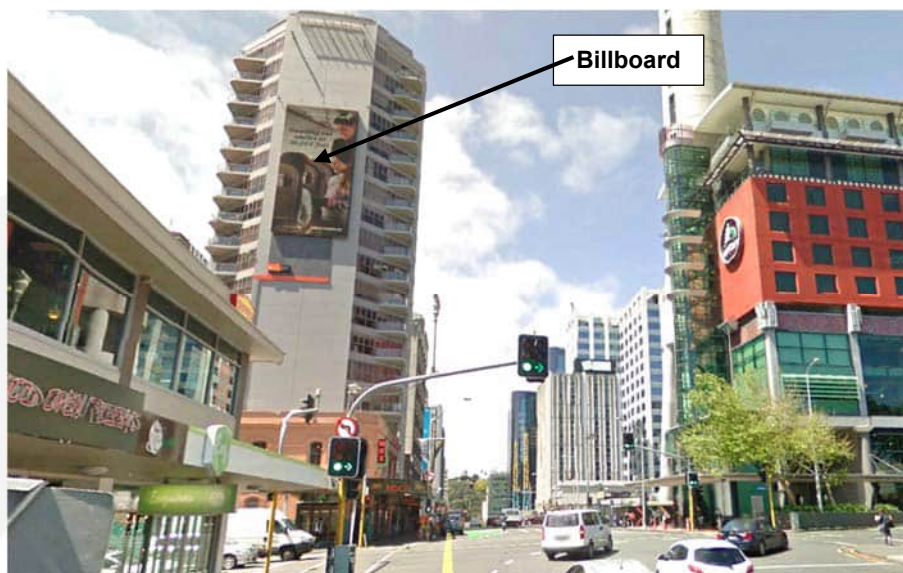


Figure 25: Billboard Location (Image ©2016 Google)

10.1.2. The billboard is directly within the cone of vision for eastbound drivers on Victoria Street. Since it is located in close proximity to an intersection, it is sited at a 'decision point'.

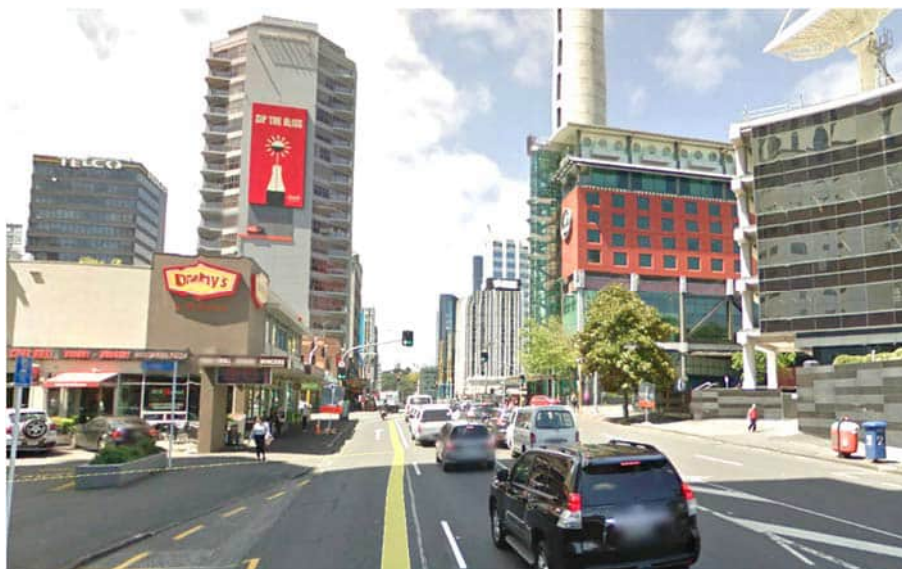


Figure 26: Billboard Within Driver Cone of Vision (Image ©2016 Google)

10.2. Traffic Flows

10.2.1. The traffic flows on the frontage roads are set out below.

Road	Traffic Volumes (Daily, Two-way)
Victoria Street (east)	25,000
Victoria Street (west)	25,000
Hobson Street (north)	25,000
Hobson Street (south)	25,000

Table 9: Traffic Flows on the Frontage Roads

10.2.2. Not all of these drivers will be able to see the billboard but rather, it is considered that it will be visible only to those drivers that are travelling eastbound on Victoria Street, towards the billboard. This traffic flow is in the order of 12,500 vehicles per day.

10.3. Road Safety Records

10.3.1. CAS has been used to identify the road safety records at the intersection for the five-year period immediately prior to the installation of the billboard (that is, September 2010 to August 2015). In this period there were three accidents recorded on Victoria Street eastbound involving vehicles travelling towards the billboard location (an average of 0.6 accidents per year).

10.3.2. CAS has also been used to identify the road safety records at the intersection for the period immediately following the installation of the billboard (that is, September 2015 to present). In this period there were no accidents recorded on Victoria Street eastbound, involving vehicles travelling towards the billboard.

10.3.3. No accidents have been recorded where distraction due to objects outside the vehicle was noted as a contributing factor.

11. Tom Pearce Drive / George Bolt Memorial Drive, Auckland

11.1. Background

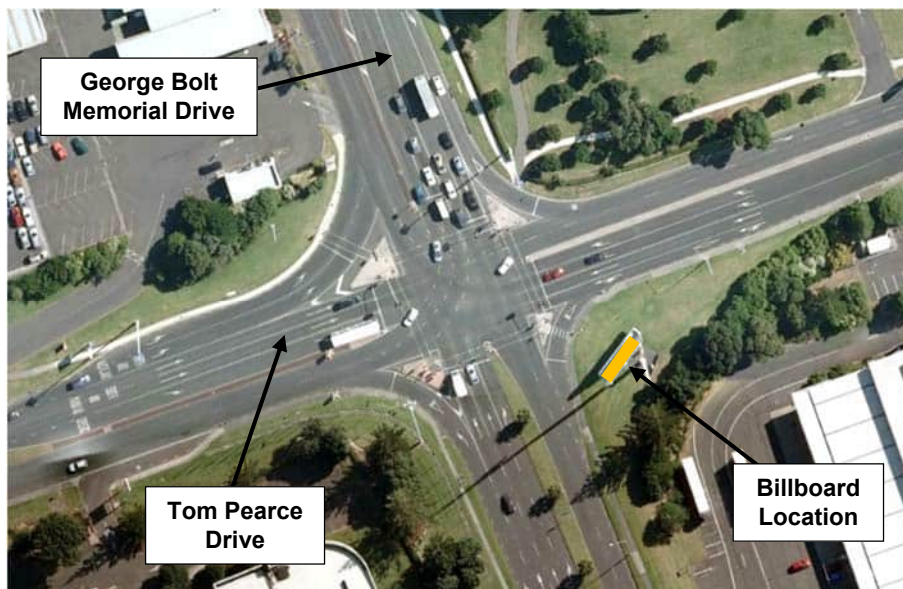


Figure 27: Aerial View of Billboard Location (Image ©2016 Google)

11.1.1. The billboard is free-standing, and was installed in December 2013.



Figure 28: Billboard Location (Image ©2016 Google)

11.1.2. The billboard is directly within the cone of vision for southbound drivers on George Bolt Memorial Drive and eastbound vehicles on Tom Pearce Drive. It also forms a backdrop to the adjacent traffic signals and as it is located immediately adjacent to an intersection, it is sited at a 'decision point'.



Figure 29: Billboard Forms Backdrop to Traffic Signals (Image ©2016 Google)

11.2. Traffic Flows

11.2.1. The traffic flows on the frontage roads are set out below.

Road	Traffic Volumes (Daily, Two-way)
George Bolt Memorial Drive (north)	No traffic data available
George Bolt Memorial Drive (south)	
Tom Pearce Drive (east)	
Tom Pearce Drive (west)	

Table 10: Traffic Flows on the Frontage Roads

11.2.2. Not all of these drivers will be able to see the billboard but rather, it is considered that it will be visible only to those drivers that are travelling southbound on George Bolt Memorial Drive and eastbound on Tom Pearce Drive, towards the billboard.

11.3. Road Safety Records

11.3.1. CAS has been used to identify the road safety records at the intersection for the five-year period immediately prior to the installation of the billboard (that is, December 2008 to November 2013). In this period there were 19 accidents recorded on George Bolt Memorial Drive southbound and Tom Pearce Drive eastbound involving vehicles travelling towards the billboard location (an average of 3.8 accidents per year).

11.3.2. CAS has also been used to identify the road safety records at the intersection for the period immediately following the installation of the billboard (that is, December 2013 to present). In this period there were five accidents recorded on George Bolt Memorial Drive southbound and Tom Pearce Drive eastbound involving vehicles travelling towards the billboard (an average of 2.3 accidents per year).

11.3.3. No accidents have been recorded where distraction due to objects outside the vehicle was noted as a contributing factor.

12. Green Lane West / ASB Showgrounds, Auckland

12.1. Background



Figure 30: Aerial View of Billboard Location (Image ©2016 Google)

12.1.1. The billboard is free standing. The date of installation is not known, but is understood to be prior to 2014.



Figure 31: Billboard Location (Image ©2016 Google)

12.2. Traffic Flows

12.2.1. The traffic flows on the frontage roads are set out below.

Road	Traffic Volumes (Daily, Two-way)
Green Lane West	30,000

Table 11: Traffic Flows on the Frontage Roads



12.2.2. As the billboard is double-sided, all of these drivers travelling towards the billboard will be able to see it.

12.3. Road Safety Records

12.3.1. CAS has been used to identify the road safety records in the vicinity of the billboard for the five-year period immediately prior to the (assumed) installation of the billboard (that is, January 2009 to December 2013). In this period there were eight accidents recorded on Green Lane West involving vehicles travelling towards the billboard location (an average of 1.6 accidents per year).

12.3.2. CAS has also been used to identify the road safety records in the vicinity of the billboard for the period immediately following its installation (that is, January 2014 to present). In this period there were five accidents recorded on Green Lane West involving vehicles travelling towards the billboard (an average of 2.3 accidents per year).

12.3.3. No accidents have been recorded where distraction due to objects outside the vehicle was noted as a contributing factor.



13. Colombo Street / Moorhouse Avenue, Christchurch

13.1. Background



Figure 32: Aerial View of Billboard Location (Image ©2016 Google)

13.1.1. The billboard free-standing, and is located in the same position at a previous (static) billboard, but elevated to a greater height, as indicatively shown below. It was installed in January 2016.

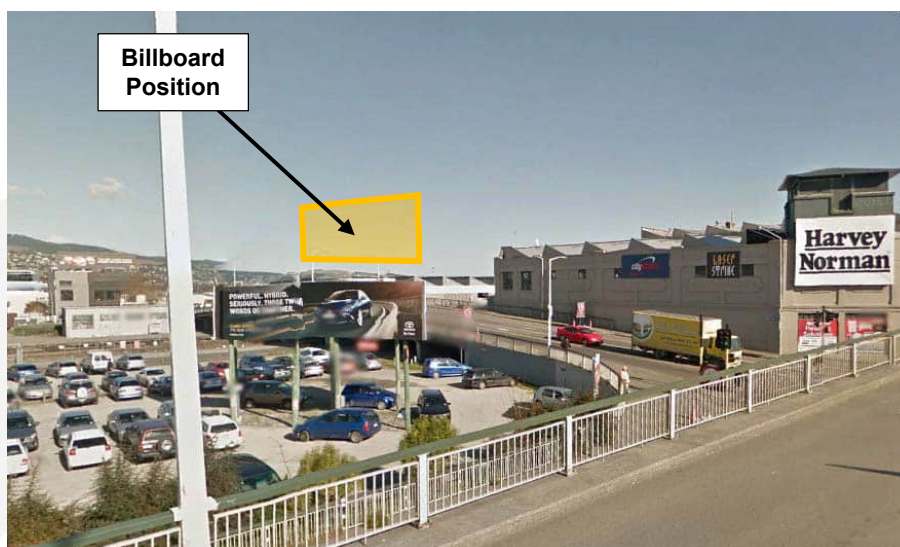


Figure 33: Approximate Billboard Location (Image ©2016 Google)

13.1.2. Of particular note is that the billboard is directly within the cone of vision for westbound drivers on Moorhouse Avenue and also turning onto Colombo Street.



Figure 34: Billboard Within Driver Cone of Vision (Image ©2016 Google)

13.2. Traffic Flows

13.2.1. The traffic flows on the frontage roads are set out below.

Road	Traffic Volumes (Daily, Two-way)
Moorhouse Avenue (east)	35,500
Moorhouse Avenue (westbound slip)	3,750
Colombo Street (north)	15,000
Colombo Street (south)	15,100

Table 12: Traffic Flows on the Frontage Roads

13.2.2. Not all of these drivers will be able to see the billboard but rather, it is considered that it will be visible only to those drivers that are travelling westbound on Moorhouse Avenue or the off-ramp, towards the billboard. These traffic flows are in the order of 17,500 and 3,750 vehicles per day respectively.

13.3. Road Safety Records

13.3.1. CAS has been used to identify the road safety records in the vicinity of the billboard for the five-year period immediately prior to the installation of the billboard (that is, January 2011 to December 2015). In this period there were no accidents recorded involving vehicles travelling towards the billboard location. However this may be due in part to the extensive repairs that have been underway on the Moorhouse Avenue overbridge over much of this period, and lower temporary speed limit that has been in place.

13.3.2. CAS also been used to identify the road safety records in the vicinity of the billboard for the period immediately following its installation (that is, January 2016 to present). In this period there were no accidents recorded involving vehicles travelling towards the billboard.

13.3.3. No accidents have been recorded where distraction due to objects outside the vehicle was noted as a contributing factor.

14. Victoria Street / Bealey Avenue, Christchurch

14.1. Background

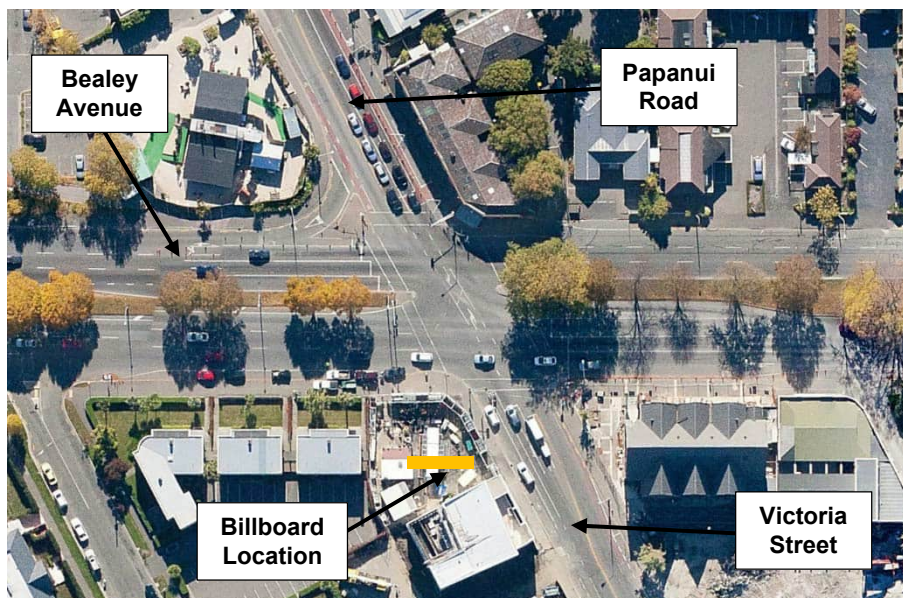


Figure 35: Aerial View of Billboard Location (Image ©2016 Google)

14.1.1. The billboard is free-standing is located just to the north of a large multi-storey building. It was installed in November 2015.

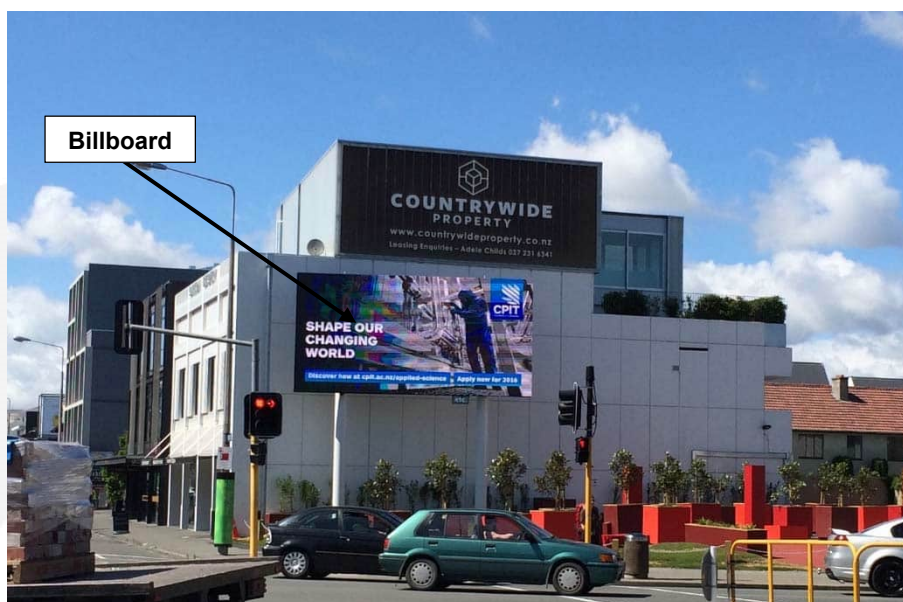


Figure 36: Billboard Location

14.1.2. The billboard is directly within the cone of vision for southbound drivers on Papanui Road, and as it is located immediately adjacent to an intersection, it is sited at a 'decision point'.

14.2. Traffic Flows

14.2.1. The traffic flows on the frontage roads are set out below.



Road	Traffic Volumes (Daily, Two-way)
Bealey Avenue (east)	37,800
Bealey Avenue (west)	35,100
Victoria Street	15,000
Papanui Road	24,200

Table 13: Traffic Flows on the Frontage Roads

14.2.2. Not all of these drivers will be able to see the billboard but rather, it is considered that it will be visible only to those drivers that are travelling southbound on Papanui Road, towards the billboard. This traffic flow is in the order of 12,100 vehicles per day.

14.3. Road Safety Records

14.3.1. CAS has been used to identify the road safety records at the intersection for the five-year period immediately prior to the installation of the billboard (that is, November 2010 to October 2015). In this period there were two accidents recorded on Papanui Road southbound involving vehicles travelling towards the billboard location (an average of 0.4 accidents per year).

14.3.2. CAS has also been used to identify the road safety records at the intersection for the period immediately following the installation of the billboard (that is, November 2015 to present). In this period there were no accidents recorded on Papanui Road southbound involving vehicles travelling towards the billboard.

14.3.3. No accidents have been recorded where distraction due to objects outside the vehicle was noted as a contributing factor.



15. Main South Road (Sockburn Roundabout), Christchurch

15.1. Background



Figure 38: Aerial View of Billboard Location (Image ©2016 Google)

15.1.1. The billboard is free-standing and is located on the northern side of Main South Road. It is double-sided and therefore visible to traffic approaching from both directions. It was installed in October 2015.

15.1.2. The billboard is directly within the cone of vision for northbound drivers on Main South Road.

15.2. Traffic Flows

15.2.1. The traffic flows on the frontage roads are set out below.

Road	Traffic Volumes (Daily, Two-way)
Main South Road	27,700

Table 14: Traffic Flows on the Frontage Roads

15.2.2. All of these drivers travelling towards the billboard will be able to see it.

15.3. Road Safety Records

15.3.1. CAS has been used to identify the road safety records in the vicinity of the billboard for the five-year period immediately prior to the installation of the billboard (that is, October 2010 to September 2015). In this period there were five accidents recorded on Main South Road involving vehicles travelling towards the billboard location (an average of 1.0 accidents per year).

15.3.2. CAS has also been used to identify the road safety records in the vicinity of the billboard for the period immediately following its installation (that is, October 2015 to present). In this period there have been no accidents recorded on Main South Road involving vehicles travelling towards the billboard.



15.3.3. No accidents have been recorded where distraction due to objects outside the vehicle was noted as a contributing factor.





16. Discussion

16.1. Data Summary

16.1.1. The locational information, traffic volumes and accident information set out in each section above has been summarised, below.

Location	At Decision Point?	Within Cone of Vision?	Background to Signals?	Views Per Day (Traffic Volume)	Accident Rates	
					Before Billboard	After Billboard
Stanley Street (State Highway 16) / Alten Road, Auckland	Yes	Yes	Yes	18,550	1.2 (5-year avg)	0.6 (1.7-year avg)
Queen Street / Wakefield Street, Auckland	Yes	Yes	No	11,000	1.4 (5-year avg)	1.5 (2.7-year avg)
Broadway / Remuera Road, Auckland	Yes	Yes	Yes	12,500	1.8 (5-year avg)	0.9 (1.3-year avg)
Karangahape Road / Ponsonby Road, Auckland	Yes	Yes	Yes	22,000	1.8 (5-year avg)	1.2 (1.7-year avg)
Khyber Pass Road / Symonds Street, Auckland	Yes	Yes	No	27,500	1.4 (5-year avg)	1.2 (1.7-year avg)
Khyber Pass Road / Southern Motorway, Auckland	No	Yes	No	15,000	0.2 (5-year avg)	0.0 (0.6-year avg)
Khyber Pass Road / Broadway, Auckland	Yes	Yes	Yes	12,500	1.0 (5-year avg)	0.0 (0.6-year avg)
Fanshawe Street / Nelson Street, Auckland	Yes	Yes	No	19,350	1.2 (5-year avg)	0.0 (0.1-year avg)
Victoria Street / Hobson Street, Auckland	Yes	Yes	No	12,500	0.6 (5-year avg)	0.0 (0.5-year avg)
Tom Pearce Drive / George Bolt Memorial Drive, Auckland	Yes	Yes	Yes	unknown	3.8 (5-year avg)	2.3 (2.3-year avg)
Green Lane West / ASB Showgrounds, Auckland	No	Yes	No	30,000	1.6 (5-year avg)	2.3 (2.2-year avg)
Colombo Street / Moorhouse Avenue, Christchurch	No	Yes	No	21,250	0.0 (5-year avg)	0.0 (0.2-year avg)
Victoria Street / Bealey Avenue, Christchurch	Yes	Yes	No	12,100	0.4 (5-year avg)	0.0 (0.3-year avg)
Main South Road (Sockburn Roundabout), Christchurch	No	Yes	No	27,700	1.0 (5-year avg)	0.0 (0.3-year avg)

Table 15: Summary of Characteristics of Billboards

16.2. Discussion

16.2.1. It can be seen that of the 14 sites considered within this report, ten are located at driver 'decision points', that is, at intersections. All of these billboards are sited within the 'cone of vision' of the driver, and in five of these ten cases, the digital billboard forms a background to the traffic signals heads themselves. Being within the cone of vision and the billboard being a background to traffic signals are typically matters that are highlighted as road safety concerns/risks when an application for a new digital billboard is made. Accordingly, it would be expected that accident rates should increase with the billboard in place.

16.2.2. However the data for nine of these ten sites shows that there has been a *decrease* in the accident rates, subsequent to the billboard being installed.

16.2.3. Accidents are by their nature random and infrequent events, and the timeframes for which the post-construction accident analysis has been carried out are relatively short. Under the NZTA Economic Evaluation Manual, a five-year timeframe is required for the determination of an accident rate for any given site, but no digital billboards have been installed for this length of time which precludes such an assessment. Nevertheless, the aggregation of these ten sites means that a total of 152 months of data has been evaluated, which is considered to be a suitably robust data set, especially given that the sites each have particularly 'risky' factors.

16.2.4. A further assessment has been carried out to rebase the data in terms of the number of accidents per million 'views' by drivers (that is, the number of vehicles passing the site where a driver would have the potential to view the billboard).

Location	At Decision Point?	Within Cone of Vision?	Background to Signals?	Accidents Per Million Views	
				Before Billboard	After Billboard
Stanley Street (State Highway 16) / Alten Road, Auckland	Yes	Yes	Yes	0.24	0.09
Broadway / Remuera Road, Auckland				0.39	0.18
Karangahape Road / Ponsonby Road, Auckland				0.22	0.15
Khyber Pass Road / Broadway, Auckland				0.22	0.00
<i>Subtotal</i>				<i>0.26</i>	<i>0.12</i>
Queen Street / Wakefield Street, Auckland	Yes	Yes	No	0.35	0.37
Khyber Pass Road / Symonds Street, Auckland				0.14	0.12
Fanshawe Street / Nelson Street, Auckland				0.17	0.00
Victoria Street / Hobson Street, Auckland				0.13	0.00
Victoria Street / Bealey Avenue, Christchurch				0.09	0.00
<i>Subtotal</i>				<i>0.17</i>	<i>0.19</i>
Total				0.20	0.15

Table 16: Accident Rates at Each Site at a 'Decision Point'

16.2.5. The subtotals and total have been calculated by a weighted sum approach, meaning that there is a bias towards those sites where data has been collected over a longer period of time.

16.2.6. Overall, the rate of accidents per million view decreases post installation of the billboards, and a decrease is seen for those sites where the billboard forms a background to the traffic signal heads. There is a slight increase seen at the Queen Street / Wakefield Street site, and this skews the overall result for those sites where the billboard does not form a background to the traffic signals since the data from this site represents slightly more than half of the data set.

16.2.7. The review also identified that no accidents were recorded at any of the 14 sites assessed where distraction due to an external source (which includes, but is not limited to, digital billboards) was a factor.



17. Conclusions

- 17.1. This report has identified, evaluated and assessed the road safety records and traffic characteristics of 14 sites where digital billboards presently operate. Of the 14 sites, ten were at 'decision points' for drivers (that is, at intersections) and five of these were at locations where approaching drivers are able to see the billboard directly behind the traffic signal head. Both of these factors are commonly mentioned as presenting a particular road safety risk when resource consent applications are made for new digital billboards. As such, it would be expected that the accident rates increase once the billboard is in place.
- 17.2. However, the data shows that the accident rate observed after the billboard was operating is *lower* than the rate observed prior to the billboard being installed and commissioned.
- 17.3. Data is required for a five-year period at each site for a robust determination of an accident rate, but no digital billboards have been in place for this length of time. As a result, the analyses have been based on the aggregation of 152 months of data. While this is less than the ideal of five years of data per site, the data set is considered to be suitably robust, especially given that each of the sites have particular 'high risk' factors and so any adverse trends in safety should be more evident.
- 17.4. In view of the lack of any increase in accident rates after the digital billboards are installed, there is no evidence from the CAS data that the operation of digital billboards gives rise to an increase in the number of accidents.

Carriageway Consulting Limited
May 2016





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Report / Decision on a Resource Consent Application

(Sections 95A, 95B and 104 / 104B)

Application number: RMA/2020/1877
Applicant: Wilsons Parking Limited
Site address: 235 Manchester Street, Central City
Legal description: Part Section 688-697 Town of Christchurch

Zone: Commercial Central City Business

Overlays and map notations: Adjoining a Central City Local Distributor;
 Adjacent to Designation V4 "The Frame - North and East" [Ōtakaro Limited];
 Central City Building Height 28m Overlay;
 Category 2: Lower Noise Level Entertainment and Hospitality Precincts;
 Central City Core Overlay;
 Central City Inner Zone; and
 Liquefaction Management Area (LMA).

Activity status: Discretionary

Application: To establish freestanding offsite digital signage.

Proposed activity

Wilson Parking Limited ("the Applicant") seeks land use consent to establish and operate an 36m² double sided free standing digital billboard, at 235 Manchester Street, Central Christchurch ("the subject site").¹

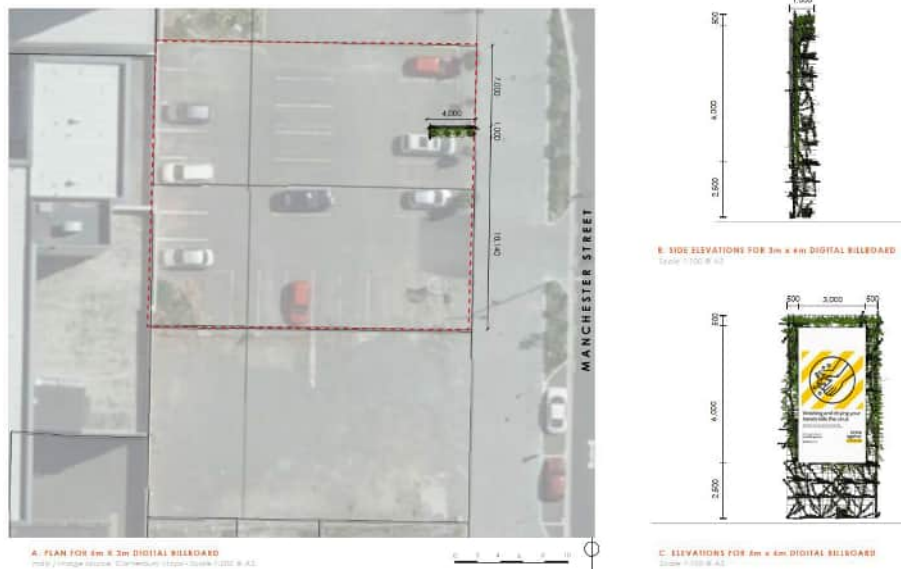


Figure 1. Snip from Applicant's plan set illustrating the subject sign.

The steel support structure holding the digital screen will measure approximately 4m wide by 9m high, and will contain a number of creeping plant species. The digital screen itself will measure approximately 6m high by 3m (having a portrait format), and will be situated at a height starting at 2.5m above ground level. The double sided sign will face north and south to capture audiences travelling along Manchester Street. The Applicant has

¹My measurement of 36m² is drawn from the definition of billboard, meaning "an **outdoor display board** of not less than 18m² in area which is used to advertise goods, services, products or events that are not directly related to the use or activities occurring on the site on which the board is physically located. **It includes both the display board and any associated supporting device whether permanent, temporary or movable**". [Emphasis mine].

While the digital sign face is 18m² this sign is framed by an additional 18m² in additional display area containing plantings which are proposed to mitigate the visual effects of the screen, and associated supporting devices.

proposed to operate the sign in accordance with a range of consent conditions commonly used for digital signage, with these conditions addressing matters in relation to lighting, glare and image selection. Other pertinent details relating to the proposal appear in the Applicant's assessment of environmental effect [AEE] located in Section 3 Description of the Proposal. I have included a snip from the Applicant's plan set for context above (refer to **Figure 1**).

To assist the decision maker, I have included a table of contents below:

Document	Page Numbers²
'Application for Resource Consent' - 27/08/2020 [Original Proposal]	1 - 21 of 163
The Certificate of Title [Appendix A]	22 - 23 of 163
Urban Design and Visual Impact Assessment - 27/08/2020 [Appendix B]	24 - 37 of 163
Visual Landscape Assessment [Appendix C]	38 - 51 of 163
Record of Outline Plans Related to Designation V4 [Appendix D]	52 - 53 of 163
Proposed Conditions [Appendix E]	54 - 55 of 163
Listed Land use Register (LLUR) [Appendix F]	56 - 62 of 163
RMA/2017/467 for 221 Manchester Street [Appendix G]	63 - 73 of 163
Response to Further Information Request - 02/11/2020	74 - 75 of 163
Urban Design and Visual Impact Assessment Updated in Response to Further Information Request - 02/11/2020 [Attachment A]	76 - 93 of 163
Further Assessment Letter - 25/11/2020	94 - 99 of 163
Letter to Commissioner - 10/02/2021	100 - 104 of 163
Assessment of Transportation Matters Report - 02/02/2021	105 - 163 of 163

I have also created a table of expert evidence and ancillary information that I have relied on in assessing this consent which can be found below.

Document	Page Numbers³
Urban Design Assessment - H. Nicholson - 25 Feb 2021 [Appendix 1A]	1 - 11 of 27
Transportation Assessment Peer-Review - A. Downard-Wilke - 26 Feb 2021 [Appendix 1B]	12 - 16 of 27
Site Visit Photographs - R. Ordelheide - 12 Nov 2020 [Appendix 1C]	17 - 26 of 27
Heritage Assessment - S. Richmond - 17 Sep 2020 [Appendix 1D]	27 of 27

Description of site and existing environment

The assessment of this consent hinges on an accurate understanding of the subject site, its history, and the broader receiving environment.

The subject site is a 719m² currently undeveloped section on the eastern side of the Central City Core Overlay. The site sits on the western side of Manchester Street, mid-block between Gloucester Street and Worcester Street, and is zoned as Commercial Central City Business Zone.⁴ Manchester Street is identified in the District Plan as a Central City Local Distributor Road⁵ and has a 30km/hr speed limit. This sign is proposed to be located:

² Page numbers are in reference to the document saved in TRIM titled 'Resource Consent - Draft Document' [21/180371].

³ Page numbers are in reference to the document saved in TRIM titled 'Council Expert Input Document (Compiled) - 02 Mar 2021' [21/245996].

⁴ The Commercial Central City Business Zone is described informally on planning maps in districtplan.ccc.govt.nz as 'the principal employment and business centre for the City and wider region and the primary destination for a wide range and scale of activities including comparison shopping, dining and night life, entertainment activities, recreation and community activities as well as civic and cultural venues, events and tourism activities'. This description comes with the caveat that it cannot be used to assist interpretation of the District Plan; however, in my view it succinctly sums up the outcomes sought in this zone. A full list of permitted activities can be found in Rule 15.10.1.1, but briefly these include retail, commercial services, entertainment, community facilities, health care facilities, residential activities, offices, and guest accommodation.

⁵ Appendix 7.5.12 [Road Classification System] / Table 7.5.12.1 [Explanation of Movement and Place Categories] defines a Local Distributor Street as "A specific type of collector road which are important for distribution and traffic to parking precincts or provide for public transport movements. Local Distributor Streets are the third highest order link types and are important for the distribution of traffic to parking precincts, or to provide for public transport movement."

- 40m south of the signalised intersection of Gloucester Street and Manchester Street; and
- 50m north of the signalised intersection of Worcester Street and Manchester Street.

The site is currently used as a Wilson's Car Parking Site consented under RMA/2018/1437. This application sought "to establish 256 temporary carparks on six separate sites within the Central City Core in the block bounded by Gloucester Street, Manchester Street, Worcester Street, and Cathedral Square" for a time period of five [5] years. This consent was granted on 19 February 2018 by Commissioner David Mountfort and is due to expire on 19 February 2023.

The following sites adjoin the subject site to north and south and are also used as temporary car parking consented under RMA/2018/1437, or are vacant undeveloped sites informally used as off street car parking.

- 127 Worcester Street [Lot 1 DP 2184];
- 133 Worcester Street [Lot 2 DP 2184];
- 221 Manchester Street [Lot 3 DP 2184];⁶
- 227 Manchester Street [Pt Sec 688 Christchurch Town];
- 239 Manchester Street [Pt Sec 691 Christchurch Town]; and
- 245 Manchester Street [Pt Sec 689, 689 Christchurch Town].

The site immediately adjoining to the west at 109 Worcester Street contains the Cathedral Junction Shopping Precinct which contains a mixture of retail and convenience activities, restaurants, and two guest accommodation providers [i.e. Hotel 115, and Quest Apartment Hotels]. I understand that both of these guest accommodation providers operate predominantly as short- to medium-stay guest accommodation activities, I also acknowledge that this site is subject to a unit title scheme and that some permanent residential activities occur on this site as well. I am not clear as to where the long term residences are located within this development.

The site adjoining to the northwest at 166 Gloucester Street [i.e. Pacific Tower] contains the Rendezvous Hotel and a number of executive high rise residential apartments. In a similar manner, this site is subject to a unit title scheme and some permanent residential activities occur on this site. I am not clear as to where the long term residences are located within this development. The site to the east of the Pacific Tower at 168 Gloucester Street [i.e. Sampan House] contains a restaurant.

Approximately 75m to the south of the proposed billboard are a number of heritage items listed in Appendix 9.3.7.2 [Schedule of Significant Historic Heritage]. These are detailed below:

- The most western heritage feature can be found at 28 Cathedral Square [item no. 575] containing the Former Government Buildings and Setting, now Heritage Hotel, which is annotated as highly significant.
- 116 Worcester Street contains the Former State Insurance Building [item no. 577], which is annotated as highly significant.
- 124 Worcester Street contains the Former Trinity Congregational Church and Setting [item no. 580], which is annotated as highly significant. Immediately south of this at 217 Manchester Street is a building annotated as a former commercial building [item no. 256] and is listed in the plan as being significant.

What is happening east of Manchester Street is equally important in the assessment of the consent. Following the February 2011 Christchurch Earthquake, central Government drafted the Christchurch Central Recovery Plan [CCRP] as a blueprint for the recovery of the Central City. The CCRP has a contentious history which would be inappropriate to rehash here; however, this plan was published in July of 2012 and defined 17 anchor projects which would contribute to the recovery of the city. The Greater Christchurch Regeneration Act 2016 requires that decisions and recommendations on resource consent applications are not inconsistent with the CCRP.

'The Frame' is one of the anchor projects referred to above and which is critical to the understanding of this proposal. The description of the frame is as follows: "Defining the Core, and providing new green space and a range of commercial and residential development opportunities, the Frame will reshape central Christchurch. Its

⁶ The Applicant references this site in their original AEE [page 15]. Consent has been granted on this site for a three storey mixed-use commercial and residential building which is proposed to contain a 55m² billboard on the northern elevation of the building and a 13m² billboard on the western elevation of the building under RMA/2017/467. This consent was granted on 9 June 2017. Condition 3 of this consent reads as follows: "the billboards on the northern and western building facades shall only be in place for a maximum of five years from the date of first occupancy of any of the commercial or residential units in the building. After this time the billboards shall be removed". This consent has not yet been given effect to and is due to lapse on 9 June 2022.

three components - East, South and North - each have their own distinct character, while the Urban Gateways in the north-west and south-east provide vibrant entry points to the central city”.⁷

The land immediately opposite the application site was identified in the CCRP as the East Frame, and is now designated “V4” in the District Plan, being The Frame - North and East. The distinct character of the East Frame is as follows:

- City-wide family playground.
- Retains the form of historic Latimer Square.
- Street links through from city to east.
- Paths for walking and cycling.
- Medium-density demonstration housing and long-term residential development.
- Provides link to the stadium and potential fan zone.
- Facilitates temporary events.
- A significant opportunity through views and vistas to enhance links to geographical landmarks.

In the section ‘Statutory Direction to Amend District Plan’, The Frame is described as a “high amenity open space and campus style development [which] will frame the new Central City Business zone to the north, east and south. This open space frame achieves the dual goals of **improving the amenity and attractiveness of the Central City** as well as providing a clear edge to the Central City Business Zone”.⁸

[Emphasis mine].

Thereafter, the East Frame is described as “enabling a range of events and activities including **parklands, playgrounds, walking and cycling tracks, places and spaces for quiet contemplation**, food and beverage facilities and **residential development**. Existing buildings consistent with the function of the Frame may be retained and further buildings may be developed over time in this location”.⁹

[Emphasis mine].

In addition, I note that as part of the Accessible City Chapter [ACC] of the CCRP, the interface between Central City Core and the East Frame is described as follows: “A soft edge between the Core and the East Frame will be created by converting Manchester Street between Armagh and Lichfield Streets into a boulevard. This will separate public transport and other vehicles, provide access to businesses, and ensure a high-quality connection between the Core and the East Frame. In addition to footpaths and on-road cycling on Manchester Street itself, cycle and walking paths will be developed in the Frame... [A] ‘Super Stop’ will be provided on Manchester Street (between Gloucester and Worcester Streets), providing a walking link into the northern half of the Core. These super stops will provide passenger waiting facilities sheltered from the weather, quality information, and dedicated cycle parking facilities nearby”.¹⁰ Super Stops are described in this plan as being “high quality”. The update of Manchester Street was completed in July 2018 after the Crown rebuild company Ōtākaro Ltd finalised the end of an extensive \$20 million upgrade.¹¹

This explanation of the planning history of the surrounding area is relevant in understanding the intent behind the designation V4 “The Frame - North and East” [Ōtākaro Limited]. This designation is currently active on the East Frame ‘superblocks’ at the following addresses:

- 210 Armagh Street;
- 218 Armagh Street;
- 199 Armagh Street;
- 205 Gloucester Street;
- 235 Gloucester Street;
- **192 Gloucester Street;**
- **198 Gloucester Street;**
- 132 Worcester Street;

⁷ Christchurch Central Recovery Plan [July 2012], pg. 35. This description goes on to state: “The Frame in tandem with zoning provisions, reduces the extent of the central city commercial area so that the oversupply of land is addressed. It will help to increase the value of properties generally across the central city in a way that regulations to contain the central core, or new zoning decisions, could not. The Frame helps to deliver a more compact core while diversifying opportunities for investment and development. The Frame allows the core to expand in the future if there is demand for housing or commercial development”.

⁸ Ibid, pg. 103.

⁹ Ibid, pg. 107.

¹⁰ Christchurch Central Recovery Plan: An Accessible City Replacement Transport Chapter [October 2013]. pg. 13.

¹¹ Hayward, M. (2018). Key Christchurch Street to reopen to two way traffic for the first time in two years. 13 July. Stuff. Available at: <https://www.stuff.co.nz/the-press/business/105459878/key-christchurch-street-to-reopen-to-two-way-traffic-for-the-first-time-in-two-years>

- 184 Hereford Street;
- 192 Cashel Street;
- 212 Cashel Street;
- 214 Cashel Street; and
- 224 Cashel Street.

[Emphasis mine].¹²

This designation is still active, but due to lapse on 31 July 2022. Its purpose is described as follows:

- Open space, park land;*
- Family playground;*
- Walking/cycling tracks;*
- Stormwater management;*
- Memorial sites;*
- Residential units;*
- Retail/food and beverage;*
- Christchurch club;*
- Amenities;*
- Temporary activities;*
- Public art;*
- Leisure and recreation activities and facilities including gymnasium facilities; and*
- Ancillary activities including car parking.*

On 18th November 2020 a partial removal of some of the sites that were designated was confirmed. The two applications related to some 105 sites which were surplus to Ōtākaro Limited's needs to give effect to the designation. Amongst others, Christchurch Club, Les Mills, some of the sites owned by Fletcher Living Ltd, the Margaret Mahy playground, CTV memorial site, some of the public realm laneways and gathering spaces and Rauora Park are no longer designated.

A resource consent has been given effect to for the superblock at 198 Gloucester Street. RMA/2019/1858 described the activity as: *“to construct a 68 unit residential development on ‘Superlot 3’ of the East Frame, in the City block bordered by Gloucester Street, Latimer Square, Worcester Street, and Rauora Park”*.

To the west of 198 Gloucester Street is the high amenity, linear, Rauora Park which provides connectivity in a north-south direction between the Margaret Mahy Playground and High Street.

To the west of Rauora Park, and directly opposite Manchester Street from the subject site, is the superblock at 192 Gloucester Street. This site is currently used as a temporary carpark. A consent was granted under RMA/2020/2633 on 10 December 2020 to allow for this site to continue to be used as temporary car parking for an additional 12 months until the end of December 2021, *“after which the application states the site is to be developed under an existing contractual obligation”*.

This consent goes on to state: *“Fletcher Living have provided further information in support of the application, including confirmation that a further extension of the carpark activity will not be sought at the expiry of this current proposed timeframe: We have completed Phase/Stage One of the One Central Development with only 10 of the 172 homes still for sale. We have recently commenced Phase/Stage two of the development with construction underway at Superlot 3 and Superlot 6C. Superlot 10 along Manchester Street is currently in design phase. Superlot 12 will be developed in the future as part of the One Central development but as we have seen with all of the Superlot developments to date, the timings are all moveable so I can't give a fixed date for commencement. Suffice to say we will not look to extend the commercial car parking aspect of it beyond the current consent application by Gap Filler...”*

A site visit was undertaken on 12 November 2020. Photographs of this site visit can be found in **Appendix 1C** of this report.

To assist the decision maker, I have including zoning maps and aerial imagery below (refer to **Figure 2** and **Figure 3**).

¹² These superblocks are anticipated to be the most directly affected by this proposal due to their close proximity, as set out in the following assessment.

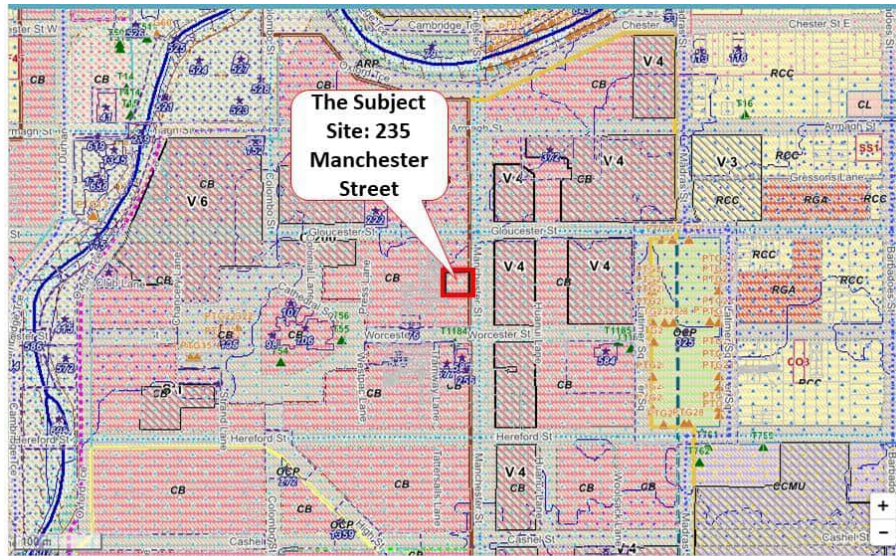


Figure 2. Snip from the District Plan Zoning Maps.



Figure 3. Snip from aerial imagery showing the subject site and surrounding environment.

Activity status

Christchurch District Plan

The site is zoned **Commercial Central City Business** in the Christchurch District Plan.

The proposal requires resource consent for a **Discretionary** activity under the following rules:

Activity status rule	Standard not met	Reason	Matters of control or discretion	Notification clause
6.8.4.1.4D1	-	<p>The proposed billboard is:</p> <p>a. not “provided for” by:</p> <p>i. Rule 6.8.4.1.3 RD2 because it cannot meet the built form standard in Rule 6.8.4.2.6.</p> <p>ii. Rules 6.8.4.1.1 P11 or P15, 6.8.4.1.3 RD3 or RD5, or 6.8.4.1.5 NC1 because it does not meet the description in those rules; and</p> <p>b. it is:</p> <p>i. an off-site sign that is not “provided for” by Rule 6.8.4.1.1 P2, P3, P4, P5, P6,</p>	None.	No clause.

Activity status rule	Standard not met	Reason	Matters of control or discretion	Notification clause
		P12, P13, or P16 because it does not meet the descriptions in those rules; and ii. a digital sign.		
6.8.4.1.4 D2	6.8.4.1.3 RD2 Off-site digital billboard in a commercial zone which does not meet the relevant built form standards in Rule 6.8.4.2.6 [Free-standing signs].	<u>Permitted</u> - For signs relating to vehicle entrances: - 2m maximum width; - 9m ² maximum total area; and - 6m maximum height. <u>Proposed</u> - - 4m wide; - 9m high; and - 36m ² total area.	None.	No clause.

For completeness, I note the following:

- There are no relevant provisions associated with this site's location in the following areas [except where assessment is required through a relevant matter of discretion and/or control, or through the objectives and policies]:
 - Adjoining a Central City Local Distributor;
 - Adjacent to Designation V4 "The Frame - North and East" [Ōtākaro Limited];
 - Central City Building Height 28m Overlay;
 - Category 2: Lower Noise Level Entertainment and Hospitality Precincts;
 - Central City Core Overlay; Central City Inner Zone; and
 - Liquefaction Management Area (LMA).
- The District Plan defines **Billboard** as "an outdoor display board of not less than 18m² in area which is used to advertise goods, services, products or events that are not directly related to the use or activities occurring at the site on which the board is physically located. It includes both the display board and any associated supporting device whether permanent, temporary or moveable."

This proposal meets the definition of a billboard. However, billboards are only specifically referred to in District Plan Chapter 6.8 [Signs] Rules: 6.8.4.1.1 P15, 6.8.4.1.3 RD3, and 6.8.4.1.5 NC1.

- The District Plan defines **Digital Sign** as "an internally lit sign that displays electronic messages and/or images".

I have assessed this proposal as a digital sign as it meets the definition.

- The District Plan defines **Free-Standing Sign** as "a sign which is fixed to the ground rather than a building (see Appendix 6.11.8 Signage – Diagram 8). It may be erected on a pole or other support structure. It excludes signs which are erected on or over the Transport Zone".

I have assessed this proposal as a free-standing sign as it meets the definition.

- The District Plan defines **Off-Site Sign** as "a sign which is used to advertise activities, goods, services, products or events that are not directly related to the use or activities occurring at the site on which the sign is physically located. It includes posters and poster boards and any other associated supporting device whether permanent, temporary or moveable".

I have assessed this proposal as an off-site sign as it meets the definition.

Written approvals [Sections 95D, 95E(3)(a) and 104(3)(a)(ii)]

No written approvals have been provided with the application.

NOTIFICATION ASSESSMENT

Adverse effects on the environment and affected persons [Sections 95A, 95B, 95E(3) and 95D]

When assessing whether adverse effects on the **environment** will be, or are likely to be, more than minor, any effects on the owners and occupiers of the application site and adjacent properties must be disregarded (section 95D(a)). The assessment of **affected persons** under section 95E includes persons on adjacent properties as well as those within the wider environment.

As a **Discretionary Activity**, assessment of this proposal is unrestricted and all actual and potential effects must be considered. Guidance as to the effects that require consideration is contained in the relevant objectives and policies, and any associated matters of discretion or control.

In review of this proposal, the Applicant has provided the following assessment which I have turned my mind to. These assessments are listed as follows:

- The AEE located in Section 5 of the original proposal.¹³
- The Urban Design and Visual Impact Assessment [Appendix B].¹⁴
- The Visual Impact Assessment [Appendix C].¹⁵
- The s92 Request for Further Information Response Dated 2 November 2020, and the Urban Design and Visual Impact Assessment [Attachment A].¹⁶
- The Further Assessment Letter dated 25 November 2020.¹⁷
- The Letter to the Commissioner dated 10 February 2021.¹⁸
- The Carriageway Consulting Assessment of Transportation Matters dated 2 February 2021.¹⁹

Sections 95D(b) and 95E(2)(a) allow the adverse effects of activities permitted by the District Plan or an NES to be disregarded (the “permitted baseline”).

The Applicant has put forward a permitted baseline argument in Section 5.2 of their proposal which relies heavily on the types of free-standing signs which could be established as a permitted activity by Rule 6.8.4.1.1 P1 / 6.8.4.2.6 Free-Standing Signs; notably these are static (non-digital) free-standing signs relating to the onsite activities.

In the context of the current use of the subject site, a non-fanciful and reasonable permitted baseline would be a sign akin to a static Wilsons Car Park on-site sign which has a maximum width of 2m, maximum height above ground level of 6m, and a maximum total area of 9m². The subject site has one formed vehicle access and as such would be permitted one free-standing sign. In my view, such a sign would be legible and directly tied to the use of the site and appropriate to the receiving environment (see **Figure 4** below as an example).

¹³ 'Resource Consent - Draft Plans', TRIM Record 21/180371; pages 13-18 of 163.

¹⁴ Ibid; pages 24-37 of 163.

¹⁵ Ibid; pages 38-51 of 163.

¹⁶ Ibid; pages 74-93 of 163.

¹⁷ Ibid; pages 94-99 of 163.

¹⁸ Ibid; pages 100-104 of 163.

¹⁹ Ibid; pages 105-163 of 163.



Figure 4. Snip from proposal as an example of what could be considered a permitted free-standing sign [for the avoidance of doubt, not the actual sign tied to the subject site].

As part of their permitted baseline analysis, the Applicant asserts that the District Plan Rule 6.8.3, Advice Note 4 enables digital signage where it is located internal of the building with no limitations placed on the size or nature of display including image controls, luminance values, use of retroreflective material and the like. This statement is partially correct. The advice note reads in full as: “*These rules do not apply to signs affixed inside a building unless affixed to the interior surface of any window or door in order to provide for external display visible from a public place for any of the purposes described in the definition of ‘sign/signage’.*” The Applicant is not proposing a billboard affixed to the inside of a building nor have they put forward a plausible permitted baseline in this regard. In addition, there are no mechanisms available to the Applicant lawfully establish a new building in this zone due to the presence of Rules 15.10.1.2 C1 and 15.10.1.3 RD1 which both regulate new buildings within the Central City Core, visible from a publicly owned and accessible space, and which require consideration against the urban design matters in Rule 15.13.2.6 [Commercial Central City Business Zone Urban Design].

What has actually been advanced in this statement by the Applicant is similar to an anticipated development model approach. Case law (*Sydney Street Substation v Wellington City Council* [2017] NZHC 2489) has opined on the problematic nature of taking such an approach [e.g. an anticipated development model is not the same as a permitted baseline and is not a matter that Council can lawfully take into account]. I have exercised my discretion to not consider this further.

In short, there is no permitted baseline by which an off-site digital sign akin to what I am currently assessing could be established as a permitted activity in the Commercial Central City Business Zone.

The objectives and policies in the District Plan set the context for assessing the effects of the application. My assessment is as follows:

Policy 6.8.2.1.1 [Enabling signage in appropriate location] -

a. Enable signage:

- i. As an integral component of commercial and industrial environments, strategic infrastructure and community activities throughout the Christchurch District; and
- ii. That is necessary for public health and safety and to provide direction to the public.

For the reasons laid out below, I do not consider this to be an appropriate location to enable a sign of this type and size. While this is a commercial zone, I do not consider it to be a ‘commercial environment’ per se.

Policy 6.8.2.1.2 [Controlling Signage in Sensitive Locations] -

- a. Ensure the character and amenity values of *residential, open space and rural zones* are protected from adverse visual and amenity effects from large areas or numbers of signs, or off-site signs within these zones.

Assuming one takes a literal reading of this policy, the subject site is not a sensitive location as contemplated Policy 6.8.2.1.2 as it is not zoned residential, open space, or rural.

Policy 6.8.2.1.3 [Managing the Potential Effects of Signage] -

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

For my assessment of Policy 6.8.2.1.3 a. iv., I am also turning my mind to the following relevant policy:

Policy 15.2.6.5 [Pedestrian Focus] -

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

[Emphasis mine].

In informing my assessment under Policy 6.8.2.1.3, I have been informed by the documents provided by the Applicant listed at the beginning of this section. I have also considered the following expert advice.

- The urban design assessment compiled and submitted by Council Urban Design Consultant, Mr Hugh Nicholson (dated 25/02/2021) [**Appendix 1A**].
- The heritage assessment compiled and submitted by Council Heritage Advisor, Ms Suzanne Richmond (dated 17/09/2020) [**Appendix 1D**].

I have accepted and given preference to the advice provided by Mr. Nicholson and Ms. Richmond, except as noted below where I add my own thoughts on the matters raised.

- Referencing **Appendix B** of the Applicant's proposal, I disagree with Mr. Compton-Moen's ratings for "*Magnitude of Change*" and see no justification for the uniformly 'Low' ratings provided particularly with regard to the ratings for close views (>100m) for pedestrians, users of the superstops, cyclists, and potential future residents in the East Frame. Based on expert evidence provided by Mr Nicholson, a digital billboard is assessed to be one of the visually 'brighter', or dominant elements in these view sheds and the changing images will further attract a viewer's attention. I concur with Mr. Nicholson's findings and am of the opinion that an adverse effect that is more than minor will be felt by pedestrians, cyclists, and bus patrons moving through the high quality and amenity Manchester Street corridor.
- Referencing the same document, I disagree with Mr. Compton-Moen's rating of "*Effects*" as uniformly less than minor and based upon the agreed 'High' ratings for *Sensitivity to Change* from certain viewpoints. Based on the evidence put forward by Mr Nicholson, I consider that there would be adverse visual effects resulting from the proposal at a scale that is at least minor or more.
- Mr. Compton-Moen's report concludes that the digital billboard "*is not considered to adversely affect (sic) the character and amenity values*" of nearby spaces Rauora Park and the Margaret Mahy Playground. In addition, he considers that these signs add vibrancy, activity and visual interest to the site. In my view, no justification is provided for these statements. I disagree with the assumptions made to inform this assessment. Mr. Compton-Moen places emphasis on the existing environment, whereas Mr. Nicholson

considers the existing environment in tandem with the anticipated environment. For this reason, I prefer Mr. Nicholson's approach. In addition, I note that the District Plan explicitly identifies that off-site and digital signage can have adverse visual and amenity effects as evidenced by the requirement for resource consent. I have given no further weight to Mr. Compton-Moen's assessment in this regard.

- The Applicant's Further Assessment Letter, dated 25 November 2020, makes the following statement: "*Mr. Nicholson is incorrect to assume that future activity at 192 Gloucester will be residential...*".²⁰ I am of the view that the Applicant is correct in this regard. In the absence of a resource consent lodgement with Council, it would be inappropriate for one to assume that a residential activity will locate on the site at 192 Gloucester Street. However, I am of the view that it would also be an error of law to disregard the ensemble of planning instruments which give effect to The Frame, the V4 designation, and the efforts of stakeholders in this area. As outlined in the sections above, there is a significant volume of contextual information which points to the potential for residential activities to locate on this site in a manner consistent with other locations in the East Frame. I acknowledge that there is a tension in the plan and a degree of uncertainty here. My view is that one cannot treat the receiving environment as a standard commercial environment. This is a mixed-use environment that skews towards residential and open-space due to the designation, and which requires a higher degree of visual amenity than most other parts of the Central City Core. The decision maker must ultimately determine what weight to give this context.

On balance, I consider this proposal to be inconsistent with Policies 6.8.2.1.3 and Policy 15.2.6.5. The proposal will detract from the anticipated character and amenity of the surrounding area, as informed by the District Plan and the CCRP; particularly the residential and public realm spaces. The free-standing and digital nature of the billboard on a vacant site further exacerbates these effects and the proposal does not enhance this location within the Central City. I accept Mr. Nicholson's assessment of effects as ranging from low to high, depending on location and separation distance. Those locations closest to the subject site will experience a high degree of adverse effects. In my view any actual and potential effects on the environment will be **more than minor**, and there are affected persons.

Policy 6.8.2.1.4 [Transport Safety] -

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

In informing my assessment under Policy 6.8.2.1.4, I have been informed by the documents provided by the Applicant listed at the beginning of this section. I have also considered the following expert advice.

- The Assessment of Transportation Matters Report, compiled by Mr. Andy Carr at Carriageway Consulting (dated 02 February 2021).
- The Transportation Assessment Peer-Review Memo, compiled by Mr. Axel Downard-Wilke at ViaStrada (dated 26 February 2021) [**Appendix 1B**].

I have accepted and given preference to the advice provided by Mr. Downard-Wilke, for the reasons established below. I acknowledge that I am taking a conservative approach and note that not all information which could and should be provided by the Applicant, has been tabled as outlined in Section 3 of **Appendix 1B**. For this assessment I refer to **Figure 5** which has been reproduced from Mr. Carr's report.

²⁰ The Further Assessment Letter, dated 25 November 2020. p. 98 of 163.

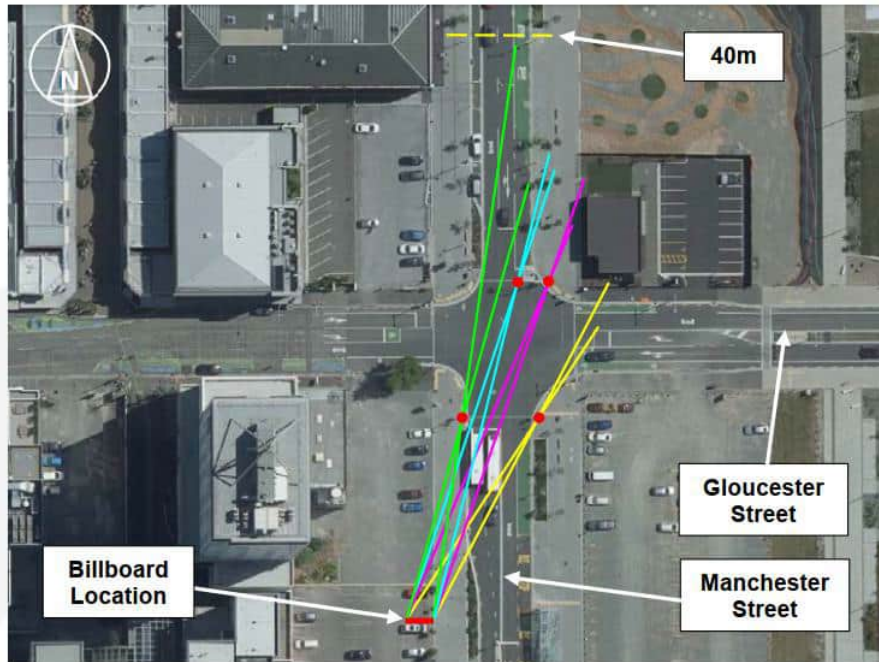


Figure 5. Area's of Potential Visual Overlap between traffic signals and billboard at Gloucester Street Intersection.

- This assessment concentrates on drivers travelling southbound towards Gloucester Street only; the equivalent issues for northbound drivers approaching Worcester Street do not exist.
- Mr. Carr's report states that for a 40km/h operating speed, the approach sight distance (ASD) to be used for analysis is 40m. The ASD represents the distanced travelled by a vehicle as driver observes, responds and then brakes. ASD represents the last point where a driver can be expected to stop if the signal changed from green to amber. However, Mr. Downard-Wilke identifies that Manchester Street has a slower operating speed of 30km/h which reduces the assumed reaction time to 1.5m seconds, and therefore reduces the ASD to 34m.
- With an ASD of 34m, the critical decision zone is pushed towards the intersection. This means that the billboard will form the background to one of the traffic signals that drivers may be observing at the time, located on the southwest corner of the intersection.
- Mr. Carr's report presents assessment that a "driver is more likely to be looking ahead to the primary and overhead primary signals". In contrast, Mr. Downard-Wilke presents assessment that drivers may be looking in any number of directions: "drivers intending to turn right into Gloucester Street are most likely to look at sign pole 5 [southwest corner]. Other drivers may look in a specific direction because something has caught their attention (e.g. like an electronic billboard)".
- Section 4.1.6 of Mr. Carr's report presents information relating to parallax effect and colour blindness. This expert asserts that "it will be evident to a driver that the lantern of the signals is separate to the billboard". Mr. Downard-Wilke responds to this by identifying that "drivers may be distracted by a variety of environmental conditions, but the reason that they still react to change in traffic signal status is that the stimulus coming from the change is high enough to get noticed. If a driver concentrates on an electronic billboard, with the traffic signal in the foreground, a signal change may create a stimulus through a combination of parallax (possibly a weak stimulus) and the colour change of the signals (potentially the much stronger stimulus)". Thereafter, Mr. Downard-Wilke presents a series of questions:
 - What happens if the light change (e.g. from green to yellow) occurs at the same time as the dominant colour of the billboard changes from green to yellow?
 - Colour-blindness is a common handicap and for these persons, and the difference between lights going green to yellow is muted for many of these individuals. What happens for these persons when the billboard content and the traffic signals change at the same time? There is a risk that colour blindness may result in drivers not receiving a stimulus high enough when signal changes occur.
- Mr. Downard-Wilke notes that there is an inherent risk when electronic billboards form the backdrop to traffic signal heads. This risk occurs when the lights and billboard change at the same time, as the stimulus received from the traffic light change might be insufficient for it to register with the driver. This risk is greatly increased for those who suffer from colour blindness.
- Finally, Mr. Downard-Wilke recommends that a vertical assessment of overlap should be undertaken. Drivers at varying eye heights may be affected differently by the configuration of the billboard forming the backdrop to the traffic signal. From this, we should be able to understand:
 - what are the risks presented to the drivers of buses?

- what are the risks to the drivers of trucks?
- what are the risks to the drivers of emergency vehicles like fire appliances?
- what are the risks to the drivers of cars?

These residual risks are not addressed in Mr. Carr's report.

Given the risks to the public, I accept and give preference to Mr. Downard-Wilke's assessment that there is overlap of the traffic signals and the proposed billboard for drivers in the critical decision zone for southbound drivers on Manchester Street. This likely will create risk, with the most significant consequences arising from a driver not noticing the signals changing away from green.

On balance, I consider this proposal to be inconsistent with Policies 6.8.2.1.4. In my view, any actual and potential effects on the environment will be **more than minor**.

Policy 6.8.2.1.5 [Temporary signage and signage managed by other agencies] -

- a. *Enable temporary signage subject to meeting basic activity and built form standards.*
- b. *Enable signage required or controlled through other legislation or government agencies.*

The Applicant has not applied for this activity based on it being temporary. This is not signage required or controlled through other legislation or government agencies. I do not consider this policy to be relevant for these reasons.

Policy 6.8.2.1.6 [Managing Off-Site Signage] -

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

My assessments above under Policies 6.8.2.1.2, 6.8.2.1.3, and 6.8.2.1.4 are applicable to my assessment of this proposal against the matters in Policy 6.8.2.1.6. I adopt these assessments and have relied on expert evidence to form my view.

- Due to the unique nature of the receiving environment, and the nature of the sign proposed, I do not consider the proposed sign to be compatible in this context.
- The Applicant has offered conditions of consent which address maintenance issues in **Appendix E**.
- I have accepted and relied on Mr. Nicholson's concerns that:
 - The proposed sign does not enliven the space or result in a more orderly or coordinated display. The surrounding area has two large scale murals, and the free-standing and digital nature of the billboard will diminish the high amenity pedestrian environment recently installed along Manchester Street.
 - The proposed planting / green element is unlikely to provide a full coverage of the mesh frame, and is unlikely to achieve growth to the full extent of the frame in under three years. This proposal has been assessed as a steel mesh frame with plants growing on it.
 - For these reasons, I concur with Mr. Nicholson that this sign will contribute to visual clutter.
- For the reasons established throughout this assessment, I consider this proposal to be inconsistent with the outcomes sought in Policy 6.8.2.1.3.

On balance, I consider this proposal to be inconsistent with Policies 6.8.2.1.6. In my view, any actual and potential effects on the environment will be **more than minor**.

Conclusion

Overall, I consider that any actual and potential adverse effects on the environment will be **more than minor**, and there are affected persons.

s95B - Limited Notification

For the purposes of regulation 10 in the Resource Management (Forms, Fees, and Procedures) Regulations 2003, I turn my mind to affected persons. In considering this proposal, I consider the following persons affected:

1. Ōtākaro Limited.
2. Fletcher Living Ltd.
3. The potential residential unit owners at 198 Gloucester Street.
4. The Christchurch Club at 154 Worcester Street.
5. The residential units at 1-6/197 Hereford Street.
6. The owner(s) and guest accommodation operator at the Urbanz Accommodation Christchurch building at 273 Manchester Street.
7. The owner(s) and occupier(s) of the Unimed Building at 165 Gloucester Street.
8. The owner(s) and occupiers(s) of Sampan House at 168 Gloucester Street.
9. The owner(s) and occupier(s) of any unit title apartments in Pacific Tower, specifically on the building's eastern and southern elevations which overlooks the subject site.
10. The owner(s) and occupier(s) of any unit title apartment in the Quest Apartment Hotel, specifically on the building's eastern elevation which overlooks the subject site.
11. The owner(s) and occupier(s) of any unit title apartment in the Heritage Hotel, specifically on the building's easternmost northern façade, and on upper floors.
12. The owner(s) and any potential occupier(s) of the Former State Insurance Building at 116 Worcester Street.
13. The owner(s) and any potential occupier(s) of the Trinity Congregational Church at 124 Worcester Street.

Notification tests [Sections 95A and 95B]
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Sections 95A and 95B set out the steps that must be followed to determine whether public notification or limited notification of an application is required.

PUBLIC NOTIFICATION TESTS – Section 95A	
Step 1: Mandatory notification – section 95A(3)	
➤ Has the applicant requested that the application be publicly notified?	No
➤ Is public notification required under s95C (following a request for further information or commissioning of report)?	No
➤ Is the application made jointly with an application to exchange reserve land?	No
Step 2: If not required by Step 1, notification is precluded if any of these apply – section 95A(5)	
➤ Does a rule or NES preclude public notification for all aspects of the application?	No
➤ Is the application a controlled activity?	No
➤ Is the application a restricted discretionary or discretionary activity for a subdivision?	No
➤ Is the application a restricted discretionary or discretionary activity for residential activity on land that, under the District Plan, is intended to be used solely or principally for residential purposes?	No
➤ Is the application a boundary activity?	No
Step 3: Notification required in certain circumstances if not precluded by Step 2 – section 95A(8)	
➤ Does a rule or NES require public notification?	No
➤ Will the activity have, or is it likely to have, adverse effects on the environment that are more than minor (discussed above)?	Yes
Step 4: Relevant to all applications that don't already require notification – section 95A(9)	
➤ Do special circumstances exist that warrant the application being publicly notified?	No

In accordance with the provisions of section 95A, the application **must publicly notified**.

Section 95B only applies where the application is not publicly notified under section 95A. However, for completeness, and should the decision maker determine that public notification is not necessary, I have considered the steps in section 95B below. I have also identified above affected parties in order for notice to be served correctly under regulation 10 of the Resource Management (Forms, Fees, and Procedures) Regulations 2003.

LIMITED NOTIFICATION TESTS – Section 95B
Step 1: Certain affected groups/persons must be notified – sections 95B(2) and (3)

➤ Are there any affected protected customary rights groups or customary marine title groups?	No
➤ If the activity will be on, adjacent to, or might affect land subject to a statutory acknowledgement - is there an affected person in this regard?	No
Step 2: If not required by Step 1, notification is precluded if any of the following apply – section 95B(6)	
➤ Does a rule or NES preclude limited notification for all aspects of the application?	No
➤ Is this a land use consent application for a controlled activity?	No
Step 3: Notification of other persons if not precluded by Step 2 – sections 95B(7) and (8)	
➤ Are there any affected persons under s95E, i.e. persons on whom the effects are minor or more than minor, and who have not given written approval (discussed above)?	Yes
Step 4: Relevant to all applications – section 95B(10)	
➤ Do special circumstances exist that warrant notification to any other persons not identified above?	No

Recovery Plans and Regeneration Plans

Section 60 of the Greater Christchurch Regeneration Act 2016 requires that decisions and recommendations on resource consent applications are not inconsistent with Recovery Plans and Regeneration Plans.

The Recovery Plan, and the associated Accessible City Chapter is relevant to this application. For the reasons established in the preceding sections, I consider this proposal inconsistent with the outcomes sought in the chapters relating to The Frame, and with the high amenity environment outcomes sought for the upgrade of Manchester Street.

Notification recommendation

That, for the reasons outlined above, the application be processed on a **notified** basis pursuant to section 95A of the Resource Management Act 1991.

Reported and recommended by: Robert Ordelheide, Planner

Date: 02 March 2021

Reviewed by: Ruth Markham-Short, Senior Planner

Date: 03 March 2021

Notification decision

That the above recommendation be accepted for the reasons outlined in the report.

Decision maker notes

In considering the extent to which this application should be notified, if at all, I am in the unfortunate position of having been provided with contrasting expert reports from highly experienced practitioners in the fields of both visual assessment and transport. The conclusions of Mr Nicholson for the Council and Visual Impact Assessment for the applicant on visual impacts are very different and cannot be reconciled. Having considered both, and conducted a site visit, I prefer the views of Mr Nicholson, particularly in regard to the effects on future residents of the anticipated development on the opposite side of Manchester St. I accept that it is not yet certain that this development will take place, but I consider that it is highly likely that it will, given the firm intention of the Council and the Crown as expressed in the documents referred to in Mr Ordelheide's report, but also having regard to the steady progress now being made on the other housing superblocks in the adjacent East Frame. These developments have been initially slow to commence but are now progressing on several fronts, perhaps encouraged by the current national housing crisis and the strong demand for apartments in Christchurch. I also note, based on previous information received, that there has been a slowdown in commercial building in the central city in recent years, probably due to market demand having been satisfied in the short to medium term, which makes it more likely that the residential alternative will occur.

I do not disregard the other viewpoints discussed by the experts but prefer not to make findings on them at this stage. The same applies to the transport experts' differing views. These can all be considered in depth at the s104 decision-making stage for this application.

Commissioner:

Name: David Mountfort

Signature: D-L Mountfort

Date: 4 March 2021

SUMMARY OF SUBMISSIONS
LIMITED NOTIFIED RESOURCE CONSENT APPLICATION RMA/20201877
235 MANCHESTER STREET, CENTRAL CHRISTCHURCH

#	NAME	POSITION	WISH TO BE HEARD	JOINT SUBMISSION	REASON
1	S. McAllister	Oppose	N	N	[No reason given]
2	M. Wells	Oppose	Y	N	<i>"Distracting, in my face, stops a driver from being present and feels like my space is being stolen by advertising".</i>
3	Y. Lallu	Oppose	Y	N	<i>"Freestanding billboards, such as that proposed are wholly inappropriate in the central city environment where a much higher standard of amenity is expected compared to what may occur in other commercial or industrial zones where proposals occur. Not opposed to digital billboards forming part of the central city environment, provided they are appropriately integrated into building design. Primary concerns are amenity effects of the proposal, particularly given the high quality environmental results anticipated for this part of the central city. The submitter considers the proposal will be entirely incongruous with the current environment, and with the planned future environment".</i>
4		Support	N	N	<i>"Support. However, do not think the billboard should be framed with mesh/landscaping".</i>
5	B. Joy	Oppose	N	N	<i>"They create visual clutter, there are enough in the city already. Billboards are also a distraction for drivers; this is a prominent corner with high vehicle traffic, the billboard could be a safety risk as well".</i>
6	K. McAra	Oppose	Y	N	<i>"Opposed to the billboard being established at all. The proliferation of bright light is very distressing to people dealing with migraines; PTSD; post-concussion. Bright LED light affects people differently, cannot rely on measurements of luminance to be predictive of the overall effect on traffic safety, not good for wellbeing and mental health. Artificial lighting is moving us away from living in harmony with our natural environment. References swedish study and driver distraction".</i>
7	I. Wells	Oppose	Y	Y	<i>Strongly disagree with motive of the application; digital advertising is wrecking my view of the urban landscape. As a resident and fan of Christchurch people-oriented redevelopment, I feel that one more digital advertising signs in the city are wrecking my view of the urban landscape. I want to view the buildings' spaces, I don't want to be advertised too. The reasons to decrease advertising area 1. In time climate crisis, which council supports, we all need to consume less, nor more. 2. Children and parents in the Margaret Mahy playground are there to experience the real work of play and making a stimulating sign is reinforcing distraction from play and kids need. 3. Just because we have several digital signs is NOT as reason to have more. Sunk cost fallacy? IU think we have enough and don't need more advertising. I realise they will make money off the sign but that is not a reason to create more advertising spaces in our urban landscape. Reject the application. It could be replaced by a non-commercial art work or wait until other structures are completed.</i>

8	M. Roers	Oppose	N	N	<p><i>Billboard will not be in keeping with Manchester St and the City's goals for redevelopment. It will detract from the redevelopment that is occurring, and impact visual and property values negatively. The billboard will impact the bike and pedestrian priority that is sought in the area, making travel more risky, as the billboard is aimed at gaining the attention of motorists.</i></p>
9	Heritage Christchurch	Oppose	N	N	<p><i>Object to the oversized dimensions of the sign, the highly powered intermittent illumination, playing advertisements 24/7 will be extremely intrusive for residents and hotel guests in our building facing the sign (especially at night). We question the appropriateness of the sign, being that this street is largely a transport corridor when the sign has the dimension of a sign more likely seen from a motorway. The sign does not fit the character of the precinct where several historic buildings are being re-used and the sign would be a blot on the landscape.</i></p>

Brown, Georgia

From: Donna Sibley <donna.sibley@otakaroltd.co.nz>
Sent: Wednesday, 26 January 2022 2:36 pm
To: Brown, Georgia
Cc: Lizzy Pearson
Subject: RE: East Frame - V4 designation

Hi Georgia,

Sorry I missed your call yesterday.

To answer your question, yes, Ōtākaro will be applying to extend the designation lapse date for V4 'The Frame – North and East' (as well as designation for 'The Frame – South'). We are currently working on this and confirming the areas of the designation for which we will apply for a date extension. However, I can confirm that the application will include the lots on the east side of Manchester Street between Worcester and Gloucester Streets, opposite 235 Manchester Street. It is likely we will apply to have the date extended for another 5 years.

I am not available for the rest of the day, but please let me know if you'd like to discuss further and I will give you a call tomorrow morning.

Kind regards,
Donna

Donna Sibley | Planning & Consents Advisor | Ōtākaro Limited
E: donna.sibley@otakaroltd.co.nz | DDI: +64 3357 6307 | M:+64 272025496
Level 8, Anthony Harper Tower, 62 Worcester Boulevard, Christchurch, 8013

Please note I work 9.00 to 2.30 Monday to Friday

otakaroltd.co.nz | Building places for people

From: Brown, Georgia <Georgia.Brown@ccc.govt.nz>
Sent: Tuesday, 25 January 2022 12:58 pm
To: Donna Sibley <donna.sibley@otakaroltd.co.nz>
Subject: East Frame - V4 designation

Hi Donna,

I've just left a voice message with you, feel free to call or email when you are free.

I am processing a resource consent application for a digital billboard at 235 Manchester Street, it was publicly notified and is going to a hearing in early March. I am currently writing my s42a report, which is due to be complete by Monday week.

I understand that the V4 Designation for the East Frame is to expire in July 2022, and I am wanting to get an understanding whether Ōtākaro are looking to apply to have this designation extended?

It would be great to have a quick chat sometime this week if possible.

Thanks in advance,

Georgia

Georgia Brown

Senior Planner
Planning Team 3



-  03 941 6839
-  Georgia.Brown@ccc.govt.nz
-  Te Hononga Civic Offices, 53 Hereford Street, Christchurch
-  PO Box 73013, Christchurch 8154
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Appendix 6 – Christchurch District Plan Objectives and Policies

Chapter 6.8 – Signs

6.8.2.1 Objective - Signage

- a. Signage collectively contributes to Christchurch's vitality and recovery by:
 - i. supporting the needs of business, infrastructure and community activities;
 - ii. maintaining public safety; and
 - iii. enhancing the visual amenity values and character of the surrounding area, building or structures.

6.8.2.1.1 Policy - Enabling signage in appropriate locations

- a. Enable signage:
 - i. as an integral component of commercial and industrial environments, strategic infrastructure and community activities throughout the Christchurch District; and
 - ii. that is necessary for public health and safety and to provide direction to the public.

6.8.2.1.2 Policy - Controlling signage in sensitive locations

- a. Ensure the character and amenity values of residential, open space and rural zones are protected from adverse visual and amenity effects from large areas or numbers of signs, or off-site signs within these zones.

6.8.2.1.3 Policy - Managing the potential effects of signage

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

6.8.2.1.4 Policy - Transport safety

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

6.8.2.1.5 Policy - Temporary signage and signage managed by other agencies

- a. Enable temporary signage subject to meeting basic activity and built form standards.
- b. Enable signage required or controlled through other legislation or government agencies.

6.8.2.1.6 Policy - Managing off-site signage

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

Chapter 15 – Commercial

15.2.6 Objective - Role of the Commercial Central City Business Zone

1. A Commercial Central City Business Zone that re-develops as the principal commercial centre for Christchurch District and is attractive for businesses, residents, workers and visitors, consistent with the Strategic Direction outcomes for the built environment.

15.2.6.3 Policy - Amenity

- a. Promote a high standard of amenity and discourage activities from establishing where they will have an adverse effect on the amenity values of the Central City by:
 - i. requiring an urban design assessment within the Core of the Commercial Central City Business Zone;
 - ii. setting height limits to support the provision of sunlight, reduction in wind, avoidance of overly dominant buildings on the street and an intensity of commercial activity distributed across the zone;
 - iii. prescribing setback requirements at the boundary with any adjoining residential zone;
 - iv. ensuring protection of sunlight and outlook for adjoining residential zones;
 - v. setting fencing and screening requirements;
 - vi. identifying entertainment and hospitality precincts and associated noise controls for these and adjacent areas, and encouraging entertainment and hospitality activities to locate in these precincts;
 - vii. protecting the efficiency and safety of the adjacent transport networks; and
 - viii. recognising the values of Ngāi Tūāhuriri/ Ngāi Tahu in the built form, and the expression of their narrative.

15.2.6.4 Policy - Pedestrian focus

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