

Before the Independent Commissioners

Under the Resource Management Act 1991

In the matter of a hearing on submissions on the proposed Te Tai o Poutini Plan

Hearing Topic Signs

Submitter: **Go Media Limited (S501)**

Statement of Evidence of Francis John Costello

6 August 2024

Introduction

- 1 My full name is Francis (Frank) John Costello.
- 2 I am a Commercial Director of Go Media Limited (Go Media) and have worked in the Out of Home (OOH) advertising sector for 20 years. In that capacity I am authorised to provide this company evidence on its behalf.
- 3 By way of background Go Media is a nationwide OOH advertising company. We have a large static billboard and bus portfolio nationwide. We currently operate approximately 120 LED digital billboards nationally and have LED digital billboards located throughout the country.
- 4 We purchase quality hardware and pay generous land lease to our landlords. We sell advertising to national and local businesses, community events and major brands. Nationally, we sponsor organisations such as Netball New Zealand, NZ Football and every Super Rugby team amongst others.
- 5 As a company we are very community minded. We are part of the local community in every city where we have advertising assets and we are vocal about showing our support. We actively support local groups and initiatives through access to our advertising assets for groups who would otherwise not have a voice or financial access.
- 6 Go Media have worked closely with various councils throughout New Zealand, including through proposed plan processes, with regard to erecting signage and having appropriate provisions in district plans. Go Media continue to work proactively with councils across the country through the PDP review process.
- 7 Go Media submitted on the Signage chapter of the Te Tai o Poutini Plan (**TTPP**) and my evidence will address these issues. In preparing this statement of evidence I read the Section 42A Officer's Report on Signs (**Report**).
- 8 Go Media generally supports the following recommendations made by the reporting Section 42A Officer in relation to Go Media's submissions:
 - (a) Amend SIGN-O1 (2) to reflect that any signage should be compatible with the character and amenity of surrounding areas;
 - (b) New SIGN-P7 – policy which seeks to avoid off-site signs in rural and residential zones but controls them in other areas;

- (c) Amend SIGN-R1 11(i) with respect to spacing requirements between signs; and
- (d) Amend SIGN-R1 10(iii) with respect to restricting words and characters. Go Media's preference is this rule is deleted in its entirety, otherwise it is accepting of the limitation to higher speed areas.

Background

- 9 In its submission Go Media specifically sought that Billboards (including digital billboards) and non-site related advertising be enabled in the TTPP in appropriate zones (such as commercial, industrial and port zones) through an activity specific permitted activity rule supported by recognised industry standards. Go Media is accepting of the comment by the Reporting Officer that off-site signs (such as billboards) should be considered on a case by case basis for the West Coast.¹ Go Media through this evidence seeks a restricted discretionary activity rule for off-site (billboard) signage supported by recognised industry standards. This will enable each billboard to be considered on a case-by-case basis, and resource consent can be declined where the location or proposed operation of the off-site (billboard) signage is considered to have unacceptable effects. Go Media seek that the assessment criteria be realistic and standards be appropriate to the effects minimisation. Most other district plans assign a number of relevant standards to digital signage which make assessments simpler for both sides.
- 10 Digital advertising has become a widely accepted form of advertising throughout New Zealand. It is more sustainable than traditional print signage, and enables an advertising platform to be used for multiple purposes. Digital advertising can enhance the character of areas, buildings and structures, and also provide a focal point which adds vibrancy and interest. The character of a billboard is defined by its location and the nature of the content displayed on the screen.
- 11 Digital signage avoids the proliferation of visual clutter as the numbers control themselves by simple economics (per paragraph 19). Digital signage through this also allows for a higher quality of presentation than traditional static signage.
- 12 Advertising contributes to the commercial vitality of a community through supporting business, infrastructure and community activities. It is a legitimate commercial activity that generates economic activity by enabling

¹ Paragraph [47].

the commercial community to advertise goods and services. Go Media spends millions of dollars each year within local communities, with landowners, bus companies, printers, installers, abseilers, engineers, planners, traffic engineers, traffic management companies, hire companies, solicitors and accountants.

- 13 The events that we advertise help to successfully promote and contribute to economic, cultural and social well-being. We advertise messages about mental health (All Right?), the environment (Drinkable Rivers, Recycling), and road safety (NZTA). Along with advertising all the sports events, art galleries, music shows, comedy festivals and major events, this also adds to the cultural and social well-being of communities. Go Media have donated millions of dollars of media over the last 20+ years to charities and community groups. For example, Go Media's good Impressions program supports charities and community groups with credits from every dollar spent by advertisers and allows use of advertising space for these groups. Examples of some of the charities and community groups supported by this program are I am Hope, Inspiring Stories, Māori Women's Development Inc, Manaaki, Kiwi Harvest, Sustainable Catlines, Forest and Bird, Talk Peach, MATES in Construction, Raukatauri Music Therapy Trust, Untamed Earth, Kaibosh and Key to Life Charitable Trust. I consider there are significant positive benefits from what we do.
- 14 Billboards or off-site advertising fails to be considered as off-site signage in the TTPP.

Off-site signage

- 15 Go Media remains concerned at the lack of off-site signage provisions in the policies and rules in the TTPP. Given the reality that digital advertising is a widely accepted form of advertising throughout New Zealand, the preference for clear standards in the TTPP is quite simply for certainty – for both the Councils and for operators. Digital signage platforms are used to display advertising nationally. Go Media's experience is that where standards are not specified in the local plans, it often results in over-prescriptive, subjective, and unnecessary conditions which do not relate to effects and which cause operational headaches and time/money seeking to improve conditions through the s127 RMA process. This is unacceptable given that there are clear industry standards for off-site (billboard) signs.
- 16 I have attached some standard provisions that Go Media seeks to have included in the TTPP in **Attachment 1**. Discretion should be restricted to the scale, design, and location of the off-site sign (after considering any mitigation offered), and if any standards are breached, discretion should

also be restricted to effects arising from the breach of that standards. The application of appropriate standards to digital simplifies the process from both an applicant and assessment perspective.

- 17 TTPP sign policies would support Go Media's request for standards to support an application for resource consent for off-site sign provisions. For example:
- (a) SIGN-P1 - enable a diversity of sign types that provide for effective communication of government, business and community information and whilst maintaining public safety, access needs and the overall character of the area;
 - (b) SIGN-P2 - ensure the landscape, natural character and amenity values of residential areas, settlements, rural areas, open space and outstanding natural landscapes and features are protected from adverse visual and amenity effects from large areas or numbers of signs;
 - (c) SIGN-P3 - ensure that signs do not adversely affect traffic safety of all road users including motorists, cyclists, pedestrians, or obstruct roads or footpaths.
 - (d) SIGN-P7 (new) - avoid new off-site signs in Rural and Residential Zones and ensure that off-site signs in all other zones maintain transport safety and are compatible with the character and visual amenity values of the surrounding area, particularly where they are visible from any Residential or Rural Zone.
- 18 What our industry needs is recognition of our business, and the ability to be able to gain consent for advertising in appropriate zones. We seek rules that provide clarity and certainty. We appreciate that the West Coast is a unique environment, and that the Council would like to control signage but we feel strongly that appropriate rules can enable our activities while still providing appropriate controls for Council.
- 19 In my experience of consenting both off-site and on-site signs (with support from technical lighting, urban design and traffic experts), effects are largely the same and off-site signs do not cause the proliferation of visual clutter (as suggested by the reporting officer). The number of billboards in a region tends to be regulated by the market, as opposed to the district plan. The level of investment required coupled with market demand quickly ensures that proliferation does not occur as the financial viability soon diminishes. It's basic supply and demand economics.

- 20 By nature, offsite signage is often less “busy” and cluttered than onsite signage as the advertiser in the most part seek to have simple and clear messaging in preference to verbose text ridden creative as is often the norm with on site signage. Billboard signage also tends to require elevation higher than is the norm for onsite signage further removing it from being a contributor to clutter.
- 21 Thank you for your time, if you wish to ask me questions I am happy to answer them for you.

Francis John Costello
6 August 2024

Proposed standards for proposed new restricted discretionary activity

Activity	Activity Standards
<p>Off-site signage (billboards) in commercial, industrial and port zones.</p>	<ol style="list-style-type: none"> 1. The maximum area of any single billboard shall be 18m². In the case of two sided billboards, the area shall be calculated as being that visible from one direction only provided that such billboards are joined at the apex and are separated by an angle of 30 degrees or less. 2. The maximum height shall be 9 metres. 3. The site shall have a minimum road frontage of 30 metres per billboard, provided that no more than 2 billboards may be erected on any single site. 4. Any billboard shall not be directly visible from any site within a residential and rural zone within 100m. 5. Each billboard shall be subject to a written maintenance programme, in the form set out in Appendix XXX, to be undertaken by the operator/provider, that has been lodged with the Council prior to the erection of the billboard. 6. The billboard shall be located at least 15 metres from any traffic device. 7. The billboard shall result in no more than 10.0 lux spill (horizontal and vertical) of light when measured or calculated 2 metres within the boundary of any adjacent site and/or arterial road and/or collector road. 8. No live broadcast or pre-recorded video shall be displayed on the screen. 9. Still images shall be displayed with a minimum duration of 8 seconds. 10. There shall be no animation of the images displayed on the screen. 11. The material displayed on the screen shall not contain any flashing images and the screen itself shall not contain any retro-reflective material. 12. There shall be no transitions between still images apart from cross-dissolve of a maximum of 0.5 seconds. 13. There shall be no sound associated with the screen and no sound equipment is to be installed as part of the screen. 14. The screen shall incorporate lighting control to adjust brightness in line with ambient light levels. 15. There shall be a 'fail-safe' feature where in the event of a malfunction, the messages will be replaced by a solid black colour until the malfunction is resolved.