

BEFORE THE WELLINGTON CITY COUNCIL

Independent Hearing Commissioner

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER Resource Consent Application 513399,
New Zealand Fruitgrowers' Charitable
Trust, To erect an electronic billboard to
the existing framework on the roof of the
building

Statement of Evidence of Jos Coolen

Urban Designer

29 November 2022

1.0 QUALIFICATIONS AND EXPERTISE

- 1.1 My name is Jos Coolen. I hold the qualifications of Bachelor of Science in Architecture Building and Planning and Master of Science in Urban Design and Planning from the University of Technology Eindhoven in the Netherlands. I am a National Committee member of the Urban Design Forum Aotearoa and an affiliate member of the New Zealand Institute of Landscape Architecture. I have over 8 years' experience working for environmental consultancies in the Wellington region.
- 1.2 I hold the position of Associate Principal Urban Designer at Boffa Miskell Limited, a national firm of consulting planners, urban designers, and landscape architects. I have held this position since March 2017. In this role, I have:
- prepared and peer reviewed urban design assessments for a number of resource consent applications for applicants and Councils,
 - prepared design guidance for district councils and for the Ministry for the Environment, including the recent Town Centres Design Guides for Upper Hutt City Council and Kapiti Coast District Council.
 - assisted city/district councils in the Wellington region with urban design input into District Plan policy, including the Planning for Residential Amenity Study for Wellington City Council which was awarded the NZPI Nancy Northcroft Supreme Award in 2021.
 - assisted in the development of master plans, including for the Department of Corrections, New Zealand Defence Force and Kainga Ora (Waitangirua, Porirua East).
- 1.3 My experience includes the preparation of urban design advice and assessments for an outdoor advertising company for a number of digital billboard applications across Wellington City, including billboards on the corner of Courtenay Place and Taranaki Street, the corner of Woodward Street and Lambton Quay and on Victoria

Street. This advice included preliminary assessments of the client's proposal considering the suitability of a billboard in the suggested location and if any potential improvements to the proposal could be made in terms of achieving good urban design outcomes.

1.4 In this matter, I am representing Boffa Miskell as a submitter on the application.

2.0 CODE OF CONDUCT

2.1 I have read the Code of Conduct for Expert Witnesses outlined in the Environment Court's Practice Note (2014) (Code) and have complied with it in preparing this evidence. I also agree to follow the Code when presenting evidence to the Independent Hearing Commissioner hearing. I confirm that the issues addressed in this brief of evidence are within my area of expertise, except where I state that I rely upon the evidence of other expert witnesses. I also confirm that I have not omitted to consider material facts known to me that might alter or detract from my opinions. As I stated above, in the qualifications and expertise section of my evidence, I declare that I have a relationship with Boffa Miskell as an employee of the company.

3.0 SCOPE OF EVIDENCE

3.1 My statement of evidence covers the following matters:

- a) Local environment
- b) Integration with architecture
- c) Dominance and visual obtrusiveness
- d) Relationship with surrounding environment

3.2 In preparing my evidence I have considered the following:

- a) The application for resource consent, including the attachments and technical reports;
- b) Submissions on the applications
- c) Section 42A Report;

d) Evidence filed on behalf of the Fruitgrower's Charitable Trust

3.3 I visit Post Office Square every weekday and am highly familiar with the area. My primary work location is on the north side of level 4 of the Huddart Parker Building and looks out over Post Office Square, Customhouse Quay and Queen's Wharf. My evidence is supported by photographs that I have taken on 18 October, 8 November, 24, 25 and 29 November, and videos and a timelapse that were taken on 15 November 2022.

3.4 In preparing my evidence I have also assessed the proposal against the Assessment Criteria in Section 21D.3.1.5 – 21D.3.1.11 and Design Guide for Signs in the Operative District Plan.

4.0 LOCAL ENVIRONMENT

4.1 I consider that the following aspects of the local environment should be considered when assessing the urban design effects of the proposed billboard:

- a) Views of the Huddart Parker Building and Post Office Square from outside of Post Office Square, predominantly when approaching from the north.
- b) Impressions of the Huddart Parker Building and Post Office Square when within Post Office Square.

4.2 Post Office Square marks a gateway into a more people focused area of the city and acts as an intersection of pedestrian movements (between the city and the railway station and between the city centre and the waterfront due to its connection with Queens Wharf) and is a popular coffee/lunch spot. The heritage buildings along two of its edges reinforce this human scale character.

4.3 I agree with the description given in paragraph 6.2 of the urban design evidence by Mr Knott of the surrounding environment with regards to the views from outside the Square.

- 4.4 I do not agree with the description by Mr Knott of his impressions from within the Square as described in paragraphs 6.3(e), 6.3(f) and 6.4 of his urban design evidence.
- 4.5 Mr Knott (paragraph 6.4) states that 'the overall impression of Post Office Square is that it is an area dominated by traffic and pedestrian and cycle movement, rather than being a pleasant urban environment, enclosed and activated by attractive buildings.'. He further notes (6.3(e)) that the grass area between the public space and Jervois Quay *'appears to be focused on providing space between busy Jervois Quay and hard surfaced public space than providing areas for recreation'*.
- 4.6 As my primary work location has direct views of the Square I note that the Square, including the grass area, is actively used by people throughout the day, and predominantly in the morning and around lunch time. The daily presence of two food trucks as well as the restaurant and café that are located on the ground floor of the Huddart Parker building make a significant contribution to the activation of the Square, as evidenced by the photos below (Figures 1 – 3):



Figure 1: Photo – taken in the morning of 18 October 8.30am



Figure 2: Photo – taken 25 November 12.50pm



Figure 3: Photo – taken 25 November 12.48pm

- 4.7 I agree with the Site Description (points 5 and 6) and partly agree with the Surrounding Context (points 7 to 9) as described in the Site Description and Context section of the Council's Section 42A report.
- 4.8 In the Section 42A report, (point 9 of the Site Description and Context section on page 2), it is noted that there is currently a billboard attached to the building at 86 Customhouse Quay. I note that this information (as well as the Google Streetview screenshot that was provided in the report) is out of date and that this billboard has for some time been replaced by static wall art. As can be seen in the photo below (Figure 4), the current wall art in this location is designed to match the buildings character by including an arch made out of large building blocks similar to that of the building's façade. Also the artwork uses a blue sky with clouds that ensures that the wall art comfortably blends in with its environment. I do not consider this wall art to be similar to the effects that any commercial signage can have on its surroundings.

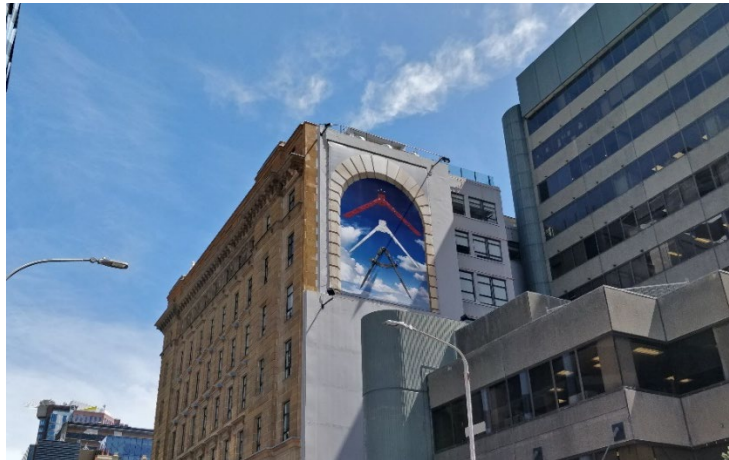


Figure 4: (Photo - taken 24 November 2.50pm - of the wall art that has replaced previous signage on 86 Customhouse Quay)

- 4.9 There is an existing digital billboard on 10 Brandon Street which is visible from Post Office Square when looking towards the north. This billboard, even though located in a slightly different environment with different views, highlights the effects that the brightness of a digital billboard can have on its surroundings.
- 4.10 To illustrate the effects of digital billboards on their surroundings, I have recorded a series of videos of the views towards 10 Brandon Street viewed from inside Level 4 of the Huddart Parker Building.

These videos can be downloaded from the following link:

https://boffa-my.sharepoint.com/:f:/g/personal/josc_boffamiskell_co_nz/EizwYXbhnF1Jr3bxOwznlEEBnXybtINy1uCcJMP7_YHgWA?e=DNF8hl

Note: to keep the evidence unedited I have uploaded the full files, which are of a very large size.

- **01_Timelapse.mp4**

Taken on 15 November 2022. This video highlights the dynamic nature of the digital billboard. Sunset starts from approximately the 2:00 minute mark. From approximately the 3:00 minute mark it is dark and the brightness effect of the billboard compared to other adjacent lighting sources can be clearly seen. It should be noted that this billboard is set against a building façade, relatively low to the ground. A proposed billboard on top of the Huddart Parker building will be visible from much further away and will not have a similar solid backdrop.

- **Daytime_Realtime.MOV** Taken on 15 November 2022 from approximately 6.30pm. This video shows the effects of the brightness of a digital billboard in an environment that has no other digital billboards. Compared to other lighting sources the brightness is noticeable.

- **Nighttime_Realtime.MOV** Taken on 15 November 2022 from approximately 8.40pm. This shows the brightness effects of the billboard at night time where it is by some margin the brightest object in the surroundings.

5.0 INTEGRATION WITH ARCHITECTURE

5.1 I consider there are two primary matters with the proposed billboard in relation to the integration with the architecture of the Huddart Parker Building. These matters are:

- a) Relationship with architectural style of the building

b) Reinstatement of historical condition on the building

Relationship with architectural style of the building

- 5.2 I concur with the concluding assessment of Ms Duffell (Conclusion of Urban Design Assessment, page 7, Appendix 4 of the Council's Section 42A Report) that the proposed billboard does not create a relationship with the architectural style of the billboard and would result in a distracting element to the character of the building.
- 5.3 The character of the Huddart Parker Building is defined by the building structure that is typical of the Chicago Style: a base, a trunk and a top, as indicated in Figure 5 below. I consider that the installation of the proposed digital billboard on the roof is incompatible with this building structure and overall architectural style of the building.

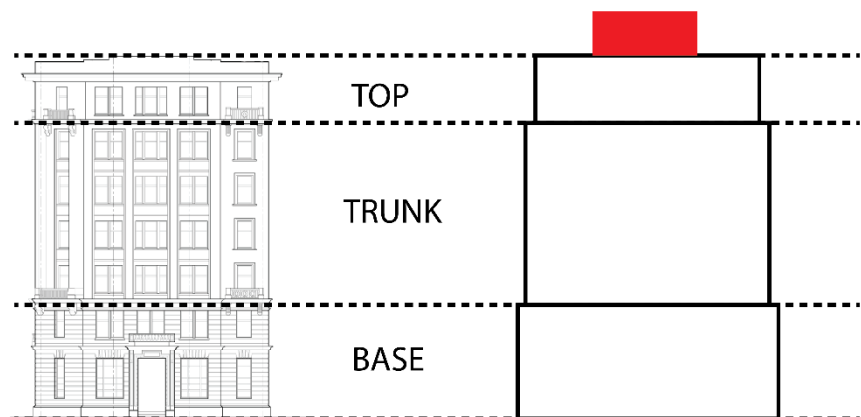


Figure 5: Diagram of the Huddart Parker Building illustrating the Chicago Style, with proposed digital billboard highlighted above the top

- 5.4 In the statement of evidence with regard to the applicant's heritage assessment, Mr Wild states in paragraph 8.2(d) that as the billboard will be 'clearly separate and legibly unrelated from the Chicago-style architectural detailing' the proposed billboard will not detract from the architecture of the building.
- 5.5 In the statement of evidence with regard to the applicant's urban design assessment, Mr Knott in paragraph 8.4 - 21D.3.1.6 says that as 'the sign is located above/behind parapet level, it does not detract from existing decorative detailing, structural divisions, windows or doorways.'

- 5.6 I consider that even though the billboard is proposed to be slightly set back from the parapet, the billboard will appear as being within the same vertical plane as the front façade and as such will be perceived as a continuation of the front façade (as illustrated in figures 6 and 7 below), that is notably distinct and incompatible with the decorative detailing and structural divisions of the façade.



Figure 6: Illustration on the left showing photomontage of proposed billboard as provided in the application (Source: page 5 of Resource Consent Application Appendix 4 - Photomontages). Image on the right includes my red markup illustrating how the north facing façade will be perceived.



Figure 7: Illustration on the left showing indicative perspective of proposed billboard and north facing façade (Source: Figure 4-4 of Traffic Engineering Report by Stantec). Image on the right includes my red markup illustrating how the north facing façade will be perceived.

Reinstatement of historical condition on the building

- 5.7 I agree with the comment made by Ms Duffell (Urban Design Assessment, note on page 2, Appendix 4 of the Council's Section 42A Report), that the installation of the proposed digital billboard

should not be considered as the reinstatement of a historical condition.

- 5.8 The Huddart Parker Building first opened in 1925 and the first display on top of the building was erected 38 years later in 1963. The display installed in 1963 only consisted of a clock and weather information which had a practical use to inform people at that time. Since the first installation, the signage has changed a number of times with small incremental changes in the purpose and type of signage over the years.
- 5.9 I consider that the effects that a digital billboard will have on the character and architectural qualities of the Huddart Parker Building and the surrounding collection of heritage buildings, as well as the effect on the visual amenity of the adjacent open space are notably different than the effects that any previous signage on top of the building will have had, due to its brightness, size, solid nature (as opposed to permeable) and its transitional content.
- 5.10 I note that the variety in types of signage that have been a part of the history of the Huddart Parker building have the characteristics of clock/weather, static, permeable letters and moderate size. Apart from the clock/weather element, all other elements of the proposed billboard contrast with this previous signage. Therefore, I do not consider that the proposed digital billboard and the associated effects on the building and surrounding open space can be easily justified as the reinstatement of a historic condition.
- 5.11 Mr Wild in paragraph 5.4 of the heritage evidence mentions that it is not the proposal to restore or replicate any of the previous signs, but to position a new digital sign to an existing historic frame. I note that it will be the newly introduced digital billboard that will be mostly visible and will for a large part obscure the historic frame behind it. In my opinion, the proposed billboard is introducing something new and cannot be considered as reinstating a previous condition and as such should be assessed as a new installation.

6.0 DOMINANCE AND VISUAL OBTRUSIVENESS

- 6.1 I concur with Ms Duffell's conclusion in the WCC Urban Design Assessment that the proposed billboard would alter the silhouette of the building (Conclusion, page 7, bullet point #2), that the sign would be dominant in views along Customhouse Quay and Waterloo Quay for a considerable distance, in an environment that is generally devoid of other signs displaying advertising (Conclusion, page 7, bullet point #3), and that the sign would detract from the public space qualities of Post Office Square and the waterfront (Conclusion, page 7, bullet point #5).
- 6.2 The applicant considers the proposed billboard a reinstatement of a historic condition. Evidence prepared by planner Mr Aburn states: *"By utilising the existing framework, the size, height, location and placement of the proposed sign does not change in any material way from the sign(s) that were in existence for some 50 years until 2012 when the last sign, but not the sign framework, was removed as part of the seismic strengthening and refurbishment project undertaken by the Applicant."*
- 6.3 I consider this statement is only partly correct and consider that when comparing potential differences between the proposed sign and any previous signs there are more characteristics that need to be considered, other than size, height, location and placement. To assess effects on dominance also the type of display should be considered including the perceived bulk and mass, contrast of the display with its surroundings, brightness, source of the lighting and the transitioning nature of the content.
- 6.4 As described in the evidence of Mr Wild (paragraph 6.14), the original display that was installed in 1963 consisted of 'a pattern of 1.5m high lights'. The current proposal is for a billboard of 4m height, which is more than double the height of the first display on the building.
- 6.5 As shown in historic photographs, previous signage was static and for a large part of its existence consisted of individual letters

resulting in a partly permeable display which allowed for clear views of the sky behind the sign.



Figure 8: Photo showing signage in 2008 (Source: Google Street view)

- 6.6 I disagree with the statement made by Mr Knott in his urban design evidence (paragraph 8.4 – 21D.3.1.11) that the proposed billboard will be ‘viewed against a backdrop of large buildings, and that clear views of it are not available from locations in close proximity’. While I agree this may be the case when viewing the building from a distance when approaching from the north via Customhouse Quay, this is not the case when viewing the building from a closer distance as can be seen below in the screenshots taken from the cover page of the applicant’s Traffic Engineering Report (Figure 9) and the applicant’s heritage assessment (Figure 10). This can also be seen in the photograph of the building and existing framework below (Figure 11), which was recently taken from the footpath leading to the building, along Jervois Quay.

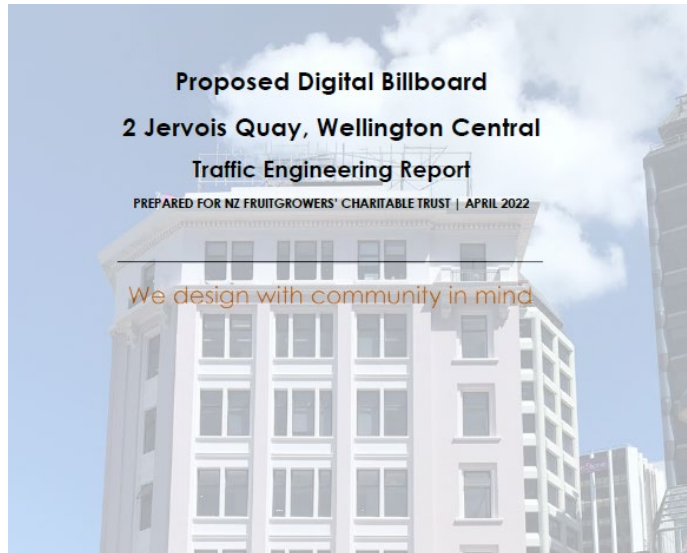


Figure 9: Screenshot taken from the cover of the applicant's traffic assessment showing the blue sky behind the existing structure



Figure 10: Screenshot taken from the applicant's heritage assessment showing the blue sky behind the existing structure)



Figure 11: Photo showing visibility of existing framework (Photo taken on 8 November 2022 12.11pm)

The current framework is visible against a backdrop of clear sky from the majority of Post Office Square as illustrated in green in the marked up plan in Figure 12 below. The yellow area illustrates the approximate locations from which the proposed billboard will be visible partly against a backdrop of sky and partly a backdrop of buildings. The amber area indicates the approximate areas of which the proposed billboard will be visible against a backdrop of buildings. These approximate markups have been determined by marking up an aerial while walking around the Square on 29 November 2022.

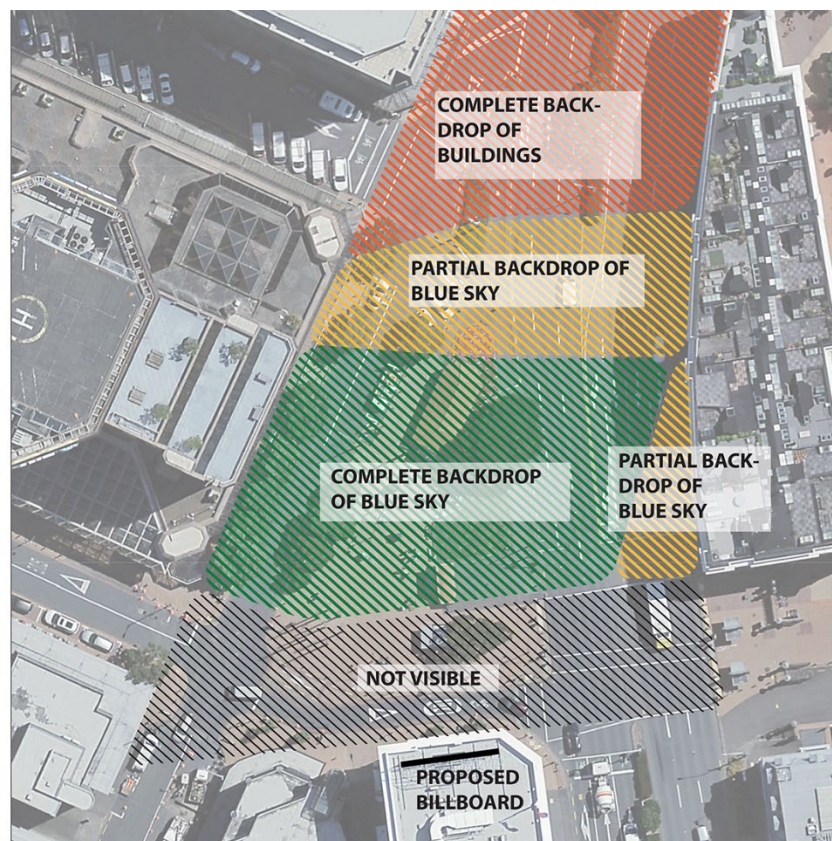


Figure 12: Markup of the approximate areas from where the proposed billboard will be visible against a sky or against a backdrop of buildings. (Markups based on a walk around the Square on 29 November 2022)

- 6.7 A billboard typically is designed to be seen and to be visible from its surroundings. A digital billboard that is viewed against a clear sky has a higher visual dominance than a billboard against a backdrop of buildings, particularly in the evening when office lights and other signage contribute to visual clutter.

- 6.8 The scale, brightness and solid nature of the proposed billboard will contribute to a bulk and mass that is in contrast with the fine detailed architecture of the Huddart Parker building and adjacent heritage buildings and I consider that this will result in visual dominance within this environment.
- 6.9 Mr Aburn states in his evidence in paragraph 12.11 that: *“Also, as a visual addition to the building’s rooftop, it will very likely draw more attention to the building itself, and in this way can be considered as complementary to the building; more so, in my opinion, than the existing framework which really does not add visually to an appreciation of the building [21D.3.1.8].”* I disagree with the statement that the proposed billboard will draw more attention to the building itself. As can be seen in the attached videos described above, it is likely that the digital billboard itself will attract attention, and the proposed billboard will detract attention from the building itself. While I agree that the existing framework does not add visually to the appreciation of the building, in my view, the installation of a billboard would worsen the visual appreciation of the building rather than improve this appreciation.
- 6.10 From a longer distance, I consider that the proposed billboard will add a contrasting element to the wider cityscape. There are a number of notable buildings in the immediate surroundings of the Huddart Parker Building that have static and partly permeable signage on or near the roof tops, as illustrated by the examples in Figure 13 below of signage in the immediate surroundings of the Huddart Parker Building. A digital billboard that consists of transitional and commercial content, that is not associated with the building itself, would result in a contrasting and visually dominant element in the wider cityscape view of buildings along the

waterfront.

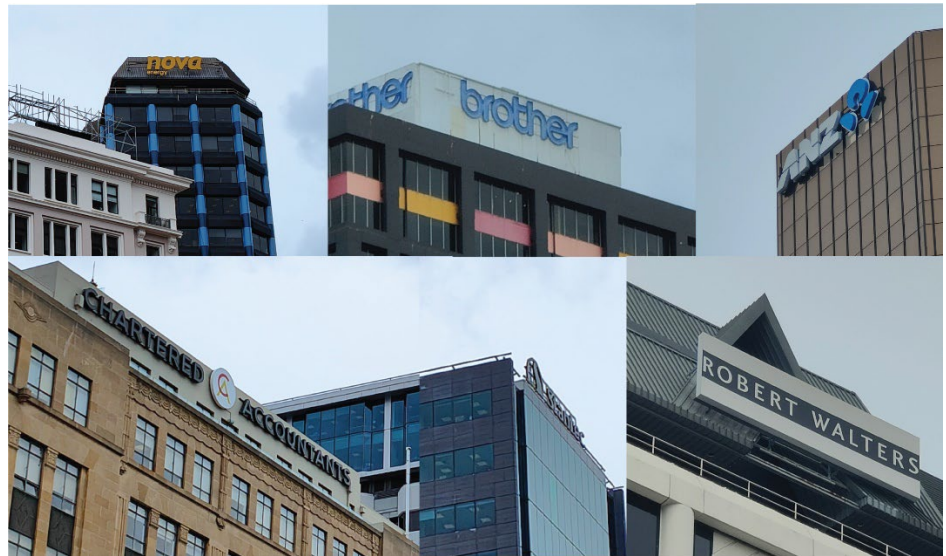


Figure 13: A collage of existing signage on or near rooftops of buildings in the immediate surrounding of the Huddart Parker Building. (Photos taken on 29 November 2022)

- 6.11 Lastly, I consider that the photomontages in the application document do not give an accurate representation of the actual end result of the proposed billboard. From my experience with billboard assessments, a digital billboard will most likely require a deeper depth to accommodate the electronics as well as additional flashing to the sides, which ultimately will have a larger effect on the dominance of the billboard than the current visual simulations suggest.

7.0 RELATIONSHIP TO SURROUNDING CONTEXT

- 7.1 I consider there are two primary matters with the proposed billboard regarding its relationship to the surrounding context. These matters are:

- a) Effects on Post Office Square public space
- b) Effects of digital billboards

Effects on Post Office Square public space

- 7.2 I concur with the conclusion of the assessment of Ms Duffell (Conclusion WCC Urban Design Assessment, page 7, bullet point #3) that the proposed billboard would introduce an element to the

area that is currently not present in the immediate surroundings of the Huddart Parker Building and Post Office Square, which is predominantly defined by its buildings and landscapes of heritage value.

- 7.3 As described in Section 4 of my statement of evidence, Post Office Square is a popular open space. With its north facing aspect it receives sunlight throughout most of the day which results in an attractive environment to spend time in. It is occupied by coffee and food vendors on a daily basis and has been the location for occasional street performers in the past.
- 7.4 As can be seen in Figure 3, paragraph 4.6 of my statement of evidence, the existing structure on top of the building is visible from within Post Office Square against a blue sky. I consider that the installation of the proposed billboard that is of a similar size as the current structure will be incompatible with the more people focussed character of the Square and will introduce a distracting element into this heritage area.

Effects of digital billboards

- 7.5 The photo (Figure 14) below is a still from a timelapse that was taken on 15 November at 10:00pm with a shutter time of 1/25sec. (Note that as this photo was taken from inside it shows reflection of office lights in the windows at the top of the photo). The brightness of the billboard is apparent and although the camera may have adjusted its brightness automatically, the brightness of the billboard can be directly compared with the brightness of office lights of the associated building, headlights of passing cars and street lights. The billboard is by some margin the brightest object in the surrounding, increasing the dominance effect.



Figure 14: Video still - taken 15 November 10.00pm

7.6 Mr Wild states: 'While I accept that the nature of signage is to be seen, I do not consider the proposal to present a sign "necessarily" more dominant than the historic signage in the same location.' I disagree with this statement. The videos linked to in paragraph 4.6 of my statement of evidence show that the brightness and dominance effects, as a result of a digital billboard with transitional content, are different from any static signage that used to be on the roof in the past. Therefore, in my view, this proposal introduces new effects and is not reinstating a historic condition.

7.7 Mr Wild in paragraph 9.3 contends that billboards can be erected on a heritage building, as exemplified by the billboard installed on the Embassy Theatre. I consider that there are a number of significant differences between the two locations. The Embassy Theatre is located within the entertainment precinct of Courtenay Place, with a significantly higher degree of visual clutter and existing signage, where the installation of a billboard is generally a more acceptable activity. Also, the Embassy Theatre billboard is set back from the front façade, against an otherwise large blank wall, which pulls it apart from the main element of the building.

8.0 CONCLUSION

8.1 In conclusion, in my view, the proposed billboard is not appropriate signage for the following reasons:

- a) The proposal is not reinstating a historic condition, as the installation of a digital billboard is significantly different from any signage that was part of the building in the past.
- b) The proposal will introduce a number of new effects that are not compatible with the architectural style and character of the building and its immediate surroundings.
- c) The billboard will introduce a distracting element into the area and will result in dominance effects on the building and Post Office Square.

Jos Coolen

Urban Designer

Boffa Miskell Limited

29 November 2022