

Before the Hearing Commissioner
Appointed by Wellington City Council

Under the Resource Management Act 1991

In the matter of Hearing Stream 3 on submissions to the proposed Wellington
City Plan: Heritage

Go Media Limited

Submitter ID: 236

Statement of evidence of Francis John Costello

24 April 2023

Introduction

- 1 My full name is Francis (Frank) John Costello.
- 2 I am a Commercial Director of Go Media Limited (**Go Media**), and I am authorised to provide this evidence on its behalf. We have an office based in Wellington and I have been working in the Out of Home (**OOH**) advertising sector for 19 years.
- 3 By way of background Go Media is a nationwide OOH advertising company. We have 450 static billboards and 665 Buses nationwide, including the Greater Wellington Regional Council bus and train networks. We currently operate 96 LED digital billboards nationally. We have LED digital billboards located in Auckland, Hamilton, Tauranga, New Plymouth, Hastings, Gisborne, Palmerston North, Levin, Otaki, Masterton, Wellington, Nelson, New Plymouth, Christchurch and Dunedin.
- 4 We purchase quality hardware and pay a generous land lease to the landlord. We sell advertising to 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 I have worked closely with the various councils throughout New Zealand, including through proposed plan processes, with regard to erecting signage and having appropriate provisions in district plans.
- 6 Go Media submitted on the proposed Wellington City Plan (**PWCP**) to enable appropriate OOH advertising. Go Media intends to submit evidence on and appear at Hearing Stream 7 to be heard on sign provisions and the Signage Chapter. Go Media's submission relates to this Historic Heritage hearing to the extent that Go Media seeks explicit acknowledgement of third-party signs in the Heritage Design Guide (**HDG**).
- 7 Go Media primarily operates digital or static "third-party" billboards in the Wellington City District, some of which are on heritage buildings. This means SIGN-R6 would apply to this signage. None of Go Media's signage is likely to fall under the SIGN-R6 permitted activity status, meaning the matters in SIGN-P3 and the HDG will be matters of discretion for any application for a third-party billboard on a heritage building.
- 8 Go Media will provide further evidence and submissions on SIGN-P3 at Hearing Stream 3, but notes, for the purposes of this hearing, that SIGN-P3(1)(f) enables signs on heritage only where the sign fulfils the intent of the HDG. Ascertaining the text and intent of the HDG is therefore important to how signs are enabled throughout the District.

Section 42A Report

- 9 The s42A Officer's Report recommends rejecting Go Media's submission on inclusion of signs in the HDG because the Signs Design Guide specifically deals with the placement of signs on heritage buildings. However, third-party billboards on heritage buildings will have to show consistency with both the HDG and the Signs Design Guide pursuant to SIGN-P3(f)(1). Therefore, the HDG must provide guidance to how this restricted discretionary matter should be assessed.
- 10 Further, evidence provided by Moira Smith on behalf of Wellington City Council on Go Media's submission states that the HDG and Sign Design Guide provide sufficient guidance as notified. Ms Smith states that there is no need for specific guidelines in the HDG. I also note Ms Smith has referred to SIGN-P3 and SIGN-P4 – Go Media will comment further on these in Hearing Stream 7 as well as the Signs Design Guide discussed in the Officer's Report.

Treatment of signage on heritage buildings

- 11 The HDG contains the following guidelines for signage:

G19. Seek to place signage in traditional locations such as:

- On or below the parapet.
- Within the extent of the verandah fascia and not to extend above or below the line of the fascia.
- Under verandahs where there is minimum clearance to the footpath and from the kerb. Under-verandah signs should align with the entrance door of the relevant business or tenancy.
- On the blank side or "party" walls of a building.

G20. Locate new signs on heritage buildings and in heritage areas below parapet level and below the highest parts of the building.

G21. Use traditional signage techniques and follow historic precedents for signs on heritage buildings, heritage structures and in heritage areas.

G22. Illuminated and digital signs should be carefully considered. If signs are to be lit, it is recommended that they are illuminated by external lighting.

- 12 It is not clear how these guidelines apply to "third-party signs" as defined in the notified PWCP. Go Media is concerned that one interpretation is that third-party signs are not appropriate on heritage buildings because they are not provided for in the HDG. That would be an inappropriate outcome when third-party signage supports historic heritage buildings and structures throughout New Zealand

already. For example, the Kauri Timber Company building at 104 Fanshawe St demonstrates how a digital billboard can support a heritage building and its heritage features.

- 13 This concern is influenced by the wording of guideline G23 which recommends the implementation of a signage policy for heritage buildings by the owners of those buildings. The suggested wording only relates to tenant signage of heritage buildings, suggesting that only on-site signage is consistent with the HDG.
- 14 Third-party signage can be beneficial to a heritage building and the community it inhabits, as I outline below. Therefore, clarification of the signage guidelines in the HDG is required. Go Media proposes the following amendments to give effect to their concerns and create more certainty and clarity in the application of the HDG:

G19. Seek to place signage in traditional locations such as:

- On or below the parapet.
- Within the extent of the verandah fascia and not to extend above or below the line of the fascia.
- Under verandahs where there is minimum clearance to the footpath and from the kerb. Under-verandah signs should align with the entrance door of the relevant business or tenancy.

~~• On the blank side or "party" walls of a building.~~

G20. Locate new signs on heritage buildings and in heritage areas below parapet level and below the highest parts of the building.

G21. Use traditional signage techniques and follow historic precedents for on-site signs on heritage buildings, heritage structures and in heritage areas.

GXX. Third-party signage can be appropriate and supportive of the maintenance and economic and viable use of heritage buildings.

Digital signage

- 15 The HDG also states:

G22. Illuminated and digital signs should be carefully considered. If signs are to be lit, it is recommended that they are illuminated by external lighting.

- 16 The use of the words "carefully considered" is vague and ambiguous, but leaves open the possibility for digital signage to be considered inconsistent with the HDG. In particular, it is not clear whether digital signs are signs illuminated by internal lighting (and therefore whether such signage is opposed by the HDG).

17 Digital signage can be incorporated appropriately within heritage buildings and support the ongoing maintenance and use of such buildings. Methods of incorporation include utilising thin screens, keeping the signage below parapets to maintain the built form, painting sign utility features the same colour as the façade and including historical imagery relating to the specific building within the rotation of digital signage (this cannot be done with static billboards). A good example of a digital billboard being incorporated onto a Wellington heritage building is the Embassy Theatre.

18 Based on the benefits of digital signage on heritage buildings, Go Media submits that the wording of guideline G22 should be amended as follows:

G22. Illuminated and digital signs can support the use and maintenance of heritage buildings. Methods to incorporate digital signs within a heritage building may include locating the sign below parapets, utilising screens of less than 500mm thickness and including historical site imagery on rotations. ~~should be carefully considered. If signs are to be lit, it is recommended that they are illuminated by external lighting.~~

19 Go Media considers this wording a more positive approach to digital signage that reflects the benefits digital signage brings.

Positive benefits of advertising

20 Go Media have a philosophy of supporting the community in the area of arts, sports, the environment, social work and other such organisations. Go Media have reaffirmed this commitment this year with the launch of the Good Impressions program. This program supports a group of notable charities/community groups, with credits from every dollar spent by advertisers entering a pool to allow use of advertising space to these groups. Examples include: 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, Key to Life Charitable Trust

21 Digital OOH through its low setup cost for advertisers and capacity allows sponsored members of the Good Impressions program to utilise the advertising space to promote their awareness and their activities.

22 Digital 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 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.

- 23 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, including providing critical community messaging. Following the earthquakes, our Christchurch billboards were used extensively by the Earthquake Commission, Canterbury Earthquake Recovery Authority, Enable and Christchurch City Council (which is one of our largest clients) to communicate important community messages and important information.
- 24 In terms of the images displayed, digital billboards (like static billboards) are subject the Advertising Standards Code which is overseen by the Advertising Standards Authority. The Advertising Standards Code contains five sector codes, where advertisers are expected to take particular care, including the 'Children and Young People' code. Any advertisements on Go Media's billboards will therefore be regulated, and particular care is given to ensure advertising is appropriate for the potential audience.

Conclusion

- 25 Go Media seek to provide billboards of an appropriate industry standard, to assist with providing for the social, economic and cultural wellbeing of heritage buildings in the local community.
- 26 Amending the HDG as proposed will:
- (a) assist the Council in carrying out its statutory duties under the Resource Management Act 1991 (**RMA**) including the integrated management of the effects of the use, development, or protection of land;
 - (b) improve the consistency of the Heritage Design Guide with the nature of third-party signage effects;
 - (c) support the use and maintenance of heritage buildings
 - (d) meet the requirements of section 32 of the RMA; and
 - (e) promote the sustainable management of natural and physical resources in accordance with Part 2 of the RMA, and in particular the efficient use of natural and physical resources.

27 Thank you for your time, if you wish to ask me questions I am more than happy to answer them for you.

Francis John Costello

Dated this 24th day of April 2023