IN THE MATTER	of the Resource Management Act 1991 (**RMA**)
AND	
IN THE MATTER	of an application by New Zealand Fruitgrowers' Charitable Trust to the Wellington City Council for a resource consent to reinstate a sign on the building located at 2 Jervois Quay, Wellington (**the Application**)

EVIDENCE OF FRANCIS COSTELLO
ON BEHALF OF NEW ZEALAND FRUITGROWERS' CHARITABLE TRUST

(Commercial Director - Go Media Ltd)

22 November 2022

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1. QUALIFICATIONS AND EXPERIENCE

1.1 My full name is Francis (Frank) John Costello.

1.2 I have been working in the Out Of Home (**OOH**) advertising industry for 18 years, my areas of specialisation being in the development of advertising products, development of both Static and Digital billboards and their operation. OOH advertising is advertising generally not associated with a content provider (i.e. television, radio or newspaper). OOH is generally located outdoors or in high density areas such as malls and train stations.

1.3 I have through my career been heavily involved in the consenting and development of digital billboards across New Zealand, from the earliest digital billboards introduced in 2012 until present. Through my period working in digital billboard development I have been involved in the development of planning rules and practice notes for the interpretation of digital signage consenting, for example:

(a) Auckland Unitary Plan – I worked as part of a group representing the OOH industry in is submission on the plan; and

(b) Christchurch City Council – I have been involved in peer reviewing the digital signs Practice Note (which is currently at a draft stage). This Practice Note is being developed to assist with interpretation of the district plan provisions as they relate to digital signs.

2. INVOLVEMENT IN THE PROJECT

2.1 I have been working with the New Zealand Fruitgrowers' Charitable Trust (**NZFCT**) to provide advice in relation to the proposed reinstatement of the sign on the Huddart Parker building. In particular I have been advising NZFCT on the operational matters that relate to erecting and operating the type of sign proposed.

2.2 In relation to this application I have been working with Go Media to support NZFCT. Go Media is an OOH media company providing a variety of OOH media products throughout New Zealand, its products include digital billboards. I have included some further background information about Go Media as an in Appendix 1 of my evidence.

2.3 In preparing my evidence I have reviewed the consent application, all of the submissions received on the application, and the section 42A report prepared on behalf of the Wellington City Council.

3. SCOPE OF EVIDENCE

3.1 I have been asked to provide evidence in relation to erection and operation of the proposed sign on the Huddart Parker building.

3.2 My evidence covers:

(a) Technical requirements relating to the erection of the proposed sign;
(b) How signs of the type proposed operate;
(c) A summary of the light effects of the proposed sign
(d) Comments on the Council Report;
(e) Comments on submissions; and
(f) Conclusions.

4. ERECTION OF THE PROPOSED SIGN

4.1 Consent is being sought for a sign no larger than 13 metres by 4 metres.

4.2 I understand that the existing structure on the roof will be utilised to erect the new screen, and engineers have confirmed that the existing framing on the building can be used (at least in part) to support the proposed sign. It is anticipated that much of the screen structure required will be bespoke to the digital sign and as such will be designed to work within the engineering characteristics of both the building and the existing sign frame which the screen will be attached to.

4.3 The sign itself will be approximately 80-120mm deep as such will have a very slender profile. The rear of the sign will be black.

4.4 Given the location much of the material and the screen structure will require crane lift to the roof and a scaffold system to enable a build. The screen would be lifted onto the building at night.

4.5 The screen will require a high capacity power feed. This will be supplied through the existing building services. The use of power from the building for the sign would not impact on the provision of power to the building's tenants.

4.6 There are a number of digital billboards in Wellington that are of a similar nature and scale to the proposed sign, including the billboards at the corner of Willeston and Willis Streets, and at the corner of Taranaki Street and Courtenay Place. While it is a significantly larger scale than the sign proposed here, the sign on Featherston Street opposite the Rydges hotel has similar characteristics (in relation to its brightness) to the sign proposed here. I have attached images of a number of LED signs from around central Wellington to my evidence as Appendix 2.

5. OPERATION OF THE PROPOSED SIGN

5.1 The proposed sign will be a face populated with LED digital modules controlled by a media content system and automated control system.

5.2 The media content will be run by a media company such as Go Media who will lease the signage space. Media companies are used to working within the requirements of resource consent conditions when leasing digital signage space.

5.3 Content will be scheduled to the screen from a remote location, and the screen management system will be connected to the web via a 4G router. The content

management system updates from a cloud based source and is able to continue to operate without access to the cloud server if the data drops out.

5.4 The proposed sign's brightness will be managed by an automated brightness control system, which will ensure that the sign operates at all times at optimal brightness for the conditions and to stay within its consented operational brightness parameters. Mr Russ Kern discusses this from a technical perspective in his evidence.

5.5 Go Media operates a number of signs in the city utilising automated brightness controls. Subject to ambient lighting conditions, Go Media signs operate easily within the night time limitations proposed and only reach the daytime limits on the brightest of sunlight conditions. Ensuring compliance with the daytime and night-time limits could be achieved through a condition requiring monitoring post establishment.

5.6 The sign will be monitored by remote monitoring systems and a digital monitoring camera to ensure any faults are identified and dealt with promptly.

5.7 The proposed dwell time for the sign on the Huddart Parker building is 8 seconds with a 0.5 second transition between the images. During trialling in Auckland in 2012 by Auckland Council to determine dwell time, 8 seconds was deemed the most acceptable to balance distraction and dominance from both a viewer and traffic perspective. This dwell time has become a nationalised norm and is standard in many locations. For example, the Christchurch City District Plan includes a minimum dwell time of 7 seconds in the relevant permitted activity rule.[1]

5.8 I am aware that in Wellington often longer dwell times are imposed on resource consents. It is not clear to me why this is, as 8 seconds is generally the dwell time that is imposed on consents in other places in New Zealand.

5.9 However, I have recently been involved in an application for resource consent (granted in early November 2022) for a digital billboard located at 84 Dixon Street, Te Aro which was granted with an 8 second dwell time. The dwell time for billboards located either side of the Stadium walkway on Waterloo Quay has been reduced to 8 seconds following applications under section 127 of the Resource Management Act 1991 (noting that the dwell time has been reduced twice for those signs).

[1] Christchurch City Council District Plan Rule 6.8.4.1-P15(h).

6. GLARE EFFECTS

6.1 Mr Kern has provided detailed expert evidence in relation to the lighting effects of the proposed sign. I have also made some comments based on my industry experience. As noted, the sign will be managed by an automated brightness control system. The system scans constantly and averages the brightness to ensure that adjustments in brightness are smoothed so they are not visible to the eye. At night (when illumination effects are more apparent) digital signs are often found to be more evenly illuminated when compared to static illuminated signs. This is because static lit signs tend to have hot spots closer to the lights.

6.2 The brightness of the screen is controlled when compared to a lit static board, and the differences in colours will result in differing reflection for a lit static sign. The overspill of light from floodlights aimed at a static sign does not occur with digital signs as the signs are self illuminating internally, no back or side spill is possible.

6.3 Light spill and glare forward of a digital sign is more controlled and in most cases less with a digital sign as rather than reflecting light from a source, the sign itself lights itself up with thousands of small LEDs. This is because the LEDs are designed to light themselves to form images and colours rather than to push light outward.

7. COMMENTS ON COUNCIL REPORT

7.1 At paragraphs [84] and [85] of his report, the Council's section 42A reporting officer states that there are no public benefits associated with the type of sign proposed in the application. I disagree with that comment. In addition to the time and temperature information that will be provided, digital billboards can provide an easy and cost effective way to provide information to the community.

7.2 As an example, Go Media retains time on digital billboards for use by community organisations. For example it has recently developed the Good Impressions initiative which enables its customers to work with Go Media to be actively involved in donating advertising to organisations achieving positive social outcomes across New Zealand. I have set out how this works in the Appendix 1 of my evidence.

8. COMMENTS ON SUBMISSIONS

8.1 The submission from the Intercontinental Hotel raises concerns about the possibility of light spill into the hotel rooms, the Premium Lounge and the Presidential suite. Based on my experience working with digital billboards for the past 10 years, I do not consider that the brightness of the screen will be sufficient to project light spill into the hotel. This is discussed further in the evidence of Mr Kern. Furthermore, I consider that the billboard will be seen as but one element of the outlook of these spaces in a very wide viewshed.

8.2 I also note that there is a recent example of a digital billboard being erected directly across from a hotel. I am referring here to the large (146m^2) billboard located at 70 Featherston Street which faces the Rydges Hotel. This sign was consented by the Wellington City Council as the effects of luminance were found to be acceptable on the hotel. Unlike the relationship between the location of the proposed sign and the InterContinental Hotel, the Featherston Street sign faces almost squarely into Rydges' façade and has been operating for approximately 2 years. The sign was granted brightness of 5500cd/m^2 during the day and 400cd/m^2 between sunset and sunrise (I note that the night-time luminance approved for that sign is significantly brighter than the luminance proposed by Mr Kern for the Huddart Parker sign).

Francis (Frank) John Costello

22 November 2022

Appendix 1– Information about Go Media

Go Media is New Zealand's largest Roadside digital billboard operator, operating 85 digital billboards from Silverdale to Invercargill. Go Media has been in operation since 2009 and grown throughout this time. Go Media are also the largest locally owned operator in the OOH sector, as the other large operators are owned by overseas investors. Go Media is also 50% Māori owned.

Go Media has a very strong community focus engrained at the heart of its business. It sponsors many events, sporting activities and organisations, charities and community initiatives as a key part of its business philosophy. Digital signage further allows Go Media to work in this space.

Digital signage can easily support community initiatives through its low cost (there are no print or installation costs) and capacity allow this to happen across its digital portfolio. At any one time there is around 20% of total space across the network utilised in this fashion, the sign on the Huddart Parker will also be used on unsold capacity for these purposes.

Earlier this year a further initiative was launched called Good Impressions whereby advertisers spend has a bonus component added to a pool from every booking which is utilised for the benefit of a number aligned organisations including:

I am Hope	Mates in Construction	Sustainable Coastlines
Cuba Dupa	Te Papa	Shave for a Cure
Fringe Festival	Wellington Cricket	Pulse
Hurricanes	NZ Football	Comedy Festival
Phoenix	Capital Photographer of the Year	Saints Basketball

Good Impressions works in the following way:[2]

1. When customers contract a campaign, Go Media will gift them no less than 5 Good Impressions, that's 5 ad-views, for every dollar they spend.

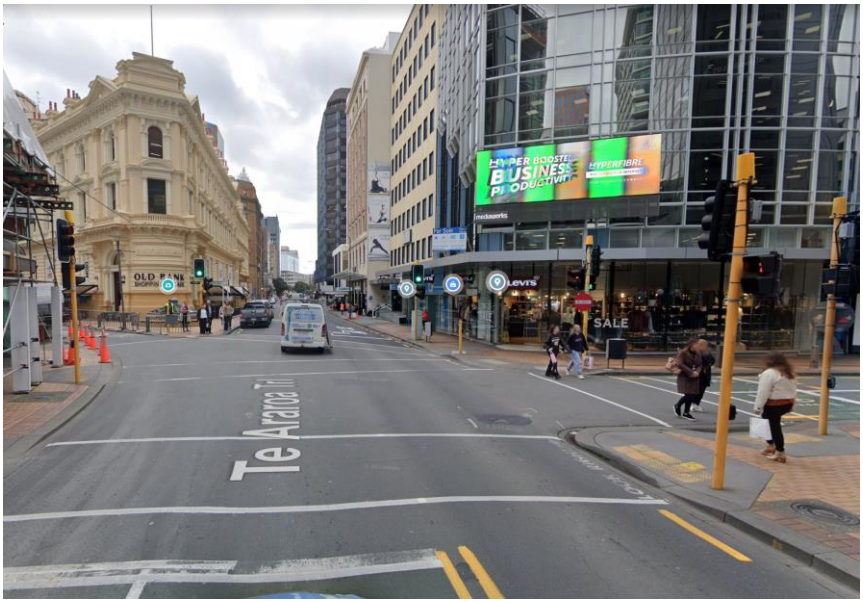
2. Customers elect to donate their Good Impressions to one, two or all three social outcome categories of Wellbeing (Piki te ora), Environment (Piki te taiao) and People (Piki te tangata).

3. Go Media will then distribute the donated Good Impressions to the benefitting organisations in each category.

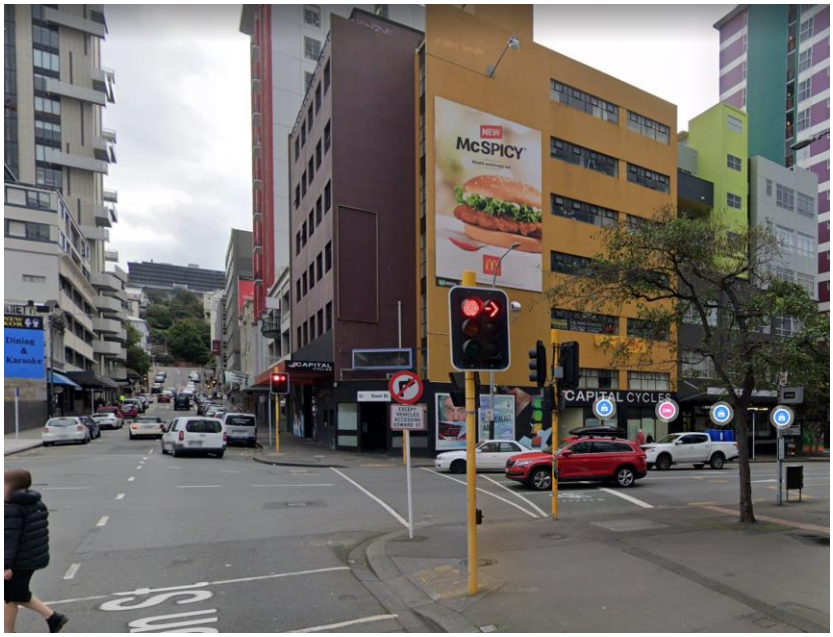
Customers will be presented a certificate annually, thanking them for their participation and confirming how many Good Impressions they donated over the year.

[2] More information is available on the Go Media website: https://www.gomedia.co.nz/in-the-community/good-impressions/

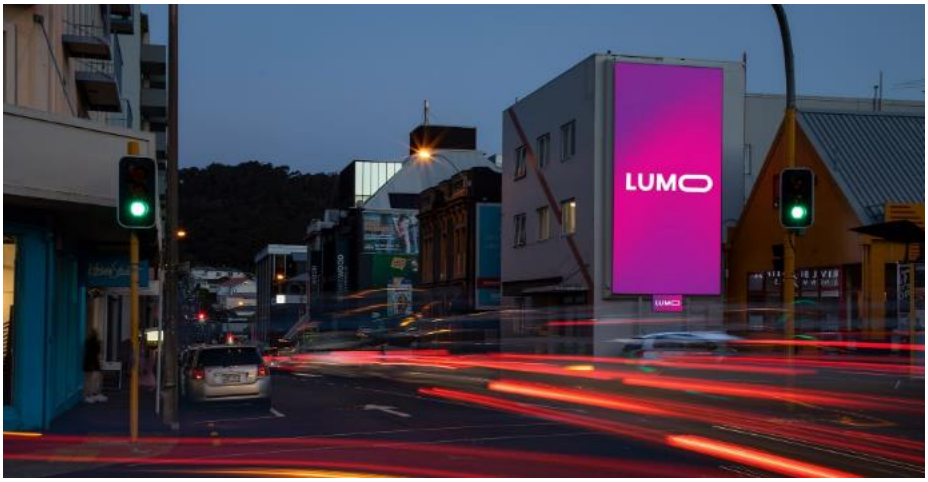
Appendix 2 – Images of LED signs around central Wellington



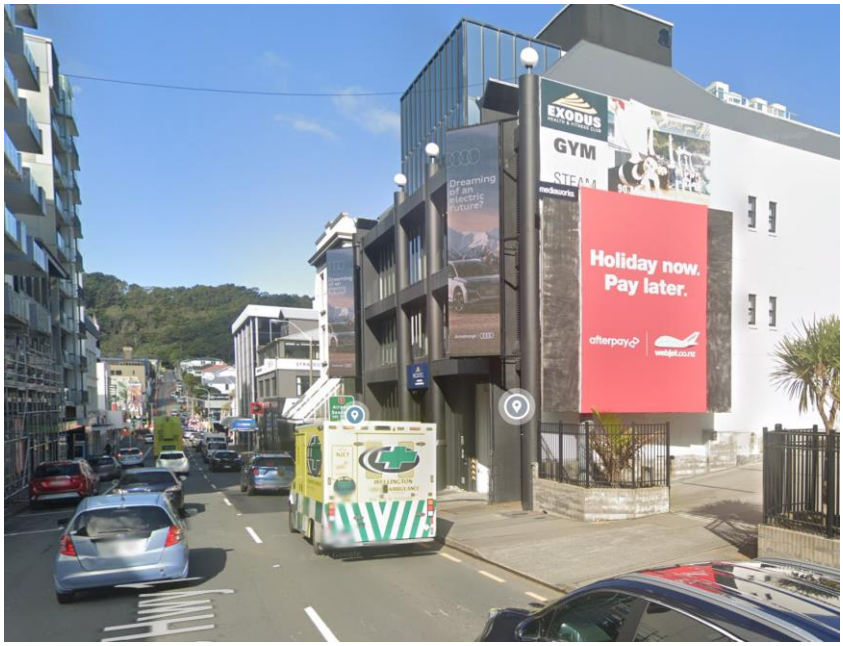
Location: Cnr Williston and Willis st, Wellington
Size: 7.5m x 2.5m
Operator: Mediaworks
Dwell: 30 seconds
Brightness: 5500 cd/m2 / 400cd/m2
Day/Night



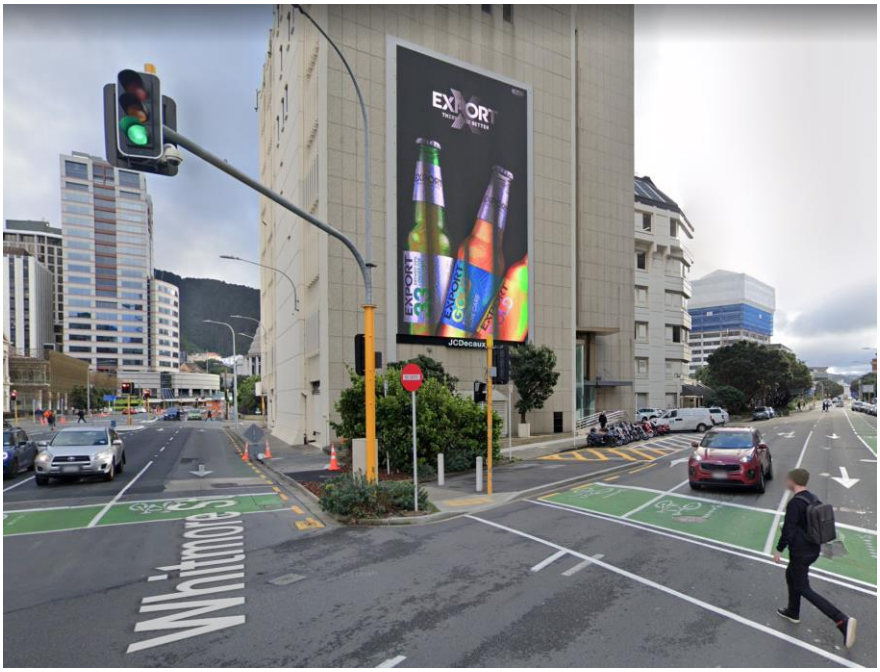
Location: 84 Dixon st (yet to be built)
Size: 7.5x2.5
Operator: Go Media
Dwell: 8 seconds
Brightness: 5000 cd/m2 / 250cd/m2
Day/Night



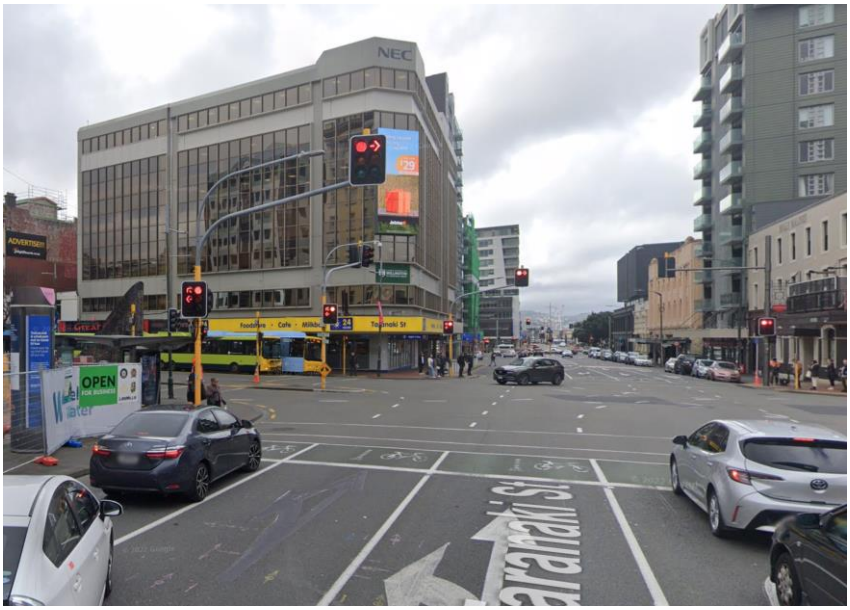
Location: 35 Vivian st, Wellington
Size: 3.657m x 7.315m
Operator: Lumo
Dwell: 8 seconds
Brightness: 5000 cd/m2 / 600cd/m2 / 250cd/m2
Day/Dawn/Dusk/Night



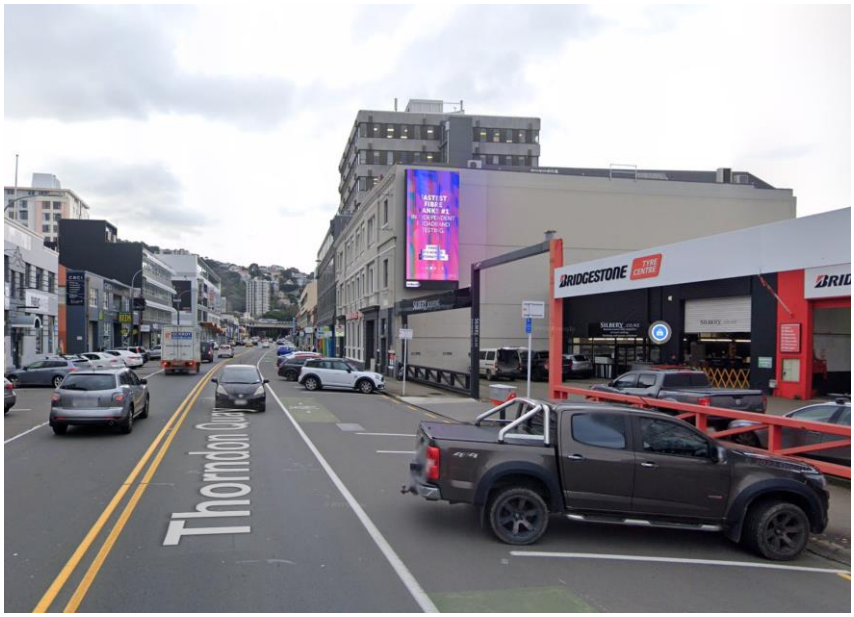
Location: 25 Vivian st, Wellington
Size: 1.7m x 6.6m and 1.9m x 6.6m
Operator: Mediaworks
Dwell: 8 seconds
Brightness: n/a permitted activity



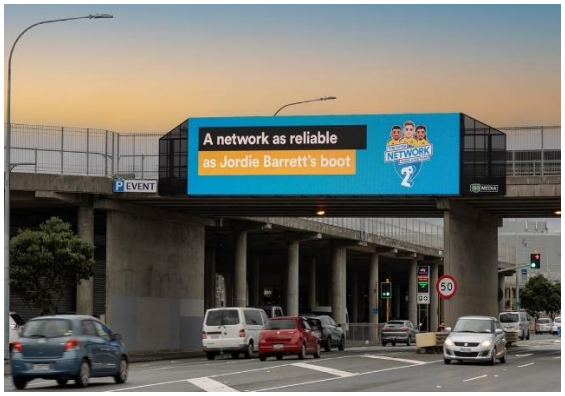
Location: 70 Featherston st, Wellington
Size: 146m2
Operator: J C Decaux
Dwell: 30 seconds
Brightness: 5500 cd/m2 / 400cd/m2
Day/Night

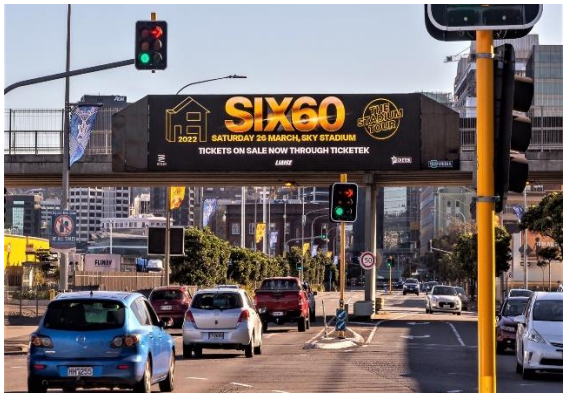


Location: 40 Taranaki st
Size: 4m x 8m
Operator: Mediaworks
Dwell: 30 seconds
Brightness: 5500 cd/m2 / 400cd/m2
Day/Night

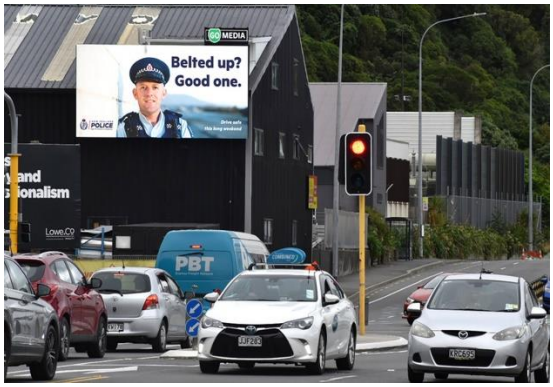


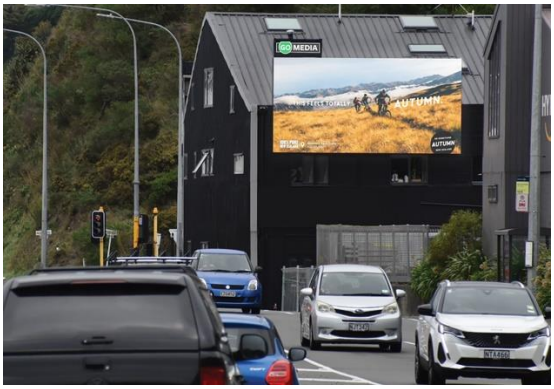
Location: 202 Thorndon Quay
Size: 3.5m x 7m
Operator: Mediaworks
Dwell: 10 seconds
Brightness: 5500 cd/m2 / 600cd/m2 / 400cd/m2
Day/Dawn/Dusk/Night





Location: Waterloo quay (pair)
Size: 12m x 3m
Operator: Go Media
Dwell: 8 seconds
Brightness: 5000 cd/m2 / 250cd/m2
Day/Night





Location: 125 Hutt Rd, Wellington (pair)
Size: 6m x 3m
Operator: Go Media
Dwell: 10 seconds
Brightness: 5000 cd/m2 / 600cd/m2 / 250cd/m2
Day/Dawn/Dusk/Night