

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**)

**SUMMARY EVIDENCE OF RICHARD KNOTT
ON BEHALF OF NEW ZEALAND FRUITGROWERS' CHARITABLE TRUST**

(Urban Design and Heritage Expert)

7 December 2022

1. INTRODUCTION

1.1 This statement provides a summary of my statement of evidence dated 22nd November 2022. I also respond to relevant aspects of the submitters' evidence and matters raised in Minute 3 from the Commissioner (and in particular consideration of the PDP).

1.2 My qualifications and experience are as set out in my statement of evidence. I confirm that I have complied with the Code of Conduct for Expert Witnesses outlined in the Environment Court's Practice Note (2014) in preparing the additional evidence included in this summary, and that I will follow the code when presenting evidence. The new evidence addressed in this Summary is within my area of expertise.

2. SUMMARY OF EVIDENCE

2.1 The sign proposed to be reinstated was first constructed in 1963 and consisted of an area dedicated to advertisement and an area dedicated to the time and weather forecast. The main words on the sign were outlined in neon. The associated support structure remains on the building.

2.2 It is intended is to upgrade the existing structure and to add a 13m(w) x 4m(h) digital sign face; the sign will include an area showing weather and time information. The images shown on the new digital face will have a minimum display time of 8 seconds, with a 0.5 second cross fade between images.

- 2.3 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.
- 2.4 There are limited opportunities to view the existing support structure, and reinstated sign, from within the south sections of Post Office Square. The visual effects of the sign from these locations would be very low (it is commonly accepted that very low or negligible visual effects are equivalent to a less than minor adverse effect).
- 2.5 In more distant views from the north, from Customhouse Quay and the northern section of the Square, the proposed sign will be viewed against the backdrop of the existing tall buildings located to the south and south-west of the site. At the distance required to easily view the sign structure and proposed digital display, the sign represents a relatively small feature in relatively expansive view. The proposed digital sign will not be a dominant feature in these views and will appear as an integral part of the wider urban context. As such, the visual effects of the sign would be low; it is commonly accepted that a low visual effect is equivalent to a minor adverse effect.
- 2.6 From locations in Grey Street and Queens Wharf the sign structure is already seen as extending above the existing building. Given the historic existence of the sign structure, and that this same structure will be utilised for the new digital sign (albeit that it will be strengthened), the addition of the digital billboard face will have little impact on these views, with the face being viewed at an angle and the existing structure still being visible. The proposed digital sign will have a low visual effect and will appear as an integral part of the wider urban context. As such, I consider that it would have a minor effect on the amenity of the area.
- 2.7 Additionally, I have concluded that the proposed reinstated sign will not have a more than minor effect on the heritage significance of the Huddart Parker Building or the Post Office Square Historic Heritage Area.
- 2.8 I have assessed the sign against the matters of discretion at 21D.3.1.5 to 21D.3.1.11 and the Design Guide for Signs. My assessment shows that the sign is considered favourably against these.
- 2.9 Overall, I consider that the proposed digital sign, which will be fixed to the existing sign structure, will not be a dominant feature in views from locations in Customhouse Quay, Grey Street and Queens Wharf and will appear as an integral part of the wider urban context. It will not have a more than minor effect on the

visual amenity of the area or heritage significance of the Huddart Parker Building or the Post Office Square Historic Heritage Area.

3. PROVISIONS OF THE PROPOSED DISTRICT PLAN

3.1 Minute 3 of the Independent Hearing Commissioner included a number of preliminary questions. The first of those asked whether the proposed sign triggers any consent requirements under the Proposed District Plan (PDP). Mr Aburn addresses the applicability of the PDP, and I have included some commentary below to assist.

3.2 Rule ‘SIGN-R6 - Signs on heritage buildings, heritage structures and their sites, or on a site within a heritage area’ of the PDP confirms that where compliance with the requirements of SIGN-R6 is not achieved, the application is a restricted discretionary application with matters of discretion confirmed as the matters in policy SIGN-P3, the Signs Design Guide and Heritage Design Guide.

3.3 I consider each of these matters below:

Matters of Discretion	Assessment
<p>Policy SIGN-P3 - Signs and historic heritage</p> <p>Enable signs on heritage buildings, heritage structures and within their sites, and within heritage areas to support wayfinding and interpretation and only allow signs for other purposes where they do not detract from the identified heritage values, having regard to:</p> <ol style="list-style-type: none"> 1. The extent to which: <ol style="list-style-type: none"> a) Damage to heritage fabric, from methods of fixing, including supporting structures, cabling or wiring is minimized or is reasonably reversible; 	<ul style="list-style-type: none"> - The sign will utilise the existing sign structure, although this will be supplemented where required to allow the installation of the new digital billboard face. - If required any additional structural members/frames could be designed to have

<p>b) The location and placement of signs obscure architectural features, project above parapet level or reflect the typical positioning of signage on the heritage building or within the heritage area;</p> <p>c) The area, height and number of signs are appropriate for the scale of the heritage building, heritage structure or heritage area or would result in clutter;</p> <p>d) The quality of the design of the sign complements the heritage building, heritage structure or heritage area;</p> <p>e) The intensity of any illumination adversely affects heritage values; and</p> <p>f) The sign fulfils the intent of the Heritage and Signs Design Guides.</p>	<p>minimal long term physical effect on the retained structure, and could be removable.</p> <ul style="list-style-type: none"> - Any additional cabling could be designed to minimise the physical impact on the building and to be removable. - The sign is located above/behind parapet level. As such, it does not detract from existing decorative detailing, structural divisions, windows or doorways. - The sign is located in the position of previous signage, utilising the remaining sign structure. As such it reflects the typical positioning of signage on the building. - The height of the sign reflects the sign being reinstated. - There are no other large signs on the building or in the immediate vicinity of the proposed reinstated sign. As such the reinstated sign will not result in clutter. - The sign will utilise the existing structure. In common with the majority of digital signs, the new digital screen will be simple and clean cut in appearance. - In my experience, billboard operators ensure that all images displayed are of an appropriate image resolution and show as high quality graphics. - Effects of illumination are discussed by Mr Russ Kern. - The Heritage Design Guide and Signs Design Guide are addressed below.
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<p>2. The benefits of allowing additional signage to support sustainable long term use.</p>	<ul style="list-style-type: none"> - The signage will bring additional revenue to the owners of the building. It will support ongoing investment into the building.
<p>Signs Design Guide</p>	<ul style="list-style-type: none"> - The revised design guide addresses similar matters to those in the ODP Signs Design Guide. - I have included an assessment against the ODP Signs Design Guide in my response to 21D.3.1.11 in my Statement of Evidence
<p>Heritage Design Guide</p> <p>Much of the heritage design guide is not of direct relevance to the consideration of the proposed sign. However, the section on Sustainability is of some relevance.</p> <p>Sustainability</p> <p>Existing buildings contain embodied energy. Retaining existing buildings in a sustainable longterm use, whether through the retention of their original use or by adaptation for a new use, can be a sustainable option. For a building to stay in use in the long term, some change is often necessary. This reflects changes over time in how we use our buildings and what we expect of them. Change needs to be considered carefully, including effects on heritage fabric and values.</p>	<ul style="list-style-type: none"> - The owners have already made significant investment into the building, including undertaking earthquake strengthening works. - The design guide recognises that <i>‘For a building to stay in use in the long term, some change is often necessary.’</i> The installation of the replacement sign will be a further source of income to the building owners and will assist the owners to maintain the building and keep it in good order. This will in turn contribute to the long-term retention of the building. This supports G32 relating to the adaptive reuse of buildings. - The billboard installation has been designed to utilise the existing structure, in a location where there has historically been signage, and where interventions are required they

	can be designed to be reversable. This is in accordance with G35.
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4. RESPONSE TO EVIDENCE FROM MR JOS COOLEN FOR BOFFA MISKELL

4.1 I accept Mr Coolen's description of the use of the Square (paragraph 4.6). He has direct knowledge of the day-to-day use of the Square.

4.2 Mr Coolen has provided both time lapse videos and videos to illustrate the effects of digital billboards on their surroundings (paragraph 4.10). Whilst I recognise that such videos can be a useful tool, I consider that they are limited.

4.3 The time lapse video provides the impression of constantly changing images. This is not what the applicant has applied for. It is intended that the sign has a minimum dwell time of 8 seconds. I consider that the time lapse video should be disregarded as it brings confusion.

4.4 The viewpoint chosen to view the 10 Brandon Street billboard does not represent a view that a member of the public would generally experience, nor is it similar to any view that a member of the public would experience of the proposed sign.

4.5 In my experience it is very difficult to photograph or video a digital sign at night time, and achieve a recorded image which reflects how the human eye sees the sign. Often the sign appears far brighter relative to its surroundings than seen by the human eye.

4.6 Accordingly, in my view the time lapse and the movies should be disregarded; if an impression is needed of what existing digital signs can look like at night, this is best achieved by viewing them in person. Care should of course be taken that the sign is actually comparable, including in relation to its brightness.

4.7 Mr Coolen provides evidence regarding the relationship of the proposed sign to the architectural style of the building (paragraphs 5.2 to 5.6). He notes that:

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.¹

4.8 I disagree with this statement. The cornice below the parapet of the building is a large, dominant feature, which provides a very clear junction between the sign and the building façade. There is a clear shadow line below the cornice which assists with highlighting its size and depth. The projection of the cornice emphasises the setback of the sign. This is clearly seen in the left-hand photos in Mr Coolen's Figures 6 and 7; the sign will not be viewed as suggested in Mr Coolen's right hand photos at Figures 6 and 7.

4.9 Mr Coolen discusses the backdrop of the sign at his paragraphs 6.6 to 6.7 and identifies areas from which the sign will be seen against the sky rather than against a backdrop of buildings. I consider that this approach ignores the behaviour of users and passers-by in these areas. I consider that it is unlikely that a viewer in the '*complete backdrop of blue sky*' area in Mr Coolen's Figure 12 would experience the proposed replacement sign within their field of view, unless they were specifically seeking to look up at the building. As such the identified areas are of little assistance to the assessment of the sign.

5. CONCLUSION

5.1 I remain of the opinion that the proposed digital sign, which will be fixed to the existing sign structure, will not be a dominant feature in views from locations in Customhouse Quay, Grey Street and Queens Wharf and will appear as an integral part of the wider urban context. It will not have a more than minor effect on the visual amenity of the area or heritage significance of the Huddart Parker Building or the Post Office Square Historic Heritage Area.

Richard Knott

07 December 2022

¹ Evidence of Mr Coolen, para 5.6