

## Auckland City Centre Resident's Group

From: <[NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz](mailto:NotifiedResourceConsentSubmissionOnlineForm@donotreply.aucklandcouncil.govt.nz)>  
Date: Wed, 28 Nov 2018 at 11:00  
Subject: Thank you for your submission  
To: <[aklccrg@gmail.com](mailto:aklccrg@gmail.com)>

Thank you for providing your opinion on the notified resource consent for 147-149 Victoria Street West, Auckland Central.

We have received your submission and will be in contact in due course.

If you have any queries about this request, send an email to [CentralRCSubmissions@aucklandcouncil.govt.nz](mailto:CentralRCSubmissions@aucklandcouncil.govt.nz).

## Details of your submission

### Notified resource consent application details

**Property address:** 147-149 Victoria Street West, Auckland Central

**Application number:** LUC60312872

**Applicant name:** Victoria Trust Company Ltd

**Applicant email:** [Kelsey@mhg.co.nz](mailto:Kelsey@mhg.co.nz)

**Application description:** To erect a new 12m (high) by 4m (wide) digital billboard on the eastern façade of an approved residential building.

### Your contact details

**Full name:** Audrey van Ryn

**Organisation name:** Auckland City Centre Residents' Group

**Contact phone number:** 021 0354431

**Email address:** [aklccrg@gmail.com](mailto:aklccrg@gmail.com)

### Postal address:

PO Box 106 667 Auckland 1143

City Centre

Auckland 1143

### Your submission

**This submission:** opposes the application in whole or in part

### Specify the aspects of the application you are submitting on:

- Visual amenity
- Affected persons
- Level of luminance
- Effect on heritage buildings

### What are the reasons for your submission?

1. This new billboard would have an adverse effect that is more than minor on the visual amenity of the area. There is an increasing number of digital 24/7 billboards in the city centre. As stated in Landscape Effects, 7.4: "Billboards are a common element within Auckland's CBD, and it would have the highest concentration of billboards within New Zealand. Landscape Effects, 7.5 states: "Electronic billboard displays within the CBD have increased in recent years." Although the applicant might see the proliferation of electronic billboards in Auckland's city centre as a reason to place another billboard there, we see this as a reason to limit the number of electronic billboards in our neighbourhood. The

cumulative effect of electronic billboards needs to be taken into account.

2. The applicant's assessment of environmental effects refers to motorists a number of times, and the effect on traffic safety is considered thoroughly, but pedestrians are barely mentioned. The effect on residents is focused on those who live in the immediate vicinity of the site. In our view, those affected by the billboard would be not only commuters passing through and residents who live in apartments in the direct vicinity of 147-149 Victoria St West, but the 50,000 plus residents who live in the city centre, who mostly move about the city centre on foot and whose neighbourhood includes 147-149 Victoria Street. (We note that "city centre" is the term used in Auckland Council planning documents, rather than "CBD," as used by the applicant. Indeed, the applicant describes the immediate and surrounding area as "typical of the Auckland Central Business District." However, this part of Auckland is both a business and a residential district, and there is a very high concentration of residents.)

3. The luminance of the billboard is proposed to be 500cd/m<sup>2</sup> during the hours of darkness. Under section E23.6.1(3) of the AUP, "A digital billboard must include controls to ensure luminance does not exceed 250cd/m<sup>2</sup>." The applicant states that this level of luminance is proposed because other billboards within the city centre have been consented at 500cd/m<sup>2</sup> during the hours of darkness and the effects associated with such levels are considered to be minor. We would like to see the standards in the AUP being the guide to the level of luminance, not other billboards that do not adhere to the AUP standards. Moreover, the more billboards, the greater the effects.

4. We have concerns for the residents at 135 Victoria Street West, as those who live on the western side of this building will have the billboard ever present in the view from their homes. This does not meet AUP criteria E23.8.2(1)(h) with regard to a sign or billboard dominating the outlook from any dwelling or any public open space. The billboard's LED display, showing a static image for a minimum of 8 seconds before changing to the next, at the rate of about 450 images per hour, would be lit all the time, with changeable messaging and luminance, with different backgrounds and colours of the images. People living close to digital billboards have complained that this constantly changing light, like the flickering effect of a TV in a darkened room, becomes very disturbing. People whose home is located close to a billboard have no choice about this intrusive form of advertising. In the words of Paul Meyer, global president of Clear Channel Outdoor, "Technology helps people avoid other advertisements, but we are the one unavoidable media. There is no mute button, no off switch. You can't change the channel. We're there."

5. We are concerned that the proposed billboard would be visible from Albert Park, a valued public open space in the city centre which has suffered increasing encroachment into its footprint and the views into and out of the park. We do not consider that the effect on the public open space of the park is negligible, as stated in section 8.6 of the Landscape and Visual Assessment in Appendix 1.

6. The assessment states that the placement of the billboard will result in "no visual clutter." Further Information part 6 states that "There is no apparent build up or dominance of signage, static or digital, and therefore there is no visual clutter created by the establishment of the proposed works." This contradicts the statement in Further Information part 2 that "The purpose of the billboard is to advertise products/services and is to be seen as much as possible from the surrounding streets and private/public spaces." Billboards are designed and located to be visible. Furthermore, in our view, a third billboard in Victoria Street West is contributing to the build-up of signage.

7. The proposed billboard would be within 30 metres of the Empire Hotel (Category B Heritage Building). E23.6.1(1)(c) in the AUP requires billboards not to be placed within 30 metres of a scheduled historic place. The heritage values of two scheduled (Category B) buildings in the area, namely, the Empire Hotel and the Cambridge Shirt Factory, would be adversely affected by this billboard, with the already cluttered environment becoming even more cluttered. Also, we understand from the heritage memo that the billboard "compromises the architectural detailing, colours and materials of the consented building's eastern façade, which was specifically designed, at the time of resource consent, to assist with mitigation and integration of this visually prominent face of the building."

**What decisions and amendments would you like the council to make?**

Decline the application.

**Are you a trade competitor of the applicant?** I am not a trade competitor of the applicant.**Do you want to attend a hearing and speak in support of your submission?** Yes

**If other people make a similar submission I will consider making a joint case with them at the hearing:** Yes