

## Submission on Queenstown Lakes Proposed District Plan Stage 2

*Under Clause 6 of the First Schedule, Resource Management Act 1991*

**To:** Queenstown Lakes District Council

**Submitter:** Go Media Ltd (**Go Media**)

- 1 This is a submission on the Queenstown Lakes Proposed District Plan – Stage 2 (**the Proposed Plan**).
- 2 Go Media could not gain a trade competition advantage through this submission (clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991 (the **RMA**)).
- 3 The specific provisions that this submission relates to is: Chapter 31 Signs, and associated definitions.
- 4 Go Media does not support Chapter 31 of the Proposed Plan in its current form, as set out in this submission.
- 5 Go Media's submission is that non-site related digital advertising (**digital advertising**) should be enabled in the Proposed Plan provisions and should not be prohibited.
- 6 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. Digital advertising can enhance the character of areas, buildings and structures also provides a focal point and adds vibrancy and interest. These positive effects should be expressly recognised in the Proposed Plan.
- 7 Digital advertising has become a widely accepted form of advertising throughout New Zealand. It is more sustainable than traditional print signage, and enables an advertising platform to be used for multiple purposes, including for civic messages, local advertising, community messages and events, as well as brand advertising. Digital advertising falls within the definition of a "hoarding" under the Proposed Plan. Hoardings are prohibited in Rule 31.5.14. Digital advertising does not have any moving parts or animation, but requires a 0.5 second dissolve between images. This dissolve could be caught within the definition of 'moving sign' in the Proposed Plan, and be prohibited by Rule 31.5.15.
- 8 Hoardings are traditionally large signs (i.e. billboards) primarily for commercial brand awareness. It is appropriate that these signs have some restrictions on locations (although it is Go Media's submission they should not be a prohibited activity). Whereas digital advertising can have a broader purpose and significantly less visual impact due to the flexibility digital advertising provides. Digital advertising also allows for some advertising to be site related. Any potential adverse effects from non-site related digital advertising in relation to traffic safety, landscape and amenity values can be managed through location and appropriate built form standards. Environmental effects assessments done for Go Media's existing static and digital billboards (nationwide) have demonstrated that effects are acceptable. These assessments were supported by technical traffic and urban design analysis where required.
- 9 Small scale digital advertising (including advertising on street furniture) should be a permitted activity, provided it is located appropriately and subject to built form standards. Built form standards should permit standard digital advertising signage sizes (which vary between approximately 1.5m<sup>2</sup> -2.3m<sup>2</sup>). The definition of 'moving sign' in the Proposed Plan should be clarified to ensure it does not unintentionally capture the 0.5 second digital dissolve between

images on a digital sign. For the avoidance of doubt, digital advertising can be programmed to display only static images.

- 10 The proposed prohibited activity status does not reflect sound resource management principles and practices and severely inhibits the operation of a legitimate business activity that can generate significant economic and other benefits. The recently operative Christchurch Replacement District Plan expressly recognises that digital advertising contributes to the commercial vitality of a community and has been afforded permitted activity status.
- 11 The Section 32 Report fails to provide an adequate planning assessment to support the proposed prohibited activity status. Suggested significant adverse effects on environmental quality, landscape and amenity values, and traffic safety are overstated and ignore the context in which non-site related digital advertising tend to be located (i.e. urban environments), and the "real world" effects of this advertising. There is no evidence to support unjustified and non-RMA comments made in the Section 32 Report that there is low demand for non-site related advertising (i.e. hoardings), and there are alternative products for advertising now available through electronic media which reduces the need to provide for economic wellbeing. The Report suggests hoardings doesn't have cultural and social benefits, and will create unnecessary visual clutter, which in Go Media's experience is the opposite of what actually occurs.
- 12 It is unclear what environmental effect non-site related advertising will have in addition to an on-site sign which is enabled in the Proposed Plan.
- 13 As a result of the matters raised above, it is Go Media's submission that the Proposed Plan fundamentally fails to achieve the requirements of the RMA, including it:
  - (a) fails to achieve the integrated management of the effects of use and development of land and associated natural and physical resources of the District a required by section 31 of the RMA;
  - (b) fails to meet the requirements of section 32 of the RMA, in that the proposed policies and rules are not the most appropriate method for achieving the RMA's purpose nor are they the most efficient and effective means for achieving the District Plan's objectives;
  - (c) will not assist the Council to carry out its statutory functions in order to achieve the purpose of the RMA; and
  - (d) does not promote the sustainable management of natural and physical resources, and is therefore not in accordance with Part 2 of the RMA.

### **Decision Sought**

- 14 Go Media seek the following decision from the Council:
  - (a) that the provisions in the Proposed Plan be amended to address issues raised in this submission; and
  - (b) such other relief as may be required to give effect to this submission, including consequential amendments to objectives, policies, rules and definitions of the District Plan that address the matters raised by Go Media.

- 15 Go Media wish to be heard in support of its submission, and will consider presenting a joint case with others presenting similar submissions.



Go Media Limited  
Signed by its duly authorised agents  
Anderson Lloyd  
Per: **Alex Booker / Rosie Hill**

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