

Before Queenstown Lakes District Council

In the matter of the Resource Management Act 1991

And **The Queenstown Lakes District Proposed District Plan –
Topic 15 (Chapter 31: Signs)**

Evidence of Michael Aaron Gray

Submitter #2516 (Go Media Limited)

Dated 06 August 2018

Solicitors:
Maree Baker-Galloway | Rosie Hill
Anderson Lloyd
Level 2, 13 Camp Street, Queenstown 9300
PO Box 201, Queenstown 9348
DX Box ZP95010 Queenstown
p + 64 3 450 0700 | f + 64 3 450 0799
maree.baker-galloway@al.nz | rosie.hill@al.nz

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Introduction

- 1 My name is Michael Gray and I am the managing director of Go Media Limited (**Go Media**).
- 2 Go Media is the third largest Out of Home advertising company in New Zealand. It is independently operated and owned, and has its Head Office in Christchurch. The company employs 19 staff.
- 3 By way of background, Go Media purchase quality hardware and pay a generous land lease to the landlord. We sell advertising to local businesses, events, and major brands. We have 400 static billboards and 650 Buses nationwide. Currently we operate digital billboards located in Auckland, Hamilton, Tauranga, Taupo, Hastings, Palmerston North, New Plymouth, Masterton, Christchurch, Dunedin, Otaki and Wellington. We currently do not have any billboards or digital advertising in the Queenstown District, having being unsuccessful in tendering for the Queenstown Airport signage. We have just been appointed the Nelson Airport signage contract.
- 4 As a company we are very community minded. We have a policy called 'Local and Vocal'. We are part of the local community in every city where we have advertising assets and we are vocal about showing our support.
- 5 For example, in Canterbury, we are the Outdoor Media Partner and sponsor of the Canterbury Crusaders. We also sponsor the Canterbury Tactix, The Canterbury Dragons and The Kings 20/20 cricket team. We sponsor the Buskers Festival, The Go Media Comedy Carnival, The Art Gallery, The Arts Festival and Cholmondeley Children's Home. We are a sponsor of the Maia Health Trust and we are working to raise money for a helicopter pad on the new hospital roof. We have the same approach in communities right across the country from Dunedin to Auckland, and it is worth noting that the local Council is a client in every market we operate in throughout New Zealand.
- 6 Nationally we are the sponsor of every Super Rugby franchise, the All Whites' official outdoor media partner, the Wellington Phoenix, and the official outdoor media partner of New Zealand Netball.

Positive benefits of advertising

- 7 It has been suggested that hoardings/billboards display no positive effects other than to display advertising. I disagree with this sentiment. Digital advertising can enhance the character of areas, buildings and structures, and also provide a focal point which adds vibrancy and interest. The character of a billboard is defined by its location and the nature of the content displayed on the screen.

- 8 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.
- 9 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. I have donated millions of dollars of media over the last 20 years to charities and groups I chose to support simply because I believe you get what you give. 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. So, my view is that there are significant positive benefits from what we do.

Chapter 31- Signs

- 10 Go Media submitted on Chapter 31 of the proposed Queenstown Lakes District Plan (**Proposed Plan**) seeking that non-site related digital advertising (**digital advertising**) should be enabled, and not be prohibited.
- 11 Go Media supports the recommendation in the Section 42A Report of Ms Amanda Jane Leith (Reporting Officer) (at [8.7]) that digital signs should be allowed within the ground floor area of a building within the Town Centre Zones. However, digital advertising which doesn't relate to a site or a proximate site should also be allowed.
- 12 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. Non-site digital advertising falls within the definition of a "hoarding" (now proposed to be called "billboards") under the Proposed Plan, and is prohibited in Rule 31.5.14.
- 13 Small scale digital signage with non-site related advertising (including advertising on street furniture and small format free-standing digital/LED displays in the Town Centre) should be a permitted activity, provided it is located appropriately and subject to built form standards. This signage does

not have any additional or adverse environmental effects when compared with site related signage or off-site signage (both of which are allowed in the Proposed Plan). Built form standards should permit standard digital advertising signage sizes (which vary between approximately 1.5m² -2.3m²). For the avoidance of doubt, digital advertising can be programmed to display only static images.

- 14 It is appropriate that larger scale billboards which are primarily for commercial brand awareness have some restrictions on locations and size (although it is Go Media's submission they should not be a prohibited activity). Whereas digital advertising enables multiple advertisements in one location and can have significantly less visual impact (when compared to multiple signs advertising only one advert). Digital advertising also allows flexibility for some advertising to be site related.
- 15 Comments by the Reporting Officer that suggest that there are no suitable locations in the district and adverse effects on environmental quality, landscape and amenity values¹ 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. 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 digital advertising (nationwide) have demonstrated that effects are acceptable in a variety of situations and locations. In some instances, these assessments were supported by technical traffic and urban design analysis.
- 16 The Reporting Officer (at 7.24) speculates that there is no appropriate location for billboards in the Queenstown District (with the exception of the Airport Zone) which is perhaps why there have been no resource consents applied for and granted. The fact Go Media and others have made a submission on the Proposed Plan, and are investing in this process, is evidence that we consider there to be appropriate locations for digital advertising. The reality is that the market dictates demand and commercial viability of an activity. There are natural barriers to signage in Queenstown, including the areas which would be considered appropriate. I note that the operative District Plan is not enabling of billboards and the opportunity to submit on the Proposed Plan provides the ability to change that.

¹Section 42A Report at [7.17, 7.23 - 7.25]

Conclusion

- 17 What our industry needs is recognition of our business, and the ability to be able to gain consent for advertising in appropriate business or industry zones, as of right, whereby the activity can be permitted. We seek rules that provide clarity and certainty and beyond multiple interpretations.
- 18 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. It is not in-keeping with the intent of the RMA which provides for activities where effects can be controlled. To insert a blanket prohibition across the District does not allow any site specific consideration as to whether the effects of a non-site signage proposal (digital or billboard) are acceptable.
- 19 We appreciate that the Queenstown Lakes District is a unique environment, and that the Council would like to control signage. We feel strongly that appropriate rules can enable our activities while still providing appropriate controls for Council.

Michael Aaron Gray

6 August 2018