

**In the matter** of the Resource Management Act 1991

**And**

**In the matter** of an application for Resource Consents by Lumo Digital Limited to construct a digital billboard display at 399 Lincoln Road.

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**STATEMENT OF EVIDENCE OF RICHARD JOHN KNOTT FOR  
LUMO DIGITAL LIMITED**

**12<sup>th</sup> November 2020**

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**Duncan Cotterill**

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## INTRODUCTION

- 1 My name is Richard John Knott.
  
- 2 I hold the following qualifications:
  - (a) Master of Arts in Urban Design, University of the West of England, UK (1995).
  
  - (b) Post-Graduate Diploma in Building Conservation, Bournemouth University, UK (2002).
  
  - (c) Bachelor of Planning, University of Manchester, UK (1989).
  
  - (d) Bachelor of Arts in Town and Country Planning, University of Manchester, UK (1988).
  
- 3 I have been elected as a full member of the following professional institutes:
  - (a) Chartered Town Planner (Member of the Royal Town Planning Institute, UK).
  
  - (b) Member of the Institute of Historic Building Conservation (UK).
  
  - (c) Member of the Institute of Highway Engineers (UK).
  
- 4 In October 2019 I undertook the Planning Institute of Australia's training in Landscape and Visual Assessment. I am also very familiar with the New Zealand Institute of Landscape Architects'<sup>1</sup> and UK's Landscape Institute's<sup>2</sup> guidance on landscape and visual assessment.
  
- 5 I am a Making Good Decisions Certificate Holder (since 2010 and last renewed in 2016 with Chairing Endorsement) and have sat as Independent Planning Commissioner (panel member and/or Chair) for resource consent and plan change hearings for Hamilton City Council, Whangarei District Council, Taupo District Council, Tauranga City Council, South Wairarapa District Council and Auckland

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<sup>1</sup> Best Practice Note, Landscape Assessment and Sustainable Management 10.1, New Zealand Institute of Landscape Architects, 2010

<sup>2</sup> Guidelines for Landscape and Visual Impact Assessment, Landscape Institute and Institute of Environmental Management and Assessment, Third Edition 2013

Council on over 40 hearings. I often sit on Hearings Panels where specialist urban design, special character or heritage expertise is required.

### ***Experience***

- 6 I have more than 30 years' experience working in the areas of urban design, heritage and planning.
- 7 My work has included designing and leading a wide range of projects, including masterplans/development frameworks for existing urban sites and greenfield areas through to providing advice for individual owners on their proposals to make alterations to their individual heritage home. In addition to this work, since 2016 I have provided urban design/visual impact advice on over 40 billboards, the majority of which were digital.
- 8 Recent urban projects include:
  - (a) Designed new town centre and preparation of comprehensive development plan for Rototuna Town Centre, Hamilton.
  - (b) Urban designer for a number of brownfield and greenfield residential, commercial and supermarket/local centre developments across New Zealand including Palmerston North, Hastings, Te Atatu, Wainuiomata, Kapiti, Lincoln, Hawera, Mosgiel and Auckland.
  - (c) Town centre masterplans and strategies for regeneration for Opotiki Town Centre (ongoing), Papakura and Manurewa.
- 9 Billboard projects include new digital billboards in urban settings in New Plymouth, Hastings, Masterton, Wellington, Christchurch and Auckland.

### **CODE OF CONDUCT**

- 10 While this is a Council Hearing, I acknowledge that I have read and am familiar with the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2014 and agree to comply with it. I confirm that this evidence is within my area of expertise, except where I state that this evidence is given in reliance on another person's evidence. I have considered all material facts that are known to me that might alter or detract from the opinions I express in this evidence.

## SCOPE OF EVIDENCE

- 11 I prepared the AEE report that accompanied the application New Digital Billboard 399 Lincoln Road, Addington Urban Design Assessment UPDATED 27<sup>th</sup> August 2020 **(the AEE report)**. This evidence does not re-cover issues which are already addressed there, other than confirmation of the key issues below.
- 12 This evidence will build on the AEE report, in response to:
  - (a) Comments and issues Christchurch City Council's Reporting Officers Section 42A Report (the s42A report), Appendix C, Memo, David Hattam, Senior Urban Designer; and
  - (b) Issues raised by Submitters;
  - (c) Feedback on consent conditions.

## EXECUTIVE SUMMARY

- 13 Having considered the matters raised in the Council's s42A report and appendices, I am of the opinion that:
  - 13.1 From the two affected apartments in the building labelled B on my plan (Figure 1) the proposed billboard would result in a low visual effect and a minor adverse effect.
  - 13.2 Due to the orientation of the building labelled A on my plan (Figure 1) there would be no effect on the view from the conservatory/enclosed balcony area or living area of any units within that building.
  - 13.3 The visual effects on the access deck of the building labelled A on my plan (Figure 1), which is a transient area which is not sensitive to change, would be very low, equivalent to a less than minor effect.
  - 13.4 Given the nature of the existing environment, the visual effects of the proposed billboard installation on the occupiers with the end units in the building labelled A on my plan would be low, equivalent to a minor adverse effect.

- 13.5 Mr Hattan has over emphasised the significance of the billboard at the end of the view along the path through the trees in Hagley Park as from many locations along the path the billboard will be offset and as a result will not be the main focus of attention of users of the paths
- 13.6 Mr Hattan's view regarding the prominence of the billboard and its impact on the amenity of park users is misguided as it places too much emphasis on the prominence of the proposed billboard and the transition of one image to the next, given the detailed position of the billboard and the proposed utilisation of a 0.5 second dissolve from one image to the next.
- 13.7 From the various viewpoints along the shared path within Hagley Park considered by Mr Hattan in the worst instance I consider the effects of the proposed billboards will be low, equivalent to a minor adverse effect.
- 13.8 When the proposed billboards are seen combined and sequentially with existing billboards they will not create cumulative impact or clutter in the street. They would have less cumulative impact and create less clutter than a permitted scenario.
- 13.9 Condition (m) should be altered to remove the opportunity to have an immediate change of image and to require a 0.5 second cross dissolve period between images.

## **EVIDENCE**

### **Section 42A report**

- 14 Mr Hattam's memo very clearly sets out his concerns with the proposal. He confirms that he agrees with my view that the visual effects in views west and east along Moorhouse Avenue will be low, but considers that the effect on the four upper floor apartment at 420 Hagley Avenue will be moderate, that the impact on views from the shared path within Hagley Park alongside Hagley Avenue will be high and that the proposed billboards will have cumulative effects with other existing billboards.

#### ***View from Upper Floor Apartments at 420 Hagley Avenue***

It is not clear from Mr Hattam's memo as to which four apartments at 420 Hagley Avenue he is referring to.



Figure 1: Views towards the proposed billboards from 420 Hagley Avenue

**Building Labelled B**

15 In Figure 1 I have considered views from 420 Hagley Avenue. This confirms that there would be views towards the east facing billboard face from some units within the building at 420 Hagley Avenue which is located against the Moorhouse Avenue boundary of the site (labelled 'B' in Figure 1). Figure 2 is a photograph showing the west elevation of these apartments. Based upon the diagram above, and given the height of the wall along the boundary of the site, I anticipate that only the first and second floor apartment against Moorhouse Avenue would have views of the east facing proposed billboard. The windows in these units facing the proposed billboard are shaded red in Figure 2.



Figure 2: Apartments with a view of the proposed east facing billboard

- 16 The original sales information for these apartments indicates that the windows shaded red open into an enclosed balcony/conservatory area, with the main living area set further back into the building.



Figure 3: Plan confirming typical internal layout of apartments at 420 Hagley Avenue, retrieved from brochure at <https://www.williamscorporation.co.nz/wp-content/uploads/2019/09/Information-Pack-420-Hagley-Avenue-Christchurch-Williams-Corporation.pdf>

17 Mr Hattan indicates that:

*Views from the apartments at 420 Hagley Avenue: Mr Knott's assessment has not considered the impact on the 4 upper-floor apartments which will have direct views of the billboard. The proposed billboard would be approximately 150m from these apartments, a distance at which it would be prominent, although within a low quality setting. The impact of transitions would increase the degree of impact by drawing attention to the sign. The proposal would be larger than the permitted scenarios and closer to the balconies, but would also be better integrated into the built environment than permitted scenario, with more visual coherence. Taking these matters into account, I consider that the proposal would have a moderate impact on occupiers (using the NZILA scale and based on the permitted scenario, including a billboard on Lincoln Road).<sup>3</sup>*

18 I do not agree that there are four upper floor apartments which will have a view of the east facing billboard; as set out above and based on Figure 1 I believe that only two upper level apartments will have a view of the east facing billboard.

19 Assuming that it is the two units discussed in paragraph 18 above that Mr Hattan is concerned with, I cannot agree with his conclusion. In the view from these two apartments the east facing billboard will be seen against the backdrop of the existing canopy and building on the site and within the context of the buildings on the Industrial General land around and behind the site, and against the Commercial Office zoned land to the rear. The billboard structure will appear lower than other buildings in the view, although marginally taller than the filling station canopy. It will not appear out of place or out of scale in the industrial commercial character of the area.

20 I do not agree with Mr Hattan's view that *'The impact of transitions would increase the degree of impact by drawing attention to the sign'*<sup>4</sup>. Whilst I accept that an immediate change from one digital image to another can draw attention, as could be the case with the permitted billboards, I do not consider this to be the case where a 0.5 second 'dissolve' is utilised with one image 'fading' into another.

21 Having provided urban design and visual impact advice to a large number of billboard proposals, and having viewed a large number of digital billboard installations to inform my understanding of their potential effects, I consider that the utilisation of a 'dissolve'

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3 s42A Report, section 3

4 s42A Report, section 3



is critical in ensuring that the change from one image to another does not attract attention.

- 22 I consider that the inclusion of this minor matter is so significant that I insist that it is a feature of proposed digital billboard installation if I am to assist an operator with their resource consent application, and would expect a condition to be placed on any consent granted requiring this. I discuss conditions in more detail below.
- 23 In this case, from the viewpoint of the two apartments in question, given the over 150m distance of the apartments from the proposed billboard face, and the nature of the intervening and surrounding existing environment, which consists of large roads, a busy intersection and a range of Industrial General and Commercial Office buildings, I cannot agree with Mr Hattan's view that the proposal would have a moderate visual effect. In coming to this view I have consider the low quality and nature of the existing environment, including the existing petrol filling station site on which the proposed billboard will be located, I do not consider that the proposal would make a partial change to the existing character or distinctive features of the landscape, nor a small reduction in the perceived amenity enjoyed by the occupiers of these apartments.
- 24 I am of the opinion, that from these apartments the proposed billboard would result in only a slight loss to the existing character, features or landscape quality for the occupiers, meaning a low visual effect and a minor adverse effect.

*Building Labelled A*

- 25 Based on the illustration included as Figure 1, it is clear that an occupier of a unit at 420 Hagley Avenue which faces Hagley Avenue (labelled 'A' in Figure 1) would not be able to view either of the proposed billboard faces from their conservatory/enclosed balcony area, or from their living area (which is set further into the building). There would therefore be no effect on this view.
- 26 Reference is made in the s42A report<sup>5</sup> that '*I add that the proposed east facing billboard is likely also to be visible from the stairs, front doors and balconies of additional apartment units situated to the south of 420 Hagley Avenue.*'
- 27 I assume that this relates to the rear elevation of the building labelled A. I consider that is more appropriate to call this area an access deck, rather than balcony as these area have been designed to provide access to the first and second floor units and

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<sup>5</sup> s42A Report, paragraph 70

apart from the front door the units do not open onto this space. The approximate location of the access decks is marked on Figure 1 and shown in the photograph at Figure 4.



*Figure 4: Rear elevation of building labelled A, showing first and second floor access decks and side elevation of building labelled B.*

- 28 Given the location of the apartment doors onto the access decks and the overall dimensions of the access decks I consider it very unlikely that any occupiers would use these areas for anything other than access. I consider that residents would not choose to dwell on the access decks, other than when they may have a passing conversation with a neighbour.
- 29 I am of the opinion, that the visual effects on the access deck, which is a transient area which is not sensitive to change, would be very low, equivalent to a less than minor effect.
- 30 As noted in the s42A report<sup>6</sup> the sill height of the windows along the southwest façade of the building labelled A is approximately 1.65m. I understand that the average eye height in NZ is around 1.60m. I noted in my report that any views towards the proposed billboard from the upper floor windows on this elevation would be blocked by the existing billboard located alongside the apartment building. I remain of the opinion that due to the high sill height of these windows there would be very limited opportunity for occupiers to view the proposed billboard from them.
- 31 Given the nature of the existing environment, which consists of large roads, a busy intersection and a range of Industrial General and Commercial Office buildings, I consider that the visual effects of the proposed billboard installation on the occupiers with these end unit windows would be Low (equivalent to a minor adverse effect).

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<sup>6</sup> s42A Report, paragraph 70

### ***Impact on views from the shared path along Hagley Avenue***

- 32 Mr Hattan notes that Hagley Park has significant heritage and amenity values, and as users will be attracted by the high quality environment they will be sensitive to changes in its visual quality.<sup>7</sup> He describes that users views are funnelled through the trees directing their view toward the proposed billboard at the end of this view, so meaning that the billboard will be prominent and becomes the focus of attention in the view.
- 33 I consider that Mr Hattan has over emphasised the significance of the billboard at the end of the view along the path through the trees; from many locations along the path the billboard will be offset and as a result will not be the main focus of attention of users of the paths. At many times of the year users will also be aware of other features within their immediate surroundings, including views towards Hagley Avenue and the apartments at 420 Hagley Avenue. Users will therefore be less sensitive to the installation of the billboard that Mr Hattan suggests.
- 34 Mr Hattan has utilised a series of photographs to illustrate his assessment, this includes 'Detail' images where it appears that a cropped and enlarged section of a photograph is utilised. He has also utilised a cropped and enlarged section of one of the visualisation images provided by the applicant. I believe that care should be taken in utilising these as part of the decision-making process.
- 35 Whilst I recognise that Mr Hattan has generally provided photographs rather than visualisations, I believe that as these photographs do not provide an accurate representation of the proposed billboard, and do not confirm the camera and lens combination utilised or the suggested viewing distance for each image, the photographs should be given limited attention. They cannot be relied upon as a visual aid.
- 36 The visualisations provided by the applicant have been professionally prepared in accordance with New Zealand Institute of Landscape Architects 'Best Practice Guide – Visual Simulations – BPG 10.2' and can be relied upon as a visual aid.
- 37 A more reliable approach would therefore be for the Commissioner to visit the locations identified by Mr Hattan, and when on site to utilise the submitted scaled

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<sup>7</sup> s42A Report, section 3

plans and the accurate, professionally prepared visualisations provided by the applicant.

38 I consider that Mr Hattan's view regarding the prominence of the billboard and its impact on the amenity of park users is misguided as it places too much emphasis on the prominence of the proposed billboard and the transition of one image to the next.

39 I have already described above the benefit of the 0.5 second dissolve from one image to the next and in view of this give little weight to Mr Hattan's concerns regarding this.

40 Mr Hattan identifies negligible visual impact at his 700m viewing distance and low visual impact at his 450m viewing distance. I accept his overall conclusion regarding these viewpoints, but do not accept his comments regarding digital transition from each of these viewpoints as I do not believe the transition will be noticeable from these distances due to the effect of the 0.5 second dissolve from one image to the next as described above.

41 At 300m, opposite the residential development on Hagley Ave, he suggests that the extent of change will be medium with moderate visual impact. I fail to see how there will be moderate visual impact from this viewpoint. The scale of visual effects I utilised for my assessment described Moderate visual effects as:

*Partial change to the existing character or distinctive features of the landscape and a small reduction in the perceived amenity.*

42 The Boffa Miskell seven-point scale of visual effects included as Appendix 1 of Mr Hattan's Memo, indicates moderate visual effects as:

*Partial loss of or modification to one or more key elements / features / characteristics of the baseline, i.e. the introduction of new elements may be prominent but not necessarily uncharacteristic when set within the attributes of the receiving context.*

43 The distinctive character of the overall view from the path in this location is formed by a number of factors, including the overall sylvan character provided by the trees, glimpse towards built development in Hagley Avenue and views along the path towards Moorhouse Avenue. Users of the path will be aware of all of these features and will not be solely aware of the view towards Moorhouse Avenue. The distance to Moorhouse Avenue is such that the existing petrol filling station canopy and buildings and existing advertising sign on the site area not a key characteristics or critical element of the character of the local area; they make only a minor contribution to the

existing character and distinctive features of the area. From this viewpoint the proposed billboard will be barely discernible through the large number of trees within the Park, even during wintertime. The utilisation of a 0.5 dissolve/transition between images will ensure that users of the path in this location are unlikely to be aware of the change of one image to another.

- 44 Given this I consider that the visual effects of the proposed billboard installation from this location would be Negligible (equivalent to a less than minor adverse effect).
- 45 At 220m Mr Hattan suggest that the regular changes of digital image seen at the end of the corridor will call attention to the end of the view and distract from the park surroundings which are the defining feature of the environment. He therefore indicates that the billboard will be a major modification to a key feature of the environment with a high visual impact due to transitions. He further concludes that the illuminated nature of the billboard in low light conditions would also be prominent and uncharacteristic and result in a moderate-high impact, regardless of the impact of changes. He suggests that this would be a greater impact than a static billboard, which would not be lit at this time.
- 46 I assessed a location 200m from the proposed billboard in my report. My assessment was based on my site visit and the professionally produced visualisations provided by the applicant, rather than the photograph and manipulated Detail photograph utilised by Mr Hattan.
- 47 In relation to the 200m viewpoint I indicated in my report that this view is dominated by the trees within Hagley Park, alongside the shared pathway, with a view through these of approximately half of the billboard face. I noted that the three storey apartments at 420 Hagley Avenue are a reasonably dominant feature in the view. During spring and summer the deciduous trees will be covered in leaves and they will further enclose the view, so that the proposed billboard will be seen within a small window between these.
- 48 I noted that from this location the proposed billboard is only seen with the petrol station canopy not with other surrounding buildings or buildings to the rear. It appears at a broadly similar height to the petrol station canopy. It does not appear out of place or out of scale against the petrol station canopy.
- 49 I do not agree with Mr Hattan that the proposed billboard will bring a major change to a key feature of this environment; the view towards Moorhouse Avenue is only one element of the view from this location. The other elements, including the trees within

the park and the apartments at 420 Moorhouse Avenue are far more significant to the overall view. The utilisation of the 0.5 second dissolve from one image to another will ensure that changes of image will not draw the attention of users of the path. I therefore remain of the opinion that from 200m (and from Mr Hattan's 220m) the proposed billboard will not be a dominant feature in this view, and given the nature of the existing environment, I consider that the visual effects of the proposed billboard installation would be Negligible (equivalent to a less than minor adverse effect).

50 I further consider that the 0.5 second dissolve will ensure that the overall effects of the billboard will be no different to an externally illuminated static billboard. The proposed 16 second duration for advertisements, double the standard time utilised by the billboard industry, will further reduce the overall effects of the billboard. I understand from Mr Clemas that the variability of the LED screen's luminance levels, managed automatically via smart technology, has been proven to be effective in dimming and brightening the screens luminosity in real-time in accordance with the ambient lighting conditions, further reducing its effects. This is particularly effective at night-time compared to the much brighter lighting effects and light spillage experienced with externally illuminated static billboards.

51 Mr Hattan introduces a further new viewpoint at 150m. He again relies on his own photograph and manipulated Detail photograph for his assessment. As noted above, I believe that as these photographs do not provide an accurate representation of the proposed billboard they should be given limited weight and cannot be relied upon as a visual aid.

52 Whilst Mr Hattan describes the proposed billboard as being prominent in this view, I consider it telling that for this view and the others he has provided he has needed to provide a manipulated cropped 'Detail' image to illustrate how prominent the existing sign is, and the billboard will be. i.e. it does not appear prominent in the original, non-cropped image.

53 Mr Hattan concludes that from this location the regular image changes would be a major modification to a key feature of the environment, would amount to a material change in the character with a high impact. In low light it would have a high impact, regardless of the impact of transition with a very high effect.

54 Whilst I did not assess this viewpoint, I did consider a viewpoint at 100m, based upon my site visit and the professionally produced visualisations provided by the applicant. Extrapolated from my conclusions for this closer viewpoint, I consider that the proposed billboard will only be a small element in this view, and as a result of the

wider range of factors which form the overall character of this location, including the trees and views towards development in Hagley Avenue, I do not consider that the billboard will be a major feature in this view during daytime or low light. Given this the extent of change brought by the billboard at all times of day will only be low with the visual effects being very low (a less than minor effect).

- 55 Even at 50m, where the applicant has provided professionally produced visualisations, Mr Hattan has chosen to instead provide his own photograph of the site. Whilst in his text he confirms that the visual effects of the proposed billboard would be low, the table earlier in his memo indicates that from this location the sensitivity of users would be high, the extent of change moderate and the visual impact moderate. I assume that his written comments supersede his table.
- 56 In this location, 50m from the billboard and close to the boundary of Moorhouse Avenue, I do not consider the sensitivity of users to be high. This location, adjacent to the busy Moorhouse Avenue where users are experiencing noise and vehicular movement, and have direct views towards commercial development. I consider that given the character of this location, users would not be particularly sensitive to change. I remain of the view set out in my report that given the nature of the existing environment, that from 50m the visual effects of the proposed billboard installation would be Low (equivalent to a minor adverse effect).

### **Cumulative Effects**

- 57 Mr Hattan indicates<sup>8</sup> that there are two established billboards at the Lincoln Road intersection with a recently constructed billboard at 2/26 Moorhouse Avenue. I have not been able to view this new billboard prior to preparing this evidence, but will do so before the hearing. Should my new site visit alter my view in any way regarding cumulative effects I will clarify this at the hearing.
- 58 Mr Hattan suggests that cumulative effects arise from the location of the proposed billboard in conjunction with other large billboards in the vicinity. He suggests that digital billboards are visible in peripheral vision due to transitions, which appear as movement, meaning that they attract attention when they would not otherwise be visible.
- 59 In relation to the last point, regarding the impact from digital billboards in peripheral vision, it is clear in my experience that transitions from one image to another do not

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<sup>8</sup> s42A Report, section 3

appear as movement and do not attract attention when a 0.5 second dissolve is utilised. I therefore consider that Mr Hattan's concerns regarding this matter are unfounded in relation to this application, where a 0.5 second dissolve is proposed. It is also important to note that billboards are an anticipated activity within the Industrial General zone and that more billboards could establish in the area, though subject to standards.

60 Mr Hattan indicates that my report did not consider cumulative effects; that is incorrect as my consideration of 6.8.2.1.6 Policy - Managing off-site signage did address this matter, I concluded that:

*'When viewed in close proximity from the west along Moorhouse Avenue it may be possible to see the proposed billboard installation with the existing billboards at positions 1 and 2 in Figure 3. Both of these are some distance away from the proposed billboard.*

*I understand that there is a consent to alter the billboard in position 1 to become a digital billboard, albeit at a reduced size. To view the billboard at position 1 from the same position as viewing the proposed billboard will require a passer-by to turn their view from one to the other. Given this I believe that there is no clutter effect or cumulative effect from this as they are not viewed together.*

*Whilst the billboard at position 2 will be seen in the same view as the proposed billboard, it is located at a higher height and at some distance behind the proposed billboard. As illustrated in the visualisation images, in this view the proposed billboard will be seen against the backdrop of existing Industry General development and will not stand out as a prominent feature in the street. Given this I believe that there is no clutter effect or cumulative effect from this.*

*When viewed from the east, it will be possible to view the proposed billboard installation with the existing digital billboard at position 2. However, in this view, as illustrated in the visualisations, when viewed from this direction the proposed billboard will be seen against the backdrop of Industry General development. It will be far less prominent in the street than the existing tall billboard at position 2. The billboards are also some distance apart from each other. Given this I believe that there is no clutter effect or cumulative effect from this.'*<sup>9</sup>

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<sup>9</sup> New Digital Billboard 399 Lincoln Road, Addington Urban Design Assessment UPDATED 27th August 2020, page 20



61 Mr Hattan provides an assessment of the cumulative effects of the proposed billboard from four directions; Hagley Avenue shared path, east along Moorhouse Avenue, west along Moorhouse Avenue and from the apartments at 420 Hagley Avenue. He concludes that there will be no cumulative effect from the first direction. I consider the other three directions below:

(a) East along Moorhouse Avenue

In considering this view Mr Hattan has included what appears to be an edited version of the 100m visualisation provided by the applicant. Editing this to use a cropped part of the image, and changes to show the proposed billboard as a single bright pink colour (which makes the image stand out more than a multi colour advertisement would) has in my view reduced the usefulness of this image for the consideration of cumulative effects as it no longer complies with the relevant NZILA guidelines. I have therefore instead considered the original professionally prepared images provided by the applicant.

Mr Hatten suggest that the effects of the proposed billboard will be higher than the permitted scenario. It appears that as a result he considers that the scale of effects from this location would be moderate when considered with the existing billboard at 30 Moorhouse Avenue and with the newly established permitted billboard at 26 Moorhouse Avenue with a perception of clutter and distraction. I do not agree with this conclusion. As stated in my report, in this view the proposed billboard will be seen against the backdrop of existing Industry General development and will not stand out as a prominent feature in the street.

A permitted scenario could include an additional two 6m(w) x 3m(h) billboards in this view, each of these being 9m high. The base of each billboard would be well above the height of the existing petrol filling station canopy. This would result in a greater area of billboard face being seen in this view than is proposed by the application.

This is a low visual amenity environment. Each billboard is separated from the other; the three billboards will not be read as one.

The billboards will be seen 'combined' (i.e. in the same view from the same viewpoint), and 'sequentially' as the observer moves through the area.

When seen combined, the three billboards will not be read as one but will each still be seen as separate element in the street. They will therefore not create any combined cumulative impact or clutter in the street.

When seen sequentially, each billboard is of a different design and different location on its own site. When seen sequentially they will each be seen as a separate entity, not in any way connected. They will therefore not create any sequential cumulative impact or clutter in the street.

Both when seen combined and sequentially the billboards would have less cumulative impact and create less clutter than the permitted scenario outlined above would.

(b) West along Moorhouse Avenue

Mr Hatten suggests that there will be moderate cumulative effects at 50m and that these effects would be greater than the permitted scenario because of the location and size of the billboard.

I do not understand Mr Hatten's logic as a permitted scenario could result in a total area of 36m<sup>2</sup> of additional billboard face in this view, at a far greater height more akin to the other existing billboards, than the proposed 29.2m<sup>2</sup> of billboard face proposed.

From this direction the proposed billboards would be seen with the billboard outside of 420 Hagley Avenue and the billboard at 30 Moorhouse Avenue. This would be a combined view, from a similar viewpoint, although the observer would have to turn their head to see the billboards together.

The three billboards are each of a different design and in a different setting, with the billboards outside of 420 Hagley Avenue being seen against a residential backdrop and the others seen within a commercial context. When seen combined, the three billboards will

not be not be read as one, but will each still be seen as separate element in the street. They will therefore not create any combined cumulative impact or clutter in the street.

Both when seen combined and sequentially the billboards would have less cumulative impact and create less clutter than the permitted scenario outlined above would.

(c) Viewed from the apartments at 420 Hagley Avenue.

Mr Hattan confirms that it is unlikely that it will be possible to view the billboards together from this location, but with the new billboard in place it will be difficult for residents to avoid looking at signage and the LED will draw attention to the signs. He considers there are moderate cumulative impacts in this view.

The view from the one first floor and one second floor apartments in 420 Hagley Avenue (building labelled B in Figure 1) which do have a view of the proposed billboard is of a busy street and commercial buildings. This is not a view which is sensitive to change, given its current low quality. As set out above, the 0.5 second dissolve time on images will ensure that the change of images does not draw attention. Accordingly, given the nature of the existing environment, I consider that the proposed billboard will not create any combined cumulative impact or clutter in the street.

### **Issues raised by Submitters**

62 A number of submitters have raised urban design/visual effect issues. These are similar to those matters raised by Mr Hattan as discussed above. I consider that I have appropriately addressed these matters above.

### **Conditions**

63 I consider the draft conditions included in the Council's s42A report to be reasonable from an urban design/visual perspective, apart from proposed condition (m). As noted above, I consider that the utilisation of a 'dissolve' between images is critical in ensuring that the change from one image to another does not attract attention.

64 As drafted condition (m) allows either an immediate change of image or a 0.5 second dissolve. I consider that this should be replaced by a new condition (m) that states:

*The transitions between static images shall include a cross-dissolve period between images of 0.5 seconds.*

## **SUMMARY AND CONCLUSION**

- 65 Having considered the matters raised in the Council's s42A report, including Appendix C the urban design assessment by Mr Hattam, I remain of the opinion that the proposed architect designed digital billboard installation will sit comfortably in the local Industry General area and will become an integrated element of the site and the surrounding area.
- 66 I consider that the levels of luminance at night-time, image dwell time and dissolve between images will exceed accepted best practice and overall the proposed billboard will appear as an integrated part of the area as it currently exists, and its overall potential for effects on the visual amenity and the character and quality of this urban environment, including cumulative and clutter effects with existing billboards, is minimal, when considered in the context of the nature of the surrounding area.



Richard John Knott

12<sup>th</sup> November 2020