

## Memorandum

20 September 2024

Attention  
*Phil Doole – Tasman District  
Council*

Issued by  
*Tony Milne  
RMM Landscape Architects*

RMM Job No.  
24177

### **Audit of Urban Design and Visual Impact Assessment for a proposed digital billboard at 332 Queen St, Richmond**

#### **Introduction**

This memo provides a review of the Urban Design and Visual Impact Assessment Rev. C dated 11 April 2024 (**UDVIA**) and addendum dated 21 May 2024 for the proposed digital billboard at 332 Queen Street, Richmond by DCM Urban (**DCM**).

The proposed billboard will be located above the parapet of the Pet Mart Shop at the corner of Queen Street and Gladstone Road (**SH6**), a key intersection within the town centre of Richmond. We understand the original proposal was for a static signage 6m wide and 3.0 m high, which has been updated to a digital billboard measuring 7m wide and 3.5m high, with a total area of 24.5m<sup>2</sup>. The proposed billboard is a Restricted Discretionary Activity under the Tasman Resource Management Plan (**TRMP**).

RMM have reviewed the DCM UDVIA document as an independent audit and have not provided a re-assessment of Urban Design and Visual Assessment matters. We set out matters for discussion following, with our response in *italics* to each of these:

1. Methodology Used.
2. Assessment of Urban Design and Amenity Effects incl. Notification Decision Report UDVIA Addendum.
3. Viewpoint Selection and Visual Effects.
4. Mitigation.

#### **Methodology Used**

The UDVIA reviews the proposal against the TRMP objectives, policies and rules in relation to the provisions for Outdoor Billboard and Advertising.

Additionally, the report references *the LED Billboard Research: Technical Review of Visual Effects, prepared by CCC, October 2016 by Boffa Miskell and Connectics* as a guideline for the billboard analysis itself.

Direct study methodology included site visits to study the existing signage/billboards along the proposed Site. Day and nighttime observation of both static and digital billboards has been undertaken to derive key viewpoint locations. These have considered the public view location within the receiving environment and visualisation for the same are provided in a Graphic Attachment (**GA**).

Based on the above methodology the UDVIA covers the following points:

- Evaluation of the existing urban character of Richmond's township.
- Assessment of effects on urban character and visual amenity values.
- Compliance with the TRMP provisions for outdoor signs.
- Additional assessment of TRMP Objectives and Policies under the TDC District Plan.
- Effects on visual amenity, considering location, visibility, impact, and comparison with existing billboard.
- Visual effects assessment including viewpoints, receptors, distance, type of view, magnitude of change, and mitigation measures.
- Cumulative effects on the visual amenity of the receiving environment.

Our Response:

*The methodology used for the UDVIA appropriately covers an understanding of the study area and assesses the various design aspects for the proposed billboard. The description of the location, receiving environment, architectural styles of proximate built form, residential proximity, existing signage/billboards, traffic movement and visibility accord with our understanding of such.*

*The reply to the TRMP provisions for Billboards is included in the response and additional documents have been correctly referred to for the assessment of technical review of the visual and amenity effects.*

*However, regarding the Visual Effects Assessment, the report cites Te Tangi a te Manu: Aotearoa New Zealand Landscape*

*Assessment Guidelines (TTatM Guidelines) - May 2021 version. This is an outdated version of this document and therefore, should not be used. Furthermore, the term 'Magnitude of Change' (Section 5.0 Appendix 2 of the UDVA) that has been applied to the descriptors used is incorrect as the descriptors are for the level of adverse effects.*

#### **Assessment of Urban Design and Amenity Effects incl. Notification Decision Report UDVA Addendum**

The UDVA assesses the proposal against the RMA Section 6 Matters of National Importance and appropriately concludes the digital billboard is not within a natural area. The conclusion is not drawn, however implied that Section 6 matters do not apply. *We agree.*

Regarding RMA Section 7 Other Matters 7c and 7f the UDVA concludes that due to already highly modified and visually cluttered commercial character of the area *"...there will be no adverse effects on the amenity values within the receiving environment by the proposed digital billboard."*

#### *Our Response*

*Given our understanding of the receiving environment, permitted building heights under the TRMP, and following a site visit, we do not agree with the conclusion reached by DCM regarding Section 7 matters. Following review of the addendum memo prepared by DCM our opinion remains the same. Refer VP1 and VP2 of the GA.*

The UDVA provides an assessment (supported by a Graphic Attachment) against the TRMP Summary Guide No. 10 – Provisions for Outdoor Signs and Advertising. Essentially the conclusion drawn is *"The proposed sign is over size and over height but is not considered to adversely affect the visual amenity or urban/commercial character of the receiving environment, which is considered to have a low-quality level of visual amenity."* (Page 6, UDVA).

## Our Response

*We agree that the urban/commercial character of the immediate receiving environment, has a low-quality level of visual amenity. However, the photomontages for VP1 and VP2 in my opinion clearly demonstrate the visual prominence of the billboard within the existing setting. We believe the DCM report does not sufficiently assess, particularly the important location of the billboard along the main town centre urban spine, and therefore underestimates the resulting effect.*

The Memo addendum covers the queries raised regarding Cumulative Effects and Visual Amenity, Interrupted Views of the Richmond Ranges, and provides an additional assessment of the TRMP Objectives and Policies, in the Notification Decision Report. The addendum concludes that “*proposed digital billboard will still have less than minor effects on the visual amenity of the receiving environment*” (Page 3 of the Addendum Memo).

## Our Response

*Having reviewed the DCM UDVIA addendum, we do not reach the same conclusion. The assessment takes into consideration the permitted building height of 10m as a baseline discussion and provides logic for the locating the billboard above the current parapet level, which in my opinion is not entirely the case. Given the majority of structures within the immediate receiving environment are single storey, and do not contain billboards above their roof lines, the proposed billboard adds to the urban clutter above the building lines in this location.*

*Therefore, we consider that the proposed billboard would have a minor adverse effect on amenity values within the area. Further, if in the future a 10m building is built on the site, we would expect it to have building integrated signage so as to avoid the urban clutter of such elements.*

*We also note in relation to amenity effects the matters of discretion under Rule 16.1.4.2 is limited to (2) “any amenity effect on the surrounding area, including size and duration.”*

*This matter is particularly broad and allows for consideration of any amenity effect not just visual amenity.*

### **Viewpoint Selection and Visual Effects**

Five public viewpoints were assessed to determine the visual effects on visually sensitive receivers (VSRs) such as vehicle users, pedestrians, and cyclists.

- VP1: Southeast from 337 Lower Queen Street
- VP2: East from 321 Lower Queen Street
- VP3: Northeast from 4a Gladstone Road (SH6)
- VP4: Northwest from 301 Queen Street
- VP5: Northwest from 273 Queen Street

Each viewpoint is accurately described and the UDVIA usefully tabulates the Assessment of Effects, and the Magnitude of Change (*note previous comments regarding this methodology*) is assessed as being either low or very low from the five respective viewpoints. After mitigation measures are considered (Viewpoints 1 -3) the effects (*assuming adverse effects as this is not stated*) are assessed as being either indiscernible or less than minor.

### Our Response

*We consider the viewpoints are representative of the typical public viewpoints afforded of the proposed billboard and for the most part find the DCM assessment balanced and considered. However, we would expect a greater assessment of both night-time visibility effects and effects on the pedestrian experience.*

*Furthermore, the assessment confuses magnitude of change and adverse effects and therefore we do not draw the same conclusion it reaches, as per the following "In terms of visual effects, the proposed digital billboard is not seen to adversely affect the visual amenity of the receiving environment." (Page 10, UDVIA)*

*In our view, the assessment understates the lack of integration of the billboard in the overall built form of the building upon which it being erected or the effect on the overall streetscape along Queen Street and SH6 intersection. It is noted that the*

*proposed location is consistent with similar settings. We disagree.*

*Notably, the nearby McDonald's fast-food restaurant signage has been used as a benchmark to rationalise the proposed billboard's location, placement above the parapet, size, visual dominance, and night illumination.*

*While we acknowledge that the McDonalds signage sits some three metres higher than adjacent roof form, the billboard is not of a similar nature and the visual impact of the proposed digital billboard, situated much closer to a major intersection, would be more dominant and feature transitional images, which we believe would add to its prominence. That is the whole point of such signage in locations like this.*

## **Mitigation**

The UDVIA recommends mitigation measures to either avoid, remedy, or mitigate any potential effects on Visual Amenity. Specifically, mitigation measure (MM1) recommends digital image transition and luminance control to achieve this.

### Our Response

*While the MM1 considers image transition and luminance control to align with ambient lighting levels, and given the dominate location and size of the billboard, we consider that the digital measures alone cannot mitigate the visual impact of the proposed billboard to the extent stated in the UDVIA. Due to the inherent design intended for the billboard it will inevitably stand out.*

## **Conclusion**

Overall, we generally find the DCM UDVIA considered and balanced. However, for the reasons stated above we believe the potential adverse effects have not been thoroughly assessed and therefore we do not agree with the conclusion reached in the UDVIA that *"the proposed location of the digital billboard is not out of character and will not generate any additional effects on the existing commercial character or*

*visual amenity of the receiving environment.” (Page 11 of the UDIVA).*

It is our opinion the potential visual and amenity effects arising from the proposed billboard will not be less than minor.

**Tony Milne (Fellow) NZILA**

20 September 2024