

**IN THE MATTER** of the Resource  
Management Act 1991

**AND**

**IN THE MATTER** of hearing of a  
submission and further  
submission lodged by  
the **OUT OF HOME  
MEDIA  
ASSOCIATION OF  
AOTEAROA INC.** in  
respect of the 'Signs'  
Chapter and the 'Signs'  
Design Guide  
**Proposed Wellington  
City District Plan**

## **STATEMENT OF EVIDENCE OF NATASHA O'CONNOR**

### **1. INTRODUCTION**

- 1.1 My name is Natasha O'Connor. I am the Chief Executive Officer of the Out of Home Media Association of Aotearoa ("OOHMAA"). I have held this position since 2019.
- 1.2 The Proposed Wellington District Plan ("PWDP") includes a "Signs' Chapter and 'Signs Design Guide', which contains a number of provisions concerning the development of signage in Wellington City.
- 1.3 OOHMAA lodged:
  - (a) A submission that both supports and opposes various provisions proposed in the 'Signs' Chapter and the 'Signs' Design Guide of the PWDP; and
  - (b) A further submission in opposition to various amendments sought by Waka Kotahi in its primary submission.

### **Purpose and scope of evidence**

- 1.4 Against that background, the purpose of my evidence is to:
  - (a) Outline OOHMAA's role in the industry (Section 2).

- (b) Provide an overview of Out of Home Media industry (Section 3).
- (c) Address OOHMAA's key concerns arising from the proposed changes to the PWDP (Section 4).

1.5 I am authorised to give this evidence on behalf of OOHMAA.

2. **OUT OF HOME MEDIA ASSOCIATION OF AOTEAROA**

2.1 OOHMAA is a not-for-profit professional industry body that represents New Zealand's major outdoor media display companies.

2.2 OOHMAA is the successor to the Outdoor Media Association of New Zealand, which was closely involved in the Local Government Act processes which resulted in the development of bylaws for billboards in Auckland in 2007, and later with the development of suitable provisions for billboards and other signs in the Auckland Unitary Plan in 2013-2016.

2.3 OOHMAA and its members are regularly involved in plan-making processes, to ensure that any regulation is workable and will result in good environmental outcomes.

2.4 Members of OOHMAA include Out of Home Media operators JCDecaux, oOh!media, MediaWorks, Media 5, Ad-vantage Media, Vast Billboards, LUMO, GO Media, HYPER, JOLT and Bekon Media, and a range of organisations which are affiliated with or support the industry overall.

2.5 Collectively, the members contribute over 90% of total Out of Home Media advertising industry revenue, being \$180 million in 2023.

2.6 OOHMAA's key focus is to:

- (a) Educate the advertising industry on the many benefits and power of Out of Home Media advertising;
- (b) Build and maintain relationships with interested parties within the broader advertising industry and with councils and government;
- (c) Seek co-operation between operators to ensure compliance across the board;
- (d) Develop best practices that become industry standards; and
- (e) Provide support for OOHMAA members.

### 3. **THE OUT OF HOME MEDIA INDUSTRY**

- 3.1 Out of Home Media (previously referred to as outdoor advertising) involves the conveying of advertising and community messages to the general public by means of (generally large format) graphic messages.
- 3.2 Out of Home Media utilises a variety of formats for different communication outcomes, including street furniture posters, 'static' billboards (comprising a static printed image), and digital billboard displays, in a range of sizes.
- 3.3 Out of Home Media is (and has long been) a legitimate field of commercial endeavour and is a recognised form of mainstream media that represents an integral part of the advertising industry.
- 3.4 OOHMAA's research in relation to the direct economic impact of the outdoor advertising industry indicates that:
  - (a) As at 2011, there was between \$160 million and \$210 million in total invested in the Out of Home Media industry;
  - (b) As at 2019, the contribution of the Out of Home Media industry to national annual GDP was estimated to be in the order of \$220 million.
- 3.5 Out of Home Media offers a range of benefits to advertisers. Billboards, in particular, offer scale, impact and reach and help create brand opportunities for advertisers. They are also an important means by which advertisers can pinpoint niche or difficult-to-reach audiences, through the location, type and environments in which billboards are located.
- 3.6 Quite aside from revenue for Out of Home Media operators, billboards also provide significant economic benefits to various other stakeholders including:
  - (a) The owner of the property on which the billboard is situated in terms of rental / licence fees.
  - (b) The person or company whose product or service is advertised.
  - (c) The advertising agency responsible attracting advertisers and working up the creative design.
  - (d) The company that produces the billboards (static or digital) or 'skins' (for static billboards).
  - (e) The contractors involved in construction and technical support.
- 3.7 The public derive the benefit of the commercial information or community messages contained in billboards. The primary nature

of this benefit is that it enables large numbers of people to become informed about products, services, social issues and community concerns more effectively and at significantly lower cost than would otherwise be the case.

- 3.8 The public also derive the benefits of the interest and vibrancy associated with the images, which contribute to the amenity of dull areas as well as contributing positively to popular culture.
- 3.9 Digital billboards in particular allow for a variety of products and services to be advertised daily, surpassing the limitations of a traditional static billboard. Not only that, but advertisements can be tailored for the time of day and type of consumer, and by targeting advertising in this way it provides enhanced public engagement and interaction with the billboard. Further, the content on digital billboards can be changed remotely, which is far quicker and cheaper than static media.
- 3.10 A further benefit of the digital outdoor advertising medium is that the units can be taken over in an emergency situation, for example, in the case of an earthquake, tsunami or other major event. Agencies such as Civil Defence or the New Zealand Transport Agency could take over the billboards to display relevant messages to the community, such messages being able to be displayed within 20 minutes of being instructed.

#### 4. **OOHMAA POSITION ON THE PDP**

- 4.1 In accordance with its key objectives, OOHMAA engaged professional advisors – legal (Berry Simons), traffic (Brett Harries) and planning (Anthony Blomfield) who have a significant amount of experience in the area to advise on the implications of the provisions proposed by the PWDP. I briefly address those aspects that OOHMAA supports and those which remain a source of concern below.

#### **OOHMAA's support of the PDP**

- 4.2 As addressed in OOHMAA's submission, OOHMAA supports the following aspects of the PWDP:
  - (a) Recognition of the importance of signage and third-party signs (billboards) for their role in providing information, messaging and advertising;
  - (b) The provision of a single chapter within the PWDP which contains the provisions for signs (as opposed to incorporating provisions for signs within each zone chapter);
  - (c) Recognition of the nature of effects of signs that need to be addressed by objectives and policies;

- (d) The permitted activity status applied to third party signs, where they are designed to comply with relevant standards;
- (e) The incorporation of those 'standards' which generally reflect current industry practice; and
- (f) The incorporation of appropriate matters of discretion for restricted discretionary activities which limit consideration to:
  - (i) Visual amenity;
  - (ii) The integration of signs with buildings;
  - (iii) Traffic, pedestrian and cyclist safety;
  - (iv) Functional and operational requirements of activities and signs; and
  - (v) The benefits (positive effects) provided by of signs.

**OOHMAA's concerns in relation to the PWDP**

4.3 Based on advice from OOHMAA's advisors, OOHMAA's position is that there are a number of shortcomings that include, in broad terms:

- (a) Inappropriate policy drafting resulting in a 'nil effects' approach to visual clutter.
- (b) The provision of onerous standards applying to third party signs and digital sign concerning:
  - (i) Maximum sign areas in the Metropolitan Centre Zone.
  - (ii) Maximum sign heights in the Metropolitan Centre, Mixed Use, and City Centre Zones.
  - (iii) Minimum separation distance between signs which are located within 10m of a legal road.
  - (iv) Restrictions as the content of images on digital signs.
  - (v) Minimum dwell time per image and dissolve rates for digital signs.
  - (vi) Lighting requirements for illuminated signs.
- (c) Various amendments to provisions relating to signs that are visible from a state highway.
- (d) Amendments to the Signs Design Guide.

- 4.4 The technical details relevant to these concerns are addressed in the evidence of Mr Blomfield on planning and Mr Harries on traffic / transportation and I do not propose to address them any further. I do, however, provide some comments below from an industry perspective.
- 4.5 As the industry body, OOHMAA seeks to maintain the integrity of the Out of Home Media industry by working with the Council to ensure that the PWDP provisions strike the right balance between managing adverse effects and enabling appropriate levels of signage development.
- 4.6 OOHMAA is concerned that a number of provisions proposed by the PWDP are unduly restrictive, which will have a prohibitive effect on the Out of Home Media industry's ability to develop and grow as a legitimate commercial field of commercial endeavour. A number of the PWDP provisions, in the form proposed by the Council, lack adequate evidential backing and, in some instances, is inconsistent with the findings of published research/relevant industry data.
- 4.7 OOHMAA is also concerned that PWDP will become too onerous for operators to be able to develop within Wellington City, resulting in the potential financial, employment and even civic value that arise from the development of signage being redirected to other Districts with less onerous planning provisions.

## 5. **CONCLUSION**

- 5.1 OOHMAA is the Out of Home Media industry body and represents Out of Home Media operators that are responsible for over 90% of all Out of Home Media activity.
- 5.2 Out of Home Media is a legitimate, mainstream medium that provides significant economic benefit to Wellington City and is an integral part of the advertising industry.
- 5.3 While OOHMAA supports several elements of the PWDP as it relates to signage, there are still a number of concerns that remain outstanding. OOHMAA's position, based on the independent professional advice it has obtained, is that the amendments contain within Messrs Harries and Blomfield's evidence ensure the appropriate balance is struck between enabling appropriate development while adequately managing (rather than avoiding) adverse effects.

**Natasha O'Connor**

**5 March 2024**