



## SECTION 32 REPORT Signs

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<b>1</b>	<b>Executive Summary .....</b>	<b>1</b>
<b>2</b>	<b>Introduction and Purpose.....</b>	<b>2</b>
<b>3</b>	<b>Statutory and Policy Context.....</b>	<b>2</b>
	3.1 Resource Management Act.....	2
	3.2 Regional Policy Statement.....	3
	3.3 Iwi Environmental Management Plans.....	4
	3.5 Local Policies, Plans and Strategies.....	6
<b>4</b>	<b>Context, Research and Trends.....</b>	<b>9</b>
	4.1 Operative District Plan Approach .....	9
	4.2 Other Methods.....	11
	4.3 State of the Environment.....	11
	4.4 Effectiveness of the Operative District Plan Approach .....	14
	4.5 Effectiveness of Other Methods .....	15
	4.6 Other Relevant Research/Documents.....	15
<b>5</b>	<b>Consultation .....</b>	<b>16</b>
	5.1 General Consultation .....	16
	5.2 Consultation with Iwi Authorities .....	17
<b>6</b>	<b>Key Resource Management Issues .....</b>	<b>18</b>
<b>7</b>	<b>Proposed District Plan Provisions (Objectives, Policies and Methods/Rules)</b> <b>.....</b>	<b>18</b>
	7.1 Strategic Objectives .....	18
	7.2 Objectives and Policies .....	18
	7.3 Rules .....	18
	7.4 Effects standards .....	19
	7.5 Definitions.....	20
<b>8</b>	<b>Approach to Evaluation.....</b>	<b>20</b>
	8.1 Evaluation of Scale and Significance .....	20
	8.2 Explanation Summary.....	21
<b>9</b>	<b>Evaluation of Objectives .....</b>	<b>22</b>
<b>10</b>	<b>Evaluation of Options to Achieve the Objectives .....</b>	<b>24</b>
<b>11</b>	<b>Summary .....</b>	<b>28</b>



## **1 Executive Summary**

A prominent feature of modern-day cities and districts, signs are important for identifying and promoting businesses and services and perform a key role in advertising events and other community activities. Road and traffic signs are vital in providing a safe public environment. However, without appropriate management, signage can compromise the safety of motorists, cyclists and pedestrians and adversely affect the environment, particularly its visual amenity.

The Operative District Plan contains complex provisions for signs within each of the Environment Areas (zones). This approach has led to adverse outcomes such as overcrowding, inappropriate location of large signs and multiple signage on properties.

The key resource management issues relating to Signs are:

- Signs contribute to the vitality and vibrancy of the district and support tourism.
- Signs can adversely affect the character and amenity values of the local environment, as well as the values of buildings and structures upon which they are placed.
- Signs can create a distraction for drivers, potentially impacting on the safety of all road users and efficiency of the roading network.

The key changes introduced for Signs are:

- A standalone chapter with specific objectives, policies and rules for signs across a range of zones that recognise the different character and amenity values.
- A requirement for most signs to be located entirely on the site to which they relate.
- Specific standards for signs on heritage buildings and items that acknowledge the legislative requirement to protect historic heritage from inappropriate development.
- Third party advertising signs will require resource consent in most instances.
- Subject to effects standards such as size, height and number most signage types continue to be permitted, with new rules restricting digital signs to pedestrian frontage in the City Centre Zone.

The proposed provisions will better ensure that signage is consistent with the objectives of the District Plan but allow the flexibility of design and style to create diversity and interest in the environment.

## 2 Introduction and Purpose

This report contains a section 32 evaluation of the objectives, policies and methods relating to signs in the Proposed New Plymouth District Plan. It is important to read this report in conjunction with the section 32 overview report which contains further information and evaluation about the overall approach and direction of the District Plan review and Proposed District Plan.

Signage is important for the identification and promotion of businesses and services and performs a key role in advertising events and other community activities. Road and traffic signs are vital in providing a safe public environment. Signage requires careful management to ensure it does not compromise the safety of motorists, cyclists and pedestrians or adversely affect the environment, particularly its visual amenity.

This report sets out the statutory and policy context for signs, the key resource management issues, specific consultation and approach to evaluation on this topic to decide on the proposed provisions. The report also includes a review of the existing plan provisions and an evaluation of alternative methods to achieve the purpose of the Resource Management Act (RMA) in relation to the signs topic.

## 3 Statutory and Policy Context

### 3.1 Resource Management Act

The Resource Management Act (RMA) sets out in Section 31 the functions of territorial authorities. The key function for the district council is set out under section 5 which relates to the integrated management of the use, development, or protection of land and associated natural and physical resources of the district. "*Natural and physical resources*" includes natural landforms, buildings and structures. Amenity and economic matters associated with signage are particularly important considerations under Section 5.

Section 6 of the RMA specifically requires that the Council recognises and provides for matters of national importance. The Section 6 matter of national importance relevant to the proposed signs provisions is:

*(f) the protection of historic heritage from inappropriate subdivision, use, and development:*

Specifically, the Signs Chapter is applicable to heritage buildings and items which require ongoing protection. Signs can detract from the heritage value of buildings and items and their fixings can cause irreparable damage.

Section 7 of the RMA requires the Council to have particular regard to the following matters:

*s7(c): Maintenance and enhancement of amenity values.*

*s7(f): Maintenance and enhancement of the quality of the environment.*

Signs can have positive or adverse effects on amenity values due to their size, location and lighting effects. Signs can also impact on the quality of the environment, particularly in residential and rural zones where signs are not anticipated to be a dominant feature.

Section 8 of the RMA requires the Council to take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi). Tangata whenua, through iwi authorities, has been consulted as part of the review process and the obligation to make informed decisions based on that consultation is noted. Section 74(2A) of the RMA requires Councils to take into account relevant Iwi Management Plans and their bearing on the resource management issues of the district.

### 3.2 Regional Policy Statement

Under Section 75(3)(c) of the RMA, the District Plan must give effect to the Regional Policy Statement. The Taranaki Regional Policy Statement (RPS) contains the following issues, objective and policy on maintaining and enhancing amenity values:

- AMY ISS 1: Recognising the positive effects of use and development activities in relation to their maintenance and enhancement of amenity values.
- AMY ISS 2: Avoiding, remedying or mitigating adverse effects that may arise from use and development activities on amenity values.
- AMY Objective 1: To recognise the positive contributions of appropriate use and development in terms of providing the maintenance and enhancement of amenity values in the Taranaki region, while avoiding, remedying or mitigating the adverse effects of inappropriate use and development on amenity values.
- AMY Policy 1: The adverse effects of resource use and development on rural and urban amenity values will be avoided, remedied or mitigated and any positive effects on amenity values promoted. Any positive effects of appropriate use and development will be fully considered and balanced against adverse effects.

Those qualities and characteristics that contribute to amenity values in the Taranaki region include:

- (a) Safe and pleasant living environment free of nuisance arising from excessive noise, odours and contaminants, and from traffic and other risks to public health and safety.
- (b) Scenic, aesthetic, recreational and educational opportunities provided by parks, reserves, farmland, and other open spaces, rivers, lakes, wetlands and their margins, coastal areas and areas of vegetation.
- (c) A visually pleasing and stimulating environment
- (d) Efficient, convenient and attractive urban forms, and
- (e) Aesthetically pleasing building design, including appropriate landscaping and **signs**.

The RPS provides the following methods which are considered relevant, and which the Council may wish to consider:

- AMY METH 8: Include in district plans and on resource consents, provisions or conditions promoting the maintenance and enhancement of rural and urban amenity values.
- HIS METH 6: Include in district plans and on resource consents, provisions or conditions promoting the identification, protection and enhancement of historic heritage.

The control of signs in the District Plan is an amenity tool and relevant to the delivery of these Regional Policy Statement provisions.

### 3.3 Iwi Environmental Management Plans

For the purposes of the District Plan Review, Iwi Environmental Management Plans must be taken into account under Section 74 (2A) of the RMA. The following Iwi Management Plans are in various stages of preparation and have been considered in the preparation of this report:

#### 3.3.1 Taiao, Taiora: An Iwi Environmental Management Plan for the Taranaki Rohe (2018).

Taiao, Taiora is a document for Taranaki Iwi to guide and inform decision making by the Iwi. At the time of writing, it has been lodged with the Council.

It is structured into five sections, reflecting the interrelated natural systems. Taiao, Taiora sets out issues, objectives and policies. While none directly mention signs, the section on Papatuanuku (the land) includes the following issue and objective:

*Issue 9.*

*Poorly designed subdivision and development can lead to unsustainable and inefficient land use, destruction of wāhi tapu and other important sites ...*

*Objective 5.*

*The whenua will be cared for by Taranaki Iwi and others for mutual, reciprocal benefit for the whole community. Taranaki Iwi are seen as leaders in sustainable living and sustainable land management on our whenua;*

Taiao, Taiora clearly states that the Taranaki Iwi will not support any subdivision and development that adversely impacts the important cultural values associated with landscapes of importance to Taranaki Iwi (hapū, marae/pā).

#### 3.3.2 Ko Tā Maniapoto Mahere Taiao, the Maniapoto Iwi Environmental Management Plan (2016). Still under revision.

Ko Tā Maniapoto Mahere Taiao (Draft) outlines the iwi's vision for environmental sustainability. The Plan describes issues, objectives, policies and actions, to protect, restore and enhance the relationship of Maniapoto with the environment; and also the social, cultural, spiritual and economic relationships. The Plan makes mention of signage in relation to public access to the coast, iwi signage and signage relating to speed restrictions, as follows:

*Policy 17.3.5.1 Maniapoto access to coastal areas for customary activities is enhanced and protected.*

*Action (f): Provide signage for public access to and along the coastal marine areas to avoid cultural heritage areas.*

*Policy: Maniapoto culture, history and identity associated with specific places are reflected in residential and commercial developments.*

*Action (f): Ensure the use of Maniapoto designed artwork, signs, materials and structures that communicate the culture, heritage and history and promote the significance of places, resources and names important to the people of Maniapoto.*

*Policy 22.3.5.1 Risks that Maniapoto are exposed to from transport users are reduced.*

*Action (b): Ensure appropriate speed limits and other signage is posted and enforced near marae, kura and other Maniapoto facilities.*

3.3.3 Ngāti Mutunga Iwi Environmental Management Plan (2016 update). Final draft provided; still under revision.

Ngati Mutunga Iwi Environmental Management Plan has a goal to provide for sustainable management of the environment for the social, cultural, economic, and environmental wellbeing of the iwi. The Plan makes mention of signage in relation to public access to wahi tapu sites and coastal access as follows:

*It is against the tikanga of Ngāti Mutunga to permit or encourage public access to waahi tapu, in particular, sites that have been used as urupā.*

*Because of this the Iwi wish that:*

- *The erecting of any signs marking these sites is only done with the approval and involvement of the Ngāti Mutunga Iwi and any owners.*

*Encourage the erection of interpretive signs explaining the cultural and environmental significance and sensitivity of the coastal environment, and our connection with the land on reserves. The content of any sign is to be developed in consultation with Ngāti Mutunga*

3.3.4 Tai Whenua, Tai Tangata, Tai Ao, Te Atiawa Iwi Environmental Management Plan (2019). Council has provided comments on Draft.

Tai Whenua, Tai Tangata, Tai Ao is a document for Te Atiawa Iwi reaffirming the iwi's role as Kaitiaki. Its secondary role is to guide and assist councils and other agencies in understanding issues of significance to Te Ātiawa. It sets out the iwi's framework for engagement, guiding principles and issues and objectives relating to eight domains; guardianship; inland and coastal whenua; freshwater; coastal and marine environment; air and atmosphere; flora and fauna; wahi taonga, urupā and sites of significance to māori; Taranaki maunga. While none directly mention signs, the section on inland and coastal whenua includes the following Issue, Objectives and Policy:

*Issue TTAN4: Inappropriate subdivision and development can generate adverse effects on Te Ātiawa values.*

*Objective TTAN4.2: Acknowledge and provide for Te Ātiawa values and the expressions of our narrative in the built form and landscaping.*

*Objective TTAN4.4: Acknowledge and provide for Te Ātiawa cultural landscapes in the built design to connect and deepen our 'sense of place'.*

*Policy TTAN4.3: Require regional council and district councils to engage at Plan Change stage, where plan changes are required to enable subdivision, to identify potential effects on wāhi tapu/wāhi taonga, urupā and sites of significance to Māori and Te Ātiawa cultural values.*

## **3.4 Other Legislation and Policy Documents**

### **3.4.1 National Planning Standards 2019**

Released in April 2019, the purpose of the National Planning Standards (planning standards) is to improve consistency in plan and policy statement structure, format and content.

The standards were introduced as part of the 2017 amendments to the Resource Management Act 1991 (RMA). Their development is enabled by sections 58B–58J of

the RMA. They support implementation of other national direction such as national policy statements and help people to comply with the procedural principles of the RMA.

As discussed in the Overview Report, the Proposed District Plan will give effect to the planning standards. The Standards include several matters relating to signs:

- The Standards require that if provisions for managing signs are addressed, they must be located in the Signs Chapter. This differs from the Operative Plan which manages signs through each of the Environment Areas, without a specific chapter for signs.
- The National Planning Standards also includes definitions for sign and official sign, which are required to be used in all district plans where signs are managed. Those definitions are:

*SIGN means any device, character, graphic or electronic display, whether temporary or permanent; which*

*a. is for the purposes of—*

*i. identification of or provision of information about any activity, property or structure or an aspect of public safety;*

*ii. providing directions; or*

*iii. promoting goods, services or events; and*

*b. is projected onto, or fixed or attached to, any, structure or natural object; and*

*c. includes the frame, supporting device and any ancillary equipment whose function is to support the message or notice.*

*OFFICIAL SIGN means all signs required or provided for under any statute or regulation, or are otherwise related to aspects of public safety.*

#### 3.4.2 Bylaw 2010 NZTA (Signs on State Highways) Bylaw

NZTA's Bylaw for Signs on State Highways prohibits advertising and other unofficial signs **on** highways road reserve. Advertising signs on state highways require written consent from the NZTA unless the sign is behind the kerb line of any state highway in any area where a 50km/hr or lesser speed limit applies. This recognises that signs can be difficult to read and can create a safety hazard, particularly in high speed environments.

Advertising signs **alongside** state highways road reserve are of interest to the NZTA if they are visible from the highway. However, the NZTA has no jurisdiction to make rules or bylaws beyond the state highways. The NZTA's primary concern is to avoid, remedy or mitigate the creation of risks to the safety of road users. NZTA likes to be involved in the resource consent process for signs within the 70km/hr or higher speed limit environment where those signs do not meet the rules in district plans.

### 3.5 Local Policies, Plans and Strategies

#### 3.5.1 New Plymouth District Strategic Framework

The vision for the New Plymouth Strategic Framework is Building a Lifestyle capital (He Whakatutu Haupu Rawa Hei Ahua Noho). The community outcomes this will achieve are: Putting people first (Aroha kit e Tangata), Caring for our place (Manaaki whenua,

manaaki tangata, haere whakamua) and Supporting a prosperous community (Awhi mai, Wahi atu, tatou katoa).

### 3.5.2 The New Plymouth District Blueprint

The Blueprint is a 30-year spatial plan for the district first adopted in June 2015. The following key direction is particularly relevant to the Signs topic:

- City Centre – champion a thriving central city for all.

This key direction recognises that the central city of New Plymouth is the social, cultural and business hub for the district and wider region. The success of the central business area will necessitate the use of effective signage.

### 3.5.3 Regional Economic Development – Tapuae Roa

Tapuae Roa—Make Way for Taranaki: *Taranaki Regional Economic Development Strategy*, August 2017 (Tapuae Roa) is a culmination of work undertaken by the district councils and regional council of Taranaki in partnership with Ngā Iwi o Taranaki. It is designed to feed into the Long-Term Plans of all the councils in the region, and influence public and private sector investment decision-making on future activities.

Tapuae Roa identifies the values of environmental sustainability, preparedness for future generations, liveability and resilience. A key theme running through the document is that lifestyle is recognised as a key factor in population attraction and retention. Goals to note in the document are the values around lifestyle and liveability; namely:

1. Talented people: "Taranaki is a place where talented people want to live."
2. Attractive lifestyles: "The Taranaki lifestyle offering retains and attracts people."

### 3.5.4 New Plymouth District Council Signs Bylaw (2014)

The purpose of the Signs Bylaw is to ensure that any signs on any public place are erected and maintained in such a manner that they do not present a hazard or danger to the public. The Bylaw regulates the type and location of advertising signs on parks and reserves and other public places. It is noted that signs on a public place must also comply with the relevant provisions of the District Plan, as the Bylaw does not control the scale of signs. There is duplication, and some inconsistency, between the District Plan provisions and the Signs Bylaw. It is intended that, once the Proposed District Plan is adopted, the Signs Bylaw will be reviewed.

### 3.5.5 Central Area Urban Design Framework (2013)

As part of becoming a signatory to the Urban Design Protocol, the Council has implemented an action plan outlining urban design initiatives it will take. One of the key actions was the formulation of a Central Area Urban Design Framework. It is a 30-year shared vision for New Plymouth's central area that drew on public feedback gathered from surveys in 2012 and 2013 on what residents like and what they wanted improved in the city's central area. The vision is that "The central area will provide a vibrant, efficient and accessible public living room and business hub for the people of New Plymouth district."

The Framework stresses the importance of a focus on streetscape and "the need to develop a cohesive sense of place for the Central Area, and to reduce visual clutter

where possible, through the rationalisation of street signs and other elements including private sandwich board advertising on the footpath.”

One of the Framework’s top 5 actions is the development of a Pedestrian Precinct in the inner core of the central area. The area extends between Queen Street and Gover Street, taking in Gill and Devon Streets and the streets that cross them. The long term vision is for this area to become a self-enforcing slow speed (30km/hr) environment through street design that caters for all street users. This Precinct aligns with the District Plan Defined Pedestrian Frontage and should be a particular area of focus for appropriate signage.

### 3.5.6 New Plymouth District Council Advertising Signs on Reserves Policy (2006)

This Policy, which was reviewed in 2012, applies to signage erected on reserves by anyone other than council. It includes the following guiding principle: No permanent advertising of any kind shall be permitted.

The policy is written in such a way that there will be no inconsistency with the District Plan. It states that “Wider neighbourhood effects are regulated by the District Plan, which must be complied with before a permit is issued. The implementation of this policy is subject to the appropriate provisions of both bylaw and District Plan rules.”

### 3.5.7 New Plymouth District Green Spaces Management Plan (2019)

The recently-adopted Green Spaces Management Plan includes the following policies and levels of service for the Council to provide directional and health and safety signage in the many parks and reserves in the district.

- Policy 4.5.1: Directional signage to be considered at reserves on a case-by-case basis.
- Policy 4.5.2: All new signs at reserves will be erected in accordance with the NPDC’s Sign Manual.
- Level of service: to provide signage related to a reserve where appropriate.
- How the Council will deliver the service: Signage in reserves helps to identify the reserve as a public place and directional signage improves accessibility. Signs in green space reserves will be installed where considered appropriate and where funding is provided.
- Level of service: allow for the installation of health and safety signage around network utilities.
- How the Council will deliver the service: permitting installation and maintenance of signage around network utilities as required by other legislation (e.g. HSNO).

The Proposed District Plan provisions are not inconsistent with the Green Spaces Management Plan.

### 3.5.8 City and Town Centre Design Guide

The City and Town Centre Design Guide is a guidance document for new development in the centre of New Plymouth, Waitara and Inglewood. Its intention is to facilitate high quality development which contributes to attractive, accessible, vibrant and safe city and town centres. The Guide has a section on signage that seeks the following outcome:

High quality signage that relates well to the scale and character of buildings or spaces it is attached to, complements the character of the surrounding environment and does not detract from the value of heritage buildings or areas.

The Design Guide provides a greater level of practical detail for appropriate sign design and content than the District Plan. It is a useful complementary document to the District Plan.

### 3.5.9 New Plymouth On-Street Dining Policy and Guidelines 2019

The recently updated policy and guidelines provide for seated dining on footpaths and road reserves adjoining restaurants and cafes. The policy emphasises that on-street dining is about consuming food (with associated drinks) and not for the sole consumption of alcohol without food.

As part of an application to provide on-street dining, the following information requirements are relevant to signage, particularly footpath signs:

- A site plan, showing the position and width of the adjoining footpath.
- The extent and location of the proposed on-street dining zone.
- The minimum clearance of the dining furniture relative to any street furniture or utilities such as parking meters, signs, trees, utility boxes and poles or adjoining kerbs, or pedestrian crossings.
- The position of proposed dining furniture including any footpath sign for the premises.
- The location of a direct and unobstructed pedestrian zone past or through the dining area. The width of this access is not less than two metres.
- Design of furniture and the materials and colours used and any associated sign writing.

The Policy requires adherence with the District Plan signs provisions by stating "Size and location controls apply to footpath signs under the District Plan and Bylaws".

## **4 Context, Research and Trends**

### **4.1 Operative District Plan Approach**

#### 4.1.1 Context

Signs provide an important function by communicating information and providing direction. They are common within road reserves providing information to drivers and pedestrians. However, signs have the potential to distract drivers especially those that do not clearly deliver information or a message, use flickering lighting or moving parts. Such signs can pose a risk to the safety of road users.

Businesses, including home occupations, need to (at a minimum) signal their location to customers and clients, by using signs that display their name, brand and services, and direct patrons and deliveries to parking and any servicing areas. The scale and design of business signs will vary depending on the type of business and the environment in which it is located.

Residential and rural amenity values are generally more sensitive to signs, yet there is still a function and demand for some signs. Likewise, parks and community facilities

also require signage to provide visitors and users with information about facilities and hours of operation. Examples of signs used for parks and community facilities, are freestanding entrance signs, maps of the area, plaques on buildings, and information on community events.

Temporary signage e.g. real estate signs, community notices and election signs are generally anticipated and accepted but can adversely affect amenity values if the duration, scale and number of such signage is not reasonably managed.

While signs play an important role in the effective functioning of towns (particularly commercial activities) and rural areas, they can also sometimes diminish the amenity of areas. Oversized or inappropriately located signs can detract from buildings and dominate their surroundings. Effects from signs can extend beyond the subject site to neighbours and to an entire street, affecting the overall streetscape, depending on how inappropriately designed and located the sign is. In addition, too many signs can clutter a building, site and/or a street.

#### 4.1.2 Plan Changes

There have been no Plan Changes relating to signs in the life of the Operative District Plan.

#### 4.1.3 Operative Plan Provisions

Primarily, signs are managed under the Management Strategy Issues 1 and 2 as follows:

*Issue 1: The adverse effects of activities on the character of areas and on other activities.*

*Issue 2: Adverse effects on amenity, health and safety due to LIGHT OVERSPILL, GLARE, noise, dust and the consumption of liquor*

The Operative District Plan does not have a chapter that specifically manages signage: the objective, policies (where applicable) and rules for signs in each environment area are duplicated throughout the chapters of the Plan.

The objectives and policies essentially seek that the character and amenity values of the environments of the District are not adversely affected by use and development including the erection of signs.

Signs are generally provided for as a permitted activity as follows:

- Official signs are not subject to any conditions.
- Advertising signs, where clearly visible from any road, are subject to conditions that manage location, general appearance, illumination, minimum lettering size and movement.
- Freestanding signs subject to conditions that manage location, size, height and projection over any road.
- Footpath signs subject to conditions that manage location, maximum number, size and height.

Non-compliance with the conditions is generally a Discretionary Activity.

## **4.2 Other Methods**

In addition to the Operative District Plan regulatory approach, the Council uses the NPDC Signs 2014 Bylaw to manage signs in public places as described above. Furthermore, the Council seeks NZTA's approval for all signs along the state highways that traverse the District.

## **4.3 State of the Environment**

Signs play a key role in the effective functioning of towns (particularly commercial activities) and rural areas, but can also diminish the amenity of areas. Oversized or inappropriately located signs can detract from buildings and dominate their surroundings.

Examples of where this has occurred have been in New Plymouth's city centre where signs have been placed over windows and architectural features or awkwardly on the sides of buildings. There is also a proliferation of signage along New Plymouth's main retailing strip (Devon Street West) detracting from the amenity of the area, and in some cases detracting from heritage buildings.

The mushrooming of signage along the one-way systems is not only distracting for drivers but is also visually dominating. It has altered the character and visual amenity of these streets (which are state highways designed to move traffic quickly through town). This proliferation has also reduced the effectiveness of the signage, meaning that signs have become larger and bolder to ensure they are noticed. In recent years, there has been an increase in the number of digital display signs along these streets.

In addition, signage is often opportunistic, being attached crudely on the side of walls, buildings, above verandas. There appears to be little consideration given to the scale and impact on the host building or wider streetscape. Furthermore, the quality of materials used can be poor and adversely impact on the quality of the surrounding area.

The sheer amount of signage in the district makes monitoring of new and unconsented signs a difficult and costly resource-intensive task. Therefore, monitoring and enforcement of signs is generally undertaken on a complaint basis and monitoring of resource consent conditions, therefore it is likely that there are as number of illegal signs throughout the district. It is difficult, for example, to look at the New Plymouth CBD, and determine which signs have existing use rights, which have been approved through the bylaw and which signs are permitted under the District Plan, which have been through a resource consent application and which are illegal.

During the last six years, there have been two queries and six complaints relating to signs that have come in through the Customer Request Management System. The two queries requested site-specific information for advertising signage. The six complaints all related to individual signs and their negative effects on safety or visual amenity. Half of these were in the Residential Environment Area, one was a trailer-mounted sign and another related to a sign along the Te Henui Walkway.

During the period 2008 – 2018, 68 resource consents were granted for signs that did not comply with the District Plan rules. The highest number were for signs in the Business Environment Areas (28 consents) the Residential Environment Area (17 consents) and the Rural Environment Area (14 consents). The rule most commonly

triggered was that relating to the maximum area of a sign, which was triggered in almost half of the consent applications. To a lesser degree, rules relating to location/content and sign height were triggered by applications. The rebranding of the Shell Service Stations to Z Energy, in multiple locations, has inflated these results accounting for four resource consent applications and the triggering of the maximum area and maximum height rules in each instance.

### *Emerging Issue – Digital Signage*

Technology is playing a part in how people wish to advertise their service or product. Requests for digital display signs has been a recent trend and while the Operative District Plan has provided for and managed illuminated or lit signs, digital signage has been a new type of advertising that is not directly managed in the Operative Plan.

Digital signage is a form of signage in which the content is displayed on digital screens. Digital signage is sometimes called the "fifth screen," with movies, TV, personal computers and mobile devices being the first four. The content may consist of graphics, text and/or video, with or without sound. It may also be static or dynamic (animated). The size and scale of a digital sign can range from small tablets to billboard signs to the giant screens seen at sports stadiums.

Advertising using digital signage has become a widely adopted 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. Due to the changing messages that are a common feature of digital signage, this type of sign is much more intrusive than traditional signage and impacts on the visual amenity of the surrounding environment. The changing image and/or message catches the eye and can present a distraction for motorists and other road users, particularly at intersections.

Digital signage can also generate economic benefits and can add vibrancy to an environment, where it is positioned well. Digital signage can work really effectively when integrated into public spaces. It can add to urban vitality and interest, especially in areas where night-time entertainment activities are prominent. Such signs can contribute to personal safety.

There is a variation across councils in the approach to managing digital signage. As digital signage is an emerging issue, there are still many district plans that do not manage this type of sign. Those that do, use the zoning tool and generally digital signs are directed toward the commercial and industrial zones, rather than the residential and rural zones.

Small scale touch-screen interactive digital signage does not give rise to road safety or amenity effects like larger digital signage does. Touch-screen signage within bus shelters, visitor information kiosks and restaurant menu boards are examples of interactive signage that can provide information and assist with wayfinding. Where these have audio capability, they perform a role in supporting visually impaired to navigate towns and cities. Where they have language options, they perform a role in supporting te reo and also supporting foreign language speakers and tourists.

A "Digital Message Centre" in the Huatoki Plaza, or another central location is a possibility in the future. We cannot foresee what technological advancements there will be in the area of digital signage. However, it is anticipated that its use will increase with improvements in technology and reduction in the cost of this technology, and as

the District grows in population. It will be important to future-proof the District Plan provisions, providing scope for future technologies, while ensuring any adverse effects are able to be avoided, remedied or mitigated. At this time, it is clear that the differences in scale and function of digital signage suggests that a single provision relating to this type of signage would be limiting.

#### *Growing Issue - Third Party Signs*

Third party signs (sometimes referred to as non-site related signs) are primarily erected for advertising products or services available at another location. They are not essential for business identification purposes. Third party signs are generally erected in areas with high traffic and pedestrian volumes to maximise exposure. These signs add to the overall level of signage that is erected within a local area, and in many cases, can have an adverse effect on visual amenity.

The erection of non-site related signage at a prominent intersection can distract road users and pedestrians from the identifying road signage and traffic controlling devices, and in addition can make it difficult to locate signage of a businesses operating within an area.

Third party signage is becoming an increasing issue in the Rural and Residential environments of the district, affecting visual amenity and traffic safety. In the Rural areas a considerable number of third party signs have been erected along the state highways, in particular along State Highway 3. In the Residential environment, both professionally and crudely made signs fixed to residential fences can be seen along many of the district's urban streets.

The Operative District Plan requires all third party advertising to gain resource consent in the Rural Environment Area. The proliferation of this type of signage suggests that many of the signs are being erected without resource consent. This is further supported by resource consent data that shows only 14 resource consents for signage were granted in the Rural Environment Area during the ten year period 2008 – 2018.

#### 4.4 Effectiveness of the Operative District Plan Approach

The following implementation table outlines signage issues that have been experienced with the Operative Plan Approach:

Issue	Comment	Response
<p>Issue 1: Signs are undermining the amenity and character of the District.</p>	<p>There are no objectives and policies for specific sign management.</p> <p>The operative rules are too permissive with the standards and assessment matters focused on the effects of signs on the safety of roads and traffic.</p> <p>This has enabled large signs to be erected as a permitted activity, and has limited the Council's ability to consider matters such as potential adverse effects on the character of the surrounding area, heritage and architectural features and proliferation.</p>	<p>Introduce a standalone Signs chapter in the District Plan, consistent with the National Planning Standards.</p> <p>Strengthen objective, policies and rules to appropriately manage signs and recognise their potential positive and adverse effects.</p>
<p>Issue 2: Proliferation of signage in high profile locations causing safety and amenity concerns.</p>	<p>The cumulative impact of signs along certain stretches of road (e.g. the one way system in New Plymouth) create a high level of driver distraction.</p> <p>The abundance of signage reduces the effectiveness of individual signs, leading to applications for larger signs.</p>	<p>Consider a strengthened level of control to manage signs in high-traffic areas.</p>
<p>Issue 3: There is no control over third party signs in residential environment areas.</p>	<p>Third party signs are a problem in residential areas where signs appear to have no relationship or connection to the host site. This can lead to proliferation and significant impacts on the safe and efficient operation of the adjoining roads as well as the character of the surrounding area.</p>	<p>Include provisions specific to third party signs</p>
<p>Issue 4: There are no provisions to manage digital signage.</p>	<p>There is increased use of digital signage that has the potential to generate significant adverse effects on amenity values, traffic safety and the character of an area and individual buildings.</p>	<p>Include provisions specific to digital signage</p>
<p>Issue 5: The provisions in the Plan are out of date and do not reflect best practice.</p>	<p>Some signage terms are out of date, for example signs 'should not emulate an official sign'.</p> <p>Some signage provisions are based on previous Transit New Zealand guidelines (e.g. separation distances and lettering sizes).</p>	<p>Ensure provisions are clear, enforceable and in line with best practice.</p>

#### 4.4.1 Summary of effectiveness of Operative District Plan approach

It is considered the existing signage provisions in the District Plan are not currently achieving the purpose of the RMA and that the above implementation issues should be resolved so that the Proposed Plan achieves the RMA purpose, reflects best practice, addresses the emerging issue of digital signage, recognises the level of sensitivity of each zone to signage, and can contribute to high quality growth and development in the district.

#### 4.5 Effectiveness of Other Methods

There is a plethora of local policy (outlined in Section 3.4 of this report) that has a role in managing and/or providing guidelines for signs in the district. These policies are limited in their usefulness, relating only to council-administered land and/or containing guidance rather than any direct control. The District Plan is the only tool that represents an overarching and binding policy document relating to signage on both public and private land.

#### 4.6 Other Relevant Research/Documents

The following technical reports and research have informed this Section 32 Report and the proposed provisions:

*Digital and Projected Advertising Signs: Road Safety Considerations and Consent Conditions, 4 February 2016*

The advice provided in the report prepared by MWH for Christchurch City Council is based on latest best practice globally (as at 2015). In developing guidance and regulation around LED advertising signage, several overseas guidelines and research studies were reviewed along with New Zealand based guidance, as follows:

- Canadian Digital and Projected Advertising Displays: Regulatory and Road Safety Assessment Guidelines (TAC 2015) – the latest and most valid of international guidelines on this topic.
- Roadside Advertising Guide (Queensland Transport and Main Roads, 2013).
- Advertising signs and road safety: design and location guidelines RTS7 (LTSA 1993).
- Traffic control devices (TCD) manual: Part 3 – Advertising Signs (NZTA 2011).
- A Guide to Outdoor Advertising and Signage (CCC 2004).
- Christchurch District Plan and Signage Bylaws.
- Auckland Transport Signage Bylaws 2015.

The report illustrates important issues that need to be covered in the regulation of digital advertising signs and the gaps in the Operative District Plan.

*Wellington City Council Design Guide for Signs*

The Guide, prepared by Wellington City Council, provides:

- Objectives and guidelines to assist the design and assessment of signage proposals.
- Help for design/signage professionals and the public in interpreting terms used in the District Plan provisions.

The guidelines promote general design principles that can be applied in different ways appropriate to each proposal and site. The illustrations further clarify and explain these principles, but are not intended to represent actual design solutions.

The Design Guide is in three main parts:

- The key characteristics of well-designed signage in terms of scale and location, relationship to context, implications for road safety and other issues.
- The design guidelines: these are applicable to all signage in Wellington City.
- Additional guidelines that apply to specific types of signs, including those relating to heritage items.

*Advertising Signs Assessment Guidelines for Road Safety. A Guide for the Department of Planning, Transport and Infrastructure. August 2014*

A strategically integrated set of advertising guidelines, prepared by the Government of South Australia that, in line with best practice, effectively balances the need to provide a safe and efficient road network, with the important social and economic role that advertising plays.

The Guidelines provide greater flexibility in the design and location of roadside advertising, while ensuring road safety is not compromised.

## **5 Consultation**

### **5.1 General Consultation**

Extensive consultation has been undertaken as part of this District Plan Review process with key stakeholders and the local community. Refer to the General Overview Section 32 Report for details on the methods that were used to carry out that consultation. Feedback from consultation relevant to the signs is summarised below.

The first Draft District Plan was released for public comment in October 2016, which contained draft objectives, policies and a summary of rules for each section. Comments received on the Signs Chapter were:

- Support for the intention to exercise greater control over third-party signs, while enabling directional signs. Retain the ability to erect farm signs and undertake farming activities. (Federated Farmers).
- The need for reference to protection of historic values in the objectives and policies. (Heritage NZ)
- Ensuring that health and safety signs which are required by legislation are permitted. (Powerco and Oil Companies)
- Support for the proposed provisions as they would enable appropriate signage to be placed on its facilities to ensure its ease of identification for customers, and on properties using its products (Ballance).

The comments received on the Draft District Plan (2016) informed the redrafting of the provisions and were reflected in the amendments to provisions in the updated Draft District Plan released for further public comment in 2018. The feedback from general consultation was considered during re-drafting of the provisions:

- The provisions for third party signs relate specifically to those signs that are not site-related. The rule is not intended to control directional signage.

- The protection of historic values is reflected in the proposed objective, policies, rules, effects standards and matters of discretion in the Signs Chapter. Specifically, a more extensive list of effects standards for signs on heritage buildings and items is proposed.
- A specific rule for official signs and an associated definition now clearly provide for signs required by legislation.

Feedback was received on the 2018 Draft from CCS Disability Action requesting that the rule relating to footpath signs be amended so that signage does not impede the 'tapping line' for people with visual impairment. (The tapping line being the footpath area that is reached by a cane, generally a 1.5m clearly accessible path.)

It is noted that the revised New Plymouth On-Street Dining Policy and Guidelines require a consistent 2m wide pedestrian zone, to enable unimpeded movement along the footpath, particularly for visually impaired pedestrians. The proposed rule for footpath signs has been drafted to be consistent with these Guidelines.

## 5.2 Consultation with Iwi Authorities

Nga Kaitiaki supports the installation of interpretative signage but seeks that it must be developed in consultation with tangata whenua. They suggest that this requirement is set out in SI-P1. It is also noted that signage is not always appropriate when located in proximity to important cultural or environmental features and Nga Kaitiaki seeks that SI-P4 should be amended to explicitly include cultural values, and the intrinsic values of natural areas. The rules should also specify location requirements, particularly along boundaries to maintain character and amenity within all zones and signs in the City Centre should be controlled to manage size, design and type.

Ngā Kaitiaki suggest that Policy SI-P6 is amended to support/encourage bi-lingual signage including the correct use of macrons. Nga Kaitiaki has also suggested setting design parameters for Entrance Corridors, maybe by way of Entrance Corridor design guidance that could include providing bilingual signs, Pou in place of signs and alignment with NZTA design guidance series.

The objective of the Signs Chapter has been drafted to specifically ensure that cultural wellbeing is a key goal in decision-making on signs.

*SIGN-01: Signs contribute to the social, cultural and economic wellbeing of the community by:*

1. *supporting the needs of commercial, rural, industrial, infrastructure, major healthcare and community activities;*
2. *maintaining or enhancing the visual amenity values and character of the surrounding area; and*
3. *ensuring public and transport safety.*

It is considered that the detailed matters raised by Nga Kaitiaki are more appropriately provided for through the Design Guides and/or some form of agreement with the Council, rather than the Proposed District Plan.

## **6 Key Resource Management Issues**

The key resource management issues that need to be addressed for Signage are:

- Signs contribute to the vitality and vibrancy of the district and support tourism.
- Signs can adversely affect the character and amenity values of the local environment, as well as the values of buildings and structures upon which they are placed.
- Signs can create a distraction for drivers, potentially impacting the safety of all road users and efficiency of the roading network.

## **7 Proposed District Plan Provisions (Objectives, Policies and Methods/Rules)**

### **7.1 Strategic Objectives**

The applicability/relevance of all the proposed Strategic Objectives will need to be considered for all development proposals requiring resource consent under the Proposed District Plan. Strategic Objectives HC-1 to HC-3 in relation to Historic and Cultural Matters and Strategic Objectives UFD-13 to UFD-24 in relation to Urban Form and Development Matters are of particular relevance to the signs provisions.

### **7.2 Objectives and Policies**

The proposed provisions are set out in the Signs Chapter of the Proposed New Plymouth District Plan. These provisions should be referred to in conjunction with this evaluation report.

In summary, the proposed objectives and policies provide a framework to deliver flexibility in the location, type and scale of signs, recognising they contribute to the social, cultural and economic wellbeing of the community. They also recognise that signs can cause adverse effects on safety and amenity.

Specifically, the objectives and policies:

- Allow traffic and railway signs and official signs required by legislation
- Manage signs that are potentially incompatible with the character of the zone in which they are proposed.
- Restrict signs that are incompatible with the character of the zone
- Provide guidance in the assessment of resource consents by listing matters that need to be considered, such as the sensitivity of the environment, the speed zone and any cumulative effects.

### **7.3 Rules**

7.3.1 Permitted Activity rules provide for the following signs:

- Traffic and railway signs, and official signs (signs required under legislation).

Permitted activity rules provide for the following signs, subject to effects standards:

- Temporary signs.
- Interpretative signs on identified features.
- Signs attached to heritage buildings or items.
- Signs attached to buildings.

- Veranda signs.
- Footpath signs.
- Touch-screen interactive digital screens.
- Signs on street furniture, in the Commercial and Mixed Use Zones and the General Industrial Zone.
- Freestanding signs.
- Signs affixed to vehicles or trailers, where the sign is not visible from a public place
- Third Party signs, in the City Centre Zone.

#### 7.3.2 Restricted Discretionary Activity Rules manage:

- Signs that do not meet the effects standards.
- Signs on street furniture, in all zones except the Commercial and Mixed Use Zones and the General Industrial Zone.
- Digital signs and signs containing moving images, text or lights, on sites with Defined Pedestrian Frontages in the City Centre Zone.

#### 7.3.3 Discretionary Activity rules manage:

- Signs affixed to vehicles or trailers, where the sign is visible from a public place.
- Any sign not listed in the Signs Chapter.

#### 7.3.4 Non-Complying Activity rules manage:

- Digital signs and signs containing moving images, text or lights, in all zones except the heart of the City Centre Zone (i.e. Defined Pedestrian Frontage).
- Third party signs, in all zones, except the City Centre.

### 7.4 Effects standards

Effects standards that manage signs in terms of:

- Number, location, maximum size and maximum height.
- Minimum lettering sizes.
- Minimum setback distances between signs.
- Illumination of signs (excluding digital signs).
- Maximum sign area and parameters for signs attached to buildings.
- Requirements for veranda signs.

Matters of discretion for restricted discretionary activities that manage the potential adverse effects of signs on character and amenity, heritage and architectural values, safety of road users, and provide for consideration of special circumstances, functional need and mitigation.

## 7.5 Definitions

To help clarify the intent of the provisions, manage residential activities or residential density and align with the National Planning Standards new residential definitions have been introduced for:

- Sign (Planning Standards definition).
- Footpath sign (NPDC Proposed Plan definition).
- Freestanding sign (NPDC Proposed Plan definition).
- Interpretative sign (NPDC Proposed Plan definition).
- Official sign (Planning Standards definition).
- Sign face area (NPDC Proposed Plan definition).
- Street furniture (NPDC Proposed Plan definition).
- Temporary sign (NPDC Proposed Plan definition).
- Third party sign (NPDC Proposed Plan definition).

## 8 Approach to Evaluation

Section 32(1)(a) of the RMA requires that this report contain a level of detail that corresponds with the scale and significance of the environmental, economic, social and cultural effects that are anticipated from the implementation of this proposal.

This section of the RMA requires that:

- New proposals must be examined for their appropriateness in achieving the purpose of the RMA.
- The benefits and costs, and risks of new policies and rules on the community, the economy and the environment need to be clearly identified and assessed.
- All advice received from iwi authorities and the response to the advice needs to be summarised.
- The analysis must be documented, so stakeholders and decision-makers can understand the rationale for policy choices.

### 8.1 Evaluation of Scale and Significance

	Minor	Low	Medium	High
Degree of change from the Operative Plan			✓	
Effects on matters of national importance	✓			
Scale of effects – geographically (local, district wide, regional, national).		✓		
Scale of effects on people (how many will be affected – single landowners, multiple landowners, neighbourhoods, the public generally, future generations?).			✓	
Scale of effects on those with specific interests, e.g., Tangata Whenua	✓			
Degree of policy risk – does it involve effects that have been considered implicitly or explicitly by higher order		✓		

	Minor	Low	Medium	High
documents? Does it involve effects addressed by other standards/commonly accepted best practice?				
Likelihood of increased costs or restrictions on individuals, communities or businesses.			✓	

## 8.2 Explanation Summary

In summary:

- The degree of change from the Operative Plan is medium; introducing provisions to manage digital displays and third party signage being the most significant changes.
- The proposal does not directly relate to any matter of national importance in section 6 of the RMA.
- The proposal does not relate to a strategic matter in the Blueprint.
- The proposal will have a district wide effect as the provisions will apply across all zones and will affect the business community who seek to advertise their products and services, and the community who may seek to advertise events. The public are affected in terms of the impact of signage on visual amenity, quality of the environment and the character of the zones.
- The changes are in accordance with commonly accepted best practice, and consistent with approaches in other second-generation District Plans that have been produced around New Zealand.
- The RPS directly addresses signage in relation to building design, requiring that buildings are designed to be aesthetically pleasing including appropriate landscaping and signs.
- There will be increased costs, particularly on businesses, as the rules and standards may restrict some signs as well as require resource consent. This will lead to the need for a change in behaviour and the use of other channels for advertising. These costs are not anticipated to be significant if signage is appropriately designed and located, and due to the range of alternative types of advertising.

Overall, it is considered the scale and significance of the proposal is medium.

## 9 Evaluation of Objectives

Existing Objective(s)	Appropriateness to achieve the purpose of the Act
<p><b>Objective 1</b> To ensure activities do not adversely affect the environmental and amenity values of areas within the district or adversely affect existing activities.</p> <p><b>Objective 4</b> To ensure the subdivision, use and development of land maintains the elements of RURAL CHARACTER.</p> <p><b>Objective 6</b> To ensure:</p> <ul style="list-style-type: none"> <li>- Sufficient space is available to protect residential amenity.</li> <li>- Visual and aural amenity is protected.</li> <li>- Traffic generation is consistent with the character of the residential area.</li> </ul> <p><b>Objective 7</b> To ensure the attractive, vibrant, safe, efficient and convenient character of the business environment is maintained.</p> <p><b>Objective 8</b> To recognise and provide for differing open space requirements in the district in an integrated manner that ensures the character of open space areas are maintained.</p> <p><b>Objective 9</b> To maintain a level of amenity within the industrial environment which is consistent with the character of the area and provides a safe working environment.</p>	<p>The main issue is that the objectives are generic and do not specifically address signage. This means there is insufficient guidance on recognising the positive effects of signage and managing the potential adverse effects of signage on the amenity and purpose/intent of the Environment Areas.</p> <p>The Environment Area objectives and policies focus on the overall amenity values and character for each zone. Furthermore, the current objectives are more like policies than outcomes or goals to be achieved.</p> <p>The existing objectives partially achieve the purpose of the RMA in that they address effects on amenity values and the character of the zones, addressing the issue of signs adversely affecting the character and amenity values of the local environment. However, a gap exists in that the current objectives do not recognise and respond to the issues that signs can result in road safety issues and that signs have positive effects on the vitality and vibrancy of the district. Therefore, they do not consider people’s ability to provide for their social, economic and cultural wellbeing or their health and safety.</p> <p>The existing objectives are limited as they do not set clear outcomes for signage. Consequently, they are not appropriate in achieving the purpose of the Act.</p>

<b>Proposed Objective(s)</b>	<b>Appropriateness to achieve the purpose of the Act</b>
<p>SIGN-O1: Signs contribute to the social, cultural and economic wellbeing of the community by:</p> <ol style="list-style-type: none"> <li>1. Supporting the needs of commercial, rural, industrial, infrastructure, major healthcare and community activities.</li> <li>2. Maintaining or enhancing the visual amenity values and character of the surrounding area. and</li> <li>3. Ensuring public and transport safety.</li> </ol>	<p>The purpose of the RMA is to promote the sustainable management of natural and physical resources by managing the use, development and protection of physical resources in a way which enables people and communities to provide for their social, economic and cultural well-being. Under Section 7(c) and (f), this includes the maintenance and enhancement of amenity values and the quality of the environment, which council shall have particular regard to.</p> <p>The proposed objective gives specific recognition to the overarching goal of contributing to the social, cultural and economic wellbeing of the New Plymouth District.</p> <p>The proposed objective directly addresses the identified resource management issues identified, it provides plan users and decision makers with certainty as to the outcomes that are appropriate under the District Plan provisions, and is considered reasonable and achievable.</p> <p>The proposed objective will sustain the potential of physical resources for current and future generations, and maintain and enhance amenity values and quality of the environment.</p> <p>The proposed objective will achieve the purpose of the RMA.</p>

<b>Evaluation of Alternative Options</b>	<b>Appropriateness to achieve the purpose of the Act</b>
<p>Do not include specific provisions for signage in the district.</p>	<p>This option does not consider the managing the adverse effects of signage such driver distraction and loss of visual amenity in sensitive environments. It also gives little guidance on expected outcomes to decision makers assessing resource consent applications for signage. This option does properly recognise the social and economic values signs can contribute to a district, including community identity and would not deliver on the requirements of section 5 the RMA.</p>

**Summary**  
Signage is important to the district’s economic and social vitality but it can impact on the overall amenity of the district if not managed appropriately. Changes over time mean there is greater demand for larger-scale signs and different types of signs including digital displays and third party signage. The proposed objective will achieve the purpose of the RMA as it is a clear statement of intent that provides for signs in a range of zones while appropriately managing the effects of signage on the environment.

## 10 Evaluation of Options to Achieve the Objectives

Options to achieve the District Plan objectives relating to (insert topic)	Benefits	Costs	Efficiency and Effectiveness	Risks of acting/not acting
<p><b>Option A: Proposed approach considered most appropriate to achieve the objectives.</b></p> <p>Introduce policies to:</p> <ul style="list-style-type: none"> <li>• Direct the activity status of signs.</li> <li>• Maintain amenity values and recognise the character and function of the different zones.</li> <li>• Manage effects on road safety.</li> <li>• Direct the use of digital displays and third party signs.</li> <li>• Include standards to manage the scale and location of signage in all zones and digital displays.</li> <li>• Broaden the assessment matters to include location, visual amenity, character and impacts on surrounding activities.</li> </ul>	<ul style="list-style-type: none"> <li>• Ability for a range of signs to be erected by businesses and organisations, advertising goods, services and events. In turn, this supports way finding, economic activity, social and cultural wellbeing.</li> <li>• All signage is controlled/managed to ensure that signs minimise adverse effects on the environment.</li> <li>• Quality of the environment and amenity values are maintained or enhanced.</li> <li>• Provides a trigger to assess the adverse effects of signs on the environment.</li> <li>• Certainty for businesses, community and Council on the type and level of signage allowed.</li> </ul>	<ul style="list-style-type: none"> <li>• Cost/time for the public in applying for consents and associated time/uncertainty.</li> <li>• Monitoring costs to enforce standards borne by Council.</li> <li>• Potentially reduced ability for businesses to erect multiple, digital, third party or large-scale signage.</li> </ul>	<ul style="list-style-type: none"> <li>• Rules and standards are generally considered effective as they clearly set out what can occur as of right and what requires resource consent.</li> <li>• When resource consent is required, the provisions will minimise potential effects on road safety and the amenity values the character of the zones of the District. It is considered that the proposed option is an efficient method of achieving the objective given the costs identified and the issues identified with the current provisions.</li> </ul> <p>It is considered that the proposed provisions will achieve the objective in the Plan because:</p> <ul style="list-style-type: none"> <li>• The provisions recognise the role that signs play</li> </ul>	<ul style="list-style-type: none"> <li>• The Council has received a number of queries about erecting digital billboards, which it considers cannot be effectively managed through the Operative District Plan provisions.</li> <li>• The risk of not acting is that digital billboards could be established throughout the district with little control over their location, siting and scale. This has the potential to undermine the quality of the environment, the character and amenity of the surrounding area and the safety of road users.</li> <li>• The risk of acting is that the Council has not received feedback from the community on this matter, and there may be no concern over a</li> </ul>

Options to achieve the District Plan objectives relating to (insert topic)	Benefits	Costs	Efficiency and Effectiveness	Risks of acting/not acting
	<ul style="list-style-type: none"> <li>• Specific control over digital displays that have the potential to generate significant adverse effects on road safety, amenity values and the character of an area.</li> <li>• All rules and standards are clearly laid out in one chapter with a clear framework to manage signs.</li> </ul>		<p>in a healthy economy and provide for permitted activity status for many signs.</p> <ul style="list-style-type: none"> <li>• The rule framework reflects the amenity anticipated in each zone by controlling the scale and location of signs.</li> <li>• The rule framework also addresses the impacts of signs on road safety.</li> <li>• The standards are aligned with the anticipated character and purpose of each zone.</li> </ul>	<p>proliferation of digital billboards.</p>
<p><b>Option B: Status Quo Regulatory Approach</b></p> <p>Control signage through each of the zone chapters.</p> <p>Generally, signs are a Permitted Activity in all zones, and non-compliance with the conditions is a Discretionary Activity. The conditions and assessment matters are directed towards managing effects on traffic safety but each</p>	<ul style="list-style-type: none"> <li>• Most signage is controlled/managed to ensure that signs do not create adverse effects on the environment.</li> <li>• Quality of the environment and amenity values are maintained to some extent.</li> <li>• Provides a trigger to assess the adverse</li> </ul>	<ul style="list-style-type: none"> <li>• Cost/time for the public in applying for consents and associated time/uncertainty.</li> <li>• Potential adverse impact on the character and amenity values in some locations where large-scale, third party or digital signs are established.</li> </ul>	<ul style="list-style-type: none"> <li>• The status quo approach is inconsistent with the National Planning Standards that require a standalone chapter for signs.</li> <li>• Rules and standards are generally considered effective if they clearly set out what can occur as of right and what requires resource consent. While the current rules and</li> </ul>	<ul style="list-style-type: none"> <li>• Overall it is considered that there is sufficient information to act based on state of the environment monitoring, knowledge of Council staff and review of existing signage across the District.</li> </ul>

Options to achieve the District Plan objectives relating to (insert topic)	Benefits	Costs	Efficiency and Effectiveness	Risks of acting/not acting
<p>environment area/zone has specific standards that apply to scale.</p>	<p>effects of signs on the environment.</p> <ul style="list-style-type: none"> <li>•</li> <li>• Certainty for businesses, community who are familiar with the type and scale of signage allowed.</li> </ul>	<ul style="list-style-type: none"> <li>• Monitoring costs to enforce standards borne by Council.</li> <li>•</li> <li>• Assessment matters are limited and constrain the matters that can be considered by the Council when processing applications.</li> <li>•</li> <li>• Reliance on NZTA requirements. Rules and standards are out of date and do not address digital signage.</li> </ul>	<p>standards are clearly stated, the standards have the potential to result in signage which detracts from the character and amenity values of the environment.</p> <ul style="list-style-type: none"> <li>• The current rules are inefficient due to the range of standards applying to signs, particularly across the business environments. This could be generating the need for consents, where the effects could be appropriately managed through rules and standards in the district plan.</li> </ul>	
<p><b>Option C: Permissive Regulatory Approach</b> (e.g. reliance on the Signs Bylaw and other local policies)</p>	<ul style="list-style-type: none"> <li>• High-level of certainty for businesses, community and Council on the type and number of signs allowed – unlimited.</li> <li>• Enables signage which supports economic and social well-being.</li> </ul>	<ul style="list-style-type: none"> <li>• Risk that signs could generate significant adverse effects on character and amenity values, and road safety, through their proliferation.</li> <li>• Potential adverse effects may not be addressed in the same manner as required under the RMA,</li> </ul>	<ul style="list-style-type: none"> <li>• The proposal would be effective in enabling activities to establish signs, which would support economic and social wellbeing.</li> <li>• A bylaw could be effective in setting the standards for signage across the District. However, to address all</li> </ul>	<ul style="list-style-type: none"> <li>• It is considered that there is sufficient information to act given state of the environment monitoring, the knowledge of Council staff and review of existing signage across the District.</li> </ul>

Options to achieve the District Plan objectives relating to (insert topic)	Benefits	Costs	Efficiency and Effectiveness	Risks of acting/not acting
	<ul style="list-style-type: none"> <li>Limited controls and few consent costs as most signs are permitted.</li> <li>Adverse effects of signage on the environment would be managed on Council-administered land, insofar as the proposed sign would be assessed against the provisions of the Bylaw that may control location, size etc.</li> </ul>	<p>and therefore the Council may not meet its obligations under section 7 and section 31, and there would be limited ability to avoid, remedy or mitigate potential adverse effects on the environment.</p> <ul style="list-style-type: none"> <li>Uncertainty for the community over the number, scale and type of signs that would establish.</li> <li>Limited enforcement options for signs which do not comply with Bylaw.</li> </ul>	<p>matters of concern it would need to be amended to consider a broader range of signs and include controls on, for example scale.</p> <ul style="list-style-type: none"> <li>Under a Bylaw, signage would not be subject to an assessment of environmental effects as required under the RMA and therefore a Bylaw may not be as effective at managing effects on amenity values and the quality of the environment, and the Council would not be meeting its obligations under the RMA.</li> </ul>	

### Quantification

Given the assessment of the scale and significance of the proposed changes above it is considered that quantifying costs and benefits would add significant time and cost to the s32 evaluation processes. The evaluation above identifies where there may be additional cost(s), however the exact quantification of the benefits and costs discussed was not considered necessary, beneficial or practicable.

### Summary

The above table has demonstrated that Option A is the most appropriate method for achieving the objectives for signage. The existing regulatory approach (Option B) is ineffectively addressing this issue and not achieving the objective of providing for signs while managing their adverse effects. Therefore, a revised approach is proposed based on regulatory controls applying rules and standards to each zone. The Signs Bylaw is limited in its ability to deliver resource management objectives and is not considered to be appropriate as the only means of managing signs in the District.

## **11 Summary**

This evaluation has been undertaken in accordance with Section 32 of the RMA in order to identify the need, benefits and costs and the appropriateness of the proposal having regard to its effectiveness and efficiency relative to other means in achieving the purpose of the RMA. The evaluation demonstrates that this proposal is the most appropriate option as:

- A separate Signs Chapter provides for a simpler plan structure that reflects the National Planning Standards.
- The objective and policies set a framework to provide for and manage signs across a range of zones recognising their differing character and amenity values. The policies also provide direction on the provision and management of digital displays and third party signs.
- Permitted activity rules and activity standards provide for signs that will not adversely impact on the district or relevant zone or are required under legislation for reasons of health and safety.
- Rules trigger resource consent requirements for signs that do not meet the effects standards and any digital displays because of the potential impacts on the amenity values and character of the district and/or the impacts on road safety. Different activity statuses apply to signs in the Commercial and Mixed Use zones to those in the Residential and Rural zones because of their differing purposes and character.
- The effects standards reflect and respond to the different types of signs and their associated characteristics, thus applying a more targeted approach to managing potential adverse effects.

Overall, it is considered that the set of proposed provisions is the most appropriate given that the benefits outweigh the costs, and there are considerable efficiencies to be gained from adopting the preferred provisions. The risks of acting are also clearly identifiable and limited in their extent.