



FURTHER SUBMISSION IN SUPPORT OF, OR IN OPPOSITION TO, A SUBMISSION ON NPDC'S NOTIFIED PROPOSED DISTRICT PLAN

Clause 8 of Schedule 1 Resource Management Act 1991

To: New Plymouth District Council
Address: Private Bag 2025, New Plymouth 4342
Email: districtplan@npdc.govt.nz

Further Submitter Details

Name of further submitter: Mike Ekdahl
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The Council will serve all formal documents by email. Where there is no email address provided, the documents will be posted to the postal address stated above.

I am: (please tick relevant box)

- a) A person representing a relevant aspect of the public interest.
(In this case, also specify the grounds for saying that you come within this category); or
- b) A person who has an interest in the proposal that is greater than the interest of the general public.
(In this case, also explain the grounds for saying that you come within this category); or
- c) The local authority for the relevant area.

Please state the grounds as to why you come within the category selected above:

- Ekdahl Property Management (Mike Ekdahl Director of) made a primary submission on the Proposed District Plan and owns property throughout New Plymouth District that is affected by the Proposed District Plan provisions.

Council Hearing (please tick relevant box)

Do you wish to be heard in support of your further submission? Yes No

If others make a similar submission would you consider presenting a joint case with them at a hearing? Yes No

Submission

The submission points, support or opposition, reasons and decisions sought are set out in the attached document.

Note: Any attachments to your submission should only be supporting information, not the submission.

Signature of the person authorised to sign on behalf of the
person making further submission

24/08/2020
Date

1. Introduction

This cover letter to the further submission able summarises key items in relation to the Proposed District Plan review (PDP) process that I have experienced to date.

2. Concerns About NPDC Consultation Process with CBD Owners and Stakeholders

The summary of submissions shows a severe lack of NPDC engagement with central city business and property owners, with only half a dozen people actually making a submission on these provisions. The PDP moving from an effects-based planning document to an activities-based planning document, is a huge change for the city of New Plymouth and the majority of these central city stakeholders are oblivious to the changes that are proposed. Unfortunately the process is too complex for most lay people to get involved, and the RMA timeframes to firstly make a primary submission (2 months) then this further submission (2 weeks) does not enable those that it will affect the most.

3. Observations from a New Plymouth Commercial Property Owner

- Design Guide

The Central City Design Guide (CCDG) has been offered up as 'best practice' with NPDC borrowing provisions from various other design guides from other District Plans around the country. A more efficient and practical method of requiring good urban design would be to require some reasonable parameters within the rules and standards section of the PDP. The CCDG are elaborate, are not currently applied as guidelines (i.e. they are tied to rules and standards) and are expected to create delays and unnecessary expense to a CBD that simply needs to be enabled to support growth and give landowners and businesses confidence to invest and develop. It is also questionable on whether a specialist urban designer needs to interpret these, or will they be considered by environmental planners?

- Digital Signage and Commercial Advertising

The Proposed District Plan does not reflect the aspirations of many business owners within a variety of business zones in the PDP that require advertising space on commercial buildings, including digital signage. Digital signage technology is not the modern equivalent of static signage, if display areas, lux, movement and transitions are carefully managed potential effects of these signs can be effectively avoided and mitigated.

4. Conclusions

If NPDC's aspirations for the Central City are to come to fruition, development and investment needs to be enabled and supported. Unfortunately the Proposed District Plan rules as drafted create more uncertainty for property owners, more regulation, and more cost to progress a central city development.

Name of Further Submitter: Mike Ekdahl

My specific further submission(s) are as follows:

(Please only insert one further submission point per line. Add further sheets as required)

I support/oppose the submission of: <i>(State the submission no., name and address of the person making the original submission)</i>	The particular part of the submission I support/oppose are: <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			The reasons for my support / opposition are: <i>(State the nature of your further submission, giving reasons)</i>	I seek that the whole (or part) of the submission be allowed / disallowed: <i>(Give precise details of the decision you want the Council to make)</i>
Name, submission number, address	Sub No. / Point No.	Support / Oppose	Provision	Reasons for support / opposition	Allow /disallow
Kāinga Ora - Homes and Communities - Dr Claire Kirman	563.604	Support	CCZ / Rules / CCZ-R12	Submission is supported. Summary of submission states: Opposes CCZ-R12 (demolition or removal of a structure) because: <ul style="list-style-type: none"> ● The demolition of existing structures and land remaining vacant for a time is a natural consequence of the development cycle. ● It is over-restrictive where the redevelopment of the City Centre land is concerned, and creates additional consenting and regulatory requirements which may discourage investment. 	Allow - Delete CCZ-R12 in its entirety.
Damian Ellerton	145.1	Oppose	CCZ / Rules / CCZ-R13	Submission is supported. Summary of submission states: Considers that under CCZ-R13 (erection of a structure (excluding on a coastal frontage site)) some erection, extension and alterations of buildings should be permitted because it is unreasonable to trigger resource consent on any works. Opposes broad application of the design guide. Considers that CCZ-R13 (erection of a	Allow - Amend CCZ-R13 to provide for some permitted building activities within the City Centre Zone. Clarify how the impact on the heritage character area will work in practice.

I support/oppose the submission of: <i>(State the submission no., name and address of the person making the original submission)</i>	The particular part of the submission I support/oppose are: <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			The reasons for my support / opposition are: <i>(State the nature of your further submission, giving reasons)</i>	I seek that the whole (or part) of the submission be allowed / disallowed: <i>(Give precise details of the decision you want the Council to make)</i>
				structure (excluding on a coastal frontage site)) should be clarified regarding impact on heritage character and is concerned that heritage experts will be required to support any resource consent application.	
Ekdahl Property Management - Steve Ekdahl	496.1a	Support	CCZ / Rules / CCZ-R13	Submission is supported. Summary of submission states: Opposes CCZ-R13 (erection of a structure (excluding on a coastal frontage site) because: <ul style="list-style-type: none"> ● The plan should provide for some erection, extension and alterations of buildings to be permitted and it is unreasonable to trigger resource consent on any works. ● Broad application of the design guide is opposed. ● Clarity is sought regarding impact on heritage character and there is concern that heritage experts will be required to support any resource consent application. 	Allow - Amend Rule CCZ-R13 to provide for some permitted building activities within the City Centre Zone. Clarify how the impact on the heritage character area will work in practice.
Murali Bhaksar and Eloise Pollard - Eloise Pollard	336.1	Support	CCZ / Rules / CCZ-R13	Submission is supported. Summary of submission states: Considers that under CCZ-R13 (erection of a structure (excluding on a coastal frontage site)) some erection, extension and alterations of buildings should be permitted because it is unreasonable to trigger resource consent on any works. Opposes	Allow - Amend CCZ-R13 to provide for some permitted building activities within the City Centre Zone. Clarify how the impact on the heritage character area will work in practice.

I support/oppose the submission of: <i>(State the submission no., name and address of the person making the original submission)</i>	The particular part of the submission I support/oppose are: <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			The reasons for my support / opposition are: <i>(State the nature of your further submission, giving reasons)</i>	I seek that the whole (or part) of the submission be allowed / disallowed: <i>(Give precise details of the decision you want the Council to make)</i>
				broad application of the design guide. Considers that there should be more clarity regarding impact on heritage character and is concerned that heritage experts will be required to support any resource consent application.	
Damian Ellerton	145.2	Support	CCZ / Rules / CCZ-R14	Submission is supported. Summary of submission states: Considers that under CCZ-R14 (alterations to the exterior of a structure (excluding on a coastal frontage site)) some erection, extension and alterations of buildings should be permitted because it is unreasonable to trigger resource consent on any works. Opposes broad application of the design guide. Considers that CCZ-R14 (alterations to the exterior of a structure (excluding on a coastal frontage site)) should be clarified regarding impact on heritage character and is concerned that heritage experts will be required to support any resource consent application.	Allow - Amend CCZ-R14 to provide for some permitted building activities within the City Centre Zone. Clarify how the impact on the heritage character area will work in practice.
Murali Bhaksar and Eloise Pollard - Eloise Pollard	336.4	Support	CCZ / Rules / City and Town Centre Design Guide	Submission is supported. Summary of submission states: Considers that the City Centre Zone rules and Town Centre Zone rules trigger resource consent for erection, alterations and additions of structures that are	Allow - Amend the City Centre Zone rules so that provisions within the design guide are included as clear 'effects standards', rather than within a design guide, to provide more certainty to property owners in the CBD when developing their sites.

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				<p>assessed against the City and Town Centre Design Guide creating additional standards in the guide, that are not 'guidelines' at all. There are only three 'effects standards'. The remainder of the bulk, location and design standards are hidden away within the design guide.</p>	
Murali Bhaksar and Eloise Pollard - Eloise Pollard	336.5	Support	TCZ / Rules / TCZ-R13	<p>Submission is supported.</p> <p>Summary of submission states:</p> <p>Considers that under TCZ-R13 (erection of a structure) some erection, extension and alterations of buildings should be permitted because it is unreasonable to trigger resource consent on any works. Opposes broad application of the design guide.</p>	Allow - Amend TCZ-R13 to provide for some permitted building activities within the Town Centre Zone.
Murali Bhaksar and Eloise Pollard - Eloise Pollard	336.6	Support	TCZ / Rules / TCZ-R14	<p>Submission is supported.</p> <p>Summary of submission states:</p> <p>Considers that under TCZ-R14 (alterations to the exterior of a structure) some erection, extension and alterations of buildings should be permitted because it is unreasonable to trigger resource consent on any works. Opposes broad application of the design guide.</p>	Allow - Amend TCZ-R14 to provide for some permitted building activities within the Town Centre Zone.

I support/oppose the submission of: <i>(State the submission no., name and address of the person making the original submission)</i>	The particular part of the submission I support/oppose are: <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>		The reasons for my support / opposition are: <i>(State the nature of your further submission, giving reasons)</i>	I seek that the whole (or part) of the submission be allowed / disallowed: <i>(Give precise details of the decision you want the Council to make)</i>	
Kāinga Ora - Homes and Communities - Dr Claire Kirman	563.603b	Support in part	CCZ / Rules / CCZ-R14	<p>Opposes suggested change to Rule CCZ-R14 (alterations to the exterior of a structure (excluding on a coastal frontage site)) but considers that it should be amended to provide an exclusion, rather than repeat the exclusion across each activity.</p> <p>Supports the opposition the inclusion of Residential Design Guidelines which act as defacto rules and would support Urban Design Guidelines as best practice guidance as a means to satisfy matters of discretion/assessment (but not a rule that requires compliance with a non-statutory guideline).</p>	Allow in part – submitter seeks that residential design guidelines are removed as defacto rules. Supports Urban Design Guidelines as best practice guidelines – not that a rule requires compliance with the guidelines.
Murali Bhaksar and Eloise Pollard - Eloise Pollard	336.2	Support	CCZ / Rules / CCZ-R14	<p>Submission is supported.</p> <p>Summary of submission states:</p> <p>Considers that under CCZ-R14 (alterations to the exterior of a structure (excluding on a coastal frontage site)) some erection, extension and alterations of buildings should be permitted because it is unreasonable to trigger resource consent on any works. Opposes broad application of the design guide.</p> <p>Considers that there should be more clarity regarding impact on heritage character and is concerned that heritage experts will be</p>	Allow - Amend CCZ-R14 to provide for some permitted building activities within the City Centre Zone. Clarify how the impact on the heritage character area will work in practice.

I support/oppose the submission of: <i>(State the submission no., name and address of the person making the original submission)</i>	The particular part of the submission I support/oppose are: <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			The reasons for my support / opposition are: <i>(State the nature of your further submission, giving reasons)</i>	I seek that the whole (or part) of the submission be allowed / disallowed: <i>(Give precise details of the decision you want the Council to make)</i>
				required to support any resource consent application.	
Murali Bhaksar and Eloise Pollard - Eloise Pollard	336.7	Support	TCZ / Rules / TCZ-R15	Submission is supported. Summary of submission states: Considers that under TCZ-R15 (additions to a structure) some erection, extension and alterations of buildings should be permitted because it is unreasonable to trigger resource consent on any works. Opposes broad application of the design guide.	Allow - Amend TCZ-R15 to provide for some permitted building activities within the Town Centre Zone.
Murali Bhaksar and Eloise Pollard - Eloise Pollard	336.3	Support	CCZ / Rules / CCZ-R15	Submission is supported. Summary of submission states: Considers that under CCZ-R15 (additions to a structure (excluding on a coastal frontage site)) some erection, extension and alterations of buildings should be permitted because it is unreasonable to trigger resource consent on any works. Opposes broad application of the design guide. Considers that there should be more clarity regarding impact on heritage character and is concerned that heritage experts will be required to support any resource consent application.	Allow - Amend CCZ-R15 to provide for some permitted building activities within the City Centre Zone. Clarify how the impact on the heritage character area will work in practice.

I support/oppose the submission of: <i>(State the submission no., name and address of the person making the original submission)</i>	The particular part of the submission I support/oppose are: <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			The reasons for my support / opposition are: <i>(State the nature of your further submission, giving reasons)</i>	I seek that the whole (or part) of the submission be allowed / disallowed: <i>(Give precise details of the decision you want the Council to make)</i>
Murali Bhaksar and Eloise Pollard - Eloise Pollard	336.10	Support	APP3 / City and Town Centre Design Guide	<p>Submission is supported.</p> <p>Summary of submission states:</p> <p>Opposes the CCDG as it may create additional compliance costs without clear benefits. Opposes the mandatory CCDG information requirements for resource consents.</p> <p>Opposes the emphasis within the CCDG on creating positive street and public spaces by ensuring consistency of building height as this conflicts with wider policy direction for compact growth. Considers that good street and public spaces are dictated by building design at first two levels and not building tops.</p>	Allow - Amend the CCDG to better enable development.
Murali Bhaksar and Eloise Pollard - Eloise Pollard	336.8	Support	APP3 / City and Town Centre Design Guide	<p>Submission is supported.</p> <p>Summary of submission states:</p> <p>Opposes the CCDG as it may create additional compliance costs without clear benefits. Opposes the mandatory CCDG information requirements for resource consents.</p>	Allow - Amend the Rules within the City Centre Zone and CCDG to make clear the activity status of each rule and when an assessment against the CCDG is required.
Murali Bhaksar and Eloise Pollard - Eloise Pollard	336.9	Support	APP3 / City and Town Centre Design Guide	<p>Submission is supported.</p> <p>Summary of submission states:</p> <p>Opposes the CCDG as it may create additional compliance costs without clear benefits. Opposes the mandatory CCDG</p>	<p>Allow - Amend Policy 1.4 of the CCDG as follows:</p> <p>When new development is located next to individual heritage buildings or in the heritage character area, it should be designed to be compatible with and</p>

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				<p>information requirements for resource consents. Opposes the policies within the CCDG with respect to buildings adjacent to heritage buildings. Considers that each building should be judged on its own merits at the time of application.</p>	<p>enhance its setting. This does not imply replicating the form and/or style of existing buildings. Instead, the design should aim for similarity of frontage alignment, height and overall bulk, form and scale <u>where practicable</u>. Buildings that contrast with the character of their surroundings might be appropriate only if they accommodate unique or publicly significant functions. A good example in the New Plymouth city centre is the Len Lye Centre (image below).—</p>
Bro Devon Limited - Jeremy Brophy (BTW Company Limited)	579.37	Support	SIGN / Policies / SIGN-P3	<p>Submission is supported.</p> <p>Summary of submission states:</p> <p>Policy SIGN-P3 (Incompatible Signs) is restrictive and should be amended to allow third party and digital signs in a great number of zones than just the City Centre Zone.</p>	<p>Allow - Amend SIGN-P3 as follows: SIGN-P3: Avoid signs that are incompatible with the role, function and predominant character of the zones, including:</p> <ol style="list-style-type: none"> 1. third party <u>and digital signs in rural, residential, open space, special purpose and industrial zones</u> signs in all zones except the City Centre Zone; and 2. digital signs (and signs containing moving images, text or lights) in all zones except the heart of the City Centre Zone.
Craig Williamson	358.1	Support	SIGN / Policies / SIGN-P3	<p>Submission is supported.</p> <p>Summary of submission states:</p> <p>Policy SIGN-P3 (Incompatible Signs) is restrictive and should be amended to provide for third party signs in all Commercial and Mixed Use Zones and the</p>	<p>Allow - Amend Policy SIGN-P3 as follows: SIGN-P3: Avoid signs that are incompatible with the role, function and predominant character of the zones, including:</p> <ol style="list-style-type: none"> 1. third party signs in all zones except the City Centre Zone; and

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				General Industrial Zone, for the following reasons: <ul style="list-style-type: none"> • third party signs play an important role in identification, information, direction and safety • third party signs are important for advertising and providing income for building owners • billboards and comprehensive development signage contribute to social and economic well-being 	2. digital signs (and signs containing moving images, text or lights) in all zones except the heart of the City Centre Zone. <u>Allow signs in all zones, including:</u> 1. <u>third party signs in all zones (except residential)</u> 2. <u>digital signs (and signs containing moving images, text or lights) in all zones (except residential)</u>
Craig Williamson	358.2	Support	SIGN / Policies / SIGN-P7	Submission is supported. Summary of submission states: Policy SIGN-P7 (Third party and digital signs) is restrictive and should provide for third party signs in all zones, except Residential, for the following reasons: <ul style="list-style-type: none"> • third party signs play an important role in identification, information, direction and safety • third party signs are important for advertising and providing income for building owners • billboards and comprehensive development signage contribute to social and economic well-being 	Allow - Amend Policy SIGN-P7 to provide for third party signs within all zones, except Residential.
Damian Ellerton	143.3	Support	SIGN / Policies / SIGN-P7	Submission is supported. Summary of submission states:	Allow - Amend Policy SIGN-P7 to provide for: <ul style="list-style-type: none"> • third party signs within all Centre Zones and Mixed Use Zones • protection of architectural features

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				Policy SIGN-P7 (Third party and digital signs) is restrictive and should provide for third party signs in all Centre Zones and Mixed Use Zone. It should also protect architectural features but not differentiate between heritage and non-heritage buildings, for the following reasons: <ul style="list-style-type: none"> • third party signs play an important role in identification, information, direction and safety • third party signs are important for advertising and providing income for building owners • billboards and comprehensive development signage contribute to social and economic well-being 	without differentiating between heritage and non-heritage buildings.
Craig Williamson	358.3	Support	SIGN / Rules / SIGN-R5	Submission is supported. Summary of submission states: Rule SIGN-R5 (Signs on or attached to heritage buildings) is restrictive and should be amended to only apply to the street-facing facade that has the heritage detail and not the blank non-character walls. The submitter is also concerned that art could be considered third party signage and subject to this rule. Rule SIGN-R5 should be amended for the following reasons: <ul style="list-style-type: none"> • third party signs play an important role in identification, information, direction and safety 	Allow - Amend Rule SIGN-R5 as follows: SIGN-R5: Signs on or attached to a scheduled heritage building or item Activity status: PER Where: ... 5. <u>On the street-facing façade only (excluding side walls)</u> , the sign is not for the purposes of third party advertising; and ...

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				<ul style="list-style-type: none"> • third party signs are important for advertising and providing income for building owners • billboards and comprehensive development signage contribute to social and economic well-being 	
Westwill Properties Limited, Mayfair NP Limited, Telfer Family Trust, Greenstone Developments Limited - Kyle Still	461.3	Support	SIGN / Rules / SIGN-R5	Submission is supported. Summary of submission states: Rule SIGN-R5 (Signs on or attached to heritage buildings) is restrictive and should be amended to only apply to the street-facing facade that has the heritage detail and not the blank non-character walls. In addition to signs, the submitter considers that trees should not be allowed to block the heritage value of buildings, for example The Mayfair.	Allow - Amend Rule SIGN-R5 so that it only applies to the areas of a building with heritage value, such as the front facade.
Business & Retail Association (BARA) - Michelle Brennan	489.1	Support	SIGN / Rules / SIGN-R6	Submission is supported. Summary of submission states: Rule SIGN-R6 (Signs attached to non-heritage buildings) is onerous and should be amended for the following reasons: <ul style="list-style-type: none"> • the clauses relating to signage on windows and signage on wall surfaces will deter owners of empty shops from tidying up and screening off their windows. • privacy screening on windows can be achieved through tasteful signage. 	Allow - Amend Rule SIGN-R6 as follows: SIGN-R6: Signs attached to buildings (excluding scheduled heritage buildings) All zones Activity status: PER Where: 1. the signage does not cover, partially cover or adhere to any window above the ground floor of any building; 2. the signs are displayed on plain wall surfaces and do not cover, or partially cover architectural features; ...

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Craig Williamson	358.4	Support	SIGN / Rules / SIGN-R6	Rule SIGN-R6 (Signs attached to non-heritage buildings) is restrictive and should be amended to provide for third party advertising in all Commercial and Mixed Use Zones and the General Industrial Zone.	Amend Rule SIGN-R6 as follows: SIGN-R6: Signs attached to buildings (excluding scheduled heritage buildings) All zones Activity status: PER Where: ... 4. the sign is not for the purposes of third party advertising; and ...
Damian Ellerton	143.5	Support	SIGN / Rules / SIGN-R6	Submission is supported. Summary of submission states: Rule SIGN-R6 (Signs attached to non-heritage buildings) is restrictive and should be amended to provide for third party advertising in all Commercial and Mixed Use Zones and the General Industrial Zone.	Allow - Amend Rule SIGN-R6 as follows: SIGN-R6: Signs attached to buildings (excluding scheduled heritage buildings) All zones Activity status: PER Where: ... 4. the sign is not for the purposes of third party advertising; and ...
New Plymouth District Council - Juliet Johnson	582.47	Oppose	SIGN / Rules / SIGN-R6	Submission is opposed, as third party signage should be enabled within all commercial/business and mixed use zones, as well as the city centre zone. Summary of submission states: Rule SIGN-R6 (Signs attached to non-heritage buildings) is unclear and should be amended to specify that third party advertising is permitted on buildings in the City Centre and Town Centre Zones. The	Disallow in it's entirety.

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				submitter considers that this would improve district plan interpretation.	
Craig Williamson	358.5	Support	SIGN / Rules / SIGN-R7	Submission is supported. Summary of submission states: Rule SIGN-R7 (Verandah signs) is restrictive and should be amended to allow for: <ul style="list-style-type: none"> • more than one sign per site, e.g. multiple tenancies • signs on top of verandahs • third party signage in the Commercial and Mixed Use Zones and the General Industrial Zone. Rule SIGN-R7 should be amended for the following reasons: <ul style="list-style-type: none"> • third party signs play an important role in identification, information, direction and safety • third party signs are important for advertising and providing income for building owners • billboards and comprehensive development signage contribute to social and economic well-being 	Allow - Amend Rule SIGN-R7 as follows: SIGN-R7: Verandah signs All zones Activity status: PER Where: 1. the sign is under the verandah, <u>on top of the verandah</u> , or within the verandah fascia; 2. the sign is not on top of the verandah; 3. the sign is not for the purposes of third party advertising; and ...
Westwill Properties Limited, Mayfair NP Limited, Telfer Family Trust, Greenstone Developments Limited - Kyle Still	461.5	Support	SIGN / Rules / SIGN-R7	Submission is supported. Summary of submission states: Rule SIGN-R7 (Verandah signs) is restrictive and should be amended to allow for: <ul style="list-style-type: none"> • more than one sign per site, e.g. multiple 	Allow - Amend Rule SIGN-R7 as follows: SIGN-R7: Verandah signs All zones Activity status: PER Where: 1. the sign is under the verandah, or within the verandah fascia;

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				tenancies • signs on top of verandahs	2. the sign is not on top of the verandah; ...
Damian Ellerton	143.6	Support	SIGN / Rules / SIGN-R7	Submission is supported. Summary of submission states: Rule SIGN-R7 (Verandah signs) is restrictive and should be amended to allow for: <ul style="list-style-type: none"> • more than one sign per site, e.g. multiple tenancies • signs on top of verandahs • third party signage in the Commercial and Mixed Use Zones and the General Industrial Zone. Rule SIGN-R7 should be amended for the following reasons: <ul style="list-style-type: none"> • third party signs play an important role in identification, information, direction and safety • third party signs are important for advertising and providing income for building owners • billboards and comprehensive development signage contribute to social and economic well-being 	Allow - Amend Rule SIGN-R7 as follows: SIGN-R7: Verandah signs All zones Activity status: PER Where: 1. the sign is under the verandah, <u>on top of the verandah</u> , or within the verandah fascia; 2. the sign is not on top of the verandah; 3. the sign is not for the purposes of third party advertising; and ...
Craig Williamson	358.6	Support	SIGN / Rules / SIGN-R13	Submission is supported. Summary of submission states: Rule SIGN-R13 (Third party signs) is restrictive and should be amended to allow for third party signs beyond the City Centre Zone, for the following reasons:	Allow - Amend Rule SIGN-R13 as follows: SIGN-R13: Third party signs (excluding temporary signs) (1) City Centre Zone <u>Town Centre Zone</u> <u>Local Centre Zone</u> <u>Mixed Use Zone</u> <u>Large Format Retail Zone</u>

I support/oppose the submission of: <i>(State the submission no., name and address of the person making the original submission)</i>	The particular part of the submission I support/oppose are: <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			The reasons for my support / opposition are: <i>(State the nature of your further submission, giving reasons)</i>	I seek that the whole (or part) of the submission be allowed / disallowed: <i>(Give precise details of the decision you want the Council to make)</i>
				<ul style="list-style-type: none"> • third party signs play an important role in identification, information, direction and safety • third party signs are important for advertising and providing income for building owners • billboards and comprehensive development signage contribute to social and economic well-being 	<p><u>General Industrial Zone</u> <u>Open Space and Recreation Zone</u> Activity status: PER (2) Town Centre Zone Local Centre Zone Mixed Use Zone Large Format Retail Zone Residential Zones General Industrial Zone Open Space and Recreation Zones Special Purpose Zones Rural Zones Activity status: NC</p>
Damian Ellerton	143.7	Support	SIGN / Rules / SIGN-R13	<p>Submission is supported.</p> <p>Summary of submission states:</p> <p>Rule SIGN-R13 (Third party signs) is restrictive and should be amended to allow for third party signs beyond the City Centre Zone, for the following reasons:</p> <ul style="list-style-type: none"> • third party signs play an important role in identification, information, direction and safety • third party signs are important for advertising and providing income for building owners • billboards and comprehensive development signage contribute to social and economic well-being 	<p>Allow - Amend Rule SIGN-R13 as follows: SIGN-R13: Third party signs (excluding temporary signs) (1) <u>City Centre Zone</u> <u>Town Centre Zone</u> <u>Local Centre Zone</u> <u>Mixed Use Zone</u> <u>Large Format Retail Zone</u> <u>General Industrial Zone</u> Activity status: PER (2) Town Centre Zone Local Centre Zone Mixed Use Zone Large Format Retail Zone Residential Zones General Industrial Zone Open Space and Recreation Zones Special Purpose Zones Rural Zones Activity status: NC</p>

I support/oppose the submission of: <i>(State the submission no., name and address of the person making the original submission)</i>	The particular part of the submission I support/oppose are: <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			The reasons for my support / opposition are: <i>(State the nature of your further submission, giving reasons)</i>	I seek that the whole (or part) of the submission be allowed / disallowed: <i>(Give precise details of the decision you want the Council to make)</i>
Harvey Norman Properties (NZ) Limited - Daniel Shao (Haines Planning Consultants Limited)	502.16	Support	SIGN / Rules / SIGN-R13	Submission is supported. Summary of submission states: Rule SIGN-R13 (Third party signs) is restrictive and should be amended to allow for third party signs beyond the City Centre Zone. The submitter considers the non-complying component of the rule to be draconian; does not reflect an appropriate balancing of the positive and negative attributes of signs (outside of the CBD); and is untenable in light of Objective SIGN-O1.	Allow - Amend Rule SIGN-R13(2) by reducing the activity status from non-complying to discretionary.
Harvey Norman Properties (NZ) Limited - Daniel Shao (Haines Planning Consultants Limited)	502.13	Support	SIGN / Rules / SIGN-R14	Submission is supported. Summary of submission states: Rule SIGN-R14 (Digital signage) is restrictive and should be amended to allow for third party signs beyond the City Centre Zone. The submitter considers the non-complying component of the rule to be draconian; does not reflect an appropriate balancing of the positive and negative attributes of signs (outside of the CBD); and is untenable in light of Objective SIGN-O1.	Allow - Amend Rule SIGN-R14(2) by reducing the activity status from non-complying to discretionary.
Heritage New Zealand Pouhere Taonga - Caroline Rachlin	522.94	Oppose	SIGN / Rules / SIGN-R14	Submission is opposed. Summary of submission states:	Disallow – only those buildings with specific heritage values listed in the PDP schedule should have an elevated level of heritage assessment.

I support/oppose the submission of: <i>(State the submission no., name and address of the person making the original submission)</i>	The particular part of the submission I support/oppose are: <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			The reasons for my support / opposition are: <i>(State the nature of your further submission, giving reasons)</i>	I seek that the whole (or part) of the submission be allowed / disallowed: <i>(Give precise details of the decision you want the Council to make)</i>
				Rule SIGN-R14 (Digital signs) is supported because it appropriately manage effects on historic heritage values.	
Damian Ellerton	143.10	Support	SIGN / Rules / SIGN-S4	Submission is supported. Summary of submission states: Effects Standard SIGN-S4 (Signs attached to heritage buildings/items) is restrictive and should be amended to allow for: <ul style="list-style-type: none"> • more than one sign per site, e.g. multiple tenancies • a greater sign face area to support a sufficient amount of information with a meaningful design • side walls to be utilised for signage The submitter refers to Auckland and Wellington Plan provisions.	Allow - Amend Effects Standard SIGN-S4 as follows: SIGN-S4: Requirements for signs on or attached to scheduled heritage buildings or items All zones 1. Maximum number of signs per site: one, except where a site has more than one road frontage, in which case signs are limited to a maximum of one per road frontage, provided the sign is not located on the side wall of a heritage building that is visible from a public place; and 2. Maximum sign face area: 1m2 <u>Maximum signage area: 50% of the area of the building facade provided the signs are attached for their full width and length to the facade of the building or painted directly onto the building.</u>
Renaissance Holdings Limited - Harvey Dunlop	482.1	Support	SIGN / Rules / SIGN-S4	Submission is supported. Summary of submission states: Effects Standard SIGN-S4 (Signs attached to heritage buildings/items) is restrictive and should be amended because it is reasonable to provide all tenants of a building an opportunity to erect suitable signage on the exterior of a building. The	Allow - Amend Effects Standard SIGN-S4 as follows: SIGN-S4: Requirements for signs on or attached to scheduled heritage buildings or items All zones 1. Maximum number of signs per site: <u>wall per activity: One</u>

I support/oppose the submission of: <i>(State the submission no., name and address of the person making the original submission)</i>	The particular part of the submission I support/oppose are: <i>(State the Submission No./Point no. of the original submission you support or oppose, together with any relevant provisions of the proposal)</i>			The reasons for my support / opposition are: <i>(State the nature of your further submission, giving reasons)</i>	I seek that the whole (or part) of the submission be allowed / disallowed: <i>(Give precise details of the decision you want the Council to make)</i>
				submitter also considers the sign size and scale maximums are restrictive and makes reference to Auckland and Wellington Plan provisions.	
Westwill Properties Limited, Mayfair NP Limited, Telfer Family Trust, Greenstone Developments Limited - Kyle Still	461.7	Support	SIGN / Rules / SIGN-S4	Submission is supported. Summary of submission states: Effects Standard SIGN-S4 (Signs attached to heritage buildings/items) is restrictive and should be amended to allow for larger buildings with multiple tenancies.	Allow - Amend Effects Standard SIGN-S4 to allow for larger buildings with multiple tenancies.
Damian Ellerton	143.11	Support	SIGN / Rules / SIGN-S7	Submission is supported. Summary of submission states: Effects Standard SIGN-S7 (Freestanding signs) is restrictive and should be amended to allow for: <ul style="list-style-type: none"> • more than one sign per site, e.g. multiple tenancies • a greater sign face area to support a sufficient amount of information with a meaningful design • vacant sites within the Heritage Character Area to generate revenue through freestanding signage 	Allow - Amend Effects Standard SIGN-S7 as follows: SIGN-S7: Requirements for freestanding signs (1) Commercial and Mixed Use Zones General Industrial Zone <u>All zones excluding Residential Zone</u> On sites adjoining an entrance corridor: ... 3. maximum number of signs <u>per activity located on the</u> per site: one; 4. maximum sign face area: 3m² <u>10m²</u> ; and 5. maximum sign height measured from ground level: 4 <u>8</u> m. On all other sites (i.e. sites not adjoining an entrance corridor): 1. the sign must not be within the Heritage Character Area; ... 4. maximum number of signs per activity

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					<p>on the site: one, except where:</p> <p>a) the site has more than one road frontage, in which case the maximum number of signs per <u>activity on the site</u> is two, provided <u>the two signs for each activity</u> are each sign is located on a different road frontage; or</p> <p>b) a site has more than 20m of road frontage, in which case freestanding signs are limited to a maximum of two; and</p> <p>5. maximum sign face area: 5m²; <u>20m²</u> and</p> <p>6. maximum sign height measured from ground level: 4 <u>10m</u>.</p>
Waka Kotahi New Zealand Transport Agency - Mike Wood (Principal Planner)	566.119	Support in part	SIGN / Rules / SIGN-S10	Submission is supported in part. Summary of submission states: Effects Standard SIGN-S10 (Illumination of signs) is inconsistent with current best practice for managing adverse effects of outdoor lighting contained in AS/NZS 4282:2019 and should be amended.	Allow - Amend Effects Standard SIGN-S10 as follows: SIGN-S10: Illumination of signs (excluding digital signs) All zones All internal illumination or external lighting of a sign must as follows: 1. not exceed a <u>the</u> luminance requirements set out in <u>Table 10A</u> of 800cds/m² between dusk and dawn; ... (see new table in Attachment 3 of original submission)
Speedy Signs New Plymouth - Kevin Jones	465.7	Support	SIGN / Rules / SIGN-S11	Submission is supported in part. Summary of submission states:	Allow - Amend Effects Standard SIGN-S11 to either: <ul style="list-style-type: none"> change the zones that are captured by the Standard; or

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				Effects Standard SIGN-S11 (Maximum signage area) is restrictive and should be amended to cater for buildings of a large scale.	<ul style="list-style-type: none"> • increase the maximum sign size parameters
Taranaki Chamber of Commerce - Michelle Brennan	490.2	Support	SIGN / Rules / SIGN-S11	E Submission is supported in part. Summary of submission states: effects Standard SIGN-S11 (Maximum signage area) is restrictive and should be amended to cater for buildings of a large scale, for the following reasons: <ul style="list-style-type: none"> • many buildings in the Centre City Zone would benefit from increased sizes of advertisements, business names and artwork, making identification of business locations easier and contributing to colour and vibrancy. • businesses would not be clearly identifiable on such a small scale. • where resource consent is required the discretion of Council is broad and potentially subjective. 	Allow - Amend Effects Standard SIGN-S11 to allow for greater signage area in the City Centre Zone and limit the discretion of the Council if resource consent is required.
Bro Devon Limited – Jeremy Brophy (BTW Company Limited)	579.1	Support	GIZ / Zoning	The submitter supports Bro Devon Limited’s opposition to the zone change of 700, 690, 688-686 and 680 Devon Road from the Industrial C Area (ODP) to the GIZ. The site to which the submission relates is very similar to the submitters own site on Oropuriri Road in that current adjoining land uses do not represent industrial characteristics and would be better suited	Allow.

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				<p>to a MUZ. The GIZ is considered to be too restrictive for the current land uses.</p> <p>This example of GIZ zoning is considered to have some similarities to the submitter's property on Oropuriri Road, concerning NPDC's determination of the proposed GIZ areas throughout the city.</p>	
Kāinga Ora - Homes and Communities - Dr Claire Kirman	563.615b	Support in Part	GIZ / Zoning / Planning Maps	<p>The submitter supports the purpose of the submission which identifies areas in the New Plymouth District that have been zoned in the GIZ but should be zoned as the MUZ.</p> <p>The submission states that the re zoning of those GIZ areas will continue to enable business activities, but it will also enable further intensification of sites that are located near a range of attractive amenities for future residents.</p>	Allow. Seek that the submitters site be re zoned MUZ.
Waitomo Petroleum Limited – Hamish Walker (BTW Company Limited)	572.23	Support	GIZ / Objectives / GIZ-02	<p>The submitter supports the submission from Waitomo Petroleum Limited and agrees that more compatible activities should be provided for in the GIZ.</p>	Allow.
Landpro Limited – Kathryn Hooper	475.5	Support	MUZ / Rules	<p>The submitter also opposes the non-complying status for business service activities in the MUZ. The submitter agrees that this is overly restrictive and inconsistent with the diversity outcomes the MUZ is supposed to encourage.</p> <p>This matter is also relevant to Rules / MUZR17.</p>	Allow in Part.

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				<p>Submission summary states: Opposes Business Service Activities being identified in the Mixed Use Zone as incompatible activities because:</p> <ul style="list-style-type: none"> • This is overly restrictive and inconsistent with their effects. • The submitter will potentially have Business Service Activity in the Mixed Use Zone which is discouraged in this zone and encouraged to locate in the city centre. All around are non-complying Business Service Activities. • Business Service Activities are compatible with the Mixed Use Zone and provide vibrancy and diversity of use that this zone encourages. <p>Supports some parts of the submission and opposes others.</p> <p>Opposition to the following submission points is provided:</p> <ul style="list-style-type: none"> • The wording and intent does not align with the National Planning Standards definition of Mixed Use Zone: "Areas used predominantly for a compatible mixture of residential, commercial, light industrial, recreational and/or community activities." The word predominantly provides flexibility for other compatible activities to be located in the Mixed Use Zone. • Disagrees that the Mixed-Use zone will 	

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				<p>become a 'holding area' for non-residential activities that are not provided for in the City Centre Zone or the Medium Density Residential Zone, creating a 'barrier' between the suburbs and the city centre with a low grade urban form. This is a broad assumption on land use.</p> <ul style="list-style-type: none"> ● The effects of non-residential activities should be managed through a resource consent or prescriptive performance standards are not supported. ● Additional effects standards sought in relate to residential activities are not supported. <p>Support to the following submission points is provided:</p> <ul style="list-style-type: none"> ● The submitter agrees that the plan does not efficiently utilise this resource to achieve its strategic objectives regarding residential intensification, and places a greater emphasis on revitalising the city centre at the expense of efficient land use. ● The zone could further enable high-density residential activities in addition to the City Centre Zone, particularly as the plan does not utilise a high-density residential zone. ● The zone could provide for activities that support high density residential living. General 'convenience' sized retail can be provided (i.e. up to 200m2) that would not 	

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				compromise the viability of the City Centre Zone or other centres.	
Kāinga Ora - Homes and Communities - Dr Claire Kirman	563.646	Oppose	MUZ	Considers that a Mixed Use Design Guideline is not necessary to support development in the Mixed Use Zone. Support is provided to the current PDP provisions which do not include a design guide.	Disallow.

Note to Further Submitter

This further submission on the Proposed District Plan must be received by the New Plymouth District Council by **5pm on Tuesday 25 August 2020**.

To get your further submission to us, either:

Post to: New Plymouth District Council, Reply Paid DX, DX Box NX10026, New Plymouth.

Attention: District Planning Team

Deliver to: Civic Centre, Liardet Street, New Plymouth
or to library and service centres at Bell Block, Inglewood or Waitara

Email to: districtplan@npdc.govt.nz

Visit our website: newplymouthnz.com/eplan

A copy of your further submission MUST be served on the original submitter within 5 working days after it is served on the local authority. Contact details for all submitters can be found on our Proposed Plan page at newplymouthnz.com/eplan.

Please note all information provided in your submission, including your personal information, will be made publicly available.

Your submission (or part of it) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of it):

- it is frivolous or vexatious;
- it discloses no reasonable or relevant case;
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further;
- it contains offensive language;
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.