

Wellington City Proposed District Plan

Hearing Stream 7 – Signs

**Section 42A of the Resource Management Act
1991**

Document Information

REPORT FOR:	Independent Hearings Commissioners: Robert Schofield (Chair) Jane Black Lindsay Daysh Miria Pomare
SUBJECT:	Wellington City Proposed District Plan – Part 3- Area Specific Matters – Signs
PREPARED BY:	Joshua Patterson
REPORT DATED:	20/02/2024
DATE OF HEARING:	19/03/2024

Executive Summary

- i. This report considers submissions received by Wellington City Council in relation to the relevant objectives, policies, rules, definitions, appendices and maps of the Wellington City Proposed District Plan as they apply to the Signs Chapter and the Signs Design Guide.
- ii. There were 328 submission points received on the Signs Chapter and 19 submission points received on the Signs Design Guide. The submissions received were diverse and sought a range of outcomes. This report assesses and makes recommendations in response to the issues and submission points raised.
- iii. The following are considered to be the key issues in contention:
 - a. Digital Signs as a Restricted Discretionary Activity, several submitters requested that they be amended to become a permitted activity.
 - b. The size of signs permitted under the provisions. Some submitters requested larger signs while others requested that they remain as notified or are decreased in size.
 - c. The treatment of signs which are oriented to be read from the State Highway Network. Several submitters, particularly the Signs Companies, requested that signs on state highways are treated the same as other signs.
 - d. The Signs Design Guide. Some submitters requested that the Signs Design Guide is deleted in its entirety.
- iv. This report addresses each of these key issues, as well as any other relevant issues raised in the submissions.
- v. The report includes recommendations to address matters raised in submissions. This includes whether the provisions in the Proposed District Plan relating to the Signs Chapter and the Signs Design Guide should be retained as notified, amended, or deleted in full.
- vi. Appendix A of this report sets out the recommended changes to the Signs chapter and the Signs Design Guide in full. These recommendations take into account all of the relevant matters raised in submissions and relevant statutory and non-statutory documents.
- vii. Appendix B of this report details officers' recommendations on submissions and whether they should be accepted, accepted in part or rejected. The associated reasoning is set out in the body of this report.
- viii. For the reasons set out in the Section 32AA evaluations included throughout this report, the proposed objectives and associated provisions, along with any recommended amendments, are considered to be the most appropriate means to:
 - a. Achieve the purpose of the Resource Management Act 1991 (RMA) where it is necessary to revert to Part 2 and otherwise give effect to higher order planning documents, in respect to the proposed objectives; and
 - b. Achieve the relevant objectives of the Proposed District Plan, in respect to the proposed provisions.

Interpretation

Table 1: Abbreviations

Abbreviation	Means
the Act / the RMA	Resource Management Act 1991
the Enabling Act	Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021
the Council/WCC	Wellington City Council
the Operative Plan/ODP	Operative Wellington City District Plan
the Proposed Plan/PDP	Proposed Wellington City District Plan
GWRC	Greater Wellington Regional Council
NPS	National Policy Statement
NPS-UD	National Policy Statement on Urban Development 2020
NZCPS	New Zealand Coastal Policy Statement 2010
PNRP	Proposed Wellington Natural Resources Plan (Decisions Version) 2019
RPS	Wellington Regional Policy Statement 2013
Spatial Plan	Spatial Plan for Wellington City 2021
S32	Section 32 of the Resource Management Act 1991
S32AA	Section 32AA of the Resource Management Act 1991

1.0 Introduction

1.1 Purpose

1. This report is prepared under section 42A of the Resource Management Act 1991 (the **RMA**) to:
 - a. Assist the Hearings Panel in their role as Independent Commissioners in making their recommendations on the submissions and further submissions on the Wellington City Proposed District Plan (the **PDP**); and
 - b. Provide submitters with information on how their submissions have been evaluated and the recommendations made by officers, prior to the hearing.
2. This report considers submissions received by the Council in relation to the relevant objectives, policies, rules, definitions and maps as they apply to the Signs Chapter and the Signs Design Guide.
3. This report discusses general issues, considers the original and further submissions received following notification of the PDP, assesses and makes recommendations as to whether or not those submissions should be accepted, accepted in part or rejected, and concludes with recommendations to retain or change the PDP provisions or maps based on the assessment and evaluation contained in the report.
4. This report is intended to be read in conjunction with the Section 42A Assessment Report: Part A – Overview, which sets out the statutory context, background information and administrative matters pertaining to the District Plan review and the PDP.
5. The Hearings Panel may choose to accept or reject the conclusions and recommendations of this report, or may come to different conclusions and make different recommendations, based on the information and evidence provided to them by submitters.

1.2 Author and Qualifications

6. My full name is Joshua (Josh) Cunningham Patterson. I am a Principal Planning Advisor in the District Plan Team at Wellington City Council (the **Council**).
7. I hold the qualification of Bachelor of Science (Geography and Development Studies) from Victoria University and a Master of Resource and Environmental Planning from Massey University.
8. I have seven years' experience in planning and resource management. I began my career at the Council before moving to the private sector, returning to the Council in October 2022. Before leaving the Council initially, I worked in District Planning Team where I was a lead on the preparation of the first Housing and Business Capacity Assessment. Additionally, I was lead on the review of several chapters, including the Heritage Chapter. I then worked at Urban Edge Planning for three years where I was the lead and support planner on Private

Plan Changes and District Plan changes, including for the Wellington City Council. In addition, I prepared and assessed resource consent applications for a range of developments across the Wellington region. With respect to the PDP, I was involved in drafting the Natural Environment Chapters and was the lead on the Signs and Large Lot Residential Chapters.

9. Since joining the District Plan Team in October 2022 my primary focus has been assessing and reporting on the submissions relating to the Part 3 – Residential Zones.
10. My role in preparing this report is that of an expert in planning.

1.3 Code of Conduct

11. Although this is a Council Hearing, I have read the Code of Conduct for Expert Witnesses contained in the Practice Note issued by the Environment Court which came into effect on 1 January 2023. I have complied with the Code of Conduct when preparing my written statement of evidence and I agree to comply with it when I give any oral evidence.
12. Other than when I state that I am relying on the evidence or advice of another person, this evidence is within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.
13. Any data, information, facts, and assumptions I have considered in forming my opinions are set out in the part of the evidence in which I express my opinions. Where I have set out opinions in my evidence, I have given reasons for those opinions.

1.4 Key resource management issues in contention

14. 328 submission points were received on the provisions relating to the Signs Chapter.
15. 19 submission points were received on the Signs Design Guide.
16. Having read the submissions and further submissions, I consider that the following matters are the key issues in contention in the chapter:
 - a. Digital Signs as a Restricted Discretionary Activity, several submitters requested that they be amended to become a permitted activity.
 - b. The size of signs permitted under the provisions. Some submitters requested larger signs while others requested that they remain as notified or are decreased in size.
 - c. The treatment of signs which are oriented to be read from the State Highway Network. Several submitters, particularly the Signs Companies, requested that signs on state highways are treated the same as other signs.
 - d. The Signs Design Guide. Some submitters requested that the Signs Design Guide is deleted in its entirety.

1.5 Procedural Matters

17. At the time of writing this report there have not been any pre-hearing conferences, clause 8AA meetings or expert witness conferencing in relation to submissions.
18. There are not considered to be any other procedural matters to note.

2.0 Background and Statutory Considerations

2.1 Resource Management Act 1991

19. The PDP has been prepared in accordance with the RMA and in particular, the requirements of:
 - Section 74 Matters to be considered by territorial authority; and
 - Section 75 Contents of district plans.
20. As set out in the Section 32 Evaluation Report Part 1 – Context to Evaluation and Strategic Objectives, there are a number of higher order planning documents and strategic plans that provide direction and guidance regarding the preparation and content of the PDP. These documents and a comprehensive assessment of all relevant consultation and statutory considerations prior to public notification of the PDP are discussed in detail within the Signs Section 32 Evaluation Report.

2.2 Schedule 1 and the Intensification Streamlined Planning Process (ISPP)

21. As detailed in the section 42A Overview Report prepared and considered by the Panel in Hearing Stream 1, the Council has chosen to use two plan review processes:
 - a. The ISPP under Part 6 of Schedule 1 of the RMA for the intensification planning instrument (IPI). There are no appeal rights on ISPP provisions.
 - b. For all other PDP provisions and content, the standard Part 1 of Schedule 1 process of the RMA is used. Part 1 Schedule 1 provisions can be appealed.
22. The Signs chapter has been notified using the standard RMA Part One, Schedule 1 process (P1 Sch1).

2.3 Section 32AA

23. I have undertaken an evaluation of the recommended amendments to provisions since the initial section 32 evaluation was undertaken in accordance with s32AA. Section 32AA states:

32AA Requirements for undertaking and publishing further evaluations

(1) A further evaluation required under this Act—

(a) is required only for any changes that have been made to, or are proposed for, the proposal since the evaluation report for the proposal was completed (the changes); and

(b) must be undertaken in accordance with section 32(1) to (4); and

(c) must, despite paragraph (b) and section 32(1)(c), be undertaken at a level of detail that corresponds to the scale and significance of the changes; and

(d) must—

(i) be published in an evaluation report that is made available for public inspection at the same time as the approved proposal (in the case of a national policy statement or a New Zealand coastal policy statement or a national planning standard), or the decision on the proposal, is notified; or

(ii) be referred to in the decision-making record in sufficient detail to demonstrate that the further evaluation was undertaken in accordance with this section.

(2) To avoid doubt, an evaluation report does not have to be prepared if a further evaluation is undertaken in accordance with subsection (1)(d)(ii).

24. The required section 32AA evaluation for changes proposed as a result of consideration of submissions with respect to this topic is included following the assessment and recommendations in relation to the relief sought in submissions of this report, as required by s32AA(1)(d)(ii).
25. The Section 32AA further evaluation contains a level of detail that corresponds to the scale and significance of the anticipated effects of the changes that have been made. Recommendations on editorial, minor, and consequential changes that improve the effectiveness of provisions without changing the policy approach have not been re-evaluated, as have any amendments that do not materially alter the policy approach in the PDP.

2.4 Trade Competition

26. Trade competition is not considered relevant to the provisions of the PDP relating to this topic.
27. There are no known trade competition issues raised within the submissions.

3.0 Consideration of Submissions and Further Submissions

3.1 Overview

28. Submitters collectively made 347 submission points in relation to the Signs Chapter and the Signs Design Guide.

Report Structure

29. Submissions on this topic raised a number of submission points that have been categorised in accordance with the general structure of PDP chapters as follows:
- Definitions
 - General Submissions
 - Signs Design Guide
 - Signs Objectives
 - Signs Policies
 - Signs Rules
 - Signs Standards
30. I have considered substantive commentary on originating submissions contained in further submissions as part of my consideration of the submissions to which they relate, noting however that this has excluded commentary on any matters outside the scope of the originating submissions.
31. In accordance with Clause 10(3) of the First Schedule of the RMA, I have undertaken the following evaluation on both an issues and provisions-based approach, as opposed to a submission-by-submission approach. I have organised the evaluation in accordance with the layout of chapters of the PDP as notified.
32. Recommended amendments are contained in the following appendices:
- a. Appendix A – Recommended Amendments to the provisions contained in the Signs chapter.
 - b. Appendix B – Recommended Responses to Submissions and Further Submissions on the Signs chapter.
33. The following evaluation should be read in conjunction with the relevant summaries of submissions and further submissions, along with the full submissions.
34. Where a submission(s) seeks to retain a specific plan provision as notified, I have not provided a detailed evaluation or recommendation in the body of this report, but an associated recommendation is provided in the summary of submission table in Appendix

B.

35. Where a further evaluation of the relief sought in a submission(s) has been undertaken the evaluation and recommendations are set out in the body of this report. A marked-up version of the Signs chapter with recommended amendments in response to submissions is included as Appendix A.
36. This report only addresses definitions that are specific to this topic. Definitions that relate to more than one topic have been addressed in Hearing Stream 1 and in the associated section 42A report.

3.2 Definitions

The following section of the report includes consideration and recommendations relating to definitions in the PDP.

Matters raised by submitters

37. The Fuel Companies (372.17) seeks to retain the definition of 'On-site Signs' as notified.
38. The Fuel Companies (372.20) and Waka Kotahi (370.35) seek to retain the definition of 'Signs' as notified.
39. Waka Kotahi (370.23) seeks to retain the definition of 'Illuminated Sign' as notified.
40. Go Media (236.2) seeks a new definition of 'Plain Wall Surface'.
41. Waka Kotahi (370.20) considers that an amendment is needed to include 'and/or' between electronic graphics and text using electronic screens to make it clear that the clauses are not necessarily conjunctive.
42. Wellington City Council (266.51) seeks to add a new definition for 'Interpretation signs' as follows:

<p>INTERPRETATION SIGNS means signs that provide information to the public on the environmental, historic, cultural or other values of an area, often with photos, drawings or maps. Consequential amendments throughout the PDP to reference new definition.</p>
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Official Sign

43. Fire and Emergency New Zealand (273.12) seeks to retain the definition of '[Official Sign](#)' as notified.
44. Waka Kotahi (370.26 and 370.27 [supported by KiwiRail Holdings Limited FS72.4]) seeks to retain parts of the definition that align with the NPS-UD and delete further parts of the definition as follows:

<p>means all signs required or provided for under any statute or regulation or are otherwise related to aspects of public safety.</p>
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Official signs include:

~~traffic / pedestrian / cycling signs;
railway signs;
airport signs;
port signs; and
signs for the purpose of health and safety.~~

Assessment

45. In response to Go Media [236.2], I do not consider that a new definition for 'Plain Wall Surface' is needed. I consider that the term is understood widely and is sufficient, and describes areas where there are no architectural features or windows, etc.
46. I disagree with Waka Kotahi [370.20] that 'and/or' is needed in the definition. The definition is a National Planning Standards prescribed definition and my view is that it is appropriate to retain the definition as notified.
47. I agree with Wellington City Council [266.51] that a new definition for 'interpretation signs' would be beneficial. This will reduce ambiguity as to what these signs are and will assist plan users.
48. In relation to Waka Kotahi [370.26 and 370.27] I am not certain on what the request entails as the definition for 'Official Signs' in the Notified PDP aligns with the definition from the National Planning Standards and does not include any additional matters as specified by the submitters. I recommend that the definition for 'Official Signs' is retained as notified and look forward to hearing from the submitters in the Hearing.

Summary of recommendations

49. That submission points relating to 'Signs Definition' are accepted/rejected as detailed in Appendix B.
50. That a new definition be added to the District Plan for 'Interpretation Signs' as set out below and detailed in Appendix A.

Interpretation Signs:

Means signs that provide information to the public on the environmental, historic, cultural or other values of an area, often with photos, drawings or maps.

3.3 General Submissions – Signs

The following section of the report includes consideration and recommendations in relation to more general matters relevant to the Signs chapter.

Matters raised by submitters

51. Paul Van Houtte (92.3) seeks that the chapter be amended so that digitally internally illuminated signs for commercial purposes are not permitted in Wellington or at least not visible from any road.
52. Paul Van Houtte (92.4) seeks that the chapter be amended to restrict commercial advertising/signs on public transport and public transport infrastructure.
53. Go Media Ltd (236.3, 236.5, and 236.7) seeks that the objectives, policies, and rules applying to signage are based on evidence, effects and best practice. They further consider that the PDP expressly recognises the positive effects of billboards, including digital advertising, and enable signage.
54. Go Media (236.4) seeks that the provisions in the chapter treat digital and static signs the same.
55. Go Media (236.6) considers that the current standards are excessively strict and are not commensurate with the safety and amenity effects of billboards. The relief sought is unclear.
56. Go Media (236.8) seeks that the words "Visual Clutter" should be qualified as "Unacceptable" or "Adverse".
57. Go Media (236.9) seeks that the formatting be amended to reduce moving backwards and forwards throughout the chapter and reduce table sizes.
58. Go Media (236.10 [opposed by Waka Kotahi FS103.39]) seeks that provisions relating to signage visibility from State Highways in the chapter are deleted.
59. Go Media (236.11) supports the restricted discretionary activity status for signs that do not meet the permitted activity standards in heritage areas.
60. Go Media (236.12) considers that the PDP fails to meet the requirements of s32 of the Resource Management Act by failing to adequately consider the costs of provisions relating to billboards. They consider that providing more adequately for billboards will ensure that the PDP achieves the requirements of the Act.
61. Kay Larsen (447.8, 447.9, 447.10, and 447.11) seeks that the PDP be amended to account for saving electricity with LED Billboards. They further seek the chapter be amended so that LED Billboards cannot be put near residential properties or Hotels, as well as roads, to proactively prevent any hazards to motorists.
62. Kay Larsen (447.12) seeks that the PDP be amended so that the activity statuses for digital signs are more restrictive.
63. Lumo Digital Outdoor Limited (285.5) supports the incorporation of those standards which reflect current industry practise, however the relief sought is unclear.
64. Out of Home Media Association Aotearoa (OHMAA) (284.1) and Lumo Digital Outdoor Limited (285.1) seek to retain provisions that support the importance of signage and third-

party signs for their role in providing information, messaging, and advertising.

65. OHMAA (284.2) and Lumo Digital Outdoor Limited (285.2) seek to retain the use of a standalone Signs chapter within the Proposed District Plan.
66. OHMAA (284.3 and 284.4) and Lumo Digital Outdoor Limited (285.3 and 285.4) seek to retain policies within the chapter that address and recognise the nature of the effects of signs.
67. OHMAA (284.6) and Lumo Digital Outdoor (285.6) seek to retain matters of discretion within the chapter restricted discretionary activity rules that limit consideration to visual amenity, the integration of signs with buildings, traffic, pedestrian and cyclist safety, functional and operational requirements of activities and signs, and positive effects of signs.
68. OHMAA (284.7) and Lumo Digital Outdoor Limited (285.7) consider the nature or certain standards that apply to third-party signs and digital signs as being onerous. However, the relief sought is unclear.
69. OHMAA (284.8) and Lumo Digital Outdoor Limited (285.8) seek that appropriate matters of discretion and assessment criteria be developed and included in the chapter to provide a clear framework for the assessment of signs that require a resource consent.
70. OHMAA (284.9) and Lumo Digital Outdoor Limited (285.9) seek that a Permitted activity rule be added to SIGN-R5 (Digital signs) to enable digital signs that are designed and operated to comply with relevant standards to be a permitted activity.
71. oOh! Media consider that the introduction be amended to reference the Public Places Bylaw 2022 and to confirm that the Council's approval is required in all instances for signs in the road reserve.
72. Taranaki Whānui ki te Upoko o te Ika (389.87) seeks that within the 'Other relevant District Plan provisions' that Sites and Areas of Significance to Māori chapter is included.
73. Waka Kotahi (370.233 and 370.234 [opposed By OOHMAA FS125.1 and Lumo Digital Outdoor Limited FS124.1) seeks to amend the rule table in the chapter to ensure the links between the table and Rules are clear.
74. Wellington City Council (266.127) seeks that the introduction be amended to cover signage for local body election hoarding.
75. Wellington International Airport Limited (406.460 and 406.461) seeks that the chapter be amended to recognise and provide for signage in the Airport environment to ensure that potential effects of aircraft safety are considered.
76. Woolworths New Zealand (359.36 and 359.37) seeks the chapter be amended to be less restrictive with respect to free-standing signage in certain commercial zones.
77. Woolworths (359.38) seeks that signage assessments need to consider the importance of

corporate branding for consistency and coherence and ensure that consideration sits alongside the urban design aspirations of the PDP.

Assessment

78. In response to Paul Van Houtte ([92.3] and [92.4]), I disagree with both requests. Digital and illuminated signs, as well as commercial advertising signs on public transport, are a reality of modern advertising. They are not going anywhere. I consider that the notified chapter strikes a balance between providing for these types of signage whilst managing the potential adverse effects that could arise.
79. In response to Go Media Ltd ([236.3], [236.5], and [236.7]), I consider that the chapter has been drafted based on evidence and best practice. The details for how can be found in the Signs Section 32 Report.
80. In response to Go Media [236.4], I disagree with treating digital and static signs the same. The two signs have different effects which need to be managed. The current rule framework for Digital Signs is sufficient in my view and the differentiation between these two sign types is necessary for the framework to work. I therefore recommend no changes are made.
81. In response to Go Media [236.6], I consider that the standards as notified are not overly strict and are necessary to manage the potential adverse effects of signage. I consider they strike an appropriate balance between providing for signage whilst managing potential effects. I recommend no changes based on this general submission point.
82. In response to Go Media [236.8], I consider that a qualifier before visual clutter is not necessary. This is because the introduction already specifies visual clutter to be adverse in the statement: "If not managed appropriately, signs have the potential to result in adverse environmental effects including visual clutter, degradation of heritage features, and erosion of the amenity of the local and wider environment".
83. In response to Go Media [236.9], I do not consider that the chapter needs to be amended to remove cross references throughout the chapter or to reduce table sizes. The cross references are necessary and is the approach used throughout the Plan and the table sizes are consistent with table sizes throughout the Plan.
84. In response to Go Media [236.10], I consider that the provisions relating to the visibility of signs from the State Highway Network are necessary to ensure traffic safety. I do not recommend any changes in relation to these and hence agree with the further submission of Waka Kotahi [FS103.39] on this specific matter.
85. In relation to Go media [236.12], I do not consider that the s32 analysis has not done enough to quantify the costs of the provisions in relation to billboards. I consider that the notified provisions strike a good balance between providing for billboards within appropriate zones as a Restricted Discretionary Activity and managing the potential adverse effects of these types of signs. I do not recommend any changes.

86. In response to Kay Larsen [447.8, 447.9, 447.10, 447.11 and 447.12], I do not consider that any changes are necessary. I note that the provisions already treat Digital Signs within residential areas as a Non-Complying Activity.
87. In response to OHMAA [284.8] and Lumo Digital Outdoor Limited [285.8], I consider that there are clear matters of Discretion and Assessment Criteria throughout the Chapter.
88. In response to OHMAA [284.9] and Lumo Digital Outdoor Limited [285.9], I do not consider that a permitted activity rule for digital signs is appropriate. Digital Signs have potential to have greater effects and are more complex than signs which are not digital. I consider that the Restricted Discretionary Activity Status allows for the potential range of effects and complexities to be considered on a case-by-case basis.
89. In response to Taranaki Whānui ki te Upoko o te Ika [389.87], I do not consider that specific mention of the SASM Chapter is required. The Signs chapter refers to all Part 2 chapters, of which SASM is one of them.
90. I agree with the Wellington City Council submission [266.127] that the introduction is amended to include local body election hoardings. This is a useful clarification within the introduction and will assist plan users. My recommendation for wording is set out below under the summary of recommendations.
91. In response to Wellington International Airport Limited [406.460] and [406.461], the chapter already directs operational safety to be considered under Policy SIGN-P6. I do not consider that further direction is needed.

Summary of recommendations

92. That submission points relating to ‘General Submission – Signs’ are accepted/rejected as detailed in Appendix B.
93. That the Signs introduction is amended as set out below and detailed in Appendix A.

Introduction

The purpose of the Signs chapter is to manage the potential for adverse environmental effects that can result from the erection and placement of signs across the city. This chapter addresses digital signs, freestanding signs, illuminated signs, official signs, third-party signs, and on-site signs. ~~Electoral signs~~ Hoarding signs for local or central government elections are exempt from these rules and are managed under the Electoral Act 1993, the electoral Act 2001 and the Council’s Election Hoarding Guideline.

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3.4 Submissions “For” and “Against” in whole

Matters raised by submitters

Further submissions in support (“for”) of submissions in whole

94. JCDECAUX New Zealand Trading Limited (FS15.1), Mediaworks Outdoor Limited (FS34.1),

and Simon Nightingale (FS77.1) support the submission of Out of Home Media Association in its entirety.

Assessment

95. The support of this submission is noted.

Summary of recommendations

96. That the submission point is accepted in part as detailed in Appendix B.

3.5 New Provisions sought – Signs

The following section of the report includes consideration and recommendations in relation to requests for new Provisions in the Signs chapter.

Matters raised by submitters

New Policy

97. oOh!Media (316.4 [opposed by Waka Kotahi FS103.40]) seek a new Policy be added as follows:

SIGN-PX Signs that are integrated with buildings and structures in the road reserve, except signs on building verandahs

Enable signs where they are an integrated component of buildings and structures in the road reserve, including ancillary road network infrastructure.

New Rule

98. oOh!Media (316.5 [opposed by Waka Kotahi FS103.41]) seek a new rule be added as follows:

SIGN-RX Signs that are integrated with ancillary road network infrastructure, except signs on building verandahs

All Zones

1. Activity status: Permitted

Where:

a. Compliance with the following standards is achieved:

i. SIGN-SX

All Zones

2. Activity status: Restricted Discretionary

Where:

a. Compliance with the Requirements of SIGN-RX.1 cannot be achieved.

Matters of discretion are:

1. The matters in SIGN-PX; and

2. The extent and effect of non-compliance with any relevant standard and the matters as specified in the associated assessment criteria for the infringed standards.

99. Wellington International Airport Limited (406.462) seeks a new rule SIGN-R4(2), be added as follows:

Airport Zone

1. Activity Status: Permitted

Where:

a. Compliance is achieved with:

i. SIGN-S7;

ii. SIGN-S9; and

iii. SIGN-S14 [as amended by submission point below]

2. Activity status: Restricted Discretionary

Where:

a. Compliance cannot be achieved with the requirements of SIGN-R4.1.

Matters of discretion are:

1. The matters in SIGN-P1, SIGN P2, SIGN-P3 and SIGN-P6;

2. The Signs Design Guide; and 3. The extent and effect of non-compliance with any relevant standard and the matters as specified in the associated assessment criteria for the infringed standards.

New Standard

100. oOh!Media (316.6 and 316.7 [opposed by Waka Kotahi FS103.42 and FS103.43]) seek a new standard and assessment for the new standard be added as follows:

SIGN-SX Signs that are integrated with buildings and structures in the road reserve, except building verandahs

Road Reserve (All Zones)

For the avoidance of doubt, the standards in SIGN-S1 to SIGN-S14 do not apply to signs that are integrated with ancillary road network infrastructure, except where specifically

stated otherwise below. These standards do not apply to signs on building verandahs, which are subject to the standards in SIGN-S1 to SIGN-S14.

1. Signs must not be located within 30m of a scheduled Historic Heritage Place.
2. Signs must be no larger than the street furniture it is attached to.
3. Signs which are lit internally or by external means (but excluding digital signs) must comply with Standard SIGN-S9.
4. The illumination of digital signs must comply with Standard SIGN-S8.4.
5. The sign must not contain any flashing or moving lights.
6. Signs must not be shaped or use images or colours, including changeable messages, that could be mistaken for a traffic control device in colour, shape or appearance.
7. Signs must not obstruct, obscure or impair the view of any traffic or railway sign or signal.
8. Digital signs must not provide advertising over multiple messages which are displayed across transitioning screens.
9. In the event of a malfunction, a digital sign shall default to a blank screen.
10. Each image on a digital sign must:
 - a. Be displayed for a minimum of 8 seconds;
 - b. Transition to another image within 0.1 to 0.5 seconds;
 - c. Transition to another image without flashing, blinking, fading or scrolling.

Assessment criteria where Standard SIGN-SX.1. is infringed:

1. The extent to which the sign adversely affects the visual amenity or detracts from the visual qualities that are fundamental to the historic heritage values of the scheduled historic heritage place; and
2. The extent to which the location of the sign is necessary to provide for functional or operational needs, including the relationship of the sign to road network features such as bus stops or pedestrian thoroughfares or waiting areas;

Assessment criteria where Standard SIGN-SX.2 to SIGN-SX.8 are infringed:

1. Visual amenity effects;
Add a new Standard in the Signs chapter as follows:
2. The impact of the sign on traffic, pedestrian and cycling safety;
3. The extent to which any infringement is necessary to provide for functional needs or operational needs; and
4. Any positive effects of the sign.

New Activity Status

101. Waka Kotahi (370.235 [opposed by OOHMAA FS125.2 and Lumo Digital Outdoor Limited FS124.2]) seek to add a new activity status to SIGN-R5 (Digital signs) as follows:

SIGN-R5.4 Activity status: Non-complying

Where:

a. A digital billboard is oriented to be read from state highway, including on-ramps and off-ramps, or 100m from any intersection with state highway.

Note: Digital signs must also comply with or apply for consent under any other relevant rule in the activity table – e.g R4 and R5 apply to digital third party signs.

Assessment

102. I do not recommend that the above new policies and rules are accepted. I am of the opinion that the notified provisions are suitable for managing the effects from Signs and strike an appropriate balance between providing for signage across the city whilst managing the effects.

Summary of recommendations

103. That submissions on proposed new provisions are accepted/rejected as detailed in Appendix B.

3.6 Objectives – Sign

3.6.1 SIGN-O1 (Role of signage)

Matters raised by submitters

Retain

104. Restaurant Brands Limited (349.35) seeks to retain the objective as notified.

Amend

105. Go Media (236.13) seeks the word “effectively” be removed from the objective.

106. OOHMAA (284.10 and 284.11 [opposed by Waka Kotahi FS103.44]) and Lumo Digital Outdoor Limited (285.10 and 285.11) seek the objective be amended as follows:

Signs support the needs of the community to advertise and inform while the effects on local amenity, historic heritage, archaeological sites, sites of significance to Māori, and the efficiency and safety of transport networks are effectively managed.

Assessment

107. I agree with Go Media [349.35] that the use of the word ‘effectively’ is superfluous. I recommend that it is removed to avoid any ambiguity.

108. In response to OOHMAA [284.10 & 284.11], Waka Kotahi [FS103.44] and Lumo Digital

Outdoor Limited [285.10 & 285.11], I agree with the suggested amendments. I consider that the amendments give greater clarity as to what the objective of the Signs Chapter is, particularly as it relates to the proposed policy and rule framework.

Summary of recommendations

109. That submission points relating to SIGN-O1 are accepted/rejected as detailed in Appendix B.
110. That SIGN-O1 be amended as set out below and detailed in Appendix A.

SIGN-O1 – Role of Signage

Signs support the needs of the community to advertise and inform while the effects on local amenity, historic heritage, archaeological sites, sites of significance to Māori, and the maintenance of the efficiency and safety of transport networks are effectively managed.

Section 32AA Evaluation

111. In my opinion, the amendment to SIGN-O1 is more appropriate in achieving the objectives of the plan than the notified provisions. I consider that:
 - a. The proposed additions will:
 - i. Result in the objective being more closely aligned with the policy and rule framework by clearly stating the matters the Signs Chapter intends to address.
 - ii. Remove ambiguity around what effectively managed means.
 - b. The changes are therefore more efficient and effective than the notified provisions in achieving the objectives of the plan.
 - c. The recommended amendments will not have any greater environmental, economic, social, and cultural effects than the notified provisions.

3.7 Policies – Sign

3.7.1 SIGN-P1 (Appropriate signs)

Matters raised by submitters

Retain

112. Restaurant Brands Limited (349.36) and Waka Kotahi (370.236 [opposed by OOHMAA FS125.3 and Lumo Digital Outdoor Limited FS124.3]) seek to retain the policy as notified.

Amend

113. Go Media (236.14) seeks that the policy more appropriately refers to “enable”.
114. OOHMAA (284.12 and 284.13) and Lumo Digital Outdoor Limited (285.12 and 285.13)

seek that the policy be amended to include a qualifier to the management of visual clutter effects to better reflect the intent of the policy to manage unacceptable adverse effects.

115. Paul Van Houtte (92.5) considers that digitally internally illuminated signs for commercial purposes should not be permitted in Wellington or at least should not be visible from any road.
116. WIAL (406.463 and 406.464) seek that the policy be amended as follows:

Allow signs where:

1. They are of an appropriate size, design, and location; ~~and or~~
2. They do not result in visual clutter; ~~and or~~
3. ~~Any potential cumulative effects are managed; and~~
4. ~~3.~~ They are required to meet regulatory or statutory requirements; and
5. ~~4.~~ Any potential cumulative effects are managed; and
6. ~~5.~~ They do not compromise the efficiency of the transport network or the safety of its users, including cyclists and pedestrians; and
7. ~~6.~~ In the Residential, Rural and Open Space Zones, they relate to an activity on the site on which they are located; and
8. ~~7.~~ They maintain the character and amenity values of the site and do not significant detract from the surrounding area.

Assessment

117. I agree with Go Media [236.14] to change 'allow' to 'enable'. This wording is consistent with wording used within the Sign Chapter and other chapters in the PDP.
118. In response to OOHMAA [284.12 & 284.13] and Lumo Digital Outdoor Limited [285.12 & 285.13], I disagree with the request for a qualifier of 'unacceptable' visual clutter. The Signs chapter is intended to manage the adverse effects of any visual clutter and the resource consent process will enable this assessment.
119. In response to WIAL [406.463 & 406.464], I disagree with the requested amendment. I do not consider that all of those points within SIGN-P1 need to be satisfied for a Sign to be allowed/enabled.

Summary of recommendations

120. That submission points relating to SIGN-P1 are accepted/rejected as detailed in Appendix B.
121. That SIGN-P1 be amended as set out below and detailed in Appendix A.

SIGN-P1 – Appropriate Signs

~~Allow~~ Enable signs where:

1. They are of an appropriate size, design and location; and
2. They do not result in visual clutter; and
3. Any potential cumulative effects are managed; and
4. They are required to meet regulatory or statutory requirements; and
5. They do not compromise the efficiency of the transport network or the safety of its users, including cyclists and pedestrians; and
6. In the Residential, Rural and Open Space Zones, they relate to an activity on the site on which they are located; and
7. They maintain the character and amenity values of the site and the surrounding area.

Section 32AA Evaluation

122. In my opinion, the amendment to SIGN-P1 is more appropriate in achieving the objectives of the plan than the notified provisions. I consider that:
- a. The proposed additions will:
 - i. Result in the chapter being aligned with the wording used throughout the District Plan.
 - b. The changes are therefore more efficient and effective than the notified provisions in achieving the objectives of the plan.
 - c. The recommended amendments will not have any greater environmental, economic, social, and cultural effects than the notified provisions.

3.7.2 SIGN-P2 (Digital and illuminated signs)

Matters raised by submitters

Retain

123. Josephine Brien/Tim Bollinger (365.2) and Restaurant Brands Limited (349.37 [opposed by WIAL FS36.171]) seek to retain the policy as notified.

Amend

124. Go Media (236.16 and 236.17) seeks that the policy be amended to clarify the meaning of “not visible”.
125. OOHMAA (284.14, 284.15, and 284.16 [opposed by Waka Kotahi FS103.45]) and Lumo Digital Outdoor Limited (285.14, 285.15, and 285.16) consider that as the Policy is currently worded it has the outcome of not allowing digital and illuminated signs where they are visible from the State Highway.

126. Paul Van Houtte (92.6) seeks that digital signs are not provided for within the policy.
127. Waka Kotahi (370.237 [opposed by OOHMMA FS125.4 and Lumo Digital Outdoor Limited FS124.4]) seeks that the policy be amended as follows:

...

6. The sign is not visible from a state highway or any road with a speed limit of 70km/h or higher; and

7. Cumulative effects of digital billboards are managed.

128. WIAL (406.465, 406.466 and 406.467) seeks that the policy be amended as follows, however if this relief is not accepted, they seek the policy be deleted in its entirety:

Provide for digital and illuminated signs where:

...

5. The sign is not directed at users of the ~~visible from a~~ state highway.

Assessment

129. In response to Go Media [236.16 and 236.17] I do not consider any changes are needed to clarify the meaning of 'not visible'. This will be assessed at a resource consent stage. The intent of the wording is to help mitigate the potential traffic safety effects on state highways. A resource consent process is the appropriate method of assessing signs on a case-by-case basis. I do not recommend altering MRZ-P2 on this basis.
130. In response to Paul Van Houtte [92.6], the policy is intended to apply to digital and illuminated signs only. Therefore, I recommend no changes.
131. In response to Waka Kotahi [370.237], I do not consider the requested amendment is appropriate. I consider that digital signs not being visible from state highways is appropriate given the national importance of these roads and the generally higher speeds on them above 70km/h. However, I do not consider that every road where vehicle speeds are in excess of 70km/h need to be controlled as to the visibility of digital signs. The resource consent process is an appropriate method of assessing traffic safety effects.
132. I disagree with the requested amendment from WIAL [406.465, 606.466, and 406.467]. Determining if signs are directed at users is open to more interpretation than visibility. In addition, the purpose of MRZ-P2(5) is to manage potential safety effects. I consider this to be an appropriate matter.

Summary of recommendations

133. That submission points relating to SIGN-P2 are accepted/rejected as detailed in Appendix B.

SIGN-P3 (Signs and Historic Heritage)

Matters raised by submitters

Retain

134. Go Media (236.18) and KiwiRail Holdings Limited (408.114) seek to retain the policy as notified.

Amend

135. Restaurant Brands Limited (349.38) seeks that the cross-reference to the Signs Design Guide be removed from the policy.
136. Wellington City Council (266.128) seeks the policy to be amended to state the full name of the Heritage Design Guide.
137. Wellington Heritage Professionals (412.66 and 412.67) consider that the policy be amended so that the rate of change is a matter of discretion. They further consider that the benefits of additional signage to support long-term use be deleted.

Assessment

138. In response to Restaurant Brands Limited [349.38] I do not consider that removal of the reference to the Signs Design Guide is appropriate. I consider that the Signs Design Guide provides useful guidance on the design and placement of signs and that it should be retained.
139. In response to Wellington City Council [266.128] I recommend deletion of the reference to the Heritage Design Guide given this has been recommended to be removed in previous Hearing Streams.
140. I disagree with the request from Wellington Heritage Professionals [412.66 and 412.67], as SIGNS-S8 contains standards which manage the transition of images. I consider there is no need to also manage this through the Policy.

Summary of recommendations

141. That submission points relating to SIGN-P3 are accepted/rejected as detailed in Appendix B.
142. That SIGN-P3 be amended as set out below and detailed in Appendix A.

SIGN-P3 – Signs and Historic Heritage

Enable signs on heritage buildings, heritage structures and within their sites, and within heritage areas to support wayfinding and interpretation and only allow signs for other purposes where they do not detract from the identified heritage values, having regard to:

1. The extent to which:
 - a. Damage to heritage fabric, from methods of fixing, including supporting structures, cabling or wiring is minimized or is reasonably reversible;
 - b. The location and placement of signs obscure architectural features, project above parapet level or reflect the typical positioning of signage on the heritage building or within the heritage area;
 - c. The area, height and number of signs are appropriate for the scale of the heritage building, heritage structure or heritage area or would result in clutter;
 - d. The quality of the design of the sign complements the heritage building, heritage structure or heritage area;
 - e. The intensity of any illumination adversely affects heritage values; and
 - f. The sign fulfils the intent of the ~~Heritage and Signs Design Guides~~.
2. The benefits of allowing additional signage to support sustainable long term use.

Section 32AA Evaluation

143. In my opinion, the amendment to SIGN-P3 is more appropriate in achieving the objectives of the plan than the notified provisions. I consider that:
- a. The proposed additions will:
 - ii. Result in the chapter being aligned with decisions made in earlier hearing streams.
 - b. The changes are therefore more efficient and effective than the notified provisions in achieving the objectives of the plan.
 - c. The recommended amendments will not have any greater environmental, economic, social, and cultural effects than the notified provisions.

3.7.3 SIGN-P4 (Signs on scheduled archaeological sites and sites of significance to Māori)

Matters raised by submitters

Amend

144. Restaurant Brands Limited (349.39) seeks that the cross-reference to the Signs Design Guide be removed from the policy.
145. Taranaki Whānui ki te Upoko o te Ika (389.88) seeks that the policy be amended to include a requirement for Taranaki Whānui to lead the decision-making around what is

appropriate regarding bilingual signage and appropriate naming opportunities.

146. Wellington Heritage Professionals (412.68 and 412.69) consider that the policy be amended so that the rate of change is a matter of discretion. They further consider that the benefits of additional signage to support long-term use be deleted.

Assessment

147. In response to Restaurant Brands Limited [349.39] I do not consider that removal of the reference to the Signs Design Guide is appropriate. I consider that the Signs Design Guide provides useful guidance on the design and placement of signs and that it should be retained. However, in alignment with the above consideration that the Heritage Design Guide has been recommended to be deleted in earlier streams, I do recommend that reference to it is deleted in SIGNS-P4.
148. In response to Taranaki Whānui ki te Upoko o te Ika [389.88], I do not support this amendment as I do not consider that a policy in a District Plan is an appropriate way of managing appropriate naming, and this can be managed outside of the District Plan and RMA processes in general.
149. I disagree with the request from Wellington Heritage Professionals [412.68 and 412.69], as SIGNS-S8 contains standards which manage the transition of images. Therefore, I consider there is no need to also manage this matter through the Policy.

Summary of recommendations

150. That submission points relating to SIGN-P4 are accepted/rejected as detailed in Appendix B.
151. That SIGN-P4 be amended as set out below and detailed in Appendix A.

SIGN-P4 – Signs on scheduled archaeological sites and sites of significance to Māori

Enable signs that relate to safety and interpretation within the extent of scheduled archaeological sites and sites of significance, and only allow other signs that do not detract from the identified archaeological values, having regard to:

1. The extent to which:
 - a. Land disturbance required for the sign and impacts on archaeological features is minimised;
 - b. Damage from methods of fixing to any feature of the site, including supporting structures, is minimised or reasonably reversible;
 - c. The location and placement of signs obscure appreciation of features integral to the significance of the scheduled archaeological site;
 - d. The area, height and number of signs are appropriate for the scale of the scheduled archaeological site or result in visual clutter;
 - e. The quality of the design of the sign complements the scheduled archaeological site;
 - f. The intensity of any illumination adversely affects archaeological values; and
 - g. The sign fulfils the intent of the ~~Heritage and Signs Design Guides~~;
2. The benefits of allowing additional signage to support sustainable long term use.

Section 32AA Evaluation

152. In my opinion, the amendment to SIGN-P4 is more appropriate in achieving the objectives of the plan than the notified provisions. I consider that:
- a. The proposed additions will:
 - iii. Result in the chapter being aligned with decisions made in earlier hearing streams.
 - b. The changes are therefore more efficient and effective than the notified provisions in achieving the objectives of the plan.
 - c. The recommended amendments will not have any greater environmental, economic, social, and cultural effects than the notified provisions.

3.7.4 SIGN-P5 (Wellington Regional Stadium signs)

Matters raised by submitters

Retain

153. Restaurant Brands Limited (349.40) seeks to retain the policy as notified.

Summary of recommendations

154. That the submission point relating to SIGN-P5 is accepted as detailed in Appendix B.

3.7.5 SIGN-P6 (Airport Zone Signage)

Matters raised by submitters

Retain

155. Restaurant Brands Limited (349.41) and WIAL (406.468) seek to retain the policy as notified.

Summary of recommendations

156. That the submission points relating to SIGN-P6 are accepted as detailed in Appendix B.

3.8 Rules – Sign

3.8.1 SIGN-R1 (Official signs)

Retain

157. Fire and Emergency New Zealand (273.164), Massey University (253.4), the Fuel Companies (372.104), and Waka Kotahi (370.238 [supported by KiwiRail Holdings Limited FS72.83]) seek to retain the rule as notified.

Amend

158. WIAL (406.469, 406.470, and 406.471) seek the rule to be amended to exclude application in the Airport Zone. If this relief is not accepted, they seek the rule to be deleted in its entirety.

Assessment

159. I disagree with WIAL [406.469, 406.470, and 406.471] to remove the applicability of the rule to the Airport Zone. I consider the framework as notified works to enable signs within the Airport Zone. I recommend some amendments to SIGN-S14 below which I consider addresses WIAL's concerns.

Summary of recommendations

160. That submission points relating to SIGN-R1 are accepted/rejected as detailed in Appendix B.

3.8.2 SIGN-R2 (Temporary signs)

Retain

161. Massey University (253.5) seeks to retain the rule as notified.

Amend

162. Waka Kotahi (370.239) seeks to amend the rule to ensure that it does not apply to the state highway.

163. WIAL (406.472, 406.473, and 406.474) seek the rule to be amended to exclude application in the Airport Zone. If this relief is not accepted, they seek the rule to be deleted in its entirety.

Assessment

164. I disagree with Waka Kotahi [370.239], as I consider that temporary signs on the State Highway Network are appropriate. The relevant standards aim to ensure that the adverse effects of temporary signs on the State Highway Network are mitigated. Any non-compliance with the relevant standards will mean a resource consent will be required which Waka Kotahi will be consulted on as an affected party.
165. I disagree with WIAL [406.472, 406.473, and 406.474] to remove the applicability of the rule to the Airport Zone. I consider the framework as notified works to enable signs within the Airport Zone. I recommend some amendments to SIGN-S14 below which I consider addresses WIAL's concerns.

Summary of recommendations

166. That submission points relating to SIGN-R2 are accepted/rejected as detailed in Appendix B.

3.8.3 SIGN-R3 (On-site signs)

Retain

167. The Fuel Companies (372.105) seeks to retain the rule as notified.

Amend

168. OOHMAA (284.17 [opposed by Waka Kotahi FS103.45]) and Lumo Digital Outdoor Limited consider that there is no justifiable rationale to classify digital signs in a different manner from static signs. They seek to amend the rule to include a reference to SIGN-S8.
169. Restaurant Brands Limited (349.42 and 349.43) seeks that the cross-reference to the Signs Design Guide be removed from the policy.
170. Retirement Villages Association of New Zealand Incorporated (350.80) seeks to amend SIGN-P1 so signs are not required to comply with all of the list matters, particularly (4) and (7).
171. WIAL (406.476, 406.477, and 406.478) considers that the rule is intended to apply to the Airport Zone but does not engage in the Airport Zone rules. They seek that the rule be amended to cross-reference SIGN-R3.2. If this relief is not accepted, they seek that the rule be amended to exclude application to the Airport Zone. If this is not accepted, they seek the rule to be deleted in its entirety.
172. Woolworths New Zealand (359.39) considers that matters listed in relation to the Signs Design Guide be clarified with a straightforward assessment and clear direction parameters.

Assessment

173. In response to OOHMAA [284.17] I do not agree that there should be no separation of digital signs and static signs within the rule framework. I consider that digital signs have a larger range of potential adverse effects compared to static signs, and that the restricted discretionary status of these signs means a case by case and location specific assessment can take place. I therefore do not recommend any amendments..
174. In response to Restaurant Brands Limited [349.42 and 349.43], I do not recommend removal of reference to the Signs Design guide. I consider that the Signs Design Guide provides useful guidance on the design and placement of signs and that it should be retained.
175. In response to WIAL [406.476, 406.477, and 406.478], I do not agree that the rule should be amended to exclude the Airport Zone. The rule references the specific Airport Zone Standard (SIGN-S14). For this reason I am of the view that the framework appropriately addresses on-site signs within the Airport Zone.
176. In response to Woolworths New Zealand [359.39], I provide an analysis of the Signs Design Guide later in this report.

Summary of recommendations

177. That submission points relating to SIGN-R3 are accepted/rejected as detailed in Appendix B.

3.8.4 SIGN-R4 (Third-party signs)

Retain

178. Go Media (236) and Massey University (253.6) seek to retain the rule as notified.

Amend

179. OOHMAA (284.18, 284.19, 284.20, and 284.21) and Lumo Digital Outdoor Limited (285.18, 285.19, 285.20, and 285.22) seek to retain SIGN-R4.1-3 as notified.
180. OOHMAA (284.22 [opposed by Waka Kotahi FS103.47]) and Lumo Digital Outdoor Limited (285.22) seek the rule to be amended to include a reference to SIGN-S8.
181. OOHMAA [284.23] and Lumo Digital Outdoor Limited [285.23] seek that SIGN-R4 does not reference the Signs Design Guide.

Delete

182. WIAL (406.479, 406.80, 406.481) seeks to delete SIGN-R4.4.

Assessment

183. In response to OOHMAA [284.22] and Lumo Digital Outdoor Limited [285.22], I disagree with the request to reference SIGN-S8. SIGN-S8 applies to digital signs, and this is managed

under SIGN-R5. I disagree with the request to treat digital signs the same as static signs as I consider a Restricted Discretionary Activity Status for digital signs is appropriate to ensure effects can be assessed on a case-by-case basis.

184. I disagree with OOHMAA [284.23] and Lumo Digital Outdoor Limited [285.23] who seek deletion of reference to the Signs Design Guide in SIGN-R4. I consider that the Signs Design Guide provides useful guidance on the design and placement of signs and that it should be retained.
185. In response to WIAL [406.479, 406.80, and 406.481], the purpose of the non-complying activity status for the Miramar South Precinct is to align with the conditions of the Designation in this area which specifies that signage within the Miramar South Precinct Area shall not be for third party advertising. Therefore, I consider the non-complying activity status is appropriate here to ensure alignment within the rules of the District Plan. I consider that this matter can be picked up at the Hearing for Designations in Hearing Stream 10.

Summary of recommendations

186. That submission points relating to SIGN-R4 are accepted/rejected as detailed in Appendix B.

3.8.5 SIGN-R5 (Digital signs)

Retain

187. Go Media (236.20) seeks to retain the restricted discretionary status as notified if the PDP retains separate rules for digital signs.

Amend

188. Restaurant Brands Limited (349.44) seeks that the cross-reference to the Signs Design Guide be omitted from the rule.
189. Restaurant Brands Limited (349.44) also seeks that the Restricted Discretionary Activity Status starting pint is removed and replaced with a Permitted Activity due to many menus being in digital form.
190. WIAL (406.482, 406,483, 406,484) seeks that the rule be amended to make digital signage controlled within the Airport Zone where it complies with the relevant standards. If this relief is not accepted, they seek to delete the policy in its entirety.

Delete

191. OOHMAA (284.24 and 284.25 [opposed by Waka Kotahi FS103.48]) and Lumo Digital Outdoor Limited (285.24 and 285.25) oppose the restricted discretionary status for signs that are designed and operated to comply with relevant standards. They seek to delete the

rule in its entirety.

Assessment

192. In response to Restaurants Brand Limited [349.44], I disagree with removing reference to the Signs Design Guide. I consider that the Signs Design Guide provides useful guidance on the design and placement of signs and that it should be retained.
193. In response to those submitters (Restaurants Brand Limited [349.44], OOHMAA [284.24 and 284.25], and Lumo Digital Outdoor Limited [285.24 and 285.25]) who seek that the Restricted Discretionary Activity Status for Digital Signs is removed and replaced with a Permitted Activity Status, I disagree for the following reasons:
- a. Digital Signs have potential for many unforeseen adverse environmental effects including visual effects and traffic safety effects. The Restricted Discretionary starting point ensures that a site-by-site assessment can be undertaken to determine the appropriateness of a digital sign in a specific location.
 - b. I acknowledge the Restaurant Brand Limited point regarding drive through menus. However, I consider that given these signs can be visible from multiple locations in the surrounding environment of a restaurant that a restricted discretionary resource consent is appropriate.
194. In response to WIAL [406.482, 406.483, and 406.484], I do not consider that a controlled activity status for digital signs is appropriate. Digital signs within the Airport Zone have the potential to create the same adverse environmental effects as those outside of the Airport Zone and I do not consider that a carve out is appropriate here. I do not consider a Restricted Discretionary resource consent will be overly onerous.

Summary of recommendations

195. That submission points relating to SIGN-R5 are accepted/rejected as detailed in Appendix B.

3.8.6 SIGN-R6 (Signs on heritage buildings, heritage structures and their sites, or on a site within a heritage area)

Amend

196. Restaurant Brands Limited (349.45 and 349.46) seeks that reference to the Signs Design Guide be omitted from the rule.

Assessment

197. In response to Restaurant Brands Limited [349.45 and 349.46], I disagree with removing reference to the Signs Design Guide. I consider that the Signs Design Guide provides useful guidance on the design and placement of signs and that it should be retained.

Summary of recommendations

198. That submission points relating to SIGN-R6 are accepted/rejected as detailed in Appendix B.

3.8.7 SIGN-R7 (Signs within the extent of a scheduled archaeological site or site of significance to Māori)

Amend

199. Restaurant Brands Limited (349.47) seeks that reference to the Signs Design Guide be omitted from the rule.
200. Taranaki Whānui ki te Upoko o te Ika (389.89 and 389.90) seeks that the rule be amended to include proximity to sites and areas of significance to Māori. They further seek that the matters of discretion be amended to include engagement with Taranaki Whānui.

Assessment

201. In response to Restaurants Brand Limited [349.47], I disagree with removing reference to the Signs Design Guide. I consider that the Signs Design Guide provides useful guidance on the design and placement of signs and that it should be retained.
202. In response to Taranaki Whānui ki te Upoko o te Ika [389.89 and 389.90], I disagree with amending the rule to make it apply to a proximity to sites and areas of significance to Māori. It is unclear the distance that this would need to be. Additionally, the purpose of the rule is to ensure archaeological artefacts remain intact and that the amenity values of these sites are not adversely affected. I consider that the rule as drafted does this.
203. In relation to engagement with Taranaki Whānui, I consider that this does not need to be included within the rule. A notification test can occur at the resource consent phase.

Summary of recommendations

204. That submission points relating to SIGN-R7 are accepted/rejected as detailed in Appendix B.

3.8.8 SIGN-R8 (All other signs)

Retain

205. Restaurant Brands Limited (349.48) and Waka Kotahi (370.240 [supported by Lumo Digital Outdoor Limited FS124.5 and OOHMAA FS125.5]) seek to retain the rule as notified.

3.9 Standards – Sign

3.9.1 SIGN-S1 (Maximum area of any sign)

Amend

206. CentrePort Limited (402.139 and 402.140) seeks that the standard be amended to include reference to the Special Purpose Port Zone.
207. Go Media (236.21 and 236.22) and Restaurant Brands Limited (349.49) seek that the 5m² area limit on signs in SIGN-S1.1.c.i and SIGNN-S1.1.f.i is increased.
208. Lumo Digital Outdoor Limited (285.26 and 285.27) and OOHMAA (284.26 and 284.27) consider that the characteristics of the Metropolitan Zone are similar to the City Centre and Mixed-Use Zones. Accordingly, they seek that the standards for signs within these zones should be consistent.
209. Lumo Digital Outdoor Limited (285.28) and OOHMAA (284.28) consider that there is no rationale for applying different standards to the design of signs that face State Highways, compared to those that face a local road.
210. Massey University (253.7 and 253.8) seeks that the standard be amended to include a reference to the Tertiary Education Zone.
211. RVA (350.81 and 350.82) seeks the standard be amended to provide for two signs up to 3m² per site for retirement villages.
212. Waka Kotahi (370.241 and 370.242 [opposed by Lumo Digital Outdoor Limited FS124.6, FS124.7, and OOHMAA FS125.6 and FS125.7]) seeks that the wording of 'facing' be amended to 'oriented to be read from'.

Assessment

213. In response to CentrePort Limited [402.139 and 402.140], I agree that the standard should be amended to also refer to the Port Zone. I recommend that the Port Zone is added to the group that contains the City Centre Zone, Mixed Use Zone, and General Industrial Zone. I acknowledge that this area permits signs up to 20m². I consider this appropriate given the location of the Port Zone being adjacent to the city centre zone.
214. In response to Go Media [236.21 and 236.22], Restaurant Brands Limited [349.49], Lumo Digital Outdoor Limited [285.28] and OOHMAA [284.28], I disagree that a 5m² limit on signs within these zones is too small as a permitted starting point. I note that for any sign which is proposed to be larger than 5m² a resource consent can be applied for as a restricted discretionary activity. My reasoning for this is that these zones are often directly adjoining residential areas and I consider that a site-by-site analysis of effects are necessary through a resource consent should signs be proposed to be larger than 5m².
215. In relation to increasing the sign size for signs facing the state highway network, I disagree. Any sign proposed to be larger than 5m² can be applied for as a restricted discretionary activity at which point the specific adverse effects on traffic safety in particular can be assessed. 5m² was landed on after consultations with Waka Kotahi, who have noted their support for this size.

216. In response to Lumo Outdoor Digital Limited [285.28] and OOHMAA [284.28], I disagree that there is no rationale for applying different standards to signs facing the state highway network. The State Highway network is a critical piece of roading infrastructure that features a higher volume of traffic and generally higher operating speeds than any other road within Wellington. Therefore, I consider that traffic safety is necessary to consider.
217. In response to Massey University [253.7 and 253.8], I agree with adding the Tertiary Zone to the list of zones within the standard. However, I do not agree with adding it to the list permitted for 20m² signs. I recommend it is added to the list permitting 5m² signs given the location of the Universities in Wellington around existing residential areas.
218. In response to the RVA [350.81 and 350.82], I disagree with the request for 2 signs up to 3m² for retirement villages. I consider that the existing standard is sufficient and that for any sign which exceeds the requirement, a resource consent as a restricted discretionary activity can be applied for.
219. In response to Waka Kotahi [370.241 and 370.242], I agree with amending the wording of SIGN-S1.1.f to read 'signs orientated to be read from'. I consider this removes ambiguity and adds clarification for plan users.

Summary of recommendations

220. That submission points relating to SIGN-S1 are accepted/rejected as detailed in Appendix B.
221. That SIGN-S1 be amended as set out below and detailed in Appendix A.

SIGN-S1 – Maximum Area of Any Sign

1. The following maximum sign areas for any sign must be complied with:

Location	Limit
a. Residential Zones Rural Zones	i. The area of a single sign must not exceed 1.5m ²
b. City Centre Zone Mixed Use Zone General Industrial Zone <u>Port Zone</u>	i. The area of a single sign must not exceed 20m ² .
c. Neighbourhood Centre Zone Local Centre Zone Commercial Zone Metropolitan Centre Zone <u>Tertiary Education Zone</u>	i. The area of a single sign must not exceed 5m ² .
d. Open Space Zones	i. The area of a single sign must not exceed 4m ² .
e. Stadium Zone	i. The area of a single sign must not exceed 40m ² .
f. Signs facing <u>oriented to be read from the State Highway Network</u>	i. The area of a single sign must not exceed 5m ² .

Section 32AA Evaluation

222. In my opinion, the amendments to SIGN-S1 are more appropriate in achieving the objectives of the plan than the notified provisions. I consider that:

- a. The proposed additions will:
 - i. Result in zones being added to the list of zones so they are not overlooked by this standard. This adds clarity to the plan.
 - ii. Results in greater clarity being added to signs on the state highway network. This will assist plan users in avoiding doubt around signs on the state highway network.
- b. The changes are therefore more efficient and effective than the notified provisions in achieving the objectives of the plan.
- c. The recommended amendments will not have any greater environmental, economic, social, and cultural effects than the notified provisions.

3.9.2 SIGN-S2 (Maximum area of any sign)

Amend

223. CentrePort Limited (402.141 and 402.142) seeks that the standard be amended to include reference to the Special Purpose Port Zone.

224. Go Media (236.23) seeks that the maximum sign area in SIGN-S2.b be increased.
225. Go Media (236.24) seeks that the meaning of ‘facing’ within the standard be clarified.
226. Massey University (253.9 and 253.10) seeks that the standard be amended to include a reference to the Tertiary Education Zone.
227. Restaurant Brands Limited (349.50) seeks the maximum total area of signage affixed to an elevation of a building or structure to be increased to 20 percent.
228. RVA (350.83 and 350.84) seeks the standard be amended to provide for two signs up to 3m² per site for retirement villages.
229. Waka Kotahi (370.243 and 370.244 [opposed by Lumo Digital Outdoor Limited FS124.8, FS124.9, OOHMAA FS125.8 and FS125.9]) seeks that the standard be amended as follows:

1. The following maximum total area of signs per site must be complied with:
 ...
 e. signs oriented to be read from facing the State Highway Network, including on-ramps and off-ramps

Assessment

230. In response to CentrePort Limited [402.141 and 402.142], I agree that the standard should be amended to also refer to the Port Zone. I recommend that the Port Zone is added to SIGN-S2.1.b. I consider this appropriate given the location of the Port Zone being adjacent to the city centre zone.
231. In response to Go Media [236.23] and Restaurant Brands Limited [349.50], I disagree with increasing the maximum sign area. I consider that the notified areas are suitable to ensure that any adverse amenity effects on surrounding environments are minimal. In addition, I note that any sign which proposes to breach the standard can go through a restricted discretionary resource consent process.
232. In response to Waka Kotahi [370.243 and 370.244] and in response to Go Media [236.24], I agree that SIGN-S1.1.e. should be amended to clarify what ‘facing the state highway’ means. I accept Waka Kotahi’s proposed amendment to change the wording to ‘signs oriented to be read from the State Highway Network’. However, I do not accept the proposed wording ‘including on ramps and off ramps’. I consider this adds further potential for misinterpretation and is not necessary given on ramps and offramps are not always on the state highway network.
233. In response to Massey University [253.9 and 253.10], I agree with adding the Tertiary Zone to SIGN-S2.1.b.
234. In response to the RVA [350.83 and 350.84], I disagree with the request for 2 signs up to 3m² for retirement villages. I consider that the existing standard is sufficient and that for any sign which exceeds the requirement, a resource consent as a restricted discretionary

activity can be applied for.

Summary of recommendations

235. That submission points relating to SIGN-S2 are accepted/rejected as detailed in Appendix B.
236. That SIGN-S2 be amended as set out below and detailed in Appendix A.

SIGN-S2 – Maximum Total Area of Signs	
1. The following maximum total area of signs per site must be complied with:	
Location	Limit
a. Residential and Rural Zones	i. The maximum total area of signage per site must not exceed 1.5m ² .
b. City Centre Zone Neighbourhood Centre Zone Local Centre Zone Mixed Use Zone Commercial Zone General Industrial Zone <u>Port Zone</u>	i. The maximum total area of signage affixed to an elevation of a building or structure must not exceed 10% of the total area of the elevation. ii. The maximum total area of free-standing signage along a street frontage of a building must not exceed 35m ² .
c. Natural Open Space Zone Open Space Zone Wellington Town Belt Zone	i. The maximum total area of signage per site must not exceed 4m ² .
d. Sport and Active Recreation Zone	ii. The maximum total area of signage per site must not exceed 40m ² .
e. <u>Signs facing</u> oriented to be read from the State Highway Network	iii. The maximum total area of signage per site must not exceed 5m ² .
2. The maximum sign area calculation must include the frame of the sign within this maximum area.	

Section 32AA Evaluation

237. In my opinion, the amendments to SIGN-S2 are more appropriate in achieving the objectives of the plan than the notified provisions. I consider that:
- a. The proposed additions will:

- iii. Result in zones being added to the list of zones so they are not overlooked by this standard. This adds clarity to the plan.
 - iv. Results in greater clarity being added to signs on the state highway network. This will assist plan users in avoiding doubt around signs on the state highway network.
- b. The changes are therefore more efficient and effective than the notified provisions in achieving the objectives of the plan.
 - c. The recommended amendments will not have any greater environmental, economic, social, and cultural effects than the notified provisions.

3.9.3 SIGN-S4 (Maximum height of freestanding signs)

Amend

- 238. CentrePort Limited (402.143 and 402.144) seeks that the standard be amended to include reference to the Special Purpose Port Zone.
- 239. Go Media (236.25) considers SIGN-S2.1.e is unreasonable because the angle of a sign is not sufficient to cause an adverse effect, however the relief sought is unclear.
- 240. Go Media (236.26) seeks that the height limits for freestanding signs in the Commercial, Mixed-Use, and Industrial Zones be increased.
- 241. Massey University (253.11 and 253.12) seeks that the standard be amended to include a reference to the Tertiary Education Zone.
- 242. Lumo Digital Outdoor Limited (285.29) and OOHMAA (284.29) consider that the characteristics of the Metropolitan Zone are similar to the City Centre and Mixed-Use Zones. Accordingly, they seek that the standards for signs within these zones should be consistent.
- 243. Woolworths New Zealand (359.40) seeks that the maximum height of a freestanding sign be increased from 4m to 8m.

Assessment

- 244. In response to CentrePort Limited [402.143 and 402.144], I agree that the standard should be amended to also refer to the Port Zone. I recommend that the Port Zone is added to SIGN-S4.1.a. I consider this is appropriate given the location of the Port Zone being adjacent to the City Centre Zone.
- 245. I disagree with Go Media [236.26], as I consider that the heights proposed allow for good visibility of signs whilst ensuring that the signs are not overly dominant within the surrounding environment. Further, if a sign is proposed to be taller than the standard specifies, a resource consent as a restricted discretionary activity can be applied for.
- 246. In response to Massey University [253.11 and 253.12], I agree with adding the Tertiary Education Zone to the standard, but to SIGN-S4.1.a. This is due to the location of the

Universities in Wellington around existing residential areas.

247. In response to Lumo Digital Outdoor Limited [285.29], OOHMAA [284.29], and Woolworths New Zealand [359.40], I disagree with the request to raise the height of freestanding signs within the MCZ. I consider the notified height is appropriate to ensure that the signs are not overly dominant within the surrounding environment of that sign. Further, if a sign is proposed to be taller than that specified a resource consent as a restricted discretionary activity can be applied for.

Summary of recommendations

248. That submission points relating to SIGN-S4 are accepted/rejected as detailed in Appendix B.

249. That SIGN-S4 be amended as set out below and detailed in Appendix A.

SIGN-S4 – Maximum Height of Freestanding Signs	
1. The following maximum height requirements for freestanding signs must be complied with:	
Location	Limit
a. Residential and Rural Zones Neighbourhood Centre Zone Local Centre Zone Metropolitan Centre Zone Mixed Use Zone Open Space Zones City Centre Zone <u>Port Zone</u> <u>Tertiary Education Zone</u>	i. The maximum height of any freestanding sign must not exceed 4m.
Commercial Zone General Industrial Zone	i. The maximum height of any freestanding sign must not exceed 9m.

Section 32AA Evaluation

250. In my opinion, the amendments to SIGN-S4 are more appropriate in achieving the objectives of the plan than the notified provisions. I consider that:

- a. The proposed additions will:
 - i. Result in zones being added to the list of zones so they are not overlooked by this standard. This adds clarity to the plan.
- b. The changes are therefore more efficient and effective than the notified provisions in achieving the objectives of the plan.
- c. The recommended amendments will not have any greater environmental, economic, social, and cultural effects than the notified provisions.

3.9.4 SIGN-S5 (Signs located on a building or structure)

Retain

251. Massey University (253.13) seeks to retain the standard as notified.

Amend

252. Go Media (236.27 and 236.28) seeks the meanings of 'plain wall surface', 'facing', and 'visible' be clarified.

253. Go Media (236.29) seeks that the standard be amended so that there are less restrictions on internally illuminated signs.

254. Lumo Digital Outdoor Limited (285.30), OOHMAA (284.30), and Restaurant Brands Limited (349.51) seek that controls on illumination for any signage visible from the State Highway be omitted from the standard.

255. Waka Kotahi (370.245 and 370.256 [opposed by Lumo Digital Outdoor Limited FS124.10, FS124.11, and OOHMAA FS124.10 and FS124.11]) seeks that the wording of 'facing' be amended to 'oriented to be read from'.

256. WIAL (406.285 and 406.286) seeks that the standard be amended to exclude its application to the Airport Zone.

Assessment

257. In response to Go Media [236.27 and 236.28], I do not consider that 'plain wall surface' or 'visible' need to be clarified. I consider that the meanings of these are clear and do not need explanations. In addition, the Design Guide provides specific guidance on the placement of signs on a building. However, I do agree that 'facing' should be clarified and I make a recommendation on this below.

258. With regards to Go Media [236.29], Lumo Digital Outdoor Limited [285.30], and OOHMAA [284.30], I disagree with removing the control on illuminated signs on the State Highway. This was intended to manage safety effects and was drafted in consultation with Waka Kotahi in the drafting stage of the Chapter. I note that signs can still be externally illuminated and that if there is a proposal for an internally illuminated, then a resource consent can be applied for as a restricted discretionary activity.

259. In response to Waka Kotahi [370.245 and 370.256], I agree that the standard should be amended so that 'facing' is replaced with 'oriented to be read from'. This adds clarity and will assist plan users.

260. In response to WIAL [406.285 and 406.286], I disagree that the standard should be excluded from applying to the Airport Zone. I consider the standard can be complied with and that compliance will ensure that signs do not have an adverse effect on buildings and the surrounding environment. If a breach is proposed then a resource consent can be applied for.

Summary of recommendations

261. That submission points relating to SIGN-S5 are accepted/rejected as detailed in Appendix B.
262. That SIGN-S5 be amended as set out below and detailed in Appendix A.

SIGN-S5 – Signs located on a building or structure

1. The sign must only be displayed on plain wall surfaces or fences.
2. The sign must not obscure windows or architectural features.
3. The sign must not project above the highest part of the building or structure.
4. Where the sign is facing oriented to be read from the state highway network, or is visible from any intersection with the state highway, the sign must not be internally illuminated.

Section 32AA Evaluation

263. In my opinion, the amendments to SIGN-S5 are more appropriate in achieving the objectives of the plan than the notified provisions. I consider that:
 - a. The proposed additions will:
 - i. Result in greater clarity being added to signs on the state highway network. This will assist plan users in avoiding doubt around signs on the state highway network.
 - b. The changes are therefore more efficient and effective than the notified provisions in achieving the objectives of the plan.
 - c. The recommended amendments will not have any greater environmental, economic, social, and cultural effects than the notified provisions.

3.9.5 SIGN-S6 (Verandah signs)

Amend

264. Waka Kotahi (370.247 and 370.248 [opposed by Lumo Digital Outdoor Limed FS124.12, FS124.13, and OOHMAA FS124.12 and FS124.13] considers that as with SIGN-S5, there should be similar control on illumination for verandah signs that are oriented to be read from the State Highway network.

Assessment

265. I disagree with Waka Kotahi [370.247 and 370.248] that verandah signs also need a control on illumination when viewed from the state highway network. Verandah signs are generally small in scale and oriented to be read from pavements rather than streets. In addition, there are only a few streets, notably Vivian Street, where the proposal would have effect. Given the impact this could have on the ability for shops to advertise and

display the name of shops etc, and the relative small impact these signs could potentially have on traffic safety, I do not consider that the requested amendment is appropriate.

Summary of recommendations

266. That submission points relating to SIGN-S6 are accepted/rejected as detailed in Appendix B.

3.9.6 SIGN-S7 (Traffic Safety)

Retain

267. KiwiRail Holdings Limited (408.115) seeks to retain the standard as notified.

Amend

268. Paul Van Houtte (92.7) seeks that the rule be amended to prevent digital signs from being visible from any road.

269. Lumo Digital Outdoor Limited (285.31 and 285.32), OOHMAA (284.31 and 284.32), and Restaurant Brands Limited (349.52) consider that the minimum separation distances between signs are impracticable and too onerous in an urban environment and will result in too many signs requiring resource consent.

270. Waka Kotahi (370.249 and 370.250 [opposed by Lumo Digital Outdoor Limited FS124.14, FS124.15, and OOHMAA FS125.14 and FS125.15) seek the standard to be amended as follows:

- | |
|--|
| <ol style="list-style-type: none">1. Where any sign is oriented to be read from located adjacent to any road, the sign must not contain any flashing or moving lights.2. Where any sign is located within 100m of an intersection and visible <u>oriented to be read</u> from a legal road, the sign must <u>not be digital</u> only contain static messaging and images.3. Signs must not be shaped or use images or colours, including changeable messages, that could be mistaken for a traffic control device in colour, shape or appearance ... |
|--|

Assessment

271. In response to Paul Van Houtte [92.7] and Waka Kotahi [370.249 and 370.250], I disagree with preventing digital signs from being visible from any road. Digital Signs are necessary and complete prohibition on them along roads would be overly onerous. I consider that the proposed provisions, including requiring resource consent for digital signs, are sufficient for managing the traffic safety and visual effects of digital signs and that complete prohibition is unnecessary.

272. I agree in part with Lumo Digital Outdoor Limited [285.31 and 285.32], OOHMAA [284.31 and 284.32], and Restaurant Brands Limited [349.52] regarding the minimum separation distances of signs. I consider that signs within a 0-70km speed area do not need to have a minimum separation distance. I consider that the other traffic safety standards will ensure traffic safety and that requiring signs to be 50m apart on a 0-70kmh speed zone would

result in many signs requiring resource consent. I therefore recommend removing the control for areas in a speed limit of 0-70kmh.

273. In response to Waka Kotahi [370.249 and 370.250], I agree that the standard should be amended so that ‘facing’ is replaced with ‘oriented to be read from’. This adds clarity and will assist plan users.

Summary of recommendations

274. That submission points relating to SIGN-S7 are accepted/rejected as detailed in Appendix B.
275. That SIGN-S7 be amended as set out below and detailed in Appendix A.

SIGN-S7 – Traffic Safety

1. Where any sign is ~~located adjacent to~~ oriented to be read from any road, the sign must not contain any flashing or moving lights.
2. Where any sign is located within 100m of an intersection and ~~visible~~ oriented to be read from a legal road, the sign must only contain static messaging and images.
3. ...
4. All signs within 10m of a legal road must comply with the minimum setback distances from other signs in Table 12 – SIGN: Minimum Separation Distances from Other Signs below.

Table 12 – SIGN: Minimum separation distances from other signs

Speed limit of road (KM/H)	Minimum separation distance (m)
0-70	50
71-80	100
>80	200

Section 32AA Evaluation

276. In my opinion, the amendments to SIGN-S7 are more appropriate in achieving the objectives of the plan than the notified provisions. I consider that:
- a. The proposed additions will:
 - i. Result in greater clarity being added to signs on the roading network. This will assist plan users in avoiding doubt around signs on the state highway network.
 - ii. Result in a more efficient plan as it will mean less signs require resource consent when it is not necessary, given the other traffic safety standards in place.
 - b. The changes are therefore more efficient and effective than the notified provisions in achieving the objectives of the plan.

- c. The recommended amendments will not have any greater environmental, economic, social, and cultural effects than the notified provisions.

3.9.7 SIGN-S8 (Digital signs)

Retain

277. Restaurant Brands Limited (349.53) seeks to retain the standard as notified.
278. Go Media (236.31) seeks to retain points a-d, and h as notified.

Amend

279. Go Media (236.32 and 236.33) seeks that the 35-second dwell time be deleted and amended to 8 seconds for all speed areas.
280. Go Media (236.34) seeks the standard be amended so that the image transition time is increased to 0.5 seconds.
281. Lumo Digital Outdoor Limited (285.37) and OOHMAA (284.37) seek that the minimum time a digital sign must be displayed for be amended to 8 seconds.
282. Lumo Digital Outdoor Limited (285.38) and OOHMAA (284.38) consider that the standard should not preclude the use of a 'dissolve' transition.
283. Lumo Digital Outdoor Limited (285.39) and OOHMAA (284.39) seek SIGN-S8.4 be amended to include reference to 'digital'.
284. Waka Kotahi (370.251 and 370.252 [opposed by Lumo Digital Outdoor Limited FS124.16, FS124.17, OOHMAA FS125.16, FS125.17, and supported by KiwiRail Holdings Limited FS72.84]) seek the standard be amended as follows:

- | |
|--|
| <p>1. Digital signs must not:</p> <p>...</p> <p>e. Contain phone numbers, email addresses, web addresses, physical addresses, or contact details <u>or logos;</u></p> <p>f. Contain more than 40 characters; or</p> <p>g. Be <u>oriented to be read from located adjacent to a State Highway, including on ramps and off ramps.</u></p> <p>h. Impair the ability of Air Traffic Control to guide aircraft, or pilots to operate aircraft.</p> <p><u>i. be located within 100m of an intersection</u></p> <p><u>j. be located where there are any other digital billboards in a driver's field of vision.</u></p> <p><u>k. be oriented to be read from any road where the posted speed limit exceeds 70km/h</u></p> <p>2. Each image on a digital sign shall:</p> <p>a. Be static only;</p> <p>b. Be displayed for a minimum of 15 seconds for roads with posted speed limits of less than and equal to 80km/h, <u>and an appropriate dwell time determined so that no more than 5 per cent of drivers are exposed to image changes. and a minimum of 35 seconds for roads with a posted speed limit of greater than 80km/h;</u></p> <p>c. Transition to another image within 0.1 to 0.5 seconds; and</p> |
|--|

d. Transition to another image without flashing, blinking, fading, or scrolling, ~~or dissolving~~.

...

285. WIAL (406.87 and 406.488) seeks the standard be amended so that the term 'impact' is replaced with 'effect'.

Delete

286. Go Media (236.32), Lumo Digital Outdoor Limited (285.33, 285.34, 285.35, and 285.36), and OOHMAA (284.33, 284.34, 284.35, and 284.36) seek to delete points e-g in their entirety.

Assessment

287. In response to Go Media [236.32 and 236.33], Lumo Digital Outdoor Limited [285.37], and OOHMAA [284.37], I disagree with the requested amendment to dwell times. The dwell times as notified are based on traffic safety. Dwell times which are too quick can cause unnecessary distraction to drivers. In addition, I consider that 35 seconds is a sufficient time to display a message on a sign and still allow for movement between multiple signs.
288. In response to Go Media [236.34], I agree with amending the transition time to 0.5 seconds. This is a reasonable time to transition between images without causing unnecessary driver distraction. I agree with the submitter that immediate change is more likely to be noticed by a passer by than a 0.5 second change.
289. In response to Lumo Digital Outdoor Limited [285.38] and OOHMAA [284.38] regarding the preclusion of a 'dissolve' transition. I agree that the standard should not preclude this. Dissolving between images is appropriate and is unlikely to cause any greater traffic safety effects than not allowing images to dissolve. I recommend this preclusion is deleted from the standard.
290. In response to Lumo Digital Outdoor Limited [285.39] and OOHMAA [284.39], I agree that SIGN-S8.4 should refer to digital signs. This adds clarity for plan users.
291. In response to the amendment proposed by Waka Kotahi [370.251 and 370.252], I agree in part with the amendments. I discuss the amendments in turn below:
- a. I disagree with the amendment to SIGN-S8.1.e. Excluding logos will be detrimental for many businesses and will result in some branding not being able to be displayed. I consider that logos will not have any traffic safety effects and I invite Waka Kotahi to demonstrate otherwise.
 - b. I agree with the amendment to SIGN-S8.1.g to the extent that 'located adjacent to' should be replaced with 'oriented to be read from'. I consider this adds clarity for plan users.
 - c. I disagree with the addition of proposed SIGN-S8.1.i, j., and k. I consider that SIGN-S7 already manages these matters and that repeating them here is unnecessary.

- d. I disagree with the requested amendment to SIGN-S8.2.b. The amendment would be difficult to calculate and will add unnecessary complexities. I consider the notified wording is sufficient for managing traffic safety effects from dwell times.
 - e. I agree with the amendment to SIGN-S8.2.d, for reasons discussed above.
292. I agree with WIAL [406.487 and 406.488]. The proposed amendment to replace 'impact' with 'effect' is consistent with wording throughout the plan.
293. In response to Go Media [236.32], Lumo Digital Outdoor Limited [285.33, 285.34, 285.35, and 285.36], and OOHMAA [284.33, 284.34, 284.35, and 284.36], I disagree with removing SIGN-S8.1.e-g. These matters are necessary for managing the adverse traffic safety effects of digital signs. I consider that any sign which proposes to breach these matters can apply for a resource consent as a restricted discretionary activity. This is the appropriate avenue of determining if the traffic safety effects can be mitigated for a specific location and design of sign.

Summary of recommendations

294. That submission points relating to SIGN-S8 are accepted/rejected as detailed in Appendix B.
295. That SIGN-S8 be amended as set out below and detailed in Appendix A.

SIGN-S8 – Digital Signs

1. Digital signs must not:
 - a. Flash or contain moving images, moving text or moving lights;
 - b. Obstruct or obscure, including partially, any traffic control device;
 - c. Play music or sound;
 - d. Provide advertising over multiple messages which are displayed across transitioning screens;
 - e. Contain phone numbers, email addresses, web addresses, physical addresses or contact details;
 - f. Contain more than 40 characters; or
 - g. Be ~~located adjacent to~~ oriented to be read from a State Highway.
 - h. Impair the ability of Air Traffic Control to guide aircraft, or pilots to operate aircraft.
2. Each image on a digital sign shall:
 - a. Be static only;
 - b. Be displayed for a minimum of 15 seconds for roads with posted speed limits of less than and equal to 80km/h and a minimum of 35 seconds for roads with a posted speed limit of greater than 80km/h;
 - c. Transition to another image within ~~0.1 to~~ 0.5 seconds; and
 - d. Transition to another image without flashing, blinking, fading, or scrolling, ~~or dissolving~~.
3. In the event of a malfunction, a digital sign shall default to a blank screen.
4. Illumination of any digital sign shall:
 - a. Automatically adjust to allow for ambient light levels; and
 - b. Not result in the illuminance of a roadway by over 4 lux in residential and rural areas and 20 lux in all other areas; and
 - c. Shall not exceed:
 - i. Daytime: 5,000cd/m²
 - ii. Dawn and dusk: 600cd/m²
 - iii. Night-time: 250cd/m²

Assessment criteria where the standard is infringed:

1. Visual amenity effects;
2. The ~~impact~~ effect of the sign on aircraft safety or the safe and efficient functioning of the Airport;
3. The ~~impact~~ effect of the sign on traffic, pedestrian and cycling safety;
4. The extent to which any size infringement is necessary to provide for functional needs or operational needs;
5. Any positive effects of the sign;
6. The frequency and intensity of any light sources;
7. The frequency of any image changes;
8. The timing and hours of operation of the sign; and
9. Any light spill or glare effects.

Section 32AA Evaluation

296. In my opinion, the amendments to SIGN-S8 are more appropriate in achieving the

objectives of the plan than the notified provisions. I consider that:

- a. The proposed additions will:
 - i. Result in greater clarity being added to signs on the roading network. This will assist plan users in avoiding doubt around signs on the state highway network.
 - ii. Add clarity to the district plan through providing clearer wording around the standards. This will assist plan users.
 - iii. Result in the standard being consistent with other wording throughout the chapter and wider plan.
- b. The changes are therefore more efficient and effective than the notified provisions in achieving the objectives of the plan.
- c. The recommended amendments will not have any greater environmental, economic, social, and cultural effects than the notified provisions.

3.9.8 SIGN-S9 (Illuminated signs)

Retain

297. Restaurant Brands Limited (349.54) seeks to retain the standard as notified.

Amend

298. Lumo Digital Outdoor Limited (285.40) and OOHMAA (284.40 [opposed by Waka Kotahi FS103.49]) seek the standard be amended as follows:

<p>All zones Illuminated Signs</p> <p>1. Any illuminated sign must be designed, measured and assessed in accordance with AS/NZS 4282:2019 Control of the obtrusive effects of outdoor lighting. Any illuminated sign which is lit internally or by external means (excluding digital signs), must:</p> <p><u>a. Not be lit with an upwardly facing light source;</u> <u>b. Not exceed a luminance of 800cd/m² when lit by an artificial light source between dusk and dawn; or</u> <u>c. Be designed to reduce any glare or direct view of the light source when viewed by an observer at ground level 2 metres or more away from the illuminated sign.</u></p> <p>2. The Light standards for the relevant zone in the Light Chapter must be met.</p> <p>3. Illumination of any sign shall:</p> <p>a. Automatically adjust to allow for ambient light levels; and b. Not result in the illuminance of a roadway by over 4 lux in residential and rural areas and 20 lux in all other areas; and</p>
--

e. Shall not exceed:

- i. Daytime: 5,000cd/m²
- ii. Dawn and dusk: 600cd/m²
- iii. Night time: 250cd/m²

299. WIAL (406.489 and 406.490 [supported by Airways Corporation of New Zealand Limited FS105.22]) seeks that the standard be amended as follows:

...

4. Illuminated signs must not impair the ability of Air Traffic Control to guide aircraft, or pilots to operate aircraft.

Assessment criteria where the standard is infringed:

...

7. The timing and hours of operation of the sign. ~~and~~

8. Any light spill or glare effects.

9. The timing and house of operation of the sign.

10. Any light spill or glare effects; and

11. The effect of the sign on aircraft safety or the efficient functioning of the Airport.

Assessment

300. In response to Lumo Digital Outdoor Limited [285.40] and OOHMAA [284.40], I disagree with the proposed amendments. I consider that the notified provisions are sufficient to ensure that any potential environmental effects resulting from light emitted from a sign are less than minor, and as such a permitted activity status is appropriate. The proposed amendments would likely result in unacceptable light effects in many instances. I consider that any sign which proposes to breach the standard can go through a resource consent process and this is the appropriate avenue to determine the effects of the breach in a specific location.
301. I agree with the requested amendments by WIAL [406.489 and 406.490]. I consider the proposed amendments will contribute to aircraft and airport safety.

Summary of recommendations

302. That submission points relating to SIGN-S9 are accepted/rejected as detailed in Appendix B.
303. That SIGN-S9 be amended as set out below and detailed in Appendix A.

SIGN-S9 – Illuminated Signs

1. Any illuminated sign must be designed, measured and assessed in accordance with AS/NZS 4282:2019 Control of the obtrusive effects of outdoor lighting.
2. The Light standards for the relevant zone in the Light Chapter must be met.
3. Illumination of any sign shall:
 - a. Automatically adjust to allow for ambient light levels; and
 - b. Not result in the illuminance of a roadway by over 4 lux in residential and rural areas and 20 lux in all other areas; and
 - c. Shall not exceed:
 - i. Daytime: 5,000cd/m²
 - ii. Dawn and dusk: 600cd/m²
 - iii. Night-time: 250cd/m²
4. Illuminated signs must not impair the ability of Air Traffic Control to guide aircraft, or pilots to operate aircraft.

Assessment Criteria

1. ..
7. The timing and hours of operation of the sign ~~and~~
8. Any light spill or glare effects.
9. The timing and hours of operation of the sign.
10. Any light spill or glare effects; and
11. The effect of the sign on aircraft safety or the efficient functioning of the Airport.

Section 32AA Evaluation

304. In my opinion, the amendments to SIGN-S9 are more appropriate in achieving the objectives of the plan than the notified provisions. I consider that:
- a. The proposed additions will:
 - i. Assist in providing greater considerations around airport and aircraft safety when proposing and consenting signage.
 - b. The changes are therefore more efficient and effective than the notified provisions in achieving the objectives of the plan.
 - c. The recommended amendments will not have any greater environmental, economic, social, and cultural effects than the notified provisions.

3.9.9 SIGN-S10 (Temporary signs)

Retain

305. Massey University (253.14) seeks that the standard be retained as notified.

Amend

306. Waka Kotahi (370.253 and 370.254) seeks the standard be amended to restrict signs visible from the State Highway occurring without a consent.

Assessment

307. I disagree with the request from Waka Kotahi [370.253 and 370.254] as temporary signs still have to comply with standards S1, S7, S10, S11, and S14. I consider that the traffic safety matters within these standards are sufficient to adequately mitigate traffic safety effects. In addition, temporary signs cannot be permanent so will be removed after a maximum of 60 days.

Summary of recommendations

308. That submission points relating to SIGN-S10 are accepted/rejected as detailed in Appendix B.

3.9.10 SIGN-S12 (Signs on a heritage building or heritage structure)

Amend

309. Heritage New Zealand Pouhere Taonga (70.30 and 70.31 [supported by Onslow Historical Society FS6.20, FS6.21 and Historic Places Wellington Inc FS111.19 and FS111.20]) seeks the standard be aligned with SIGN-R6 and SIGN-S12 by including reference to heritage areas.
310. Waka Kotahi (370.255 and 370.256 [opposed by Lumno Digital Outdoor Limited FS124.18 and OOHMAA FS125.18]) considers that as with SIGN-S5, there should be similar controls in SIGN-S12 on illumination for signs on a heritage building that are oriented to be read from the state highway network.
311. Wellington City Council (266.129) seeks the term 'interpretative content' be replaced with 'interpretation'.
312. Wellington Heritage Professionals (412.70) consider that digital signs should not be a permitted activity due to the additional adverse effects of illumination levels and rates of change as compared to static signage.

Assessment

313. In response to Heritage New Zealand Pouhere Taonga [70.30 and 70.31], I agree with the request to add 'heritage areas' to the standard. This adds clarity to the standard and is consistent with SIGN-R6.
314. I disagree with Waka Kotahi [370.255 and 370.256] that controls are needed for signs facing the state highway. Signs complying with this standard can only be up to 0.5m² in size. I consider that signs of this size will have a negligible impact on traffic safety.
315. In response to Wellington City Council [266.129], I agree with this amendment which adds clarity to the standard for plan users.
316. In response to Wellington Heritage Professionals [412.70], I disagree with the amendment

as if a digital sign is proposed then SIGN-R5 and SIGN-S8 will apply.

Summary of recommendations

317. That submission points relating to SIGN-S12 are accepted/rejected as detailed in Appendix B.
318. That SIGN-S12 be amended as set out below and detailed in Appendix A.

SIGN-S12 - Signs on a heritage building or heritage structure, or within a heritage area

Only one sign is installed:

1. The size of the sign does not exceed 0.5m²; and
2. The sign displays only:
 - a. The name or purpose of any activity undertaken on the site; or
 - b. ~~Interpretative content~~ Interpretation about the values and history of the building/object.

Section 32AA Evaluation

319. In my opinion, the amendments to SIGN-S12 are more appropriate in achieving the objectives of the plan than the notified provisions. I consider that:
- a. The proposed additions will:
 - i. Add greater clarity to the standard and align the standard with the associated rule.
 - b. The changes are therefore more efficient and effective than the notified provisions in achieving the objectives of the plan.
 - c. The recommended amendments will not have any greater environmental, economic, social, and cultural effects than the notified provisions.

3.9.11 SIGN-S13 (Permitted signs within the extent of a scheduled archaeological site)

Retain

320. Restaurant Brands Limited (349.55) seeks that the standard be retained as notified.

Amend

321. Taranaki Whānui ki te Upoko o te Ika (389.91) seeks that the standard be amended to include proximity to sites and areas of significance to Māori.
322. Wellington City Council (266.230) seeks that the standard be amended to include reference to sites and areas of significance to Māori.

Assessment

323. In response to Taranaki Whānui ki te Upoko o te Ika [389.91] and Wellington City Council

[266.230], I agree with amending the standard to include reference to Sites and Areas of Significance to Māori. This aligns the standard to the corresponding rule (SIGN-R7).

Summary of recommendations

324. That submission points relating to SIGN-13 are accepted/rejected as detailed in Appendix B.
325. That SIGN-S13 be amended as set out below and detailed in Appendix A.

SIGN-S13 - Permitted signs within the extent of a scheduled archaeological site or site and area of significance to Māori

Safety and interpretation signs must not:

1. Exceed 0.5m²;
2. Be installed with a post hole greater than 100mm in diameter; and
3. Exceed one safety and one interpretation sign per scheduled archaeological site.

Section 32AA Evaluation

326. In my opinion, the amendments to SIGN-S13 are more appropriate in achieving the objectives of the plan than the notified provisions. I consider that:
- a. The proposed additions will:
 - i. Add greater clarity to the standard and align the standard with the associated rule.
 - b. The changes are therefore more efficient and effective than the notified provisions in achieving the objectives of the plan.
 - c. The recommended amendments will not have any greater environmental, economic, social, and cultural effects than the notified provisions.

3.9.12 SIGN-S14 (Airport Zone signs and billboards)

Amend

327. WIAL (406.91, 406.492, and 406.493 [Guardians of the Bays FS44.131, FS44.132, FS44.133, and FS44.134 support the relief sought for point 1, but oppose the remainder of the amendments sought) seeks that the standard be amended as follows, and if the relief sought is not accepted that the standard be deleted in its entirety:

1. Signs are not permitted in the Airport East Side designation. Any sign within the East Side Precinct shall be limited to official signs and signs associated instructional or directional signage.

2. Any sign which is erected in the Airport Miramar South Precinct ~~designation~~, and which is visible from the road reserve or immediately adjacent land:

- ~~a. Shall not contain moving images, moving text or moving lights; and
a.b. Shall not be for the purpose of third party advertising.~~

~~Airport Main Site Designation~~

~~3. Signs on buildings shall:~~

- ~~a. Be affixed to the underneath of a verandah and shall provide at least 2.5 metres clearance directly above the footpath or ground level:-
b. Be displayed only on plain wall surfaces:-
c. Not obscure windows or architectural features: or-
d. Not project above the parapet level, or the highest part of that part of the building/structure to which it is attached (including above verandah)-.~~

~~4. Signs on buildings, where the sign projects more than 12 metres in height above ground shall:~~

- ~~a. Bear only the name and/or logo of the building owner or occupier, or the building on which the sign is located.
b. Not flash.~~

~~5. Any illuminated sign (excluding signs below verandah level) within 50 metres and visible from any Residential zone shall not flash.~~

~~3.6. For any free-standing sign or sign located on a structure within any part of the Airport Zone area, except the Terminal Precinct:~~

- ~~a. the maximum area of a single sign is 8m².
b. the maximum height of a single sign is 4m.
c. any illuminated sign must not flash.
d. any sign that is visible from Residential zoned land must be located a minimum of 50 metres from that area.
e. no sign shall front onto State Highway 1, Moa Point Road, or Lyall Parade.~~

~~7. In relation to requiring authority signage in the (Airport Main Site) Terminal precinct, any free-standing sign or sign located on a structure shall not exceed a maximum height of 9 metres (above ground level)-.~~

~~4. For any free-standing sign or sign located on a structure within the Terminal Precinct, the maximum area of a single sign must not exceed 20m².~~

Assessment

328. In response to WIAL [406.91, 406.492, and 406.493], I agree with the proposed amendments to the extent that the Sign standards duplicate the conditions within the WIAL designation. The standards that I recommend removing from Standard S14 are within the WIAL Designation and do not need to be repeated here. The designation has suitable controls on signage and will require an assessment when the conditions are proposed to be breached.

Summary of recommendations

329. That submission points relating to SIGN-14 are accepted/rejected as detailed in Appendix B.
330. That SIGN-S14 be amended as set out below and detailed in Appendix A.

SIGN-S14 – Airport Zone Signs and Billboards

- ~~1. Signs are not permitted in the Airport East Side designation. Any sign within the East Side Precinct shall be limited to official signs and signs associated instructional or directional signage.~~
2. Any sign which is erected in the Airport Miramar South Precinct designation, and which is visible from the road reserve or immediately adjacent land:
 - a. ~~Shall not contain moving images, moving text or moving lights; and~~
 - b. Shall not be for the purpose of third party advertising.

Airport Main Site Designation

- ~~3. Signs on buildings shall:
 - a. Be affixed to the underneath of a verandah and shall provide at least 2.5 metres clearance directly above the footpath or ground level.
 - b. Be displayed only on plain wall surfaces.
 - c. Not obscure windows or architectural features.
 - d. Not project above the parapet level, or the highest part of that part of the building/structure to which it is attached (including above verandah).~~
- ~~4. Signs on buildings, where the sign projects more than 12 metres in height above ground shall:
 - a. Bear only the name and/or logo of the building owner or occupier, or the building on which the sign is located.
 - b. Not flash.~~
5. Any illuminated sign (excluding signs below verandah level) within 50 metres and visible from any Residential zone shall not flash.
3. For any free-standing sign or sign located on a structure within any part of the Airport Zone area, except the (Airport Main Site) Terminal Precinct:
 - a. the maximum area is 8m².
 - b. the maximum height is 4m.
 - c. any illuminated sign must not flash.
 - d. any sign that is visible from Residential zoned land must be located a minimum of 50 metres from that area.
 - e. no sign shall front onto State Highway 1, Moa Point Road, or Lyall Parade.
- ~~4. In relation to requiring authority signage in the (Airport Main Site) Terminal precinct, any free-standing sign or sign located on a structure shall not exceed a maximum height of 9 metres (above ground level).~~
4. For any free-standing sign or sign located on a structure within the Terminal Precinct, the maximum area of a single sign must not exceed 20m².

Section 32AA Evaluation

331. In my opinion, the amendments to SIGN-S14 are more appropriate in achieving the objectives of the plan than the notified provisions. I consider that:
- a. The proposed additions will:
 - i. Remove duplication of the WIAL Designation and reduce the need for the Airport to consider both the designation and the Signs chapter when proposing signage or applying for a resource consent.
 - ii. The proposed changes will reduce the need for resource consent for signage within the airport zone when signage is often critical for operations and safety within this zone.
 - b. The changes are therefore more efficient and effective than the notified provisions in achieving the objectives of the plan.
 - c. The recommended amendments will not have any greater environmental, economic, social, and cultural effects than the notified provisions.

3.10 Signs Design Guide

Matters raised by submitters

3.10.1 Signs Design Guide – General matters

332. Go Media (236.35) consider that the Design Guide is broad and open to interpretation.
333. Go Media (236.37) seeks that the Signs Design Guide is amended to make prioritisation of each principle clear without owner or applicant having to enter preapplication discussions with the Council.
334. Lumo Digital Outdoor Limited (285.41) and OOHMAA (284.41) seek that parts of the Signs Design Guide that are not appropriately balanced to enable a site-by-site consideration of signs and billboards relative to their context be deleted.
335. Lumo Digital Outdoor Limited (285.42) and OOHMAA (284.42) seek that the Signs Design Guide in Part 4 be deleted in its entirety.
336. Restaurant Brands Limited (349.1 [supported by Foodstuffs North Island FS23.30]) seeks that Te Aratohu Hoahoa o Ngā Pokapū Whakamahinga Rau - Centres and Mixed-Use Design Guide be deleted in its entirety.
337. Taranaki Whānui ki te Upoko o te Ika (389.139) seeks that the Design Guide be amended to include Taranaki Whānui in relation to te reo Māori and as first points of contact in relation to ahi kā and primary mana whenua status matters.
338. Wellington Heritage Professionals (412.97) seeks to add a new guideline as G29 as follows with a three or two-point rating: "Ensure the rate of change and transition times are appropriate to the context of the sign".

Assessment

339. I disagree with Go Media [236.35] that the Signs Design Guide is broad and open to too much interpretation. I consider the Signs Design Guide provides useful guidance on how to design and place signs, so they are well designed and sensitive to the location within which they are located.
340. In response to Go Media [236.37], I consider that the Signs Design Guide is sufficient to follow and prioritise without needing to have a pre-application meeting with Council. However, this could be improved by removing the priority rating system from the Guide. This would also make the Guide consistent with other design guides that have been through hearings to date. In addition, there are only 30 guidance points and not all will be relevant to every proposal.
341. In response to Lumo Digital Outdoor Limited [285.42], OOHMAA [284.42], Restaurant Brands Limited [349.1], and Foodstuffs North Island [FS23.30], I disagree with deleting the Signs Design Guide in its entirety. I consider the Guide contains useful and important considerations for the design of signage and its integration with the surrounding environment. I consider that it will not only assist plan users but will also result in better outcomes for the environment in which signs are proposed.
342. In response to Taranaki Whānui ki te Upoko o te Ika [389.139], I do not consider that the Signs Design Guide is the appropriate place to manage ahi kā and primary mana whenua status matters.
343. I disagree with the request from Wellington Heritage Professionals [412.97], as transition times for digital signs are already managed under SIGN-S8 and it is unnecessary to duplicate here.

Summary of recommendations

344. That submission points relating to General Matters on the Signs Design Guide are accepted/rejected as detailed in Appendix B.
345. That the Signs Design Guide be amended as detailed in Appendix A.

Section 32AA Evaluation

346. In my opinion, the amendments to the Signs Design Guide are more appropriate in achieving the objectives of the plan than the notified provisions. I consider that:
- a. The proposed additions will:
 - i. Remove the ambiguity around guidelines that are mandatory or not. It will also allow for an assessment to be undertaken to determine the applicability of guidelines to proposals, both on the applicant side and council side.
 - ii. Results in the Signs Design Guide being consistent with other design guides which have been reviewed through the hearing process.

- b. The changes are therefore more efficient and effective than the notified provisions in achieving the objectives of the plan.
- c. The recommended amendments will not have any greater environmental, economic, social, and cultural effects than the notified provisions.

3.10.2 Signs Design Guide – G3

347. Go Media (236.38 and 236.39) seeks that the guideline be deleted or amended to reflect that architectural features do not necessarily make a positive contribution to the building and local area.

Assessment

348. In response to Go Media [236.38], I consider that G3 should not be deleted or amended. I consider that there are very few architectural features so ugly that obscuring them with a sign is a better option.

349. In response to Go Media [236.39], I consider that the specific design of buildings and signs can be considered at the resource consent stage and that the design guide does not require amending. The Signs Design Guide provides a starting point for this assessment.

Summary of recommendations

350. That submission points relating to G3 are accepted/rejected as detailed in Appendix B.

3.10.3 Signs Design Guide – G9

351. Wellington Heritage Professionals (412.98) seeks that the guideline be retained as notified.

3.10.4 Signs Design Guide – G10

352. Go Media (236.40) seeks that the guideline be deleted or amended to reflect that architectural features do not necessarily make a positive contribution to the building and local area.

Assessment

353. In response to Go Media [236.40], I consider that G10 should not be deleted or amended. I consider that there are very few architectural features so ugly that obscuring them with a sign is a better option.

Summary of recommendations

354. That submission points relating to G10 are accepted/rejected as detailed in Appendix B.

3.10.5 Signs Design Guide – G11

355. Go Media (236.41) seeks that the guideline be deleted or amended to reflect that architectural features do not necessarily make a positive contribution to the building and local area.

Assessment

356. In response to Go Media [236.41], I consider that G11 should not be deleted or amended. I consider that there are very few architectural features so ugly that obscuring them with a sign is a better option.

Summary of recommendations

357. That submission points relating to G11 are accepted/rejected as detailed in Appendix B.

3.10.6 Signs Design Guide – G15

358. Go Media (236.42) seeks that the guideline be deleted or amended to make it only considered on a building-by-building basis.

Assessment

359. I agree with Go Media that G15 can be deleted. Different signs will be appropriate for different settings and other Guidelines such as G14 and G16 allow adequate scope for quality outcomes.

Summary of recommendations

360. That submission points relating to G15 are accepted/rejected as detailed in Appendix B.

361. That the Signs Design Guide be amended as detailed in Appendix A.

Section 32AA Evaluation

362. In my opinion, the amendments to the Signs Design Guide are more appropriate in achieving the objectives of the plan than the notified provisions. I consider that:

- a. The proposed additions will:
- b. Remove an unnecessary guideline from the Design Guide and result in a more efficient design guide for all plan users. The guideline is unnecessary as other guidelines within the Design Guide are sufficient.
- c. The changes are therefore more efficient and effective than the notified provisions in achieving the objectives of the plan.
- d. The recommended amendments will not have any greater environmental, economic, social, and cultural effects than the notified provisions.

3.10.7 Signs Design Guide – G16

363. Go Media (236.43) seeks that the guideline be deleted or amended to be more specific to relate more fully to the example within the Guideline.

Assessment

364. In response to Go Media [236.43], the relief being sought is unclear. I consider more information is needed from the submitter.

Summary of recommendations

365. That submission points relating to G16 are accepted/rejected as detailed in Appendix B.

3.10.8 Signs Design Guide – G26

366. Go Media (236.44) seeks that the guideline be amended to remove bias and the potential for misinterpretation.

Assessment

367. I do not consider that G26 conveys bias. I therefore do not recommend any changes on this basis.

Summary of recommendations

368. That submission points relating to G26 are accepted/rejected as detailed in Appendix B.

3.10.9 Signs Design Guide – G28

369. Wellington Heritage Professionals (412.96) seeks that the guideline be amended to receive a three or two point rating.

Assessment

370. It is proposed to delete the rating system. Therefore, I recommend this submission point is rejected.

Summary of recommendations

371. That submission points relating to G26 are accepted/rejected as detailed in Appendix B.

4.0 Minor and inconsequential amendments

372. Pursuant to Schedule 1, clause 16 (2) of the RMA, a local authority may make an amendment, without using the process in this schedule, to its proposed plan to alter any information, where such an alteration is of minor effect, or may correct any minor errors.

373. The following minor and inconsequential amendments relevant to this report are

identified below and will be corrected:

- a. The chapter refers to the Heritage Design Guide. I recommend that this reference is deleted throughout the chapter given the recommendation to delete the Heritage Design Guide in earlier Hearing Streams.

374. The recommended amendments are set out in Appendix A.

5.0 Conclusion

375. Having considered all the submissions and reviewed all relevant statutory and non-statutory documents, I recommend that the PDP should be amended as set out in Appendix A of this report.

376. For the reasons set out in the Section 32AA evaluation included throughout this report, I consider that the proposed objectives and provisions, with the recommended amendments, will be the most appropriate means to:

- i. Achieve the purpose of the Resource Management Act 1991 (RMA) where it is necessary to revert to Part 2 and otherwise give effect to higher order planning documents, in respect to the proposed objectives; and
- ii. Achieve the relevant objectives of the PDP, in respect to the proposed provisions.

5.1 Recommendations

377. I recommend that:

- a. The Independent Hearing Panel accept, accept in part, or reject submissions (and associated further submissions) as outlined in Appendix B of this report; and
- b. The PDP is amended in accordance with the changes recommended in Appendix A of this report.