

# Section 32 Evaluation Report

## Part 2: Signs

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## Table of acronyms

<b>Abbreviation</b>	<b>Full term</b>
<b>AUP</b>	Auckland Unitary Plan
<b>ECO</b>	Ecosystems and Indigenous Biodiversity
<b>NES</b>	National Environmental Standards
<b>NFL</b>	Natural Features and Landscapes
<b>NPS</b>	National Policy Statements
<b>NZTA</b>	Waka Kotahi NZ Transport Agency
<b>ONFL</b>	Outstanding Natural Features and Landscapes
<b>PDP</b>	Proposed District Plan
<b>PNRP</b>	Proposed Natural Resources Plan
<b>R&amp;H</b>	Ridgelines and Hilltops
<b>RMA</b>	Resource Management Act
<b>RPS</b>	Regional Policy Statement for the Wellington Region 2013
<b>SAL</b>	Special Amenity Landscapes
<b>WCC</b>	Wellington City Council

## 1. Overview and Purpose

### 1.1 Introduction to the resource management issues

This section 32 evaluation report is focussed on signs. The purpose of the signs chapter is to manage the potential adverse environmental effects that can result from the erection and placement of signs across the city.

Signs are useful for displaying important information including community messages, wayfinding and directions, health and safety messages, and placenames. Third-party signs advertise events, products, and services. Signs are important for traffic safety to warn motorists of approaching hazards and to convey important information such as speed limits.

This chapter addresses digital signs, freestanding signs, illuminated signs, official signs, third-party signs, and on-site signs. Electoral signs are exempt from these rules and are managed under the Electoral Act 1993.

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. The scale of effect is also often related to the location, with suburban residential zones being more sensitive to sign effects than commercial or city centre locations.

The sign provisions in the operative district plan are not consolidated within a dedicated chapter but are instead spread throughout the various zone based chapters. Furthermore, the district plan does not manage digital signs which is captured under more general provisions.

Accordingly, the Signs chapter proposes to update and consolidate the sign provisions. The definition of a sign in this plan is limited to signs that are projected onto, or fixed or attached to, any structure or natural object such as buildings. Portable signs in the form of a board on Council owned land are managed under the Wellington Consolidated Bylaw 2008. Under this bylaw, written approval is required for signage in public places.

In addition to the provisions in this chapter, a number of other Part 2: District-Wide chapters also contain provisions that may be relevant in addition to the underlying Zone chapter provisions.

## 2. Reference to other evaluation reports

This report should also be read in conjunction with the following evaluation reports:

Report	Relationship to this topic
<b>Zone chapters:</b> <ul style="list-style-type: none"><li>• Residential Zones</li><li>• Rural Zones</li><li>• Commercial and Mixed Use Zones</li><li>• Industrial Zones</li><li>• Open Space and Recreation Zones</li><li>• Special Purpose Zones</li><li>• Development Areas</li></ul>	The zone chapters contain provisions that manage activities, use and development relative to the zone purpose. Effects on character and amenity are managed by the provisions and accordingly the s32 evaluation for the zone chapters is of relevance.

<b>Report</b>	<b>Relationship to this topic</b>
<b>District Wide Overlay Chapters:</b> <ul style="list-style-type: none"> <li>• Natural Features and Landscapes</li> <li>• Ecosystems and Indigenous Biodiversity</li> </ul>	<p>The Natural Features and Landscapes chapter contains provisions relating to the protection of identified Outstanding Natural Features and Landscapes (ONFL), Special Amenity Landscapes (SAL) and Ridgeline &amp; Hilltops (R&amp;H).</p> <p>The Ecosystems and Indigenous Biodiversity chapter contains Significant Natural Areas. Signs located within these overlays areas can have an adverse effects on the values and therefore the s32 evaluations for NFL and ECO are of relevance.</p>
<b>District wide chapters:</b> <ul style="list-style-type: none"> <li>• Energy, Infrastructure and Transport</li> <li>• Historical and Cultural Values</li> </ul>	<p>These chapters comprise Infrastructure, Renewable Electricity Generation, Transport, Three Waters, Historic Heritage and Sites and Areas of Significance to Māori. The s32 evaluations for these chapters are of relevance.</p>
<b>General District Wide Chapters:</b> <ul style="list-style-type: none"> <li>• Coastal Environment</li> </ul>	<p>This chapter manages the effects of use and development within the coastal environment and identifies areas of high and very high coastal natural character. Signs can therefore have an adverse effect and as such the s32 evaluation for this chapter is of relevance.</p>

### 3. Strategic Direction

The following objectives in the Strategic Direction chapter of the Proposed District Plan are relevant to this topic:

<b>AW-O3</b>	<b>Anga whakamua – Moving into the future</b>
<p>Mana whenua can exercise their customary responsibilities as mana whenua and kaitiaki with their own mātauranga Māori.</p>	
<b>AW-O4</b>	<b>Anga whakamua – Moving into the future</b>
<p>The development and design of the City reflects mana whenua and the contribution of their culture, traditions, ancestral lands, waterbodies, sites, areas and landscapes, and other taonga of significance to the district's identity and sense of belonging.</p>	
<b>HHSASM-O1</b>	<b>Historic Heritage and Sites and Areas of Significance to Māori</b>
<p>Significant buildings, structures, areas, and sites that exemplify Wellington's historical and cultural values are identified, recognised, and protected.</p>	
<b>HHSASM-O2</b>	<b>Historic Heritage and Sites and Areas of Significance to Māori</b>
<p>Built heritage is resilient and has a sustainable long term use while ensuring heritage and cultural values are recognised and maintained.</p>	
<b>HHSASM-O3</b>	<b>Historic Heritage and Sites and Areas of Significance to Māori</b>
<p>The cultural, spiritual and/or historical values associated with sites and areas of significance to Māori are protected.</p>	

An evaluation of these objectives is contained in the companion Section 32 Evaluation Overview Report.

## 4. Regulatory and policy direction

In carrying out a s32 analysis, an evaluation is required of how the proposal achieves the purpose and principles contained in Part 2 of the RMA.

Section 5 sets out the purpose of the RMA, which is to promote the sustainable management of natural and physical resources.

Sustainable management

*means managing the use, development, and protection of natural and physical resources to enable people and communities to provide for their social, economic and cultural wellbeing and for their health and safety, while -*

- (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
- (b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
- (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment.*

In achieving this purpose, all persons exercising functions and powers under the RMA also need to:

- Recognise and provide for the matters of national importance identified in s6
- Have particular regard to the range of other matters referred to in s7
- Take into account the principles of the Treaty of Waitangi/Te Tiriti o Waitangi in s8.

### 4.1 Section 6

The s6 matters relevant to this topic are:

Section	Relevant Matter
Section 6(a)	<p><i>the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development.</i></p> <p>This is relevant to Signs where signs are proposed within the coastal environment, wetlands, and lakes and rivers and their margins.</p>
Section 6(b)	<p><i>the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development.</i></p> <p>This is relevant to Signs where signs are proposed within Outstanding Natural Features and Landscapes.</p>
Section 6(c)	<p><i>The protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna.</i></p> <p>This is relevant to Signs where signs are proposed within a Significant Natural Area.</p>

Section 6(e)	<i>the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga</i> Signs may have an operational or functional need to be located or partially located within sites or areas of significance to Māori.
Section 6(f)	<i>the protection of historic heritage from inappropriate subdivision, use, and development</i> There may be requirements for signs within areas or sites with historic heritage values.

## 4.2 Section 7

The s7 matters that are relevant to this topic are:

Section	Relevant Matter
Section 7(c)	<i>the maintenance and enhancement of amenity values:</i>
Section 7(f)	<i>maintenance and enhancement of the quality of the environment:</i>

## 4.3 Section 8

Section 8 requires all persons exercising functions and powers under the RMA, in relation to managing the use, development, and protection of natural and physical resources, to take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).

Council works in partnership with Taranaki Whānui ki te Upoko o te Ika and Ngāti Toa Rangatira to actively provide for and protect their interests and develop provisions to recognise and provide opportunities for tangata whenua to exercise kaitiakitanga.

This is relevant when considering every aspect of the development of signage provisions but particularly when considering signage on or around Sites and Areas of Significance to Māori.

## 4.4 Section 31

Section 31 lists the functions of territorial authorities. The following is of relevance to the coastal environment:

- (1) *Every territorial authority shall have the following functions for the purpose of giving effect to this Act in its district:*
  - (a) *the establishment, implementation, and review of objectives, policies, and methods to achieve integrated management of the effects of the use, development, or protection of land and associated natural and physical resources of the district.*

## 4.5 National Direction

### 4.5.1 National Policy Statements

There are five National Policy Statements (NPS) currently in force:

- NPS for Electricity Transmission 2008

- New Zealand Coastal Policy Statement 2010
- NPS for Renewable Electricity Generation 2011
- NPS for Freshwater Management 2020
- NPS on Urban Development 2020

It is considered there are no NPS of direct relevance to this topic.

#### 4.5.2 Proposed National Policy Statements

In addition to the five NPS currently in force there are also two proposed NPS under development, noting that these are yet to be issued and have no legal effect:

- Proposed NPS for Highly Productive Land
- Proposed NPS for Indigenous Biodiversity

These have no direct relevance to this topic.

#### 4.5.3 National Environmental Standards

In addition to the NPS there are nine National Environmental Standards (NES) currently in force:

- NES for Air Quality 2004
- NES for Sources of Human Drinking Water 2007
- NES for Electricity Transmission Activities 2009
- NES for Assessing and Managing Contaminants in Soil to Protect Human Health 2011
- NES for Telecommunication Facilities 2016
- NES for Plantation Forestry 2017
- NES for Freshwater 2020
- NES for Marine Aquaculture 2020
- NES for Storing Tyres Outdoors 2021

Of these it is considered that the only relevant NES is that for Electricity Transmission Activities 2009 (NES-ETA). The relevant provision to this topic is identified below:

<b>NES-ETA</b>	
Regulation 23 – Permitted Activities	<p>(1) Installing or modifying a sign on a transmission line support structure of an existing transmission line that is intended to identify the structure or its owner, or is intended to help with safety or navigation, is a permitted activity if the applicable condition in subclause (2) or (3) is complied with.</p> <p>Conditions</p> <p>(2) The signs on a transmission line support structure that are intended to identify the structure, or its owner must together cover an area of no more than 1m<sup>2</sup>.</p> <p>(3) The signs on a transmission line support structure that are intended to help with safety or navigation must together cover an area of no more than 6m<sup>2</sup>.</p>

NES-ETA	
Regulation 24 – Restricted Discretionary Activities	<p>(1) Installing or modifying a sign on a transmission line support structure of an existing transmission line that is intended to identify the structure or its owner, or is intended to help with safety or navigation, is a restricted discretionary activity if the applicable condition in regulation 23(2) or (3) is breached.</p> <p>(2) Installing or modifying a sign next to a transmission line support structure of an existing transmission line that is intended to identify the structure or its owner, or is intended to help with safety or navigation, is a restricted discretionary activity.</p> <p>Matters to which discretion restricted:</p> <p>(3) Discretion is restricted to the following matters in relation to a restricted discretionary activity under this regulation:</p> <p>(a) visual effects; and</p> <p>(b) the effects on services and infrastructure.</p>

#### 4.5.4 National Planning Standards

The National Planning Standards require that if provisions are made for managing signs, they must be located in the Signs (SIGN) chapter in Part 2 – District-Wide Matters of the District Plan.

The National Planning Standards include the following mandatory definitions for *sign* and *official sign*:

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

- a. is for the purposes of —
  - i. identification of or provision of information about any activity, property or structure or an aspect of public safety;
  - ii. providing directions; or
  - iii. promoting goods, services, or events; and
- b. is projected onto, or fixed or attached to, any structure, or natural object; and
- c. includes the frame, supporting device and any ancillary equipment whose function is to support the message or notice.

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

## 4.6 Regional Policy and Plans

### 4.6.1 Regional Policy Statement for the Wellington Region 2013 (RPS)

The table below identifies the relevant provisions and resource management topics for signs contained in the RPS.

Section	Relevant matters
Objective 4	The natural character of the coastal environment is protected from the adverse effects of inappropriate subdivision, use and development.

<b>Section</b>	<b>Relevant matters</b>
<b>Objective 15</b>	Historic heritage is identified and protected from inappropriate modification, use and development.
<b>Objective 17</b>	The region's outstanding natural features and landscapes are identified, and their landscape values protected from inappropriate subdivision, use and development.
<b>Objective 18</b>	The region's special amenity landscapes are identified and those landscape values that contribute to amenity and the quality of the environment are maintained or enhanced
<b>Objective 28</b>	The region's special amenity landscapes are identified and those landscape values that contribute to amenity and the quality of the environment are maintained or enhanced
<b>Policy 22</b> (M)	District and regional plans shall include policies, rules and/or other methods that: <ul style="list-style-type: none"> <li>(a) protect the significant historic heritage values associated with places, sites and areas identified in accordance with policy 21, from inappropriate subdivision, use, and development; and</li> <li>(b) avoid the destruction of unidentified archaeological sites and wāhi tapu with significant historic heritage values.</li> </ul>
<b>Policy 24</b> (M)	District and regional plans shall include policies, rules and methods to protect indigenous ecosystems and habitats with significant indigenous biodiversity values from inappropriate subdivision, use and development.
<b>Policy 26</b> (M)	Where outstanding natural features and landscapes have been identified in accordance with policy 25, district and regional plans shall include policies, rules and/or methods that protect outstanding natural features and landscape values from inappropriate subdivision, use or development.
<b>Policy 28</b> (M)	Where special amenity landscapes have been identified in accordance with policy 27, district and regional plans shall include policies and/or methods (which may include rules) for managing these landscapes in order to maintain or enhance their landscape values in the context of the continuation of: <ul style="list-style-type: none"> <li>(a) existing land uses that contribute to these landscape values,</li> <li>(b) predominant existing land uses that are provided for within the underlying zoning, and</li> <li>(c) other lawfully established activities.</li> </ul>
<b>Policy 30</b> (M)	District plans shall include policies, rules and/or methods that enable and manage a range of land use activities that maintain and enhance the viability and vibrancy of the regional central business district in Wellington city and the: <ul style="list-style-type: none"> <li>(b) Suburban centres in: <ul style="list-style-type: none"> <li>(ii) Kilbirnie, and</li> <li>(iii) Johnsonville.</li> </ul> </li> </ul>
<b>Policy 42</b> (R)	When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district plan, the adverse effects of stormwater run-off from subdivision and development shall be reduced by having particular regard to:

Section	Relevant matters
	(j) using educational signs, as conditions on resource consents, that promote the values of water bodies and methods to protect them from the effects of stormwater discharges.

*M = policies which must be implemented in accordance with stated methods in the RPS*

*R = policies to which particular regard must be had when varying a district plan*

#### 4.6.2 Regional Plans

There are currently five operative regional plans and one proposed regional plan for the Wellington region:

- Regional Freshwater Plan for the Wellington Region, 1999
- Regional Coastal Plan for the Wellington Region, 2000
- Regional Air Quality Management Plan for the Wellington Region, 2000
- Regional Soil Plan for the Wellington Region, 2000
- Regional Plan for discharges to the land, 1999
- Proposed Natural Resources Plan, appeals version 2022

The proposed Natural Resources Plan (PNRP) replaces the five operative regional plans, with provisions in this plan now largely considered operative subject to the remaining appeals.

There are no relevant provisions within the identified regional plans with the exception of following two rules in the Regional Discharges to Land Plan.

Regional Discharges to Land Plan	
Section	Relevant matters
<b>Rule 3 Stormwater</b>	Permitted activity rule for discharge of contaminants into or onto land....  (e) signs indicating any public health risks arising from the discharge shall be displayed at the discharge site, for as long as the health risk exists.
<b>Rule 16 Application of pesticides</b>	Permitted activity rule for the discharge of any pesticide into or onto land as a solid or paste...  (c) signs shall be placed at all normal lines of approach to the discharge site...

#### 4.6.3 Proposed Natural Resources Plan, appeals version 2022 (PNRP)

The following provisions of the PNRP are of relevance to this topic:

PNRP	
<b>Objective O32</b>	Outstanding natural features and landscapes and their values are protected from inappropriate use and development.
<b>Objective O34</b>	Significant historic heritage values are protected from inappropriate modification, use and development.

<b>PNRP</b>	
<b>Objective O35</b>	Ecosystems and habitats with significant indigenous biodiversity values are protected and, where appropriate restored to a healthy and functioning state as defined by Tables 3.4, 3.5, 3.6, 3.7 and 3.8.
<b>Policy P41</b>	Managing adverse effects on ecosystems and habitats with significant indigenous biodiversity values.
<b>Policy P46</b>	<p>More than minor adverse effects on the significant historic heritage values identified in Schedule E1 (heritage structures), Schedule E2 (wharves and boatsheds), Schedule E3 (navigation aids), Schedule E4 (archaeological sites) and Schedule E5 (freshwater heritage) shall be avoided, remedied, or mitigated by managing activities so that:</p> <ul style="list-style-type: none"> <li>(a) significant historic heritage values are not lost, damaged, or destroyed</li> <li>(b) effects are of a low magnitude or scale, or effects are reversible</li> <li>(c) interconnections and linkages between sites are not significantly altered or lost</li> <li>(d) previous damage to significant historic heritage values is remedied or mitigated where relevant</li> <li>(e) previous changes that have significant historic heritage value in their own right are respected and retained</li> <li>(f) adjacent significant historic heritage values are unlikely to be adversely affected</li> <li>(g) unique or special materials and/or craftsmanship are retained</li> <li>(h) the activities do not lead to cumulative adverse effects on historic heritage.</li> </ul>
<b>Policy P48*</b>	<p>The natural features and landscapes (including seascapes) of the coastal marine area, rivers, lakes and their margins and natural wetlands shall be protected from inappropriate use and development by:</p> <ul style="list-style-type: none"> <li>(a) identifying outstanding natural features and landscapes within the region, and</li> <li>(b) avoiding adverse effects of activities on outstanding natural features and landscapes, and</li> <li>(c) avoiding significant adverse effects and avoiding, remedying or mitigating other adverse effects of activities on all other natural features and landscapes.</li> </ul>

#### 4.7 Iwi Management Plans

There are no Iwi Management Plans relevant to this topic.

#### 4.8 Relevant plans or strategies

The following plans / strategies are relevant to this topic:

<b>WCC Documents</b>	
<b>Wellington Consolidated Bylaw 2008</b>	<p>Contains provisions relating to the control of signs. These include:</p> <ul style="list-style-type: none"> <li>• Part 4: Alcohol Control includes controls on signage</li> <li>• Part 5: Public Places includes controls on signage and advertising.</li> <li>• Requiring written approval for signage located in public places, including the ability for Council to specify conditions.</li> <li>• Requiring posters or notices which display event information to be removed within 24 hours of the event concluding.</li> </ul>
<b>Traffic and Parking Bylaw 2021</b>	<p>Controls placement of parking and traffic control signs.</p>
<b>Suburban Reserves Management Plan 2015</b>	<p>Recognises the benefits that council signage and interpretation boards have for visitors but also addresses the adverse effect that signs can have on the amenity values of a reserve.</p> <ul style="list-style-type: none"> <li>• Signs which are not relevant to the activities occurring on, or features of, the reserve are not permitted.</li> <li>• Control the number, location, and design of signs in reserves.</li> <li>• In general, signs used for advertising purposes are not permitted within reserves.</li> </ul>
<b>Outer Green Belt Management Plan 2019</b>	<p>Recognises the benefits that council signage and interpretation boards have for visitors but also addresses the adverse effect that signs can have on the amenity values of the Outer Green Belt.</p> <ul style="list-style-type: none"> <li>• Signs which are not relevant to the activities occurring on, or features of, the Outer Green Belt are not permitted.</li> <li>• Control the number, location, and design of signs in the Outer Green Belt.</li> <li>• In general, signs used for advertising purposes are not permitted within the Outer Green Belt.</li> </ul>
<b>Wellington Town Belt Management Plan 2018</b>	<p>Recognises the benefits that council signage and interpretation boards have for visitors but also addresses the adverse effect that signs can have on the amenity values of the Wellington Town Belt.</p> <ul style="list-style-type: none"> <li>• Signs in the Town Belt require council's approval.</li> <li>• Signs not relevant to the Town Belt are not permitted.</li> <li>• Size and location of signs should be controlled to manage adverse amenity effects.</li> <li>• Existing and future sponsorship advertising relating to sports fields and events is permitted in certain circumstances.</li> </ul>
<b>Botanic Gardens of Wellington Management Plan 2014</b>	<ul style="list-style-type: none"> <li>• Signs in the Botanic Gardens require council's approval.</li> <li>• Signs must have a high standard of design and presentation which complements and enhances the garden environment.</li> <li>• Clear entry signs are provided at every entrance.</li> </ul>

<b>WCC Documents</b>	
	<ul style="list-style-type: none"> <li>• Interpretive signage is enabled for educational purposes.</li> <li>• Signs which are not relevant to the activities occurring on, or features of, the gardens are not permitted.</li> </ul>
<b>Our Capital Spaces 2013</b>	<ul style="list-style-type: none"> <li>• Open spaces need signs and interpretive panels to help people find them and get around.</li> <li>• Seeks to improve signs to provide for information on biodiversity and historical significance.</li> </ul>
<b>Open Space Access Plan 2016</b>	<ul style="list-style-type: none"> <li>• Signs across the track networks will be updated.</li> <li>• Provide for consistent signage, information, and mapping.</li> <li>• All event signage must be approved by Council and removed promptly after the event.</li> <li>• Any walking, running, equestrian and biking events must include a detailed signage plan.</li> </ul>
<b>Our Natural Capital 2015</b>	<ul style="list-style-type: none"> <li>• Create and install interpretive signage to help educate people on biodiversity and history of all parks/open spaces.</li> </ul>
<b>Wellington Waterfront Signage Guidelines 2014</b>	<p>The overall objective of the guidelines is to provide appropriate signage that supports public and approved commercial activity while maintaining the special character of the waterfront. The key points from the guidance are:</p> <ul style="list-style-type: none"> <li>• Clear signage helps people navigate around the waterfront and can help communicate Māori heritage along the waterfront.</li> <li>• Signs should be designed to complement the characteristics of the waterfront.</li> <li>• Signage along the waterfront should be consistent in size, scale, and design.</li> <li>• Signage should maintain the transparency of shop frontages.</li> </ul>
<b>Footpath Management Policy 2007</b>	<p>Among other functions, the Footpath Management policy controls signs on footpaths, particularly sandwich boards, with the aim of ensuring safe and efficient pedestrian movement on footpaths. It controls:</p> <ul style="list-style-type: none"> <li>• Location of sandwich boards. <ul style="list-style-type: none"> <li>○ Limited to one per retail site.</li> <li>○ Placed on the kerb edge.</li> <li>○ Away from bus stops, disability parks, taxi stands and pedestrian crossings.</li> </ul> </li> <li>• Design and maintenance. <ul style="list-style-type: none"> <li>○ Maximum dimensions: 600mm wide by 600mm deep by 900mm high.</li> <li>○ Sandwich boards to be weighted.</li> </ul> </li> </ul>

WCC Documents	
	<ul style="list-style-type: none"> <li>○ Must be able to be seen by those who have visual impairments (wide base, contrasting colour from the footpath).</li> </ul>
<p><b>Trading in Public Places Policy (Adopted in 2006, with additions in 2014).</b></p> <p>*Under Review</p>	<p>This policy manages trading in public places, such as temporary retail and food stalls, retail kiosks, hawking, and markets.</p> <p>The policy generally controls signage through directing that the activity must be consistent with relevant governing frameworks such as the District Plan and Bylaws. Additionally, the stalls and areas around the stall must be kept tidy and free of clutter.</p> <p>Signage is specifically controlled in relation to group fitness classes whereby:</p> <ul style="list-style-type: none"> <li>• Fitness trainers should not erect advertising signs in parks.</li> <li>• Any signs indicating a fitness session is in progress should be free standing and not block public access.</li> </ul>

#### 4.9 Other relevant legislation or regulations

The following additional legislative / regulatory requirements are also relevant to this topic:

Other relevant regulations	
<b>NZTA (Signs on State Highways) Bylaw 2010</b>	<p>Sets out requirements for signs on or over any State Highway. The requirements differ based on the speed limit being 70km/h and under or over.</p> <p>The requirements control the size of a sign, the colouring of signs, positioning of signs and the number of words/characters allowed.</p>
<b>NZTA Traffic Control Devices Manual</b>	<p>Parts 1 and 3 are most applicable to the management of signs under the District Plan.</p> <p>Part 1 contains the general requirements for all signs, including traffic and advertising signs. The guide contains specifics around the style and types of signs to be used in certain circumstances.</p> <p>Part 3 contains specific guidance for advertising signs, including what is considered an advertising sign and how they should be designed.</p>
<b>NZTA Land Transport Rule: Traffic Control Devices 2004</b>	<p>This document provides rules for the use of traffic control devices. It covers requirements for the design, construction, installation, operation and maintenance of traffic control devices and the functions and responsibilities of road controlling authorities.</p>
<b>Electoral Act 1993</b>	<p>Section 221B of the Electoral Act sets out the timeframe for which signs can be erected and the requirements for size.</p>
<b>Electoral (Advertisements of a Specified Kind) Regulations 2005</b>	<p>Contains regulations which control the type and content of electoral signs. Includes requirements for reflective material or lamination, shape and colours, sizes and a requirement for no moving parts.</p>

## 5. Resource Management Issues Analysis

### 5.1 Background

Signs are currently managed through the operative District Plan and the Wellington Consolidated Bylaw 2008. Electoral signs are managed under the Electoral Act 1993. The sign provisions are located throughout various zone based and precinct chapters of the district plan.

There has not been a comprehensive review or update to the sign provisions since the district plan became operative. Some minor updates within the respective zone based chapters were completed as part of the following plan changes:

Plan Change	Operative date	Relevant updates to signs
<b>Plan Change 48: Central Area Review</b>	16 October 2013	<ul style="list-style-type: none"><li>• New design guide for signs.</li><li>• New rules to:<ul style="list-style-type: none"><li>○ Permit certain temporary signs;</li><li>○ Control signs that are a hazard to traffic safety; and</li><li>○ Control signs adjacent to the proposed Parliamentary Precinct Heritage Area.</li></ul></li></ul>
<b>Plan Change 72: Residential Review</b>	19 November 2014	<ul style="list-style-type: none"><li>• Only a small change was made to sign provisions which resulted in the addition of a standard limiting the maximum height of signs to 2m in the residential area.</li></ul>
<b>Plan Change 73: Suburban Centres</b>	19 November 2014	<ul style="list-style-type: none"><li>• Changes included:<ul style="list-style-type: none"><li>○ Amending provisions to reduce size and number of signs to be displayed in centres zone.</li><li>○ Changes to the definition of a sign.</li></ul></li></ul>

Signs are an inherent part of the urban landscape, used for displaying information, street names, traffic regulations, providing directions, meeting health and safety requirements and advertising products, services, or events.

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.

It is also necessary to review and update sign provisions to address emerging mediums such as digital signs which may not be adequately captured by existing district plan provisions.

### 5.2 Evidence Base - Research, Consultation, Information and Analysis undertaken

The Council has reviewed the operative District Plan, commissioned technical advice and assistance from various internal and external experts and utilised this, along with internal workshops and community feedback to assist with setting the plan framework. This work has been used to inform the identification and assessment of the environmental, economic, social,

and cultural effects that are anticipated from the implementation of the provisions. This advice includes the following:

Title	Author	Brief synopsis
<b>Digital Sign Guidance 2017</b>	MWH Global / Stantec	Reviewed existing sign provisions, particularly focusing on digital signs. The report included recommendations on how the provisions could be improved, including proposed standards.
<b>Monitoring Evaluation Report 2020</b>	Urban Edge Planning Ltd	Undertakes a review of the operative Sign provisions in the district plan across all chapters and provides an analysis of resource consent decisions between 2010-2020 and provides a key summary of findings to inform a review of the sign chapter.
<b>Issues &amp; Options Report 2021</b>	Urban Edge Planning Ltd	The report provides an analysis of the key issues and options that are experienced from both a legislative perspective as well as for district plan users. The report identifies six key issues including digital signs, third party signs, traffic safety and temporary and regulatory signage. District Plan change options are identified to address these issues.

In addition to the material listed in the table above, the Council has also gathered further information and advice from stakeholder workshops held with commercial media and signage companies, Waka Kotahi (“NZTA”) and internal council stakeholders such as the Parks, Sport and Recreation team, and the Heritage Team. These are summarised within the engagement table at section 5.2.4 of this report.

### 5.2.1 Analysis of Operative District Plan provisions relevant to this topic

The current sign provisions are spread across ten separate topic chapters within the Operative Wellington District Plan. These include the Residential Area, Centres, Institutional Precincts, Central Area, Open Space, Conservation Sites, Rural Area, Heritage and Business Area Zones and Airport Precinct. The operative District Plan also includes a Signs Design Guide to support the provisions and includes the following definitions: *Official Sign, Sign, Sign Area Third Party Advertising and Temporary Sign.*

The key provisions within the operative District Plan are summarised below.

Topic	Summary of relevant provisions
<b>Residential Area</b>	<p><b>Policies:</b></p> <ul style="list-style-type: none"> <li>Objective 4.2.14 – To achieve signage that is well integrated with and sensitive to the receiving environment and that maintains public safety.</li> <li>Policy 4.2.14.1 – Control the erection of signs within residential areas.</li> </ul> <p><b>Rules:</b></p> <ul style="list-style-type: none"> <li>Rule 5.1.13 provides for signs as a permitted activity where compliance with standard 5.6.3 is achieved.</li> <li>Rule 5.3.11 identifies signs as a restricted discretionary activity and controls area, number of signs, illumination, and amenity impacts.</li> </ul>

Topic	Summary of relevant provisions
	<ul style="list-style-type: none"> <li>Standard 5.6.3 identifies the maximum standards for permanent &amp; temporary signs within residential areas.</li> </ul>
<b>Centres</b>	<p><b>Policies:</b></p> <ul style="list-style-type: none"> <li>Objective 6.2.6 – To achieve signage that is well integrated with and sensitive to the receiving environment and that maintains public safety.</li> <li>Policy 6.2.6.1 – Manage design of signs (and their associated structures and fixings) to enhance the quality of signage within Centres.</li> <li>Policy 6.2.6.2 – Manage the scale, intensity, and placement of signs.</li> <li>Policy 6.2.6.3 – Ensure signs in Centres do not adversely affect the architectural integrity of the building on which the sign is located.</li> <li>Policy 6.2.6.4 – Ensure that signs contribute positively to the visual amenity of the building neighbourhood and city landscape.</li> <li>Policy 6.2.6.5 – Control the number and size of signs within Heritage Areas</li> <li>Policy 6.2.6.6 - Ensure that signs in Centres do not adversely affect the amenity of nearby Residential Areas.</li> </ul> <p><b>Rules:</b></p> <ul style="list-style-type: none"> <li>Rule 7.1.6 Permitted activity provision for signs subject to meeting the standards in 7.6.3.</li> <li>Rule 7.3.12 Signs that do not meet the standards in 7.6.3.1 are restricted discretionary.</li> <li>Standard 7.6.3.1.1 – 7.6.3.1.6 identifies the permitted standards for a range of sign types.</li> </ul>
<b>Airport and Golf Course Precinct</b>	<p><b>Policies:</b></p> <ul style="list-style-type: none"> <li>Objective 10.2.6 - To ensure signage is designed and located in a way which will not detract from the character of the locality, and will not cause a traffic hazard.</li> <li>Policy 10.2.6.1 - Manage the scale and placement of signs in order to maintain and enhance the visual amenity of the host building, site, and locality.</li> <li>Policy 10.2.6.2 - Ensure any signage located in and along State Highway 1 and the coastal roads contribute positively to the quality of these routes and the natural landscape.</li> <li>Policy 10.2.6.3 - Ensure any signs located on Rongotai Ridge respect the important cultural and natural qualities of this landform.</li> </ul> <p><b>Rules:</b></p> <ul style="list-style-type: none"> <li>Rule 11.1.5 Any signs is permitted subject to meeting the conditions regarding signage attached to a building, within the terminal area and freestanding.</li> <li>Rule 11.3.4 signs that do not meet one or more of the permitted conditions are restricted discretionary with matters of discretion on position, dimension, flashing lights, above 12m high and traffic/pedestrian safety.</li> <li>Rule 11.5.1.8 Signs are permitted in the golf course precinct subject to meeting identified standards.</li> <li>Rule 11.6.1 Signs that do not meet the permitted activity conditions in the gold course precinct are restricted discretionary activities.</li> </ul>

Topic	Summary of relevant provisions
<b>Central Area</b>	<p><b>Policies:</b></p> <ul style="list-style-type: none"> <li>• Objective 12.2.10 – To achieve signage that is well integrated with and sensitive to the receiving environment, and that maintains public safety.</li> <li>• Policy 12.2.10.1 - Guide the design of signs (and their associated structures and affixtures) to enhance the quality of signage within the Central Area.</li> <li>• Policy 12.2.10.2 – Manage the scale, intensity, and placement of signs to maintain visual amenity and safety.</li> <li>• Policy 12.2.10.3 – Ensure signs in the Central Area do not adversely affect the architectural integrity of the building on which the sign is located.</li> <li>• Policy 12.2.10.4 - Ensure that signs contribute positively to the visual amenity of the building neighbourhood and cityscape above the fourth storey level.</li> <li>• Policy 12.2.10.5 - Control the number and size of signs within heritage areas and areas of special character.</li> <li>• Policy 12.2.10.6 - Ensure that signs contribute positively to the context of the Parliamentary Precinct Heritage Area.</li> <li>• Policy 12.2.10.7 - Ensure that signs in the Central Area do not adversely affect the amenity values of nearby Residential Areas.</li> </ul> <p><b>Rules:</b></p> <ul style="list-style-type: none"> <li>• Rule 13.1.3 – Signs are permitted activities subject to standards.</li> <li>• Rule 13.3.9 – Signs are restricted discretionary where they do not meet the identified standards. Matters of discretion include number, position, moving text, or illumination.</li> <li>• Standard 13.6.4 – Standards for illuminated signs, located on buildings, freestanding, within the stadium, heritage areas and for temporary signs.</li> </ul>
<b>Rural Area</b>	<p><b>Policies:</b></p> <ul style="list-style-type: none"> <li>• Policy 14.2.2.4 - Control the siting and size of new signs within the Rural Area.</li> </ul> <p><b>Rules:</b></p> <ul style="list-style-type: none"> <li>• Rule 15.1.9 – Signs are Permitted Activities provided that they comply with the following conditions for permanent and temporary signs.</li> <li>• Rule 15.1.11 – Hazardous facilities are permitted activities with requirements and includes requirements for signage.</li> <li>• Rule 15.3.2 – Work from home activities are restricted discretionary activities where permitted activity standards not met including signs.</li> <li>• Rule 15.3.4 – Signs (other than temporary signs) are restricted discretionary activities.</li> </ul>
<b>Open Space Area</b>	<p><b>Rules:</b></p> <ul style="list-style-type: none"> <li>• Rule 17.1.4 – Signs are Permitted Activities provided they meet the identified conditions for permanent or temporary signs.</li> <li>• Rule 17.2.2 – Signs are restricted discretionary where they do not meet the permitted conditions for area and height.</li> </ul>
<b>Conservation Sites</b>	<p><b>Rules:</b></p>

Topic	Summary of relevant provisions
	<ul style="list-style-type: none"> <li>• Rule 19.1.3 – Signs are permitted activities where they comply with the conditions for permanent or temporary signs.</li> <li>• Rules 19.3.1 – Signs not permitted are restricted discretionary activities in respect of area and height.</li> </ul>
<b>Heritage Area</b>	<p><b>Policy:</b></p> <ul style="list-style-type: none"> <li>• Policy 20.2.1.9 – Ensure that signs on listed heritage buildings or objects (or sites on which they are located) or within Heritage Areas do not adversely affect heritage values and qualities and avoid unnecessary or inappropriate signage.</li> </ul> <p><b>Rules:</b></p> <ul style="list-style-type: none"> <li>• Rule 21D.1.1 – Permitted activity for one sign less than 0.5m<sup>2</sup>.</li> <li>• Rule 21D.2.1 – Controlled activity for signs larger than 0.5m<sup>2</sup>.</li> <li>• Rule 21D.3.1 – Restricted activity for signs that do not meet permitted conditions.</li> </ul>
<b>Business Area</b>	<p><b>Policies:</b></p> <ul style="list-style-type: none"> <li>• Objective 33.2.7 - To achieve signage that is well integrated with, and sensitive to, the receiving environment and that maintains public safety.</li> <li>• Policy 33.2.7.1 – Manage the design of signs (and their associated structures and fixings) to enhance the quality of signage within Business Areas.</li> <li>• Policy 33.2.7.2 – Manage the scale, intensity, and placement of signs to maintain and enhance the visual amenity of the host building, appropriate form and scale, reduce visual clutter and ensure public safety.</li> <li>• Policy 33.2.7.3 - Ensure signs in Business Areas do not adversely affect the architectural integrity of the building on which the sign is located.</li> <li>• Policy 33.2.7.4 - Ensure that signs contribute positively to the visual amenity of the building neighbourhood and cityscape.</li> <li>• Policy 33.2.7.5 - Ensure that signs in Business Areas do not adversely affect the amenities of nearby Residential Areas.</li> </ul> <p><b>Rules:</b></p> <ul style="list-style-type: none"> <li>• Rule 34.1.8 - Signs are a Permitted Activity provided that they comply with the standards specified in section 34.6.3 (signs).</li> <li>• Rule 34.3.13 - Signs that do not meet one or more of the standards specified in section 34.6.3.1, are a restricted discretionary activity with discretion restricted to the standard not met.</li> <li>• Standard 34.6.3 add identifies maximum standards for signs in relation to illumination, moving images, lights, location adjacent to sensitive zones, signs on buildings and freestanding structures.</li> </ul>

### 5.2.2 Analysis of provisions in other District Plans relevant to this topic

Current practice has been considered in respect of this topic, with a review undertaken of the following District Plans. It is noted that some of these plans have been prepared in accordance with the National Planning Standards.

District Plan	Approach
<b>Auckland Unitary Plan (AUP)</b>	<p>Except for billboards and comprehensive development signage which are managed under the AUP, most signs are managed under the Auckland Transport/Auckland Council Signage Bylaw 2015.</p> <p>Billboards are non-complying within all residential zones. There are limited scenarios where billboards are permitted within the Business Zones. In all other zones billboards are either Non-Complying, Restricted Discretionary or Discretionary.</p> <p>Comprehensive Development Signage is Restricted Discretionary across all zones.</p> <p>The permitted activity standards include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Billboards cannot be placed within 30m of a residential or open space zone.</li> <li>• Billboards cannot be placed within 30m of a scheduled heritage place.</li> <li>• Digital billboards must control illuminance to specified set levels.</li> <li>• Billboards cannot emit noise, smoke, steam or any other matter.</li> <li>• A billboard cannot exceed an area equal to 25% of the wall area or 50m<sup>2</sup>, whichever is the lesser.</li> </ul> <p>The matters of discretion and assessment criteria focus on:</p> <ul style="list-style-type: none"> <li>• Visual amenity.</li> <li>• Scale and location.</li> <li>• Lighting and traffic pedestrian safety.</li> <li>• Duration of consent.</li> <li>• Cumulative effects.</li> </ul>
<b>Christchurch City Plan</b>	<p>Christchurch City takes a permissive approach towards signs. Subject to standards, most sign types, including digital signs, are permitted.</p> <p>The standards include:</p> <ul style="list-style-type: none"> <li>• The maximum area and height of a sign.</li> <li>• The maximum number of characters on a sign, including the maximum number of words.</li> <li>• Maximum number of signs across a road frontage.</li> </ul> <p>The standards for digital signs include:</p> <ul style="list-style-type: none"> <li>• A maximum area of 18m<sup>2</sup>.</li> <li>• A maximum height of 9m.</li> <li>• No sign/billboard should be visible from any site within a residential zone.</li> <li>• The billboard should be located 50m away from any signalised traffic intersection and not in an area with a speed limit greater than 70km/h</li> <li>• The billboard should result in no more than 10lux light spill.</li> <li>• No moving images.</li> </ul>

District Plan	Approach
	<ul style="list-style-type: none"> <li>• No flashing images.</li> <li>• No sound.</li> <li>• Transition time of 0.5secs.</li> <li>• Dwell time of at least 7 seconds.</li> </ul> <p>Signage on a new building or an addition to a new building is a controlled activity subject to being approved by a council approved urban design expert.</p> <p>Signage which does not meet any of the permitted activity standards, including for digital signs, are restricted discretionary activities. The matters of discretion include:</p> <ul style="list-style-type: none"> <li>• Whether the design of the sign will have impacts on architectural integrity, amenity values, character, visual coherence, heritage values, the surrounding area or residential activities.</li> <li>• Whether the impacts can be lessened.</li> <li>• Whether the sign enlivens a space.</li> </ul>
<b>Porirua Proposed District Plan</b>	<p>Official signs, interpretation signs, directional signs, traffic signs, railway signs, temporary signs, real estate signs, election signs, freestanding signs and signs on buildings are permitted subject to meeting specified standards. These include:</p> <ul style="list-style-type: none"> <li>• Maximum area of signs, ranging from 1.5m<sup>2</sup> in residential zones to 10m<sup>2</sup> in the Large Format Retail Zone.</li> <li>• Restriction on the number of signs per site, ranging from 1 in residential zones to unlimited in commercial zones.</li> <li>• Maximum height of free standing signs, ranging from 2m in residential zones to 10m in commercial zones.</li> </ul> <p>Where permitted standards are not met, the signs become a restricted discretionary activity. The matters of discretion are specified in the policies, they include:</p> <ul style="list-style-type: none"> <li>• Not compromising the amenity values of other adjacent zones.</li> <li>• Not compromising public health and safety.</li> <li>• Not resulting in visual clutter.</li> <li>• The effects of spill and glare not adversely affecting other activities.</li> </ul> <p>Within the City Centre Zone and Large Format Retail Zone, digital signs do not have a permitted starting point in the proposed plan, they start as restricted discretionary and become discretionary when they do not meet the permitted activity standards, as listed above. Digital signs in all other zones (residential, rural, open space, centres, and mixed use) are non-complying.</p>
<b>Upper Hutt City District Plan</b>	<p>The signs provisions are located in a consolidated chapter in accordance with the National Planning Standards.</p> <p>The signs provisions apply to all zones with matters of discretion relating to the number of signs per site. Some signage is excluded where it is instead controlled through council bylaws.</p>

District Plan	Approach
	<p>Temporary signs are permitted where they comply with specified standards, including not exceeding 3m<sup>2</sup>, temporary signs cannot be erected for longer than 2 months and cannot be digital.</p> <p>Health and safety signs are permitted and are not required to meet any permitted standards as they are defined within the District Plan. Most other signs are permitted subject to meeting specified standards. Digital signs are restricted discretionary and all third-party advertising signs are discretionary.</p> <p>The permitted activity standards for residential, rural and open space zones include:</p> <ul style="list-style-type: none"> <li>• Maximum area of temporary signs cannot exceed 3m<sup>2</sup>.</li> <li>• Temporary signs cannot be digital.</li> <li>• In residential zones and rural zones, a maximum of one sign per site is allowed.</li> <li>• In open space zones, a maximum of one free-standing sign per 100m of road frontage is allowed.</li> <li>• The maximum height of freestanding signs cannot exceed 3m and maximum width should not exceed 2m.</li> <li>• Signs must not cover windows.</li> <li>• Signs cannot be illuminated/digital.</li> </ul> <p>The permitted activity standards for business commercial, business industrial and special activity zones include:</p> <ul style="list-style-type: none"> <li>• Maximum area of signs: 5m<sup>2</sup> for business commercial and special activity zones, 10m<sup>2</sup> for business industrial zone.</li> <li>• Total area of combined signs does not exceed 30% of the total area of the building elevation or structure.</li> <li>• Signs on verandas must be 2.5m from ground level.</li> <li>• Signs cannot be illuminated/digital.</li> </ul> <p>The permitted standards for traffic safety across all zones, include:</p> <ul style="list-style-type: none"> <li>• Not locating signs where it will obstruct any traffic sign or signal.</li> <li>• The sign cannot resemble any traffic sign or signal.</li> <li>• No sign should incorporate reflective materials.</li> <li>• When signs are located on state highways with a speed limit of 70km/h or greater, the sign shall: <ul style="list-style-type: none"> <li>○ Have a minimum lettering height of 160mm.</li> <li>○ Contain no more than six words and 40 characters.</li> <li>○ No obstruct any view for motorists up to 180m from any point.</li> </ul> </li> </ul> <p>Where any sign breaches a permitted activity standard, it becomes a restricted discretionary activity. Matters of discretion include:</p> <ul style="list-style-type: none"> <li>• The effect the sign has on the appearance of a building.</li> </ul>

District Plan	Approach
	<ul style="list-style-type: none"> <li>• Whether the sign results in additional clutter.</li> <li>• Whether there are any special circumstances or functional need for the sign.</li> <li>• Whether the sign impacts on residential amenity values.</li> <li>• The illumination or glare from digital signs.</li> <li>• The potential for obstruction, confusion, or distraction in the observance of traffic signals.</li> <li>• Any mitigation measures proposed that would lessen the impact of the sign.</li> </ul>
<b>Queenstown Lakes Proposed District Plan</b>	<p>Most signs are permitted subject to standards, including flags, temporary event signs, real estate signs, free-standing signs, sandwich board signs, new or replacement signs on buildings.</p> <p>Off-site signs (third party advertising) and signs on any listed historic heritage building are discretionary activities.</p> <p>There are several prohibited activities, including:</p> <ul style="list-style-type: none"> <li>• Billboards</li> <li>• Flashing or moving signs</li> <li>• Roof signs</li> <li>• Signs displaying sexually explicit or lewd material.</li> <li>• Signs on permanently stationed vehicles/trailers or boats.</li> <li>• Signs imitating traffic signals.</li> </ul> <p>The permitted activity standards include:</p> <ul style="list-style-type: none"> <li>• Maximum area and height of signs.</li> <li>• Maximum number of signs allowed.</li> <li>• Maximum illumination (150candelas per square meter).</li> <li>• Specific lettering height, number of characters and number of words for signs on state highways.</li> </ul> <p>There are additional sign standards specific to each zone, these include:</p> <ul style="list-style-type: none"> <li>• Commercial Zone: Billboard signs exceeding 2m<sup>2</sup> are prohibited, and digital signs are discretionary.</li> <li>• Residential areas: 1 sign allowed with a maximum area of 0.5m<sup>2</sup>, unless for the purposes of visitor accommodation, recreation grounds, nursing homes, education activities or community activities, when they can be 2m<sup>2</sup>.</li> <li>• Rural Areas: 4m<sup>2</sup> signs allowed within ski area sub zones, up to 2m<sup>2</sup> signs allowed elsewhere with no illumination.</li> </ul>
<b>New Plymouth Proposed District Plan</b>	<p>Signs required for traffic and railways are permitted and signs required for health and safety are permitted where they are legislative requirements.</p>

District Plan	Approach
	<p>Signs on or attached to a scheduled heritage building or item are permitted subject to meeting several conditions, including:</p> <ul style="list-style-type: none"> <li>• The sign must only denote the name, character or purpose of any activity undertaken within the building/item.</li> <li>• Signs do not cover architectural features.</li> <li>• Signs do not project above parapet level.</li> <li>• Signs fixtures do not damage the building. The sign is not third-party advertising.</li> <li>• The sign complies with the Signs Effects Standards: <ul style="list-style-type: none"> <li>○ Max number of one sign per site, max area of 1m<sup>2</sup>.</li> </ul> </li> </ul> <p>Third party advertising signs are only permitted within the city centre zone and are non-complying in all other zones. The sign must not be located adjacent to or along a state highway and the standards must be complied with:</p> <ul style="list-style-type: none"> <li>• Signs within 10m of a road must comply with minimum lettering standards which differ based on the speed limit of the area.</li> <li>• Signs affixed to buildings must be a maximum of 10% of the area of the building or 5m<sup>2</sup> in area (city centre zone), whichever is the lesser.</li> </ul> <p>Digital signs are restricted discretionary within the city centre zone and are non-complying in all other zones. The digital sign must not be located on or adjacent to a state highway, within 20m of an intersection or create more than 10.0 lux spill. Additionally, the sign:</p> <ul style="list-style-type: none"> <li>• Cannot display live video and can only display still images.</li> <li>• Must have a min dwell time of 7 seconds and a transition time of 0.5 seconds.</li> <li>• Cannot emit noise.</li> <li>• Must incorporate lighting control to adjust levels throughout the day.</li> </ul> <p>Matters of discretion include:</p> <ul style="list-style-type: none"> <li>• Impact on architectural features.</li> <li>• Traffic safety and driver distraction.</li> <li>• Cumulative effects.</li> </ul> <p>A catch all rule exists which is set as a Discretionary activity status.</p>

These plans were selected because:

- They have been subject to recent plan changes or a recent plan review that has addressed similar issues relating to this topic; and
- The associated Councils are of a similar scale to Wellington City and are confronting similar issues relating to this topic.

A summary of the key findings:

- All Council's control the maximum area, height, and numbers of signs. These differ based on the zone.
- The activity status of digital signs varies but the controls are similar, including controlling the dwell time, transition time, illuminance, and number of characters/words.
- All councils included provisions or matters of discretion to reduce the effects of signs on traffic safety, these included not imitating traffic signals, not obstructing any signs or view of roads, and not including any flashing.
- All councils recognise the impact of the cumulative effects of multiple signs. This is controlled by specifying the maximum percentage of a road frontage or building which can be covered by signs.
- The matters of discretion aim to ensure that signs do not adversely impact on the aesthetics of a building or the amenity values of a certain area.
- Third-party advertising signs are generally accepted within central city zones and occasionally within other business/industrial zones.

### 5.2.3 Advice received from Taranaki Whānui and Ngāti Toa Rangatira

Under Clause 4A of Schedule 1 of the RMA local authorities are required to:

- Provide a copy of any draft policy statement or plan to any iwi authority previously consulted under clause 3 of Schedule 1 prior to notification;
- Allow adequate time and opportunity for those iwi authorities to consider the draft and to supply advice; and
- Have particular regard to any advice received before notifying the plan.

As an extension of this s32(4A) requires evaluation reports prepared in relation to a proposed plan to include a summary of:

- All advice received from iwi authorities concerning the proposal; and
- The response to that advice, including any proposed provisions intended to give effect to the advice.

The District Plan Review has included significant engagement with our mana whenua partners - Taranaki Whānui ki te Upoko o te Ika and Ngāti Toa Rangatira. This has included over 100 hui and wānanga attended by Council officers over the last 12 months. This has provided a much greater understanding of mana whenua values and aspirations as they relate to the PDP.

The PDP elevates the consideration of mana whenua values in resource management processes, including:

- A new Tangata Whenua chapter which provides context and clarity about who mana whenua are and what environmental outcomes they are seeking.
- A new Sites and Areas of Significance to Māori chapter that provides greater protection for sites and areas of significance than the current District Plan.
- Integrating mana whenua values across the remainder of the plan where relevant.

This is consistent with both the City Goal of ‘Partnership with mana whenua’ in the Spatial Plan; and the recently signed Tākai Here (2022), which is the new partnership agreement between the Council and our mana whenua partners, Rūnanga o Toa Rangatira, Taranaki Whānui ki Te Upoko o Te Ika and Te Rūnanganui o Te Āti Awa.

A full copy of the advice received is attached as an addendum to the complete suite of Section 32 reports as Addendum A – Advice received from Taranaki Whānui and Ngāti Toa Rangatira.

#### 5.2.4 Consultation undertaken to date

The following is a summary of the primary consultation undertaken in respect of this topic:

Who	What	When	Relevant Issues Raised
<b>Heritage Team (WCC)</b>	Workshops	November 2020 to January 2021	<ul style="list-style-type: none"> <li>• Third party advertising detracts from the heritage building values, especially large signs/billboards.</li> <li>• Digital signs on heritage buildings should be static, avoiding changing images and colours.</li> <li>• Signage should relate to the activity on the site.</li> <li>• Current precinct guidance is supported (e.g. the Parliamentary Precinct). Design guidance for signage is supported.</li> <li>• Erection of freestanding signs on archaeological sites needs to consider impacts to site values.</li> </ul>
<b>Urban Design (WCC)</b>	Workshops	November 2020 to January 2021	<ul style="list-style-type: none"> <li>• Signs can create visual and physical clutter to the detriment of the wider urban environment.</li> <li>• Digital signs within buildings could result in visual clutter unless controlled.</li> </ul>
<b>Compliance, Monitoring Enforcement Team (WCC)</b>	Workshops	November 2020 to January 2021	<ul style="list-style-type: none"> <li>• Illuminated signs require external experts to measure with no standards within the current plan.</li> <li>• Paintings and murals on the side of buildings/objects can be defined as signs.</li> <li>• Often signs erected before applying for resource consent.</li> </ul>
<b>Parks Sport Recreation Team (WCC)</b>	Workshops	November 2020 to January 2021	<ul style="list-style-type: none"> <li>• Current provisions work well for gardens and reserves where directional and information signs are used. These are permitted activities.</li> <li>• Information signs in Botanical Gardens could require consent if heritage provisions apply.</li> <li>• Waterfront signage provisions work well.</li> <li>• Sponsorship signs on sport clubs in reserves are an issue – third party signage results in clutter.</li> </ul>
<b>Transport &amp; Street</b>	Workshops	November 2020 to	<ul style="list-style-type: none"> <li>• Signs on verandas and over footpaths need to be controlled.</li> </ul>

<b>Activities (WCC)</b>		January 2021	<ul style="list-style-type: none"> <li>Signs, especially digital signs, create driver distraction. Resource consent conditions on these signs should be consistent.</li> </ul>
<b>Resource Consent Team (WCC)</b>	Workshops	November 2020 to January 2021	<ul style="list-style-type: none"> <li>Existing provisions do not control flashing and moving signs which need regulating.</li> <li>Non-complying status for certain signs needs consideration when restricted discretionary standard exceeded.</li> <li>Allowing for small signs within rural areas could be provided for.</li> </ul>
<b>Waka Kotahi (NZTA)</b>	Workshops	November 2020 to January 2021	<ul style="list-style-type: none"> <li>NZTA is not always considered an affected party for signs on State Highways. Concern is driver distraction.</li> <li>Signs are required to be assessed on a site-by-site basis due to the differences in the immediate environment. This makes a permitted baseline difficult.</li> <li>Conditions on resource consents control aspects of the sign such as number of characters and transition time. These are designed to limit driver distraction.</li> <li>The governments 'Road to Zero' campaign requires NZTA to take a precautionary approach.</li> </ul>
<b>Go Media</b>	Workshops	November 2020 to January 2021	<ul style="list-style-type: none"> <li>Digital signs are the most prevalent form of signs.</li> <li>The current District Plan lacks clarity.</li> <li>Traffic assessments are not always necessary within 100m of an intersection.</li> </ul>
<b>QMS Media</b>	Workshops	November 2020 to January 2021	<ul style="list-style-type: none"> <li>The current District Plan is not clear regarding where and in what form signs are anticipated.</li> <li>Digital sign software is complex enough to adjust lighting levels based on lighting in the immediate environment.</li> <li>While New Zealand is not considered to be ready for signs with animations and moving images, the industry is ready and will eventually incorporate these types of signs.</li> </ul>
<b>Feedback on Draft Plan</b>	Feedback on Draft Plan, through submissions and targeted discussions	November 2021	<ul style="list-style-type: none"> <li>General support of the Signs provisions, with specific requests for technical changes. For example, requests for alterations on the permissible size of signs in certain areas.</li> <li>Changes requested to improve traffic safety, including minimum distances from traffic control devices and controls on digital signage facing the State Highway.</li> </ul>

			<ul style="list-style-type: none"> <li>• Request for specific provisions for the Airport Zone so that the designation provisions are not relied on.</li> <li>• Request for the prohibition of signage on public transport.</li> <li>• Opposition to large billboards being permitted within the Central Area.</li> <li>• Opposition to references to the Signs Design Guide.</li> </ul>
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A summary of specific feedback on this topic received during consultation on the Draft District Plan is contained in **Appendix 1**, including how it has been responded to in the Proposed District Plan. Additional detail concerning the wider consultation undertaken in preparing the Proposed District Plan is contained in the companion Section 32 Evaluation Overview Report.

In summary, the key findings arising from the consultation undertaken on this topic are:

- There was general support for the proposed sign provisions, with specific amendments requested in relation to traffic safety and standards.
- Separate provisions were requested for the Airport Zone, instead of reliance on the Airport Designation.
- There was some opposition expressed in relation to the reference of the Signs Design Guide and to large billboards in the Central Area.
- Digital signs have become the prevalent type of advertising and are not specifically captured under the current district plan provisions.
- Signs can create driver distraction and traffic safety concerns. Especially digital signs which flash and transition images. Standards should control variables such as dwell time, transition time and illuminance.
- Third party advertising is generally accepted within the central area. However, it is not anticipated on heritage buildings or within residential and open space areas.
- There is an operational need for some signs, particularly health and safety signs, locational signs, and interpretive signs. The current provisions generally allow for these.
- Cumulative effects of signs are an ongoing issue across all zones but particularly around sensitive areas such as open space areas and residential areas.
- The existing sign provisions are not always clear or consistent. Greater clarity around what is expected and where is sought by both third party and internal stakeholders.

### 5.3 Summary of Relevant Resource Management Issues

Based on the research, analysis and consultation outlined above the following issues have been identified:

Issue	Comment	Response
<b>Issue 1: Digital Signage</b>	<ul style="list-style-type: none"> <li>• Digital signs are not specifically regulated in the operative District Plan, yet these signs have recently become the dominant form of signage.</li> <li>• The monitoring report by Urban Edge Planning Ltd shows that 42% of the 153 resource consent applications between 2010 – 2020 were for digital signs. Stakeholder feedback indicates this will continue to increase.</li> <li>• The existing District Plan provisions apply to all signs, which therefore captures digital signs. However, digital signs require further guidance for plan users around variables such as illumination, transition times and flashing.</li> <li>• The location of signs in relation to intersections (the preferred location for these signs) requires potential effects in relation to traffic safety to be considered.</li> </ul>	<ul style="list-style-type: none"> <li>• Include provisions that require all digital signs to go through the resource consent process by identifying them as restricted discretionary activities.</li> <li>• A permitted activity status is not appropriate as the effects of digital signs can differ significantly based on their location and characteristics. Requiring resource consent means signs are assessed in relation to the site and the wider environment within which they are proposed to be located.</li> <li>• Include a restricted discretionary activity status to allow for a wide range of effects to be considered, including the impact on traffic safety. Allows the differences in the scale of signs to be considered.</li> </ul>
<b>Issue 2: Third Party Advertising</b>	<ul style="list-style-type: none"> <li>• Third-party advertising is used for commercial purposes and is generally appropriate within central city zones, business areas and occasionally within urban centres.</li> <li>• Third-party advertising is not considered appropriate within open spaces and reserves, on heritage buildings or objects or within residential areas but signs are being erected in these areas under the operative provisions.</li> <li>• Feedback from Council’s Parks, Sport and Recreation indicates that third party advertising is increasing within reserves and around sports clubs, which detracts from the open space and amenity values of these areas.</li> <li>• Third-party advertising on heritage buildings is also becoming more common which can adversely affect heritage values.</li> </ul>	<ul style="list-style-type: none"> <li>• Include provisions managing third-party advertising signs by only providing for them within commercial and mixed-use zones, industrial zones, and special purpose zones and excluding third-party advertising signs from natural environment overlays, residential zones, rural zones, open space and recreation zones and future urban zones.</li> <li>• Requiring all third-party advertising to go through a resource consent process is not considered feasible as there are areas where a certain scale of third-party advertising signs is expected and can be accommodated. This potentially includes on fencing around sports fields or within the central area or centres areas.</li> <li>• A restricted discretionary status within certain areas and circumstances is considered appropriate as there will be some circumstances where third-party</li> </ul>

	<ul style="list-style-type: none"> <li>• Third party advertising within residential areas is generally not appropriate, impacting on residential character and amenity. The operative District Plan does not permit third party advertising signs within residential areas.</li> </ul>	<p>advertising signs are appropriate and can be accommodated within open space/reserve areas, within residential areas and on/within heritage buildings and features.</p>
<b>Issue 3: Cumulative effect of signs</b>	<ul style="list-style-type: none"> <li>• The range of different sign types, purposes and demand for certain locations can result in some areas experiencing adverse cumulative effects from multiple signage.</li> <li>• Feedback from QMS Media highlighted third-party signs seek areas where there are high 'dwell' times and where both foot and vehicle traffic are frequent. There are a limited number of areas that meet these criteria resulting in multiple signs being erected in the same locations. This can create adverse cumulative effects and while each sign may be permitted or assessed as appropriate in its own respect, the effects of multiple signs in one location need to be addressed.</li> </ul>	<ul style="list-style-type: none"> <li>• Manage signs by setting a permitted activity standard for smaller scale signs and consider limiting the amount of a building façade that can be taken up by signs.</li> <li>• Include a matter of discretion that allows for the cumulative effects of signs to be considered when assessing applications, especially for larger scale signs.</li> </ul>
<b>Issue 4: Traffic safety</b>	<ul style="list-style-type: none"> <li>• Signs located on or adjacent to the road network or within 100m of intersections and on State Highways can result in traffic safety issues.</li> <li>• The main issue is driver distraction resulting in vehicle accidents.</li> <li>• Waka Kotahi (NZTA) has a particular interest where signs are placed including from viewing distance of a State Highway.</li> <li>• The Wellington City Transport Team has a particular interest where signs are placed within the road corridor in general.</li> </ul>	<ul style="list-style-type: none"> <li>• Manage signs within or adjacent to the road network through the resource consent process to assess the scale of the potential adverse effects and ensure appropriate regulatory responses.</li> <li>• Require resource consent within areas adjacent to roads with a speed limit 70km/h or more and require NZTA to be considered an affected party for all signs on State Highways.</li> <li>• Require resource consent for signs within 100m of an intersection to enable assessment of traffic safety impacts.</li> </ul>
<b>Issue 5: Temporary &amp; Regulation Required Signage</b>	<ul style="list-style-type: none"> <li>• Temporary signage is often required to advertise community and other events, as well as for advertising the services of shops using sandwich boards, advertising of elections and advertising of real estate.</li> <li>• These signs have the potential to create physical and visual clutter on</li> </ul>	<ul style="list-style-type: none"> <li>• Recognise the need for legislative required signs and provide for these signs as a permitted activity in the District Plan.</li> <li>• Acknowledge temporary signs in the District Plan and provide for them as a permitted activity subject to</li> </ul>

	<p>the surrounding amenity and result in safety hazards. These signs are currently managed through the Wellington Consolidated Bylaw.</p> <ul style="list-style-type: none"> <li>• Other signs are required under legislative requirements for health and safety purposes, road work purposes or construction purposes. They are critical for ensuring the health and safety of the public and those who work within certain premises. The District Plan should not unduly complicate the process for erecting these signs.</li> </ul>	<p>meeting standards for area, height, and duration.</p> <ul style="list-style-type: none"> <li>• Any temporary digital signs should trigger the digital signs rules. This will allow the existing processes through the bylaw and councils plans and policies for temporary signs to continue.</li> <li>• Ensure that legislative signs can be erected as required.</li> </ul>
<p><b>Issue 6: Replacing existing signs with Digital Signs.</b></p>	<ul style="list-style-type: none"> <li>• Feedback and monitoring confirms some existing static signs are being replaced with digital signs, due to the technology becoming cheaper and a more preferable form for advertisers.</li> <li>• Static signs on Adshel Bus Shelters are being replaced by digital signs. Sometimes consent is not sought for these conversions as the signs are being replaced with signs of the same dimensions – yet different form.</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure that the replacement of existing signs capture digital signs through the resource consent process in order to assess the effects.</li> <li>• Digital signs can have effects which go beyond the effects of a traditional static sign. Allowing conversions to take place as a permitted activity could potentially result in additional adverse amenity effects.</li> <li>• Ensure all digital signs, regardless of whether new or conversion of existing, are required to be assessed through resource consent process.</li> </ul>

## 6. Evaluation of the Proposal

This section of the report evaluates the objectives of the proposal to determine whether they are the most appropriate means to achieve the purpose of the RMA, as well as the associated policies, rules, and standards relative to these objectives. It also assesses the level of detail required for the purposes of this evaluation, including the nature and extent to which the benefits and costs of the proposal have been quantified.

### 6.1 Scale and Significance

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

The level of detail undertaken for this evaluation has been determined by assessing the scale and significance of the environmental, economic, social and cultural effects anticipated through introducing and implementing the proposed provisions (i.e. objectives, policies and rules) relative to a series of key criteria.

Based on this the scale and significance of anticipated effects associated with this proposal are identified below:

Criteria	Scale/Significance			Comment
	Low	Medium	High	
Basis for change	✓			<ul style="list-style-type: none"> <li>Forms part of the wider District Plan review and implementation of the national planning standard requirements.</li> <li>The provisions require updating to address the growth in digital sign media and address the associated effects.</li> <li>The District Plan review also includes new overlay chapters that are sensitive to the effects of signage and therefore the provisions need to be updated.</li> </ul>
Addresses a resource management issue	✓			<ul style="list-style-type: none"> <li>While provisions regulating signs already exist in the District Plan this assessment has identified a need to update the provisions to manage digital signs, address the conversion of existing static signs to digital and temporary signs.</li> </ul>
Degree of shift from the status quo	✓			<ul style="list-style-type: none"> <li>The existing district plan contains provisions regulating signs across most zones and relevant topics.</li> <li>The updates represent a refinement of provisions rather than a substantial shift.</li> <li>An analysis of the operative provisions showed most applications were restricted discretionary which is considered appropriate to capture the relevant matters of discretion and is reflected in the proposed rule framework.</li> <li>The consolidated chapter of sign provisions is intended to provide a clear regulatory framework at a district wide scale.</li> </ul>
Who and how many will be affected/ geographical scale of effect/s	✓			<ul style="list-style-type: none"> <li>The provisions will apply at a district wide scale. However, the analysis of the resource consent applications shows the majority of sign applications occur within the centres and central</li> </ul>

Criteria	Scale/Significance			Comment
	Low	Medium	High	
				area zones reducing the potential scope of effected parties.
Degree of impact on or interest from iwi/ Māori	✓			<ul style="list-style-type: none"> <li>Only a limited degree of impact or interest from iwi in relation to signs and the impact of signs on sites and areas of significance to Māori.</li> </ul>
Timing and duration of effect/s	✓			<ul style="list-style-type: none"> <li>Effects will be ongoing.</li> <li>Once beyond challenge the operative provisions will have an ongoing effect until reviewed as part of the Council's statutory requirements to undertake a plan review.</li> </ul>
Type of effect/s	✓			<ul style="list-style-type: none"> <li>There will be a limited degree of impact on the social, economic, and cultural wellbeing of people, compared to the existing ODP framework.</li> </ul>
Degree of risk and uncertainty	✓			<ul style="list-style-type: none"> <li>The proposed signs framework is intended to provide a clearer more detailed regulatory approach including appropriate definitions for types of signs as per the National Planning Standards.</li> <li>Thorough stakeholder engagement combined with comprehensive background monitoring and community consultation has assisted in the refinement of the provisions and reduce risk and uncertainty.</li> </ul>

Overall, the scale and significance of the proposed provisions are considered to be low for the following reasons:

- The degree of shift from the existing signs provisions and controls is not significant;
- While the existing sign provisions do not specifically provide for digital signs, they are generally captured and therefore the shift is focused on addressing the specific affects associated with digital media signage;
- Most topic and zone chapters already include sign provisions and regulation, the proposed shift will address the national planning standards format by introducing these as a consolidated chapter and address the new overlay topic chapters that council is required to include; and

- The degree of regulatory control will be similar to the existing plan through similar use of permitted standards and restrict discretionary activity status for activities to manage effects.

Consequently, a high level evaluation of these provisions has been identified as appropriate for the purposes of this report.

## 6.2 Quantification of Benefits and Costs

Section 32(2)(b) requires that, where practicable, the benefits and costs of a proposal are to be quantified.

Based on the assessment of the scale and significance of the proposed provisions in section 6.1, specific quantification of the benefits and costs in this report is considered neither necessary, beneficial nor practicable in relation to this topic. Instead, this report identifies more generally where any additional costs or cost may lie.

## 7. Overview of Proposals

The proposed provisions relevant to this topic are set out in detail in the ePlan and should be referenced to in conjunction with this evaluation report.

In summary, the proposed provisions include:

- Definitions
  - A set of relevant definitions, including:
    - Sign (National Planning Standards)
    - Digital sign;
    - Freestanding sign;
    - Illuminated sign;
    - Official sign (National Planning Standards);
    - On-site signs;
    - Temporary sign; and
    - Third-Party signs.
- An objective that addresses:
  - The role of signs and the need to advertise and inform while managing adverse effects on amenity.
- Six policies that:
  - Allow appropriate signage across Wellington City where the character and amenity is maintained;
  - Allow for official and regulatory signs and manage the location of third-party signs in relation to the sensitivity of the surrounding amenity;
  - Provide for digital signage where amenity and safety is not compromised;
  - Enable signs on historic heritage buildings and sites where the historic value is maintained;

- Enable signs on scheduled archaeological sites and sites of significance that minimise disturbance and do not detract from the archaeological values;
- Manage signage in the airport zone and provide for signs in the Wellington stadium zone recognising the different requirements of these areas.
- A rule framework that manages land use activities as follows:
  - Official signs – identified as permitted activities in all zones subject to standards including maximum area. The activity elevates to restricted discretionary status when the standards are not met.
  - Temporary signs - identified as permitted activities in all zones subject to standards including maximum area and duration. The activity elevates to restricted discretionary status when the standards are not met.
  - On-site signs – identified as permitted activities in all zones subject to meeting standards in relation to maximum area, number per site and, and location and form. Signs are restricted discretionary activities when the standards are not met.
  - Third-party signs – identified as permitted activities subject to a range of standards when located outside residential, rural, and open space zones. Where the standards are not met the activity elevates to restricted discretionary. Third-party signs within all residential, rural, and open space zones are identified as Discretionary. Third-party signs in the airport zone are non-complying activities where compliance with the Miramar South Precinct is not met.
  - Digital signs – are restricted discretionary activities when located outside residential, rural and open space zones, and discretionary activities when the identified standards cannot be met. Digital signs within all residential, rural and open space zones are non-complying activities.
  - Signs on heritage buildings or heritage area – identified as permitted activities subject to standards. Signs are restricted discretionary activities when standards are not met.
  - Signs within a scheduled archaeological site or within a scheduled site or area of significance to Māori are permitted in accordance with standards. Signs are restricted discretionary activities when a standard is not met.
  - A discretionary activity rule for all other signs not otherwise provided for.
- A supporting set of standards that address:
  - Maximum area of any sign;
  - Maximum total area of signs;
  - Maximum number of signs;
  - Maximum height of freestanding signs;
  - Signs located on a building or structure;
  - Veranda signs;
  - Traffic safety;

- Digital signs;
- Illuminated signs;
- Temporary signs;
- Wellington regional stadium signs;
- Signs on a heritage building or structure;
- Signs within archaeological sites or within sites and areas of significance to Māori;
- Airport Zone signs
- Supporting Design Guide for Signs that;
  - identifies the intent, outcomes and guidelines for signage;
  - addresses the scale, visual dominance, design quality, illuminated and digital signs and maintenance.

## 8. Evaluation of Proposed Objectives

### 8.1 Introduction

Section 32(1)(a) of the RMA requires that the evaluation report examine the extent to which the objectives of the proposal are the most appropriate way to promote the sustainable management of natural and physical resources.

An examination of the proposed objectives along with reasonable alternatives is included below, with the relative extent of their appropriateness based on an assessment against the following criteria:

1. Relevance (i.e. Is the objective related to addressing resource management issues and will it achieve one or more aspects of the purpose and principles of the RMA?)
2. Usefulness (i.e. Will the objective guide decision-making? Does it meet sound principles for writing objectives (i.e. does it clearly state the anticipated outcome?)
3. Reasonableness (i.e. What is the extent of the regulatory impact imposed on individuals, businesses or the wider community? Is it consistent with identified tangata whenua and community outcomes?)
4. Achievability (i.e. Can the objective be achieved with tools and resources available, or likely to be available, to the Council?)

## 8.2 Evaluation of Objective SIGN-O1

While not specifically required under s32, it is appropriate to also consider alternative objectives to those currently included in the Proposed District Plan, so as to ensure that the proposed objectives are the most appropriate to achieve the purpose of the RMA.

For the purposes of this evaluation, the Council has considered two potential objectives:

1. The proposed objective
2. The current most relevant objective - the status quo.

<b>Evaluation of Objectives</b>
<p><b>Proposed objective:</b></p> <p><b>SIGN-O1: Role of Signage</b></p> <p>Signs support the needs of the community to advertise and inform while the effects on local amenity are effectively managed.</p>
<p><b>General intent:</b></p> <p>The general intent is to:</p> <ul style="list-style-type: none"> <li>• Provide for a range of sign types across the city;</li> <li>• Manage the effects of the various different forms of signage; and</li> <li>• Maintain the amenity of the different zones and overlays.</li> </ul>
<p><b>Other potential objectives:</b></p> <p>Status quo:</p> <ul style="list-style-type: none"> <li>• <b>Objective 4.2.14</b> – To achieve signage that is well integrated with and sensitive to the receiving environment and that maintains public safety.</li> <li>• <b>Objective 6.2.6</b> – To achieve signage that is well integrated with and sensitive to the receiving environment and that maintains public safety.</li> <li>• <b>Objective 10.2.6</b> - To ensure signage is designed and located in a way which will not detract from the character of the locality, and will not cause a traffic hazard.</li> <li>• <b>Objective 12.2.10</b> – To achieve signage that is well integrated with and sensitive to the receiving environment, and that maintains public safety.</li> <li>• <b>Objective 33.2.7</b> - To achieve signage that is well integrated with, and sensitive to, the receiving environment and that maintains public safety.</li> </ul>

	Preferred objective	Status quo
<b>Relevance:</b>		
Addresses a relevant resource management issue	Yes – the objective recognises and addresses the issues identified in section 4.3 above.	No – the objectives are topic and zone based and in some cases topic chapters do not include an objective for signs. As such, an objective is only identified within Residential, Centres, Airport Precinct, Central Area and Business Areas chapters. The rest of the district plan chapters lack an objective for signs.
Assists the Council to undertake its functions under s31 RMA	Yes - the objective achieves the requirement under s31(1)(a) to manage the effects of the use, development or protection of land and associated natural and physical resources of the district.	No – while the wording of the objective is broadly sufficient, the objectives are limited to only five of the 18 topic chapters. This means the objectives are absent from topic chapter such as Historic Heritage and therefore only partly achieve the requirement under s31(1) to achieve integrated management of the use, development or protection of land and associated natural and physical resources of the district.
Gives effect to higher level documents	Yes – the objective gives effect to the required higher-level documents identified in Section 3.	No – the objectives do not give effect to the required higher-level documents. Particularly, in relation to the natural environment overlay chapters including Natural Features and Landscapes.
<b>Usefulness:</b>		
Guides decision-making	Yes – the objective provides clear direction on the purpose of the SIGN topic and the outcomes sought for the SIGN chapter.	No – the existing objectives are absent from some topic chapters and results in an unclear direction for plan users, with some zones having a clear outcome while other chapters are silent.
Meets best practice for objectives	Yes – the objective clearly states the intended outcome and the desired end state which is consistent with national best practice.	No - most of the intended outcome in the objective direction is contained within the explanatory text under the objective which does not have statutory weight and is not current best practice. Furthermore, the objectives are spread inconsistently throughout some topic chapters rather than consolidated within a single SIGN chapter.

<b>Reasonableness:</b>		
Will not impose unjustifiably high costs on the community/parts of the community	Yes – the objective is balanced to avoid imposing unjustifiably high costs on the community.	Yes – the objectives are generally balanced to avoid imposing unjustifiably high costs on the community.
Acceptable level of uncertainty and risk	Yes – there is minimal risk as the objective provides certainty and is not a significant shift from the status quo.	Partially – provides guidance in the topic chapters that the objectives are including in, but not for the balance of chapters.
<b>Achievability:</b>		
Consistent with identified tangata whenua and community outcomes	Yes - the proposed objective is considered consistent with identified tangata whenua and community outcomes.	Yes – the proposed objectives are consistent with identified tangata whenua and community outcomes.
Realistically able to be achieved within the Council's powers, skills and resources	Yes – the proposed objective is achievable and is a topic in the national planning standards zone framework.	Yes – evidenced by existing provisions in the operative plan. Although feedback has highlighted that implementation is limited for addressing effects of emerging digital media.
<b>Summary</b>		
<p>The above analysis indicates that the proposed objective is the most appropriate way of achieving the purpose of the RMA.</p> <p>The proposed objective addresses relevant resource management issues and is in line with national best practice. The proposed provisions also provide certainty and guidance to decision makers and plan users regarding the desired outcomes, are consistent with the wider PDP's strategic objectives and are balanced against the other competing directions.</p> <p>As shown, the existing objectives are not appropriate for the identified outcomes of the SIGN chapter.</p>		

## **9. Evaluation of Reasonably Practicable Options and Associated Provisions**

### **9.1 Introduction**

Under s32(1)(b) of the RMA, reasonably practicable options to achieve the objective/s associated with this proposal need to be identified and examined. This section of the report evaluates the proposed policies and rules, as they relate to the associated objective.

The technical and consultation input used to inform this process is outlined in section 5 of this report.

### **9.2 Evaluation method**

For each potential approach an evaluation has been undertaken relating to the costs, benefits and the certainty and sufficiency of information (as informed by section 5 of this report) in order to determine the effectiveness and efficiency of the approach, and whether it is the most appropriate way to achieve the relevant objective.

This evaluation is contained in the following sections.

### 9.3 Provisions to achieve Objective SIGN-O1

For the purpose of this evaluation, the Council has considered the following potential options:

1. The proposed provisions; and
2. The status quo.

Evaluation of provisions to achieve Objective SIGN-O1																																																
Objective: SIGN-O1 Role of Signs Signs support the needs of the community to advertise and inform while the effects on local amenity are effectively managed.																																																
Option 1: Proposed approach (recommended)	Costs	Benefits	Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions																																													
<p><b>SIGN-O1</b></p> <table border="1"> <thead> <tr> <th>Policies</th> <th>Rules</th> <th>Standards</th> </tr> </thead> <tbody> <tr> <td>SIGN-P1</td> <td>SIGN-R1</td> <td>SIGN-S1</td> </tr> <tr> <td>SIGN-P2</td> <td>SIGN-R2</td> <td>SIGN-S2</td> </tr> <tr> <td>SIGN-P3</td> <td>SIGN-R3</td> <td>SIGN-S3</td> </tr> <tr> <td>SIGN-P4</td> <td>SIGN-R4</td> <td>SIGN-S4</td> </tr> <tr> <td>SIGN-P5</td> <td>SIGN-R5</td> <td>SIGN-S5</td> </tr> <tr> <td>SIGN-P6</td> <td>SIGN-R6</td> <td>SIGN-S6</td> </tr> <tr> <td></td> <td>SIGN-R7</td> <td>SIGN-S7</td> </tr> <tr> <td></td> <td>SIGN-R8</td> <td>SIGN-S8</td> </tr> <tr> <td></td> <td></td> <td>SIGN-S9</td> </tr> <tr> <td></td> <td></td> <td>SIGN-S10</td> </tr> <tr> <td></td> <td></td> <td>SIGN-S11</td> </tr> <tr> <td></td> <td></td> <td>SIGN-S12</td> </tr> <tr> <td></td> <td></td> <td>SIGN-S13</td> </tr> <tr> <td></td> <td></td> <td>SIGN-S14</td> </tr> </tbody> </table>	Policies	Rules	Standards	SIGN-P1	SIGN-R1	SIGN-S1	SIGN-P2	SIGN-R2	SIGN-S2	SIGN-P3	SIGN-R3	SIGN-S3	SIGN-P4	SIGN-R4	SIGN-S4	SIGN-P5	SIGN-R5	SIGN-S5	SIGN-P6	SIGN-R6	SIGN-S6		SIGN-R7	SIGN-S7		SIGN-R8	SIGN-S8			SIGN-S9			SIGN-S10			SIGN-S11			SIGN-S12			SIGN-S13			SIGN-S14	<p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>There will be little to no environmental cost as the provisions are focused on managing the effects of signs district wide, addressing all different forms, purposes and types relative to the sensitivity of the subject location.</li> </ul>	<p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>Signs in sensitive natural environment overlays are managed through the consenting pathways.</li> <li>Signs within urban environments manage the impact on amenity through standards. This will result in the potential environmental effects being identified and addressed at a consistent district wide scale.</li> <li>Controls on the effects associated with digital signs will be managed to maintain amenity and traffic safety.</li> <li>Signs in sensitive areas (residential, rural and overlay areas) will be managed at a district wide scale to maintain amenity at the appropriate level. Signs with significant effects</li> </ul>	<p>It is considered that there is certain and sufficient information on which to assess the proposed provisions.</p> <p>The proposed provisions have been consulted on with the public and key stakeholders and have been refined to address key issues raised during consultation. The proposed approach is generally supported by the community.</p>
Policies	Rules	Standards																																														
SIGN-P1	SIGN-R1	SIGN-S1																																														
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	<p><b>Economic</b></p> <ul style="list-style-type: none"> <li>• The costs to commercial sign companies are unlikely to change significantly as resource consent applications are already required for digital signage.</li> <li>• Similarly, third-party signage within the urban areas has a permitted activity starting point. Signage in open space or sensitive overlay areas would require consent which could result in increased cost but equally are not locations of particular interest to commercial sign providers.</li> </ul> <p><b>Social</b></p> <ul style="list-style-type: none"> <li>• It is unlikely the provisions will result in any discernible social cost given the provisions are focused on</li> </ul>	<p>are classified as non-complying to enable a full assessment (limited to restricted discretionary under the status quo provisions).</p> <p><b>Economic</b></p> <ul style="list-style-type: none"> <li>• Greater clarity to plan users for the various different forms of signage, in terms of scale, location and intended outcome. Avoids uncertainty and unnecessary expense as the rule framework is much clearer, consolidated and supported with specific standards and matters of discretion.</li> <li>• Permitted standards provide for signs without need for resource consent thus avoiding costs associated with preparing and submitting applications.</li> <li>• Costs will be imposed through the resource consent process for digital signage applications. This will be experienced mostly by commercial applicants. However, this is balanced with clearer direction on expected outcomes, locations, and restricted matters of discretion.</li> </ul> <p><b>Social</b></p> <ul style="list-style-type: none"> <li>• The proposed provisions allow a range of signs that support commercial and private interests, enabling people to provide for their social well-being, while managing</li> </ul>	
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	<p>maintaining the amenity of the surrounding area.</p> <p><b>Cultural</b></p> <ul style="list-style-type: none"> <li>No specific cultural costs associated with the proposed signs provisions were identified.</li> </ul>	<p>potential adverse effects and maintaining surrounding amenity.</p> <ul style="list-style-type: none"> <li>Providing for regulatory and official signs supporting information and health and safety supports ongoing social well-being of the community.</li> <li>Some signs in the rural areas will be permitted contributing to the community well-being and character of the rural environment. Larger or third-party advertising will require resource consent.</li> </ul> <p><b>Cultural</b></p> <ul style="list-style-type: none"> <li>Recognition of appropriate signage within sites and areas of significance to tangata whenua has been incorporated into the policy framework.</li> </ul>	
<p><b><u>Effectiveness and efficiency</u></b></p>	<p><b><i>Effectiveness</i></b></p> <p>The proposed provisions are the most appropriate method of meeting the objective for SIGNs. The objective is focused on maintaining the amenity of all zones and overlays while recognising and providing for a range of sign types and formats.</p> <p>The objective provides a clear direction on the anticipated outcome and the proposed policies, rules and standards provide a practical and balanced framework to achieve these outcomes.</p>	<p><b><i>Efficiency</i></b></p> <p>The proposed provisions are the most efficient method of meeting the objective for the SIGN chapter by providing a consolidated chapter of provisions with consistent regulatory controls and at a district wide scale. As identified above, the benefits outweigh the costs.</p>	
<p><b><u>Overall evaluation</u></b></p>	<p>This option is the most appropriate way to achieve the preferred objective by representing regulatory certainty and an effective provision of social and economic well-being.</p>		

	<p>The proposed provisions are the most appropriate way to achieve the objective because they are effective and efficient. They achieve regulatory certainty and enable people and communities to provide for their social, economic, and cultural well-being.</p> <p>It is considered that this option will achieve the objectives because:</p> <ul style="list-style-type: none"> <li>• Appropriate signs are permitted subject to standards, signs with potential adverse effects are managed with matters of discretion clearly identified and inappropriate signs are discouraged through the proposed framework of provisions that: <ul style="list-style-type: none"> <li>○ Addresses signs within a single consolidated chapter with policies that provide clear direction for managing potential effects depending on the type and location of the sign and the sensitivity of the receiving environment;</li> <li>○ Recognises the importance of signs providing information or to meet official or regulatory requirements and enables these as a permitted activity;</li> <li>○ Provides for new third-party advertising signs as a permitted activity within commercial areas subject to standards to maintain the amenity of these areas and requires resource consent for the more sensitive areas to manage the effects on amenity;</li> <li>○ Specifically recognises digital signs and manages the potential effects through restricted discretionary matters;</li> <li>○ Addresses illuminated signs and manages their effects while maintaining the character of the surrounding environment;</li> <li>○ Addresses potential impacts of signs on the values of heritage, archaeological sites and sites of significance to Māori; and</li> <li>○ Recognises the unique environments of the stadium and airport zone and manages signage relative to those particular sites.</li> </ul> </li> </ul> <p>The proposed provisions align with and give effect to higher order documents and legislation.</p>		
<b>Option 2: Status Quo</b>	<b>Costs</b>	<b>Benefits</b>	<b>Risk of Acting / Not Acting</b> if there is uncertain or insufficient information about the subject matter of the provisions
<u><b>Policies and rules as outlined in section 5.2.1</b></u>	<p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>• The current provisions do not sufficiently protect the intended outcomes identified within the SIGN chapter. Provisions do not recognise the identified values and amenity of all overlay areas and do not cover all</li> </ul>	<p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>• The status quo provisions would regulate most signs within nine topic or zone areas, thereby enabling the assessment of signs in most zones in the PDP. However, provisions would not apply district wide or</li> </ul>	<p>It is considered that there is certain and sufficient information on which to base the proposed policies and methods.</p>

	<p>the zone areas within the proposed district plan.</p> <ul style="list-style-type: none"> <li>• Digital, flashing or moving signs are not specifically controlled and do not recognise sensitive overlay areas.</li> <li>• The impacts of third-party advertising on recreation grounds are not controlled.</li> <li>• The impact of signs on residential zoned areas remain limited to restricted discretionary status which prevents full assessment of the impacts on residential amenity.</li> </ul> <p><b>Economic</b></p> <ul style="list-style-type: none"> <li>• Increased costs through resource consent process where uncertainty remains around digital signs.</li> <li>• Continued cost to the public for monitoring of illuminated signs and digital signs which have no specific standard.</li> </ul> <p><b>Social</b></p> <ul style="list-style-type: none"> <li>• The impact on social well-being through lack of specific controls on digital signs which can result in adverse effects on amenity and impacts on safe operation of the road network.</li> <li>• Continued cost associated with proposed signs in rural areas which</li> </ul>	<p>address the new zones and overlays areas.</p> <p><b>Economic</b></p> <ul style="list-style-type: none"> <li>• Permitted standards provide for signs without need for resource consent thus avoiding costs associated with preparing and submitting applications.</li> </ul> <p><b>Social</b></p> <ul style="list-style-type: none"> <li>• Impacts on the value of heritage buildings and areas would be managed through the resource consent process, albeit digital signage and third-party signs would be permitted.</li> </ul>	
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	<p>require resource consent, whether related to the site or third-party.</p> <p><b>Cultural</b></p> <ul style="list-style-type: none"> <li>• Indirect cost from the impact on heritage sites from permitted rule that does not exclude digital signs or third-party signs.</li> </ul>	<p><b>Cultural</b></p> <ul style="list-style-type: none"> <li>• Some protection on sites of significance.</li> </ul>	
<p><b><u>Effectiveness and efficiency</u></b></p>	<p><b>Effectiveness</b></p> <p>The status quo provisions are not considered the most appropriate method of meeting the objective for SIGNs. The existing provisions do not apply to all chapters and do not recognise new chapters and district wide overlays. Furthermore, they do not distinguish the various types of signage in all cases which limits the ability to maintain the amenity of all zones and overlays which is the intent of the objective.</p>	<p><b>Efficiency</b></p> <p>The current provisions are inefficient as they do not distinguish between the different types of signage and are spread through various zone based chapters. Digital signage is not directly recognised which results in some uncertainty on the intended outcome for some forms of signage in different locations.</p>	
<p><b><u>Overall evaluation</u></b></p>	<p>The existing provisions (policies and rules) are not considered effective in achieving the objectives because:</p> <ul style="list-style-type: none"> <li>• They do not apply district wide across all zones and topic areas;</li> <li>• The existing provisions do not address digital signage or the effects associated with them;</li> <li>• They do not distinguish third-party or digital signage for permitted signs on heritage buildings; and</li> <li>• They do not apply to new zones or the more sensitive overlay areas and therefore cannot maintain amenity as intended by the objective.</li> </ul> <p>The current provisions are therefore not the most efficient and effective way of achieving the objectives, and do not give effect to higher order documents and legislation.</p>		

## 10. Conclusion

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

- Gives effect to higher order documents, including s31 of the RMA and the National Planning Standards;
- Is the most effective and efficient way to achieve the purpose of the Act and the Proposed District Plan's strategic objectives; and
- Addresses the identified issues.

## Appendix 1: Feedback on Draft District Plan 2021

Who	Feedback Received	Response
Waka Kotahi NZ Transport Agency	<ul style="list-style-type: none"> <li>• Generally supportive.</li> <li>• Requests the inclusion of 'cyclists and pedestrians' in SIGN-P1, which focuses on the safety and efficiency of the transport network.</li> <li>• SIGN-P2: include that '[digital] signs are not visible from the State Highway'.</li> <li>• SIGN-S1 and SIGN-S2: requests a maximum area of 5m<sup>2</sup> for signs facing the state highway.</li> <li>• SIGN-S5: requests no internally illuminated signs visible from any intersection with the state highway.</li> </ul>	<p><b>Changes made for the following reasons:</b></p> <ul style="list-style-type: none"> <li>• The requested amendments aligned with the intent of the Signs chapter and resulted in clearer Policies and Standards.</li> <li>• The changes still allow for Signs, whilst ensuring that traffic safety and efficiency is not compromised.</li> </ul>
Waka Kotahi NZ Transport Agency	<ul style="list-style-type: none"> <li>• Generally supportive.</li> <li>• SIGN-R6: requests any digital sign facing the state highway is a non-complying activity.</li> <li>• Requested minimum distances from traffic control devices.</li> <li>• SIGN-R10: requests the time limit for temporary signs to be one week prior to event and removal before 48 hours afterwards.</li> </ul>	<p><b>Changes not made for the following reasons:</b></p> <ul style="list-style-type: none"> <li>• The discretionary activity status of digital signs on the state highway network is sufficient for assessing safety.</li> <li>• The standards already provide sufficient controls for signs within intersections and around traffic control devices, including SIGN-S7.3.</li> <li>• The suggested time limits do not provide sufficient time for advertisement or removal.</li> </ul>

Heritage NZ Pouhere Taonga Takiwa o Te Putahi a Maui	<ul style="list-style-type: none"> <li>• Supportive.</li> <li>• SIGN-P2: requests compatibility with overlays and heritage be a factor listed.</li> <li>• SIGN-S12: requests reference to heritage areas.</li> </ul>	<p><b>Changes made for the following reasons:</b></p> <ul style="list-style-type: none"> <li>• The changes provided clarity and make the provisions easier to understand.</li> </ul>
Wellington International Airport Limited	<ul style="list-style-type: none"> <li>• Noted that the signage provisions replicated the Airport Designation provisions.</li> <li>• SIGN-P2: requests an amendment to consider aircraft safety.</li> </ul>	<p><b>Changes made for the following reasons:</b></p> <ul style="list-style-type: none"> <li>• The airport zone is now included in the provisions and the signage provisions do not rely on the designation provisions. This means there is no replication and the signage provisions within the airport are clearer.</li> <li>• Aircraft safety is an important consideration to add.</li> </ul>
The Fuel Companies	<ul style="list-style-type: none"> <li>• Supports the definition of Official Signs.</li> </ul>	<p><b>Changes not made for the following reasons:</b></p> <ul style="list-style-type: none"> <li>• No changes necessary.</li> </ul>
Paul Van Houtte	<ul style="list-style-type: none"> <li>• Requests that commercial advertising is not allowed on public transport.</li> </ul>	<p><b>Changes not made for the following reasons:</b></p> <ul style="list-style-type: none"> <li>• Public transport is a legitimate place for advertising signs. These support the economic well-being of Wellington City.</li> <li>• The proposed signage provisions do not apply to transportation vehicles and the current provisions adequately control signage at bus stops/train stations etc.</li> </ul>
Sky Sigal	<ul style="list-style-type: none"> <li>• Only allowing one sign on rural properties could be problematic for way finding.</li> </ul>	<p><b>Changes made for the following reasons:</b></p> <ul style="list-style-type: none"> <li>• Wayfinding is now excluded from SIGN-S3 to allow for wayfinding on larger rural properties.</li> </ul>

Kay Larsen	<ul style="list-style-type: none"> <li>• Opposes large digital billboards in the central area and concerned about the impact of digital billboards on traffic safety.</li> </ul>	<p><b>Changes not made for the following reasons:</b></p> <ul style="list-style-type: none"> <li>• The proposed provisions for Signs in the Central Area are in keeping with provisions in other District Plans. Signage in the Central Area is reasonably expected. The proposed provisions provide a sufficient level of restrictions.</li> </ul>
Woolworths New Zealand Limited	<ul style="list-style-type: none"> <li>• Requests diagrams to help determine how to calculate the area of a sign.</li> <li>• Requests increases to the permitted area of signs in the Neighbourhood Centre, Local Centre, and Commercial Zones.</li> <li>• Requests that the maximum number of signs along street frontages is increased.</li> <li>• Does not support reference to the Signs Design Guide.</li> </ul>	<p><b>Changes not made for the following reasons:</b></p> <ul style="list-style-type: none"> <li>• The calculation of the area of a sign includes the whole sign, and frame.</li> <li>• The proposed provisions allow for a permitted level of signs and resource consent can be applied for if these provisions are proposed to be breached.</li> <li>• The Signs Design Guide assists in ensuring signs which need resource consent are of good quality design.</li> </ul>
Woolworths New Zealand Limited	<ul style="list-style-type: none"> <li>• Assessment of signage in the Commercial and Mixed-use Zones needs to consider corporate branding.</li> <li>• Points out that there is no reference to the Metropolitan Centre Zone in the Signs chapter.</li> </ul>	<p><b>Changes made for the following reasons:</b></p> <ul style="list-style-type: none"> <li>• There was no reference to the Metropolitan Centre Zone. This was amended.</li> <li>• Corporate branding is important and has been allowed for.</li> </ul>
CentrePort Limited	<ul style="list-style-type: none"> <li>• There are no specific PORTZ Zone signage provisions.</li> </ul>	<p><b>Changes not made for the following reasons:</b></p> <ul style="list-style-type: none"> <li>• No specific provisions for the PORTZ zone are required in relation to Signs as the current provisions adequately address signage within the Port Zone.</li> </ul>