

Submission on Notified Proposal for Plan, Change or Variation

Clause 6 of Schedule 1, Resource Management Act 1991

To: Timaru District Council

Name of submitter:

Out Of Home Media Association of Aotearoa

.....
[State full name]

This is a submission on the following proposed plan or on a change proposed to the following plan or on the following proposed variation to a proposed plan or on the following proposed variation to a change to an existing plan) (the 'proposal'):

Proposed Timaru District Plan

.....
[State the name of proposed or existing plan and (where applicable) change or variation].

I ~~could~~/could not* gain an advantage in trade competition through this submission.

[*Select one.]

~~*I am/am not† directly affected by an effect of the subject matter of the submission that~~

~~(a) adversely affects the environment; and~~

~~(b) does not relate to trade competition or the effects of trade competition.~~

[*Delete or strike through entire paragraph if you could not gain an advantage in trade competition through this submission.]

[†Select one.]

The specific provisions of the proposal that my submission relates to are: [Give details]

Refer attached submission

My submission is: [Include whether you support or oppose the specific provisions or wish to have them amended; and reasons for your views]

[If your submission relates to a proposed plan prepared or changed using the collaborative planning process, you must indicate the following:

- Where you consider that the proposed plan or change fails to give effect to a consensus position and therefore how it should be modified; or
- In the case that your submission addresses a point on which the collaborative group did not reach a consensus position, how that provision in the plan should be modified.]

.....
Refer attached submission

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I seek the following decision from the local authority: *[Give precise details as this is the only part of your submission that will be summarised in the summary of decisions requested]*

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Refer attached submission
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I wish ~~(or do not wish)~~ to be heard in support of my submission.

*[*In the case of a submission made on a proposed planning instrument that is subject to a streamlined planning process, you need only indicate whether you wish to be heard if the direction specifies that a hearing will be held.]*
[†Select one.]

***If others make a similar submission, I will consider presenting a joint case with them at a hearing.**

*[*Delete if you would not consider presenting a joint case.]*

Signature of submitter (or person authorised to sign on behalf of submitter)

[A signature is not required if you make your submission by electronic means]

Date 15/12/2022

Electronic address for service of submitter: ablomfield@bentley.co.nz

Telephone: 0211339309

Postal address (or alternative method of service under s352 of the Act):
C/ Bentley & Co Ltd, PO Box 4492, Shortland Street, Auckland 1140

Contact person: *[name and designation, if applicable]* Anthony Blomfield

Note to person making submission

1. If you are making a submission to the Environmental Protection Authority, you should use form 16B. If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.
2. Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):
 - It is frivolous or vexatious:
 - It discloses no reasonable or relevant case:
 - It would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
 - It contains offensive language:
 - It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialist knowledge or skill to give expert advice on the matter.

**SUBMISSION ON THE PROPOSED TIMARU DISTRICT PLAN
UNDER CLAUSE 6 OF THE FIRST SCHEDULE TO THE
RESOURCE MANAGEMENT ACT 1991**

To: Timaru District Council
PO Box 522
Timaru 7940

Name of submitter: Out Of Home Media Association of Aotearoa (“**OOHMAA**”)

Address: C/- Bentley & Co Limited,
PO Box 4492,
Shortland Street,
Auckland 1140
Attn: Anthony Blomfield

1. This is a submission on the following proposed plan:
 - Proposed Timaru District Plan (“**Proposed Plan**”)
2. OOHMAA could not gain an advantage in trade competition through this submission.
3. This submission relates to the Proposed Timaru District Plan in its entirety, but in particular:
 - Part 2 – General District-wide matters relating to Signs.

Introduction

4. OOHMAA is a non-profit industry body which represents New Zealand’s largest ‘Out of Home’ Media companies.
5. OOHMAA is focused on leadership, standardisation, and innovation. Members of OOHMAA include out-of-home media operators (JCDecaux, oOh!media, MediaWorks, Jolt, Media 5, Ad-vantage Media, Vast Billboards and Bekon Media), and a range of organisations which are affiliated with or support the industry overall. The members of OOHMAA collectively contribute up to 76% of the total industry revenue.
6. OOHMAA and its members are regularly involved in plan-making and resource consent processes, in an attempt to ensure that any regulation will:
 - a. Result in good environmental outcomes and represent sound resource management practice;
 - b. Be workable, efficient and effective in terms of process;

- c. Be equitable in terms of recognising and providing for all interests which may be affected by the OOHM Industry; and
- d. Be consistent nationwide.

The Out of Home Media Industry

- 7. In essence, the Out of Home Media (“**OOHM**”) industry (previously referred to as ‘outdoor advertising’) involves the conveying of advertising and community messages to the general public by means of (generally large format) graphic messages.
- 8. OOHM is a form of media in the same way that television, radio or newspapers are. To that extent, OOHM is one of the media available to advertising agencies for conveying a creative advertising message to its intended audience. Analysis commissioned by OOHMAA in 2021 confirmed that OOHM, when combined with other forms of media, provided a 31% higher return on investment compared with any other combination of advertising media, which demonstrates the importance of OOHM to the effectiveness of commercial advertising.
- 9. The OOHM industry utilises a variety of formats for different communication outcomes, including street furniture posters, ‘static’ billboards (comprising a static printed image), and digital billboard displays, in a range of sizes. As a result of evolving patterns of media consumption and advertising trends, the technologies and formats used for OOHM are constantly changing, with digital displays having been widely in use by the OOHM industry throughout New Zealand for approximately ten years.
- 10. The OOHM industry involves a range of participants, all of whom derive benefits and/or income from that field of commercial activities. These include the OOHM companies themselves, the owners of the sites on which advertising is located, along with a range of people involved in the sale and design of the advertisement, production of billboards, technical support and the public.

Economic benefits of the Out of Home Media Industry

- 11. The OOHM industry generates a number of benefits for the community, including economic benefits. The economic impact of the OOHM industry is of considerable significance not only in respect of its own activities but also in terms of supporting industries and households. That impact takes the form of both dollar output and full time employment positions created. In relation to the direct economic impact of the outdoor advertising industry, advice received by OOHMAA indicates that as at 2019, the contribution of the OOHM industry to national annual GDP was estimated to be in the order of \$220 million.
- 12. The OOHM industry is expected to grow over the coming years during the economic recovery from the COVID-19 pandemic. OOHMAA forecasts that the growth in the

New Zealand OOHM industry will be in the order of 10%, which will be the strongest year of growth for the industry.

13. The OOHM industry has developed rapidly in the last ten years, with the introduction of digital advertising technology playing a significant role in the change and growth of this advertising medium. It is anticipated that the manner in which they are used to provide effective advertising will continue to grow at pace, to contribute to the economic benefits.

Other benefits of out of home media

14. The OOHM industry produces a number of other benefits. For example, billboard advertising can be informative, provide enjoyment to the public, provide a focal point and add vibrancy and interest to commercial areas, enhancing the vitality of the area.
15. The revenue generated by OOHM is also being used to fund the installation and provision of public transport and pedestrian amenity infrastructure (such as bus shelters) and electric vehicle charging stations nationwide.
16. OOHM not only carries advertisements for commercial products and services, but also provides the opportunities for community messages to be displayed for a range of agencies and authorities, including Councils. This was particularly prevalent during the COVID19 lockdown periods, where OOHM was used to convey important public health information to communities. Many OOHM operators also provide advertising opportunities to charities as a means of support.

Scope of submission

17. The specific provisions of the Proposed Plan to which OOHMAA's submission relates, and the reasons for its submissions, are set out in **Appendix 1**.

Nature of submission

18. OOHMAA supports the following aspects of the Proposed Plan:
 - a. Recognition of the benefits that signage provides to people and communities;
 - b. Recognition of the nature of effects of signs that need to be addressed by objectives and policies;
 - c. The incorporation of 'standards' which generally reflect current industry practice regarding the operation of digital signs; and
 - d. The incorporation of appropriate matters of discretion for restricted discretionary activities which limit consideration to visual amenity, the integration of signs with buildings, traffic, pedestrian and cyclist safety, the functional and operational requirements of activities and signs, and the positive effects of signs.
19. OOHMAA supports these provisions because, in its submission, they would:

- a. Promote the sustainable management of resources and achieve the purpose of the RMA;
 - b. Enable the social, economic and cultural well-being of the community in the Timaru District, particularly in terms of assisting the retention and generation of employment; and
 - c. Represent the most appropriate means of exercising the Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means.
20. OOHMAA opposes the following aspects of the Proposed Plan:
- a. The policy approach of the Proposed Plan to “avoid” off-site commercial advertising signs, and the associated non-complying activity status which applies to such signs; and
 - b. The onerous nature of certain standards that apply to digital signs.
21. OOHMAA opposes these provisions on the basis that, if imposed, they would not:
- a. Promote the sustainable management of resources and achieve the purpose of the RMA;
 - b. Enable the social, economic and cultural well-being of the community in the Timaru District, particularly in terms of assisting the retention and generation of employment; and
 - c. Represent the most appropriate means of exercising the Council's functions, having regard to the efficiency and effectiveness of the provisions relative to other means.
22. As described in further detail in **Appendix 1**, the core of OOHMAA’s submission relates to the framework that is proposed to apply to the display of ‘off-site commercial advertising signs’. The combination of Policy SIGN-P3 (which imposes an “avoid unless” requirement) and the non-complying activity status for such signs across all zones (except where off-site signs advertise recreational facilities) is such that the pathway to obtain resource consent is unreasonable and unnecessarily onerous.
23. Consistent with the wide range of activities that are enabled within the Commercial, Mixed Use, and General Industrial Zones, OOHM is a form of commercial activity that enables businesses to advertise their goods and services, and/or provide important messaging to the public in a variety of forms (ranging from large format to small format signs). The blanket non-complying activity status for ‘off-site commercial advertising signs’ does not achieve the objectives of the plan as they relate to these zones, as it will not enable:
- a. Business and economic prosperity in the District in appropriate locations, including by providing opportunities for a range of business activities to establish and prosper (Strategic Direction SD-O6).

- b. The District’s city and town centres to be the primary focus for commercial activity, providing for the highest density of business (SD-O7).
 - c. Signs to contribute to the needs of business and community activities (SIGN-O1).
 - d. The City Centre Zone to establish as the main commercial and civic centre for the District and wider South Canterbury sub-region, providing for a diverse range of activities (CCZ-O1).
 - e. The Town Centre Zone to establish as a focal point for the local community, and provide for a diverse range of activities that support the residents of the township and surrounding rural areas (TCZ-O1).
 - f. The Mixed Use Zone to provide for a wide range of activities, including commercial activities (MUZ-O1).
 - g. The Local Centre Zone to provide for a range of commercial activities which primarily support the daily and weekly goods and service needs of surrounding residential areas (LCZ-O1).
 - h. The Neighbourhood Centre Zone to provide for small-scale commercial activities that serve the day-to-day convenience needs of the surrounding residential neighbourhood (NCZ-O1).
24. While the amenity and transportation effects of ‘off-site commercial advertising signs’ are an important consideration, such matters can be appropriately dealt with on a broadly discretionary basis within the Commercial, Mixed Use, and General Industrial Zones (as well as the Port Zone) on the basis that they are not “sensitive” to the effects of commercial advertising.
25. Specific to Policy SIGN-P3, which seeks to avoid new ‘off-site commercial advertising signs’ unless certain criteria are met, will place a significant burden on an applicant to demonstrate that:
- a. There will be *no* precedent, or *no* similar applications requesting equivalent treatment. It is not possible for an applicant to consider the potential effects of future activities, or the actions of other parties who make their own applications. The resource consent application process requires all activities to be considered on their own merit, relative to the circumstances and characteristics of the proposed activity and the receiving environment.
 - b. There will be *no* cumulative adverse effects. In Commercial, Mixed Use, and Industrial zones, where advertising of goods and services are prevalent, it will not be possible to demonstrate that there are *no* adverse cumulative effects. Such a threshold is unreasonable and unjustifiable in this context; rather, the key consideration should be whether the adverse cumulative effects are such that would render the proposal incompatible with the character and qualities of the site and surrounding environment.
26. When such a policy is coupled with a non-complying activity status (which will engage the ‘gateway tests’ of s104D of the RMA), the proposal will result in an inefficient and costly resource consent process, and will not appropriately implement the objectives of the plan.

27. The blanket non-complying activity status is based on Council's "position" on 'off-site commercial advertising signs', rather than an examination of the appropriateness, efficiency, and effectiveness of the proposed signage provisions, as required by s.32 of the RMA. The non-complying activity status within the Commercial, Mixed Use, and Industrial zones is not reasonably justified. OOHMAA therefore seeks that 'off-site commercial advertising signs' are provided for as a:
 - a. Discretionary activity within the Commercial, Mixed Use, General Industrial, and Port Zones; and
 - b. Non-complying activity within the Residential, Rural, Open Space and Recreation, and Māori Purpose Zones.
28. Stated simply, the apparent intent of the Proposed Plan is to avoid off-site signs in general. To the extent that that is so, it is OOHMAA's submission that the approach is unreasonable and unjustifiable and needs to be ameliorated to a significant extent if it is to comply with the basic requirements of the RMA.
29. Without limiting the generality of the reasons above, further specific reasons for OOHMAA's submission are set out in **Appendix 1**.

Relief sought

30. OOHMAA seeks the following relief:
 - a. That the proposed provisions be retained, deleted or amended, as set out in **Appendix 1** so as to provide for the sustainable management of Timaru's natural and physical resources and thereby achieve the purpose of the RMA.
 - b. Such further or other consequential relief as may be necessary to fully give effect to the relief sought in OOHMAA's submission.
31. OOHMAA wishes to be heard in support of this submission.
32. If others make a similar submission, consideration would be given to presenting a joint case with them at any hearing.

OUT OF HOME MEDIA ASSOCIATION OF AOTEAROA

by their planning and resource management consultants and authorised agents
Bentley & Co. Ltd.

Date: 15 December 2022



Signature:

Anthony Blomfield
Resource Management Consultant

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APPENDIX 1 – SUBMISSION AND RELIEF SOUGHT BY OOHMAA

| Row | Provision | Support / Oppose / Amend | Reasons | Relief Sought |
|--|--------------------------|--------------------------|---|---|
| 1 | All of the Proposed Plan | Support | Except as otherwise specified further in this submission, OOHMAA supports the provisions of the Proposed Plan. | Retain the provisions of the Proposed Plan as notified. |
| Part 2 – DISTRICT-WIDE MATTERS / GENERAL DISTRICT-WIDE MATTERS / SIGN – Signs | | | | |
| 2 | Introduction | Support | OOHMAA supports the ‘Introduction’ to the Signs Chapter, which appropriately recognises the benefits of signs to people and communities through providing information, advertising for events, products, services and business, and by identifying places and providing directions. The Introduction also appropriately recognises the potential effects of signs, and that it is necessary to manage such effects. | Retain Introduction as worded. |
| 3 | SIGN-O1 | Support | OOHMAA supports Objective SIGN-O1 as worded. | Retain Objective SIGN-O1 as worded. |
| 4 | SIGN-P1 | Amend | OOHMAA supports the intent of the proposed policy, which is to allow for signs where they are appropriately designed and operated to manage adverse effects. However, the RMA is not a “nil effect” statute and there is no reasonable justification to require <i>all</i> adverse cumulative effects to be avoided, noting that such an outcome will not be possible to achieve in commercial, mixed use, industrial, and port areas where the advertising of goods and services to the public is prevalent. In OOHMAA’s submission, it is necessary to include a qualifier to the management of ‘visual clutter and cumulative’ effects. | Amend Policy SIGN-P1 as follows: SIGN-P1 Managing the effects of signs Enable signs in all zones, but require signs to: 1. be compatible with the purpose, character and qualities of the Zone in which they are located; and 2. be compatible to the design and visual amenity of the building on which they are located; and 3. not contribute to <u>unacceptable</u> visual clutter or cumulative effects. |
| 5 | SIGN-P2 | Amend | OOHMAA supports the intention to provide regulation for signs to manage the potential effects of signage on traffic safety, as with any other activity with the potential to cause traffic safety effects. | Amend SIGN-P2 as follows: SIGN-P2 Managing road safety |

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| | | | <p>In OOHMAA’s submission, the research that relates to the effects of outdoor advertising is relatively conclusive that such a form of signage does not result in unacceptable traffic safety effects, but it accepts that the research is at times inconclusive.</p> <p>In OOHMAA’s submission, to the extent that off-site signs have the potential to result in driver distraction (as does any activity occurring within the view of a driver or other road user), it is the potential effect of distraction that needs to be managed (for example, by managing the change from one message to another). In this respect, the intention of Policy SIGN-P2 should be directed to managing signage to ensure that the effects of the potential for distraction are acceptable.</p> | <p>Require that signs are designed and located so they do not compromise the safe use of any road by motorists, pedestrians and other road users, by:</p> <ol style="list-style-type: none"> 1. ensuring the type, scale, design and location of signs are appropriate to the classification of road; and 2. ensuring signs do not cause motorist distraction or confusion; and 3. ensuring sign proliferation, illumination levels, light spill, flashing and moving images and digital signs do not cause <u>unacceptable effects of</u> distraction; 4. ensuring signs do not imitate, compete with, or give instructions that conflict with traffic signs or traffic control devices; and 5. minimising the potential for line of sight obstruction. |
| 6 | SIGN-P3 | Oppose | <p>OOHMAA opposes Policy SIGN-P3, which seeks to avoid new ‘off-site commercial advertising signs’ unless certain criteria are met, will place a significant burden on an applicant to demonstrate that:</p> <ol style="list-style-type: none"> a. There will be <i>no</i> precedent, or <i>no</i> similar applications requesting equivalent treatment. It is not possible for an applicant to consider the potential effects of future activities, or the actions of other parties who make their own applications. The resource consent application process requires all activities to be considered on their own merit, relative to the circumstances and characteristics of the proposed activity and the receiving environment. b. There will be <i>no</i> cumulative adverse effects. In commercial, mixed use, and industrial zones, where advertising of goods and services are prevalent, it will not be possible to demonstrate that there are <i>no</i> | <p>Amend SIGN-P4 as follows:</p> <p>SIGN-P4 Off-site Commercial advertising signs Avoid <u>Provide</u> for new off-site commercial advertising signs not provided for under SIGN-P4, unless where:</p> <ol style="list-style-type: none"> 1. it can be demonstrated it will not establish a precedent or result in similar applications to request equivalent treatment <u>they are of an appropriate size, design and location;</u> and 2. it they <u>they</u> will not create <u>unacceptable</u> cumulative adverse effects; and 3. it they <u>they</u> meets the requirements detailed in SIGN-P1 and SIGN-P2; <u>and</u> 4. <u>they maintain the character and amenity values of the site and the surrounding area, while having regard to the outcomes that the zone of the site anticipates.</u> |

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| | | | <p>adverse cumulative effects. Such a threshold is unreasonable and unjustifiable in this context; rather the key consideration is whether the adverse cumulative effects are such that would render the proposal incompatible with the character and qualities of the site and surrounding environment.</p> <p>When such a policy is coupled with a non-complying activity status (which will engage the ‘gateway tests’ of s104D of the RMA), the proposal will result in an inefficient and costly resource consent process, and will not appropriately implement the objectives of the plan as it will not enable:</p> <ol style="list-style-type: none"> a. Business and economic prosperity in the District in appropriate locations, including by providing opportunities for a range of business activities to establish and prosper (Strategic Direction SD-O6). b. The District’s city and town centres to be the primary focus for commercial activity, providing for the highest density of business (SD-O7). c. Signs to contribute to the needs of business and community activities (SIGN-O1). d. The City Centre Zone to establish as the main commercial and civic centre for the District and wider South Canterbury sub-region, providing for a diverse range of activities (CCZ-O1). e. The Town Centre Zone to establish as a focal point for the local community, and provide for a diverse range of activities that support the residents of the township and surrounding rural areas (TCZ-O1). f. The Mixed Use Zone to provide for a wide range of activities, including commercial activities (MUZ-O1). | |

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| | | | <p>g. The Local Centre Zone to provide for a range of commercial activities which primarily support the daily and weekly goods and service needs of surrounding residential areas (LCZ-O1).</p> <p>h. The Neighbourhood Centre Zone to provide for small-scale commercial activities that serve the day-to-day convenience needs of the surrounding residential neighbourhood (NCZ-O1).</p> | |
| 7 | SIGN-R4 | Amend | <p>The non-complying activity status for ‘off-site commercial signage’ across all zones (except where off-site signs advertise recreational facilities) will result in an unreasonable and unnecessarily onerous resource consent process.</p> <p>Consistent with the wide range of activities that are enabled within the Commercial, Mixed Use, and General Industrial Zones, OOHM is a form of commercial activity that enables businesses to advertise their goods and services, and/or provide important messaging to the general public in a variety of forms (ranging from large format to small format signs). The blanket non-complying activity status for ‘off-site commercial advertising signs’ does not achieve the objectives of the plan as they relate to these zones (identified above).</p> <p>While the amenity and transportation effects of ‘off-site commercial advertising signs’ are an important consideration, such matters can be appropriately dealt with on a broadly discretionary basis within the Commercial, Mixed Use, and General Industrial Zones (as well as the Port Zone) on the basis that they are not “sensitive” to the effects of commercial advertising.</p> | <p>Amend SIGN-R4 to apply the following activity status to off-site signs:</p> <ul style="list-style-type: none"> • Discretionary activity within the Commercial and mixed use zones, the General Industrial Zone and Port Zone • Non-complying activity within the Residential Zones, Rural Zones, Māori Purpose Zone, Open space and recreation zones. |

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| | | | <p>The blanket non-complying activity status is based on Council’s “position” on ‘off-site commercial advertising signs’, rather than an examination of the appropriateness, efficiency, and effectiveness of the proposed signage provisions, as required by s.32 of the RMA. In particular:</p> <ul style="list-style-type: none"> a. The s.32 assessment for the signs chapter does not adequately describe the perceived issues that the Council are trying to address. b. While s.32(2)(a) requires an examination of the appropriateness, efficiency and effectiveness of proposed district plan provisions, and the identification and assessment of the benefits and costs of the environmental, economic, social and cultural effects of the implementation of the provisions, the Council’s assessment has not (in the first instance) identified the potential effects of ‘off-site commercial advertising signs’ as implemented under the ‘status quo’ of the discretionary activity status under the Operative District Plan (being Option 1). c. Rather, the s.32 assessment reflects a ‘position’ of the Council, and is reflected in several statements within the assessment, such as: <p><i>Off-site signs can have social and cultural benefits, including being used for the purpose of advertising community activities, however it is appropriate that their effects are managed. <u>A stronger policy position around off-site signs will strengthen Council’s current position around off-site signs. This includes clarifying only community activities will be considered for off-site signs. This will enable the</u></i></p> | |

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| | | | <p><i>effects of such signs to be considered and appropriately managed.</i> (page 16, emphasis added)</p> <p>d. The s.32 assessment incorrectly describes the significance of the change that the proposed provisions will make to the ‘status quo’, which results in the assessment of the potential costs of the proposed provisions being inadequate. In particular, the assessment states:</p> <p><i>There will be an economic cost for an individual or business wanting to erect an off-site sign, however, there are only minor changes to interpretation of the status quo provision.</i></p> <p>The status quo provisions include a discretionary activity status for off-site signs, and an enabling policy framework for all signs (provided that the effects of signs are suitably managed). The proposed provisions will result in a significant ‘shift’ from this operative framework for off-site signs.</p> <p>In OOHMAA’s submission, a discretionary activity status for off-site signs would better reflect the inherent appropriateness of commercial signage and advertising in the Commercial, Mixed Use, General Industrial, and Port Zones. Such an activity status is consistent with the provisions of the Operative District Plan (which have not resulted in proliferation of off-site signs within the District).</p> <p>Lastly, OOHMAA considers that SIGN-P4 should refer to “off-site signs” rather than “off-site Commercial</p> | |

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| | | | advertising signs”, with the former being a defined term which captures the nature of billboards. | |
| 8 | SIGN-S1 | Amend | <p>OOHMAA supports the intention to include standards to manage the potential traffic safety effects of signs.</p> <p>However, the standard which seeks to require minimum setback distances between signs which are within 10m of a legal road is too onerous and impracticable to comply with, particularly in urban commercial environments where the density and ‘spacing’ of commercial activities will invariably result in closely spaced signage, and will lead to inefficient resource consent processes.</p> | <p>Amend SIGN-S1 as follows:</p> <p>SIGN-S1 Traffic safety</p> <ol style="list-style-type: none"> 1. All freestanding signs visible from State Highways must be erected at a right angle to the road or within a variance of 15° either side of the right angle. 2. No sign shall be erected adjacent to a road in a manner that will: <ol style="list-style-type: none"> a. obstruct the line of sight of any road corner, bend or intersection, or vehicle crossing; or b. obstruct, obscure or impair the view of any traffic sign or signal; or c. resemble or be likely to be confused with any traffic sign or signal; or d. use reflective materials that may interfere with a road user’s vision. 3. All signs within 10 horizontal metres of a road must comply with the minimum lettering sizes in Table 27 – Minimum lettering size. 4. All signs within 10 horizontal metres of a road must comply with the minimum setback distances from other signs as read from one direction and measured parallel to the centre line of the road in Table 28 – Separation distances. |
| 9 | SIGN-S2 | | <p>OOHMAA supports the principle of prescribing parameters for the operation of digital signs and billboards. Standards which are specific to digital signs will ensure that the particular effects that might be generated by unregulated digital signs will be avoided, and provide the Council with the means to undertake enforcement against digital signs which are being operated in a non-compliant manner.</p> | <p>Amend SIGN-S2 as follows:</p> <p>SIGN-S2 Illuminated, moving, flashing and digital signs</p> <ol style="list-style-type: none"> 1. Illuminated, moving, flashing or digital display sign must not display a digital or pre-recorded broadcast. 2. Any illuminated, moving, flashing or digital display sign must only display still images, and where multiple still images are displayed, each still image must be displayed for a minimum of 30 8 seconds each before changing to a different still |

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| | | | <p>That said, OOHMAA considers that several of the proposed standards are overly onerous, and are not justifiably necessary.</p> <p>OOHMAA opposes or seeks amendments to the following standards within SIGN-S2 for the following reasons:</p> <ul style="list-style-type: none"> • 2. Digital signs and billboards are typically operated to display a message for a length of eight seconds, which has been an industry standard since the first digital billboards were established in New Zealand in 2013. Research¹ has been undertaken which demonstrates that there is no measurable difference in effect on driver performance resulting from the dwell time for the display of digital messages. • 3. Digital signs are regularly located within 100m of an intersection, and such signs can be readily managed (through the consideration of the scale, position and operational parameters of the sign) relative to the safety of vehicular, pedestrian and cyclist traffic. It is not appropriate to impose a blanket restriction on any digital sign within 100m of an intersection. • 7. Digital signs are typically operated with a variable illuminance system which manages the output of the LED display to ensure the message being conveyed is readily legible in daylight conditions, and is suitably dim during the night to avoid excessive light output. The industry standard for daytime illuminance levels of digital signs is 5,000 candelas per square meter, | <p>image, and there must be no transitions between still images apart from cross-dissolve of a maximum of 0.5 seconds.</p> <p>3. No illuminated, moving, flashing or digital display sign must be visible to vehicles travelling on a legal road within 100 metres of an intersection.</p> <p>4. No illuminated, moving, flashing or digital display sign is to be visible from and/or located within 50 metres of a Residential zone or a residential unit.</p> <p>5. No illuminated, moving, flashing or digital display sign shall create more than 10.0 lux spill (horizontal and vertical) of light when measured or calculated 2m within the boundary of any adjacent site or road.</p> <p>6. Illumination levels of any sign must not exceed 250 candelas per square metre between sunset and sunrise.</p> <p>7. Illumination levels of any sign must not exceed 2000 <u>5000</u> candelas per square metre between sunrise and sunset.</p> <p>8. No digital sign is to be located adjoining a State Highway.</p> |

¹ Goodsell R, Dr Roberts. P “On-Road evaluation of the driving performance impact of digital billboards at Intersections” Project No. PRS17074 - ARRB

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| | | | <p>which such a level enabling signs to be legible in full sunlight conditions.</p> <ul style="list-style-type: none"> • 8. OOHMAA does not support the proposed ‘blanket’ approach to digital or illuminated signs which are visible from a state highway. In the context of Timaru, this will preclude a significant amount of business-zoned land from establishing digital signs. Such an approach is unnecessarily onerous. There are no inherent differences between local roads and state highways which would otherwise result in digital signs being unacceptable. Rather, consistent with the “management” approach of the proposed objective, it is appropriate that the policy seeks to ensure that digital signs do not compromise the safety of the transport network. | | | | | | | | | |
| 10 | SIGN-S3 | Amend | In OOHMAA’s submission, a 4m maximum height for free-standing signs in commercial, mixed use, industrial and port environments is insufficient, and does not reflect the common use of taller sign elements such as identification pylon signs. OOHMAA considers that a maximum height of 8m is more appropriate, noting that the building height standards within these zones ranges between 10m and 20m. | <p>Amend SIGN-S3 as follows:</p> <table border="1"> <thead> <tr> <th>SIGN-S3</th> <th>Maximum height of signage</th> </tr> </thead> <tbody> <tr> <td>1. All Zones</td> <td>Any temporary sign must not exceed 3m in height, measured from ground level.</td> </tr> <tr> <td>2. Commercial and Mixed Use zones Open Space and Recreation zones General Industrial Zone Port Zone</td> <td>1. Any freestanding sign must not exceed 4m <u>8m</u> in height, measured from ground level. 2. Any sign attached to a building must not extend above facade height.</td> </tr> <tr> <td>...</td> <td>...</td> </tr> </tbody> </table> | SIGN-S3 | Maximum height of signage | 1. All Zones | Any temporary sign must not exceed 3m in height, measured from ground level. | 2. Commercial and Mixed Use zones Open Space and Recreation zones General Industrial Zone Port Zone | 1. Any freestanding sign must not exceed 4m <u>8m</u> in height, measured from ground level. 2. Any sign attached to a building must not extend above facade height. | ... | ... |
| SIGN-S3 | Maximum height of signage | | | | | | | | | | | |
| 1. All Zones | Any temporary sign must not exceed 3m in height, measured from ground level. | | | | | | | | | | | |
| 2. Commercial and Mixed Use zones Open Space and Recreation zones General Industrial Zone Port Zone | 1. Any freestanding sign must not exceed 4m <u>8m</u> in height, measured from ground level. 2. Any sign attached to a building must not extend above facade height. | | | | | | | | | | | |
| ... | ... | | | | | | | | | | | |
| 11 | SIGN-S4 | Amend | In OOHMAA’s submission, a 5m ² maximum area standard for free-standing signs in commercial and mixed | Amend SIGN-S4 as follows: | | | | | | | | |

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| Row | Provision | Support / Oppose / Amend | Reasons | Relief Sought | | | | | | | | | | | |
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| | | | <p>use environments is insufficient, and does not recognise or provide for the requirements for effective commercial signs. OOHMAA considers that a maximum area of 20m² is more appropriate, and that the effects of larger signs are able to be readily assessed through the resource consent process.</p> | <table border="1"> <thead> <tr> <th data-bbox="1230 329 1587 367">SIGN-S4</th> <th data-bbox="1587 329 1961 367">Maximum area of a sign</th> </tr> </thead> <tbody> <tr> <td data-bbox="1230 367 1587 610"> 1. All Zones </td> <td data-bbox="1587 367 1961 610"> 1. Any temporary sign must not exceed 2m² in area but may be double sided. Where a sign is double-sided, the maximum area of the sign is calculated as the area of one side of the sign. </td> </tr> <tr> <td data-bbox="1230 610 1587 870"> 2. Commercial and Mixed Use zones </td> <td data-bbox="1587 610 1961 870"> Any freestanding sign must not exceed 520m² in area. </td> </tr> <tr> <td data-bbox="1230 870 1587 902"> ... </td> <td data-bbox="1587 870 1961 902"> ... </td> </tr> <tr> <td data-bbox="1230 902 1587 997"> 6. General Industrial Zone Port Zone </td> <td data-bbox="1587 902 1961 997"> There is no maximum area of a sign. </td> </tr> </tbody> </table> | | SIGN-S4 | Maximum area of a sign | 1. All Zones | 1. Any temporary sign must not exceed 2m ² in area but may be double sided. Where a sign is double-sided, the maximum area of the sign is calculated as the area of one side of the sign. | 2. Commercial and Mixed Use zones | Any freestanding sign must not exceed 520m ² in area. | ... | ... | 6. General Industrial Zone Port Zone | There is no maximum area of a sign. |
| SIGN-S4 | Maximum area of a sign | | | | | | | | | | | | | | |
| 1. All Zones | 1. Any temporary sign must not exceed 2m ² in area but may be double sided. Where a sign is double-sided, the maximum area of the sign is calculated as the area of one side of the sign. | | | | | | | | | | | | | | |
| 2. Commercial and Mixed Use zones | Any freestanding sign must not exceed 520m ² in area. | | | | | | | | | | | | | | |
| ... | ... | | | | | | | | | | | | | | |
| 6. General Industrial Zone Port Zone | There is no maximum area of a sign. | | | | | | | | | | | | | | |
| 12 | SIGN-S6 | Support | <p>OOHMAA supports standard SIGN-S6 which does not limit the number of signs on a site in the Commercial and Mixed Use zones, General Industrial Zone, and the Port Zone.</p> <p>Activities within such zones commonly require a range of signs, such as identification, advertising and informational/directional signs, and it is appropriate to enable such a range of sites, noting that the characteristics of commercial, mixed use, industrial and port environments can accommodate the effects of signs.</p> | Retain SIGN-S6 as worded. | | | | | | | | | | | |

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| 13 | Table 28 – Separation distances | Delete | For the reasons specified in Row 8, OOHMAA does not support a standard which requires a minimum separation distance between signs. | Delete Table 28 – Separation distances |