

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:

GRIFF SIMPSON Family Trust.

[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'):

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]

See documents attached.

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.]

See documents attached.

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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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See documents attached
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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

Electronic address for service of submitter:

See attached

Telephone:

Postal address (or alternative method of service under s352 of the Act):

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

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 notified proposal for Proposed Timaru District plan

- 1 This is a submission on the Proposed Timaru District council Proposed District plan (TDPP) by Griff Simpson Family Trust Ltd.
- 2 Griff Simpson Family Trust does not support the Signage chapter or the other provisions relating to signs in the TDPP in its current form.
- 3 Griff Simpson Family Trust's submission is that billboards (including digital billboards) and non-site related advertising should be explicitly enabled in the TDPP provisions and in appropriate zones (commercial/Mixed use, industrial and port zones) through an activity specific rule and subject to appropriate industry standards.
- 4 Advertising, including off-site signage, contributes to the commercial vitality of a community through supporting business, infrastructure and community activities. It is a legitimate commercial activity that generates economic activity by enabling the commercial community to advertise goods and services. Advertising can enhance the character of areas, buildings and structures also provides a focal point and adds vibrancy and interest. These positive effects should be expressly recognised in the TDPP. Griff Simpson Family Trust supports SIGN-O1(1).
- 5 Griff Simpson Family Trust do not support SIGN-P2(3) with the additional description to Digital signs, we feel the preceding text is inclusive of digital signage. Suggestion:

"ensuring sign proliferation, illumination levels, light spill, flashing and moving images do not cause distraction"
- 6 Griff Simpson Family Trust's submission to SIGN-P3 is that the Policy for avoidance is too restrictive to allow for quality installation of third party signage. The Policy is contradictory to the objective SIGN-O1. The Policy does not allow businesses and community activities to advertise other than on site. SIGN-P3(3) is linked to SIGN-P1 and SIGN-P2, the management of signage is better managed via rules and standards for off-site signage.
- 7 SIGN-R4(PER-1) specifically excludes all signs which are off site. This is too prohibitive for off site signage. The rules should be more inclusive and apply a more balanced consideration for off site signage in the Commercial/Mixed use zones and General Industrial Zones. Under the TDPP any third party signage would become Non-complying straight away. The rules seek to control activity rather than the effects of signage.
- 8 SIGN-S2(2) applies too restricted a consideration for dwell time on a digital image, 30 seconds is too long. Most other regions have applied standards of 8 seconds based on empirical evidence from existing signs.

- 9 SIGN-S2(7) applies too low a level of illumination for a digital sign at 2000cd/m². 5000cd/m² is more appropriate, this has been applied in other regions as a standard and or covered in Practice Notes eg Auckland Unitary plan, Christchurch City Council Practice Note. Control of daytime illumination through an automated brightness control system is more important than any applied maximum, automated brightness systems moderate brightness to be appropriate for mean ambient light conditions at that time. As an example non-illuminated signage of light colours under high sunlight conditions have been tested at between 10,000 and 13,500cd/m² reflected light as part of monitoring comparisons. 2000cd/m² under high sunlight will make a digital sign very dim and more of a traffic hazard than an appropriately lit sign.
- 10 SIGN-S2(8) restricts signs adjoining the State Highway network. This is too prohibitive. Other regions apply permitted rules and standards which are more tolerant and only include Waka Kotahi when permitted standards are breached in relation to traffic matters.
- 11 SIGN-S3(2(1)) applies a maximum height of 4m for any sign not attached to a building, this is too low for any zone especially Commercial/Mixed Use Zones, Port and General Industrial Zones where taller signage is anticipated ordinarily in all regions.
- 12 SIGN-S4(2) 5m² is too small for a sign, the standard is too small for these zones, this would necessitate a restricted discretionary/Non-complying application for most free standing signs. There is no provision for a double sided sign in a v format, many other regions assign a maximum angle of separation, eg CCC say 30 degrees.
- 13 Table 28 outlines separation distances between signs, these are too prohibitive. For example a sign on the neighbouring boundary of a property of 40m road frontage would deny any signs on a property. Properties must be allowed to sign whether this be on site or off site, this table assumes that all properties in all zones have road frontages of greater than 60m. This rule would deny most properties the right to sign in the Commercial and Mixed use Zones.
- 14 Digital advertising can have a broader purpose and significantly less visual impact when compared with on-site advertising due to the flexibility digital advertising provides. Digital advertising also allows for some advertising to be site related. Any potential adverse effects from non-site related advertising in relation to traffic safety, landscape and amenity values can be managed through location and appropriate built form standards. Environmental effects assessments done for Griff Simpson Family Trust's existing static and digital billboards nationwide have demonstrated that effects are acceptable. These assessments were supported by technical traffic and urban design analysis where required.
- 15 Griff Simpson Family Trust is also concerned with:
 - (a) the lack of provision for off-site advertising in the policies and rules

- (b) All third party signage is considered a Non-complying activity, this is too onerous and contrary to the Objectives
 - (c) the onerous size and height provisions
 - (d) Onerous and counterproductive illumination standards under day light hours
 - (e) restrictive spacing between signs, in the township and industrial areas it would mean only every second or third property would be able to have a sign
 - (f) any third party sign falls straight to restricted discretionary
- 16 The Section 32 Report fails to provide an adequate planning assessment to support the proposed signage chapter. The report has accepted Waka Kotahi guidance as fact and ignored comments from others.
- 17 The Section 32 report favours assignment of non-compliant status on off site signage rather than the application of permitted standards and rules meaning any application requires a resource consent and an onerous processing framework at a Non-compliant status, by contrast the same was not applied to site related, official signs or temporary signs which have many of the same effects.
- 18 Under 1.5 Best Practice Review the Section 32 report notes review of both the Christchurch City Council and Dunedin City Council, both in respect to off site signage are contrasting. Dunedin have opted for an avoid policy, not a "No commercial advertising off-site" as stated. Christchurch have opted for a more permissive plan assigning a number of standards and rules which limit the number of applications to council. The avoid and Non-Complying scenarios provide little option for applicants other than onerous application costs, and from council tie down resource processing and interpreting.
- 19 If off-site signage is expressly provided for as requested it is Griff Simpson Family Trust' submission that the TDPP would achieve the requirements of the RMA, including:
- (a) achieving the integrated management of the effects of use and development of land and associated natural and physical resources of the districts as required by section 31 of the RMA;
 - (b) meeting the requirements of section 32 of the RMA, in that the amended policies and rules would be the most appropriate method for achieving the RMA's purpose and are the most efficient and effective means for achieving the District Plan's objectives;
 - (c) assisting the Council to carry out its statutory functions in order to achieve the purpose of the RMA; and

- (d) promoting the sustainable management of natural and physical resources in accordance with Part 2 of the RMA.

Decision Sought

20 Griff Simpson Family Trust seek the following decision from the Council:

- (a) That billboards (including digital billboards) and non-site related advertising be explicitly enabled in the TDPP provisions;

That billboards (including digital billboards) and non-site related advertising be explicitly enabled in appropriate zones (such as commercial and mixed use, industrial and port zones) through an activity specific permitted activity rule supported by recognised industry standards;

- (b) That the provisions allow for larger signage than is proposed; and
- (c) That the provisions allow for more accepted lighting standards as per other regions; and
- (d) that the provisions in the Proposed Plan be amended to address issues raised in this submission; and
- (e) such other relief as may be required to give effect to this submission, including consequential amendments to objectives, policies, rules and definitions of the District Plan that address the matters raised by Griff Simpson Family Trust.

Dated this 13th day of December 2022



Griff Simpson
Trustee, Griff Simpson Family Trust

TIMARU



DISTRICT COUNCIL
Te Kaunihera ā-Rohe
o Te Tihi o Maru



YOUR PLAN OUR FUTURE
TIMARU DISTRICT PLAN REVIEW

Signs S.32

June 2022



YOUR PLAN OUR FUTURE
TIMARU DISTRICT PLAN REVIEW
LAND USE PLAN

TIMARU DISTRICT COUNCIL

Section 32 Report

Signs Chapter

June 2022

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1 Signs

1.1 Introduction

Signs contributes to the social and economic wellbeing of the Timaru District by supporting the needs of business, infrastructure, providing information and identifying places. Relevant controls around signs are required to manage potential adverse effects.

Council currently controls the extent of signage through rules in the Plan which assist in maintaining the amenity values of the different zones across the district and ensuring the safety of the community. There are also controls over signage in public places in the Timaru District Consolidated Bylaws 2018 (public places and reserves, beaches and tracks). Sign provisions have a district-wide application in the District Plan but may be individualised in more sensitive locations.

The focus on the review of the Signs chapter is to assess the existing signs provisions of the Operative District Plan in light of local, regional and national direction and planning best practice. Current implementation issues with the current plan's sign provisions have also been considered. The objectives, policies and rules have been revised to provide greater clarity regarding the desired environmental outcomes.

1.2 Community / Stakeholder / Iwi Engagement

Signs was not specifically included in any of the Council's discussion documents that were released to prompt discussion on the District Plan Review. However, when the Draft District Plan was released in October 2020, the general public were given the opportunity to provide feedback on the draft provisions.

Approximately 20 feedback points were received on this topic, many of which were from Waka Kotahi, but also from a range of businesses particularly those located in rural areas or that are industrial in nature. The feedback has been worked through by staff and has been used to shape the provisions of the PDP. In summary, the feedback can be summarised as:

- The Plan should make provisions for signs associated with network utility construction;
- A non-complying status for off-site signs is too onerous, particularly in the Rural Zone, where cell phone reception can be patchy and where directional signage to a place is necessary;
- Objective 1 which recognises the benefits of signs, is generally supported;
- Signs required by other legislation or regulations particularly for health and safety purposes should be permitted;
- Traffic control devices (traffic signs) should be permitted;
- Waka Kotahi supports that the policies do not support off-site signs;
- The permitted status for official signs is supported;
- Waka Kotahi has provided feedback that illuminated signs in higher speed environments such as rural areas can create a hazard and in residential environments can have an impact on amenity. Illuminated signs should be included in SIGN-R-5 PER-2;
- Waka Kotahi provided some detailed feedback on how signs should be positioned, the size of lettering, and how light spill and digitisation is managed so as best to preserve road safety.

In light of this feedback, the Proposed District Plan now more clearly provides for official signs, much of the design and positioning feedback from Waka Kotahi has been incorporated.

The feedback that opposed the non-complying status of off-site signs, although noted, has not resulted in a change to the provisions. The messaging around avoiding visual clutter is clear within the policy framework. If consent is however needed for a sign, the positive benefits of the sign are a matter to be taken into account during the resource consent process.

1.3 Strategic directions

The 2045 Timaru Growth Management Strategy includes one action (A2.5) relevant to the review of the Signs chapter of the District Plan: *“Provide appropriate nuisance controls to maintain and as appropriate enhance amenity as associated with.... signage.”* There are no other relevant Strategic Directions to the Signs chapter.

Council has the ability to control the extent of signs through rules in the District Plan which assist in maintaining the amenity values of the different zones across the district.

1.4 Problem definition

Definition of signs under National Planning Standards

The national planning template provides a new standardised definition for signs and a new definition for official signs which differ from the Operative Plan’s definition. These definitions help to focus on the key provisions needed to manage signage in the Plan. Details of the new definitions are found in Appendix 1.

Effectiveness and efficiency review

The main problems identified with the current operative provisions are

- In town centres (commercial and industrial zones), signs are a permitted activity, therefore there is no ability to manage adverse effects of signage on public safety and visual quality, or minimise advertising clutter and visual disparity (cumulative effects)
- There may be duplication with Council Bylaws and District Plan zoning e.g., signs in parks and tracks (Public Places Bylaw) and the provisions for signs in the Open Space zone/s
- Discussions with Council staff

Council officers have also identified the following areas to be considered through a review of the Signs chapter provisions:

- Off-site signs - there are areas within the district, especially along the roads leading into towns which have numerous signs advertising businesses within the Timaru town centre. Council has received applications for off-site signage, with only limited number been granted, and the remaining applications being refused or withdrawn with the main issue being a deterioration of rural visual amenity, landscape and environment.
- Official signs – ensuring public safety and relevant information required to be articulated under government legislation can be conveyed without unnecessary resource consent requirements.
- Temporary signs – providing the opportunity for community signage that is not commercial in nature to be temporarily displayed in strategic places.
- Road safety matters associated with signage – ensuring road safety effects are taken into account through signage provisions.
- Enforcement of signage rules – there is currently a reactive approach taken by Council

1.5 Best practice review

A review of approaches from recently drafted, notified or operative District Plans has identified best practice to be taken into account. Key direction relevant to the review of the Plan’s Signs chapter is identified below:

Plan	Local Authority	Description of Approach
Operative Christchurch City District Plan 201	Christchurch City	<ul style="list-style-type: none"> • Broad objective linking to key areas of influence of Plan signage provisions • Enabling signage in the appropriate locations • Controlling signage in sensitive locations • Managing the effects of signage

Plan	Local Authority	Description of Approach
		<ul style="list-style-type: none"> Managing the effects of signage on transport safety Managing temporary signage Managing off site signage
Proposed New Plymouth District Plan 2019	New Plymouth District	<ul style="list-style-type: none"> Broad objective recognising the benefits provided by signs Managing signs incompatible with zone Generally avoiding third party signs Locating signs in appropriate locations Supporting use of digital display signage only in city centre, with tight controls over details
Dunedin City District Plan (Decisions version December 2018)	Dunedin City	<ul style="list-style-type: none"> No commercial advertising signage off-site

A summary of key direction from a review of best practice approaches has indicated the following matters should also be considered in the Plan's Signs chapter review:

- Clearer provisions around assessing the effects of signs.
- A greater consideration of the cumulative effects of signs .
- Clearer provisions around temporary signs.
- Clearer provisions around illuminated signs, flashing, moving, digital signs in all zones (performance standards).
- Stronger provisions for Commercial and Industrial zone signs.
- Clearer policy direction around off-site signs.
- New provisions for signs in the Open Space Zone (sponsorship signage).

Options to change status quo provisions

A summary of options to consider for change is identified in Table 3 below.

Options for change	Rationale for change	Adding new regulation Y or N
Remove reference to signs relating to advertising businesses of prostitution/brothels	This current District Plan signage provision links back to a previous Council Bylaw around the display of signage for businesses of prostitution / brothels in commercial and residential areas. There is no longer a relevant bylaw provision in place relating to this issue. There is also no effects-based rationale for controlling this type of signage under the RMA91. Note: the current provision around signage not having explicit and lewd content, including pictorial content, is proposed to remain as it seeks to control social and economic effects of signage in commercial areas.	N
Provide clearer provisions around managing the effects of signs	To clarify policy around managing the effects of signs to enable a consistent assessment approach and link to effects	Y

Options for change	Rationale for change	Adding new regulation Y or N
	on social, economic, and cultural wellbeing, including the consideration of cumulative effects.	
Provide clearer provisions for temporary signs	To enable clear direction and consistent assessment approach for temporary signs. New restricted discretionary activity status where permitted rule is not complied with.	Y
Provide stronger policy direction around commercial advertising off-site signs	To avoid the proliferation of off-site signs New non-complying activity status.	Y
Stronger provisions for Commercial and Industrial zones signs	To clarify expectations around acceptable signs in the commercial and industrial zones.	Y
New provisions for Rural zone signs	To clarify expectations around acceptable signs in the Rural zones	Y
New provisions for Open space zone signs	To clarify expectations around acceptable signs in the Open space zones, in particular the appropriate consideration of sponsorship signs (off site)	Y
Provide additional performance standards and matters of discretion for illuminated, flashing, moving, digital signs in all zones	To enable illuminated, flashing, moving and digital signage in appropriate locations, and to ensure a consistent approach to assessment - currently the Plan only provides performance standards for illuminated signs adjacent to a road involving intermittent/revolving lights and in the commercial, industrial, recreation, residential and rural zones. New matters of discretion for illuminated flashing, moving and digital signage provide a greater level of certainty regarding the assessment of any non-compliance with the standards.	Y

Table 3: Options for change to current Signage provisions of District Plan

1.6 Statutory and Planning Context

The following national planning direction is relevant to a review of the Signs chapter:

National direction

RMA91

- Section 5 – promoting the sustainable management of natural and physical resources
- Section 7 (c) – have particular regard to the maintenance and enhancement of amenity values

Both sections are relevant to a review of the Signs chapter as they provide the overarching direction from the RMA91. No other national direction is considered to be relevant to the Signs chapter.

Regional direction

At a regional level, the Canterbury Regional Policy Statement provides the relevant direction for a review of the Signs chapter:

Canterbury Regional Policy Statement	Relevance
<p>Policy 5.3.1 Regional growth (Wider Region) To provide, as the primary focus for meeting the wider region’s growth needs, sustainable development patterns that: 5. encourage high quality urban design, including the maintenance and enhancement of amenity values.</p> <p>Methods 3. Consider methods which promote good planning, building design and urban design that give effect to the New Zealand Urban Design Protocol (2005).</p>	<p>There are no specific provisions for signs in the RPS, however, there are references to encouraging good urban design and maintaining and enhancing amenity values, both relevant to managing the effects of signs at a local level.</p>

Table 5: Regional direction

Local direction

In addition, the Strategic directions document discussed above, at the local level, the following policy direction is relevant to a review of the Signs chapter:

Timaru District Consolidated Bylaws 2018	Relevance
<p>Parks and Reserves, Beaches and Tracks</p> <ul style="list-style-type: none"> • 713 Notices and signs <p>Public places</p> <ul style="list-style-type: none"> • 213 Placards on buildings, posts and pavements and markings on footpaths • THIRD SCHEDULE BYLAW POLICY - Advertising signs, sign on or over public places, Sign affecting traffic, Signs parked on vehicles, temporary signs 	<p>Council’s Consolidated Bylaw covers signage in parks, reserves, beaches and tracks and in public places. While there is an overlap between this Bylaw and the signs provisions in Open Space zones, there is no assessment criteria in the bylaw to manage the effects of signage. It only relates to the requirement to seek Council approval for the placement of signage on a public reserve and track. The signs provisions of the Open Space zone/s provide the criteria for signs and the relevant RMA91 effects-based considerations.</p>

Table 6: Local direction

2 Approach to Evaluation

A summary of issues and an assessment of their scale and significance follows.

2.1 Scale and significance

The tables below summarise the scale and significance of the identified issues or problems with the current signage provisions in the Operative Plan.

Issue: <i>There is no uniform policy around managing the effects of signage (including cumulative effects)</i>		
Reasons for change in policy		Assessment of scale and significance
Relevant Statutory Considerations / Drivers	RMA Part 2 RPS	Low
Degree of shift from status quo required	New policy for assessing the effects of signs (including cumulative effects).	Medium
Who and how many will be affected?	All	Medium
Degree of impact on, or interest from iwi / Maori	Unknown	Low
When will affects occur?	N/A	Low
Geographic scale of impacts / issue	District wide	Low
Type of effect(s)	Provides a consistent approach to assessing signage and includes a wider assessment of cumulative effects.	Medium
Degree of policy risk, implementation risk, or uncertainty	New policy, with clear policy direction - the risks and uncertainties will be low. Assessing cumulative effects imposes a degree of subjectivity, however this assessment is guided by section 3(d) and (e) of the RMA91	Medium
Overall Assessment of Scale and Significance		Medium

Issue: <i>There are limited activity standards for signs in the Commercial, Industrial, Rural and Open space zones</i>		
Reasons for change in policy		Assessment of scale and significance
Reasons for change in policy	District Plan Review	Low
Relevant Statutory Considerations / Drivers	RMA Part 2 RPS	Low
Degree of shift from status quo required	<p>Additional permitted activity standards for height, clarification around requirements of freestanding signs and signs attached to buildings, maximum signage area on buildings in the Commercial and Industrial zones.</p> <p>Maximum height restrictions for signs in the Rural zones.</p> <p>No flashing or moving signs in the Residential zone.</p> <p>New provision for sponsorship signs in the Open space zone.</p>	Medium
Who and how many will be affected?	All	Medium
Degree of impact on, or interest from iwi / Maori	Unknown	Low
When will affects occur?	N/A	Low
Geographic scale of impacts / issue	Commercial, Industrial, Rural, Open space zones	Low
Type of effect(s)	More restrictions on signage height, area to reflect desired amenity levels of relevant zone and minimize visual clutter in Commercial and industrial zones, clarify expectations around appropriate sponsorship signs in open space zones	Medium
Degree of policy risk, implementation risk, or uncertainty	New activity status will standardise Council's approach to the consideration of flashing, moving and digital signs across the district, there is likely to be less uncertainty around interpretation. More flexibility around sponsorship signs (off site advertising) within Open space zoned areas while	Medium

	retaining appropriate standards will result in less uncertainty around interpretation.	
Overall Assessment of Scale and Significance		Medium

Issue: <i>There is limited guidance for the assessment of illuminated, flashing, moving and digital signage</i>		
Reasons for change in policy		Assessment of scale and significance
Reasons for change in policy	District Plan Review	Low
Relevant Statutory Considerations / Drivers	RMA Part 2 RPS	Low
Degree of shift from status quo required	New district wide rule requirements for illuminated, flashing, moving and digital signage. New matters of discretion.	Medium
Who and how many will be affected?	All	Medium
Degree of impact on, or interest from iwi / Maori	Unknown	Low
When will affects occur?	N/A	Low
Geographic scale of impacts / issue	District wide	Low
Type of effect(s)	More restrictions for illuminated, flashing, moving and digital signs and a consistent assessment approach for these types of signs.	Medium
Degree of policy risk, implementation risk, or uncertainty	New rule requirements (District side) will standardise Council's approach to the consideration of flashing, moving and digital signs across the district, and there is likely to be less uncertainty around interpretation.	Medium
Overall Assessment of Scale and Significance		Medium

Issue: <i>There is open discretion to consider temporary signs (discretionary activity status)</i>		
Reasons for change in policy		Assessment of scale and significance
Reasons for change in policy	District Plan Review	Low
Relevant Statutory Considerations / Drivers	RMA Part 2 RPS	Low
Degree of shift from status quo required	New Restricted Discretionary activity status for Temporary signs, where there is an infringement of a standard (*except rule matter requiring sign to be part of a permitted temporary event). *New non-complying activity status If the sign is not part of a permitted temporary event.	Medium
Who and how many will be affected?	All	Medium
Degree of impact on, or interest from iwi / Maori	Unknown	Low
When will affects occur?	N/A	Low
Geographic scale of impacts / issue	District wide	Low
Type of effect(s)	Provides a consistent approach to assessing temporary signs, with matters of discretion limited to the degree of non-compliance with the standard e.g., maximum duration of sign on-site, rather than requiring a full assessment of effects against the relevant signs objectives and policies.	Medium
Degree of policy risk, implementation risk, or uncertainty	New policy, with clear policy direction - the risks and uncertainties will be low. The short-term duration of such signage also reduce the implementation risk associated with the proposed provisions.	Medium
Overall Assessment of Scale and Significance		Medium

2.2 Quantification of Costs and Benefits

The cost and benefits of proposed changes to the Signs chapter have not been costed, as the scale of change proposed does not constitute the need for this level of scrutiny.

2.3 Choice of Evaluation Methods

A simple evaluation of the provisions of the Signs chapter has been undertaken as the scale and significance assessment of the issues identified did not result in any significant matters.

2.4 Proposed objective

It is recommended that the current (status quo) signage objective be amended for the following reasons:

- To better reflect the desired end result for the management of signs (purpose of an objective)
- To achieve integrated management of signs linking RMA91 and LGA02 provisions
- To ensure consistency with Council’s District Plan Writing Guide
- To align with current best practice for signs objectives in District Plans

Recommended objective

The wording of the proposed objective is as follows:

SIGN-O1 Signs
<p>Signs contribute to the social, cultural and economic wellbeing of the Timaru District while:</p> <ol style="list-style-type: none"> 1. supporting the needs of business, infrastructure and community activities; 2. maintaining or enhancing the character and amenity values of the surrounding area; and 3. maintaining public safety.

An evaluation of this option is found in sections 3 and 4.

3 Evaluation of Objective

The following table evaluates the recommended revised signage objective.

Category	Criteria	Comments
Relevance	Directed to addressing a resource management issue	The proposed objective more clearly articulates the desired end state for managing signs through the Plan provisions.
	Focused on achieving the purpose of the Act	The proposed objective ensures that people and communities can be provided for while ensuring the adverse effects of signs are avoided, remedied, or mitigated.
	Assists a council to carry out its statutory functions	The proposed objective achieves section 31 (1) (a) of the Act by achieving integrated management of the effects of land use (signage).

	Within scope of higher-level documents	The proposed objective is within the scope of the regional policy statement and Council's strategic directions document.
Feasibility	Acceptable level of uncertainty and risk	This will not be known until after the provisions have been assessed.
	Realistically able to be achieved within council's powers, skills and resources	This will not be known until after the provisions have been identified and assessed.
Acceptability	Consistent with identified iwi/Māori and community outcomes	This should be informed by earlier community outcomes processes, or further consultation.
	Will not result in unjustifiably high costs on the community or parts of the community	This will not be known until after the provisions have been identified and assessed.

4 Identification of Options

The following sets out the reasonably practicable options for achieving the sign objective.

4.1 Option 1: Status Quo

This option involves a continuation of the Operative Plan provisions brought into a National Planning Standard framework, including the current objectives, policies, rules.

4.2 Option 2: Revised Signage chapter

This option builds on the Operative Plan provisions and adding a new objective, policy and rule framework which represents best practice and takes into account the public feedback received.

See assessment of options in section 5 below.

5 Evaluation of Options

5.1 Evaluation table

The follow table evaluates the two options identified in Section 4. Key considerations that informed this assessment included whether the provisions:

- Involve a matter of national importance;
- Are the subject of a NPS or the relevant RPS;
- Are consistent with national or regional direction through plans, other strategies or guidance;
- Are required resolve an issue or problem particularly to protect life and property;
- Involve a minor or major change to the current provisions;
- Are controversial and /or will affect groups with specific interests or a large number of residents;
- Will significantly reduce development opportunities or land use options; and
- Are likely to have a major financial impact on landowners / developers / businesses due to compliance and or administrative costs.

OPTION 1 <i>Status quo (with National Planning template requirements)</i>			
Benefits The monetary benefits of retaining the current plan provisions have not been calculated (the rationale discussed above). One benefit of retaining the current provisions is familiarity with the current policy and rule framework.			
Benefits Environmental	Economic	Social	Cultural
Low	Low There may be negative impacts on economic growth and employment.	Low	Low
Costs The monetary cost of retaining the current plan provisions have not been calculated (the rationale discussed above). However, then non-monetary costs of an unclear objective, policies and rules is high. The status quo provisions do not link to central, regional direction, and best practice. Retention of the status quo would not meet the desired outcomes of the District Plan review including the Strategic Directions of Council. The status quo provisions include reference to restricting signage for advertising brothels and/or business of prostitution. As discussed above, these matters are no longer to considered to be relevant under an effects-based RMA assessment, and therefore should not be continued to be included in the District Plan.			
Costs Environmental	Economic	Social	Cultural
Medium	Low - There may be negative impacts on economic growth and employment.	Low	Low
Efficiency	The status quo Signs chapter provisions do not achieve the desired outcome for the management of signs across the district.		
Effectiveness	The status quo Signs chapter provisions do not achieve the desired outcome for the management of signs across the district.		
Strategic Direction(s)	The status quo Signs chapter provisions do not provide an appropriate framework for the provision of nuisance controls to maintain and as appropriate enhance amenity as associated with signage. They also contain out of date provisions that are not considered to be appropriately addressed through a District Plan.		
Overall Appropriateness of Option 1 - Low			

OPTION 2

Preferred option - revised Signs chapter

Benefits

The monetary benefits of a revised Signs chapter have not been calculated (the rationale discussed above). A clearer objective, refined policies and rules have the benefit of ensuring the desired environment, economic, social and cultural outcomes are being achieved through the effective management of Signage across the District.

Limiting signage displaying words, images, or model (human or mannequin) that are sexually explicit or lewd.

It is proposed to retain control over signs containing explicit or lewd content as it is considered to be a reasonable social and cultural adverse effect of signage that can be controlled through the District Plan. However, the reference to brothels has been removed.

Off-site signs

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. 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 effects of such signs to be considered and appropriately managed.

Commercial and industrial zone signs

The proposed provisions generally enable signs in commercial zones including the City Centre, Port and Industrial zones, where there is no limit on the number of signs, but the size of the signs, height and their nature is controlled. Limitation on sign area will enable better urban design outcomes to be achieved.

Illuminated, flashing, moving and digital display signage

Clearer provisions for illuminated, flashing, moving and digital display signs will ensure that the Plan's provisions keep pace with the impact of changing technology in this space. This will result in social and environmental benefits through better management of these signs.

Temporary signage

Restricting temporary signs to that ancillary to temporary activities provided for under the Plan will assist in managing the volume of temporary signs. This is proposed to be contemplated by only allowing one temporary sign per site at any one time which will assist in managing signage proliferation. Restrictions on temporary sign height and area will assist with managing the visual effects of such signs. A new restricted discretionary activity status for temporary signs (forming part of a permitted temporary event but breaching a rule matter relating to duration, setback and height or other relevant general sign standards) will provide more certainty as to the assessment of effects for such signs.

A new non-complying activity status for temporary signs not associated with a permitted temporary event is also proposed which will ensure that such signs are not used for off-site advertising

Open space zone

Providing more flexibility around sponsorship signs not visible from other public places or roads will help to ensure the sustainability of public good use and activity within open space zones while managing the adverse effects on users of the reserve or adjoining residential neighbourhoods

Benefits			
Environmental	Economic	Social	Cultural
Medium	Medium - There will be more positive impacts on economic growth and employment	Medium	Medium

Costs

The monetary cost of revised Signs chapter has not been calculated (the rationale discussed above). However, the non-monetary cost of clear objectives, policies and rule framework are low due to clear outcomes for managing signs across the district.

Off-site signage

There are potential for costs to the environment when off-site signs result in adverse environmental effects. These costs are considered to be low, as off-site signs for commercial related activities will be considered on a case-by-case basis, being assessed as a non-complying activity.

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.

Restricting the majority of off-site signs could reduce the diversity of sign types in the district, which will result in a reduction of advertising opportunities for economic activities. However, in the case of off-site signs, no resource consents have been applied for, for this sign type since the current rules became operative, which suggests that there is not a high level of demand for off-site signs. There could also be a cost to Council of enforcing the standards for off-site signs.

Commercial and industrial signs

Additional restrictions on sign area and height could result in some economic costs to businesses. However, the changes proposed are consistent with good practice across New Zealand for commercial and industrial zone signs, and resource consent can be considered for breaches of permitted activity standards. There could also be a cost to Council of enforcing the new activity standards.

Illuminated, flashing, moving and digital display signage

Clearer provisions for illuminated, flashing, moving and digital display signs will ensure that the Plan's provisions keep pace with the impact of changing technology in this space. This will result in social and environmental benefits through better management of these signs.

Temporary signage

Restricting temporary signs to that ancillary to temporary activities provided for under the Plan will assist in managing the volume of temporary signs. This is proposed to be contemplated by only allowing one temporary sign per site at any one time which will assist in managing signage proliferation. Restrictions on temporary sign height and area will assist with managing the visual effects of such signs. A new restricted discretionary activity status for temporary signs (forming part of a permitted temporary event but breaching a rule matter relating to duration, setback and height or other relevant general sign standards) will provide more certainty as to the assessment of effects for such signs.

A new non-complying activity status for temporary signs not associated with a permitted temporary event is also proposed which will ensure that such signs are not used for off-site advertising.

<p>Open space zone Providing more flexibility around sponsorship signs not visible from other public places or roads will help to ensure the sustainability of public good use and activity within open space zones while managing the adverse effects on users of the reserve or adjoining residential neighbourhoods.</p> <p>Permitted activity standards The limits for permitted activity signs in each of the zones are designed to ensure that signs do not result in adverse environmental effects that would impact negatively on the district’s social, economic and environmental wellbeing. For example, signs in the Commercial and Industrial areas are anticipated to assist with the economic viability of businesses operating and to provide identification, however in residential areas it is more appropriate to have limited provision for signs recognising the high levels of amenity anticipated, and the lesser necessity for signs in residential areas</p>			
Costs			
Environmental	Economic	Social	Cultural
Low	Medium	Medium	Low
<p>Efficiency Revised Sign objectives and policies would result in the desired outcome for the management of signs across the district being achieved more efficiently. This includes addressing the key implementation issues of the current plan.</p> <p>The revised provisions relating to off-site signs will ensure that the adverse effects of these sign types are managed. Restricting/limiting the majority of off-site signs will ensure that these sign types are avoided, which provides complete certainty regarding the management of their effects.</p> <p>Managing the effects of signs through appropriate standards that relate directly to the relevant zone is efficient as it ensures that the effects of signs are managed in a manner that results in environmental outcomes that are commensurate with the levels of amenity anticipated in these zones.</p> <p>Placing additional controls around temporary and off-site signs is considered to be efficient as it will ensure signs are appropriate to the location. Providing limits around sponsorship signage in the open space zone site is considered to be efficient.</p>			
Efficiency			
Environmental	Economic	Social	Cultural
High	Medium	Medium	Low
<p>Effectiveness Revised Signs objectives and policies would result in the desired outcome for the management of signs across the district being achieved more effectively.</p> <p>The proposed provisions are considered to be the most effective way of managing signs across the district as they address the key implementation issues of the current plan and build on the success of the plan’s provisions. The proposed changes are based on industry good practice.</p> <p>Providing limits around sponsorship signs in open space zone sites is considered to be an effective way of managing the potential adverse effects associated with such signs while ensuring the long-term viability of activities on use for sports clubs and the like</p>			

Effectiveness Environmental	Economic	Social	Cultural
High	Medium	Medium	Low
Strategic Direction A revised Signs chapter would provide an appropriate framework to maintain and as appropriate enhance amenity associated with signs.			
Strategic Direction Environmental	Economic	Social	Cultural
N/A	N/A	Medium	N/A
Overall Appropriateness of Option 2 - Low			

5.2 Risk of Acting or Not Acting

It is not considered that there is uncertainty or insufficient information, therefore an evaluation of risk of acting or not acting has not been undertaken.

6 Preferred Option

Option 2: Revised Signs chapter provisions

The preferred option 2 (revised Signs chapter) has been recommended for the following reasons:

- There will be greater clarity regarding the desired environmental outcomes for signs across the district; and
- The social, economic and environmental benefits area are high; and
- The social, economic and environmental costs are medium-low; and
- There is likely to be greater efficiency with the plan's implementation; and
- There is likely to be greater effectiveness with the plan's implementation; and
- There is consistency with national and regional direction; and
- There is consistency with Council's Strategic direction; and
- There is consistency with best practice across New Zealand.

Appendix 1 – National planning template direction

Definitions

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.”

Appendix 2 – Relevant Council Bylaw provisions

Parks and Reserves, Beaches and Tracks

713. Notices and signs

713.1. No person shall post or interfere with any placard, sign, or notice board in, on, or about any reserve without the prior permission of Council, nor without such permission distribute any handbill or notice in a reserve or at any entrance to a reserve.

Public places

This chapter of the bylaw document applies to state highways in the following circumstances:

- Where signs are located on state highways within the 70km / hr speed zone; and
- On state highways in speed zones greater than 70km / hr in circumstances where specifically stated in the bylaw.

213. Placards on buildings, posts and pavements and markings on footpaths

213.1. No person shall:

- (a) Place any poster, or other document on, or write, or otherwise disfigure or deface, any building or any wall, fence, statue, lamp post, verandah post, gate, telegraph or telephone post, or electric light or power post, or any waiting-shed, convenience, rubbish receptacle, fireplug notice plate, or urinal, or upon anything whatsoever erected in, on or abutting any public place, excepting where pillars have been erected specifically for the display of posters or advertising; or
- (b) Stamp, stain, paint, write, print, or post any advertisement or notice upon any public place or kerbstone, footpaths or steps, except with the prior written authority of Council and then only in conformity with the terms of any permit or consent that may be granted; or
- (c) Upon or over any footpath or any road, private street or public place erect any placard, board, flag, screen, or frame by way of advertisement, unless permission or consent in writing shall have been obtained from Council. Provided that Council may by resolution from time to time specify conditions with regard to the control of such advertising signs. Refer to Third Schedule of this chapter of the bylaw.

213.3. Where a sign is in the opinion of Council dangerous or creating hazardous conditions for traffic or pedestrians notice may be given requiring the sign to be removed. If the person on whom such notice has been served fails to comply with the terms of the notice within the time stated therein, they will commit an offence under this chapter of the bylaw. Council shall remove any illegal or dangerous sign.

THIRD SCHEDULE BYLAW POLICY

Advertising signs

Subject

Clause 213 - Placards on buildings, posts and footpaths

Signs in, on or over a public place must comply with the performance standards of this policy.

This policy is in two parts. Part 1 addresses portable advertising signs outside shops. Part 2 addresses signs which protrude into or hang over a public place / space.

Purpose

Part 1 The reason for this policy is to allow retailers and business premises to advertise their business by means of portable display boards without in each individual case having to seek the permission in writing of Council.

The policy also details the manner in which Council staff shall address the problem of signs that are displayed in contravention of the policy.

Part 2 This policy provides information and performance standards for other advertising signs which hang or are located in a position where there is potential for the sign to obstruct, obscure or cause injury to users of the public place.

No sign which by its location or construction presents a danger, or which may cause injury to the public, is authorised or permitted by this chapter of the bylaw or policy.

Policy

Part 1 Portable advertising signs outside shops or places of businesses in the areas zoned Commercial in the Timaru District Plan

- (a) That general exemption be granted to allow portable display board type signs to be displayed up to 600 millimetres from commercial property holders' boundaries;
- (b) The maximum size of portable display board signs shall be 1000mm x 600mm;
- (c) That signs may only be displayed outside the premises to which they apply during the hours which the premises are open for business;
- (d) That officers be authorised to give written notice for the removal of signs which do not comply with this Council policy. Such notice may require the removal of signs within 24 hours, or such lesser time as is deemed appropriate, failing which the signs are to be impounded and released on payment of an appropriate fee;
- (e) That should any person contravene this policy, that person shall receive only one 24-hour warning, or such lesser time as is deemed appropriate, thereafter it shall not be required that officers serve written notice prior to the sign being impounded;
- (f) Neither clause 213.1(c) nor this policy shall apply to retailers and business premises outside the areas zoned Commercial in the Timaru District Plan. Officers shall in cases where clause 213.1(c) does not apply, use the general obstruction provisions of clause 203.

Part 2 Signs on or over public place

Interpretation: A sign has the meaning given in the District Plan.

Providing those temporary signs covered by Part 1 of this policy are excluded.

General requirements for construction and maintenance of signs

- (a) No sign shall be made, erected, or constructed otherwise than in a safe manner and securely fastened to a permanent structure. Signs on the faces of buildings, sky signs and pole signs shall, if required by Council, be designed by a structural engineer and shall be located in a position approved by Council.
- (b) Every sign shall at all times be maintained in good repair and condition.
- (c) Where a sign is not maintained in good order and condition, or if it at any time becomes unsightly or dangerous, the Council may, by notice in writing require the owner or lessee to repair or secure or otherwise put in order or remove the sign within a period stated in the notice.
- (d) All signs must conform to the following dimensions if they overhang footpaths, span carriageways and / or are connected to verandahs:
 - (i) Minimum height to underside of sign from footpaths 2.4m;
 - (ii) Set back, 600mm from an imaginary vertical line from the kerb;
 - (iii) Verandah fascia sign maximum 450mm in depth;
 - (iv) Minimum height to underside of sign where the sign spans the carriageway shall be 5.5 metres.

Signs affecting traffic

- (a) No person shall display, erect, or maintain any sign on or adjacent to any part of a road, motorway, or to any corner, bend, safety-zone, traffic sign, traffic signal, or intersection that will:
 - (i) Obstruct the line of sight of any corner, bend, intersection or vehicle crossing;
 - (ii) Obstruct, obscure or impair the view of any traffic sign or signal;
 - (iii) Resemble or be likely to be confused with any traffic sign or signal;
 - (iv) Use reflective materials that may interfere with a road user vision;
 - (v) Use intermittent or revolving lights.

(b) No person shall place or display any sign containing any reflective material which tends to reflect vehicle lights, or contains any material dependent for illumination upon the lights of traffic in such a position as in the opinion of the Council would distract or be likely to distract the attention of the

Signs on parked vehicles

In the event of a complaint being received, and / or if the Council considers a problem is caused by a sign on a parked vehicle, then the removal of such a sign shall be required.

Temporary signs

(a) Temporary signs advertising the sale of land on which the sign is situated shall be restricted to a maximum of 0.7 square metres in any location.

(b) Temporary signs advertising a forthcoming event shall be restricted to a size of 3.0 square metres in any rural location and Council may detail a lesser size in other locations.

(c) No temporary signs are permitted on reserves or roadsides with the exception of the Church Street over bridge and then only in accordance with Council policy for that over bridge.

(d) No temporary signs may be attached in any way to power or telephone poles or to fences on any public property.

(e) Signs for elections are not permitted on any reserves or roadsides.

Removal of offending signs

(a) If any sign, whether approved or not, fails to conform to all the provisions of this schedule it shall be the duty of the owner of the sign to take down and remove or to repair the sign or so much thereof as does not conform to the provisions of this schedule.

(b) The Council may remove any sign that does not comply with this policy or is considered to be hazardous or dangerous and to recover the costs of doing so. In such cases the Council will, where possible, notify the person or persons responsible prior to any removal.

Jane Marine

From: Griff Simpson <griff@mrboats.co.nz>
Sent: Tuesday, 17 January 2023 1:32 pm
To: Jane Marine
Subject: Submission Griff Simpson Family Trust
Attachments: DOC -17012023.pdf

Jane,

Please see attached

Kind regards

Griff Simpson

Fi-GLASS Boats

Managing Director

p: 0064 3 384 3199

f: 0064 3 384 4470

e: griff@fi-glass.co.nz

a: 247 Dyers Road

Bromley, Christchurch 8062

New Zealand

p: PO Box 19-602, Christchurch 8241

New Zealand

w: www.fi-glass.co.nz

w: www.mrboats.co.nz

-----Original message-----

From: HP Scanner <sales@fi-glass.co.nz>
Sent: Tuesday 17th January 2023 13:29
To: Griff Simpson <griff@mrboats.co.nz>
Subject: From HP Scanner

Jane Marine

From: Jane Marine
Sent: Tuesday, 17 January 2023 11:20 am
To: griff@mrboats.co.nz
Subject: Proposed Timaru District Plan
Attachments: 636102-Template-Form-5-Submission-on-proposed-plan,-change-or-variation.pdf

Good morning Griff,

As discussed please fill out the attached Submission Form 5 for each of your submission and resend them as a complete package that is the submission for Redsky plus a filled out form 5, the submission for the family trust plus a filled out form 5 and finally the submission for Mr Boats and a filled out form 5. Email to pdp@timdc.govt.nz Thank you.

Regards
Jane



Jane Marine | Policy Planner

Timaru District Council | PO Box 522 | Timaru 7940
P: 03 687 7200 | W: www.timaru.govt.nz

e: griff@fi-glass.co.nz

a: 247 Dyers Road

Bromley, Christchurch 8062

New Zealand

p: PO Box 19-602, Christchurch 8241

New Zealand

w: www.fi-glass.co.nz

w: www.mrboats.co.nz

-----Original message-----

From: HP Scanner <sales@fi-glass.co.nz>

Sent: Tuesday 17th January 2023 13:29

To: Griff Simpson <griff@mrboats.co.nz>

Subject: From HP Scanner

Jane Marine

From: PDP
Sent: Friday, 16 December 2022 1:18 pm
To: Griff Simpson
Subject: RE: Submission on notified proposal for the Timaru District Plan
Attachments: 636102-Template-Form-5-Submission-on-proposed-plan,-change-or-variation.pdf

Dear Griff,

In order for your submission to be considered please complete the attached Submission Form and return ASAP.

Kind regards



Timaru District Council | PO Box 522 | Timaru 7940
P: 03 687 7200 | W: www.timaru.govt.nz

From: Griff Simpson [mailto:griff@mrboats.co.nz]
Sent: Thursday, 15 December 2022 10:55 am
To: PDP <pdp@timdc.govt.nz>
Cc: Rob Anderson <caltexkingstreet@xtra.co.nz>; Frank Costello <frank@gomedia.co.nz>
Subject: Submission on notified proposal for the Timaru District Plan

To the Timaru District Planner,

Please see the attached submission from the Griff Simpson Family Trust.

Can you please confirm via return email that you have received the documentation.

Thank you

Kind regards

Griff Simpson

Fi-GLASS Boats

Managing Director

p: 0064 3 384 3199

f: 0064 3 384 4470

e: griff@fi-glass.co.nz

a: 247 Dyers Road

Bromley, Christchurch 8062

New Zealand

p: PO Box 19-602, Christchurch 8241

New Zealand

w: www.fi-glass.co.nz

w: www.mrboats.co.nz

-----Original message-----

From: HP Scanner <sales@fi-glass.co.nz>

Sent: Thursday 15th December 2022 10:52

To: Griff Simpson <griff@mrboats.co.nz>

Subject: From HP Scanner