

PROPOSED GORE DISTRICT PLAN SECTION 32 REPORT

SIGNS



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Glossary of Terms

Resource Management Act 1991	RMA or 'the Act'
Gore District Council	GDC or 'the Council'
Operative District Plan	ODP
Proposed District Plan	PDP
Southland Regional Policy Statement	RPS
National Planning Standards 2019	PS
Southland Regional Policy Statement 2017	RPS
National Policy Statements	NPS
National Policy Statement for Urban Development	NPS-UD
National Environmental Standards	NES
National Environmental Standard for Electricity Transmission Activities 2009	NES-ETA
Crime Prevention Through Environmental Design	CPTED
Permitted Activity	PA
Controlled Activity	CA
Restricted Discretionary Activity	RDA
Discretionary Activity	DA
Non-complying Activity	NCA
Heritage New Zealand Pouhere Taonga	HNZPT
Department of Conservation	DoC
Southland District Plan	SDP
Clutha District Plan	CDP
Proposed Timaru District Plan	PTDP
Proposed Selwyn District Plan	PSDP
Proposed New Plymouth District Plan	PNPDP

1. Executive Summary

Section 32 of the Act requires objectives in plan change proposals to be examined for their appropriateness in achieving the purpose of the Resource Management Act 1991 ('the Act' or 'the RMA'), and the policies and methods of those proposals to be examined for their costs, benefits, efficiency, effectiveness and risk in achieving the objectives. The analysis set out in this report is to fulfil the obligations of the Council under s32 of the Act.

This section 32 evaluation report relates to the evaluation of options for the management of signs in the Gore District Plan. Objectives, policies, rules and standards for managing signs are located within Part 2 – District Wide Matters in the Signs Chapter as required by the National Planning Standards.

Signs can contribute to a range of business, community, and health and safety benefits, provided they are appropriate to the location that they are placed. Signs that are not appropriate to their environment, or signs that are placed in more sensitive environments, have the potential to have adverse effects on the character and amenity values of those local environments. Signs also have the potential to distract road users, thereby impacting on traffic safety and the efficiency of the roading network.

This report evaluates the resource management issues relating to signs against the Operative District Plan (ODP) and the Proposed District Plan (PDP) provisions to ascertain if they are the most efficient and effective means of achieving the purpose of the Act to manage the effects of signs.

The Signs Chapter will assist the Council to fulfil its statutory functions and responsibilities as required by the Act through the following proposed objectives, policies and rules:

- Objectives which provide for signs that are consistent with the purpose, character and amenity of the zone where it is located, provided that signs do not affect the safety of users of the transportation network, including pedestrians and cyclists.
- Policies which seek to:
 - enable signs, including temporary signs, associated with activities being undertaken on the site where the sign is located, subject to type, scale and design.
 - avoid signs within legal roadways and signs which generate glare or light spill.
- Rules and standards that recognise the variety of different types of signs that exist and prescribe limits on height, face area, setback from a road boundary and the number of signs per site in different zones.

Key changes from the ODP include the following:

- New Objectives which replace the more generic objectives, relating to the effects of signs on traffic safety and pedestrians and amenity values within the current zones.
- Revised signs rules and standards to better align with the purpose and character of the PDP zones.
- Specific provisions for temporary signs, signs on a scheduled heritage building or structure, cultural markers and digital signs.
- Clear and directive matters of discretion.
- Introduction of definitions for the relevant new terminology.

2. Overview and Purpose

2.1 Introduction to the resource management issues

The Signs Chapter provides a regulatory framework for the provision and management of signs and the associated adverse effects of signs. The provisions seek to manage the following issues:

1. The need to recognise and provide for signs which contribute to a range of business, community, and health and safety benefits within different zones.
2. The need to manage the extent and effects of signs, due to the potential adverse effects on the character and amenity values of local environments, as well as the values of the buildings and structures upon which signs are placed.
3. Signs may create a distraction for road users, potentially impacting on the traffic safety of all road users and the efficiency of the roading network.

2.2 Purpose of the report

The purpose of this report is to provide an evaluation of the proposed provisions in accordance with the requirements of Section 32 of the RMA 1991.

The PDP includes a chapter relating to signs which is consistent with the requirements of the National Planning Standards. It contains objectives, policies, rules and standards to make provision for business, community and health and safety signs to advertise, inform and caution, while managing the potential adverse effects on character and amenity, heritage values and transport safety.

This report assesses the appropriateness of the proposed Objectives to achieve the purpose of the Act and the effectiveness and efficiency of the policies, rules and standards which give effect to the Objectives. This report also provides information on the issues the provisions seek to address and an evaluation of the provisions relating to signs within the ODP.

An assessment of the scale and significance of the provisions will inform the level of detail included in this report.

3. Statutory and Policy Context

3.1 Resource Management Act

In carrying out a section 32 analysis, an evaluation is required of how the proposal achieves the purpose and principles contained in Part 2 of the RMA.

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

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

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

In achieving this purpose, authorities also need to recognise and provide for the matters of national importance identified in section 6, have particular regard to other matters referred to in s7 and take into account the principles of the Treaty of Waitangi referred to in section 8.

The section 6 matters relevant to this topic are sections 6(e) and 6(f).

- (e) the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga*
- (f) the protection of historic heritage from inappropriate subdivision, use, and development.*

The standards for signs attached to scheduled heritage buildings or items are more restrictive in order to protect these valued resources from the inappropriate use and development of signs. Signs can detract from the heritage value of buildings and items and their fixtures can cause damage. The provisions provide for cultural markers which are defined as “*Pouwhenua (carved posts), interpretation panels, Māori art installations, and other kaupapa Māori markers of place, or relationship of mana whenua to place*”.

The section 7 matters that are relevant to this topic are section 7(b), (c) and (f).

- (b) the efficient use and development of natural and physical resources.*
- (c) the maintenance and enhancement of amenity values.*
- (f) maintenance and enhancement of the quality of the environment.*

In relation to Section 7(b), signs have the potential to affect the efficient use of the transport network being a physical resource.

In relation to Sections 7(c) and 7(f), signs can have positive or adverse effects on amenity values due to their size, location and lighting effects. Signs can also impact on the quality of the environment, especially in zones where signs are not anticipated to be a dominant feature.

Section 8 of the RMA requires the Council to take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi). Mana whenua, through the Hokonui Runanga, have partnered with the Council in the preparation of the proposed District Plan.

Section 31 is relevant insofar as it requires the Council to establish, implement and review a District Plan which contains objectives, policies and methods to achieve a range of purposes as listed above. This report considers the appropriateness of the new objectives within the PDP to achieve the purpose of the Act. The review of the Operative District Plan and the establishment of a new District Plan allows Council to give effect to Section 31.

3.2 National Policy Statements

The Section 32 – Overview and Urban Form and Development report includes details and a brief assessment of all National Policy Statements (NPS).

There are no NPS which have particular relevance to Signs.

However, the National Policy Statement for Urban Development (NPS-UD) which has a focus of creating well-functioning environments has indirect relevance. The use of signage may be necessary to facilitate well-functioning environments and support functional and operational activities. This is particularly true in the Commercial and Industrial Zones. It should also be acknowledged that increased urban intensification, which is encouraged through the NPS-UD, would by default potentially increase the numbers of signs within an urban environment as a result of an increased number of commercial or industrial activities being established.

3.3 National Environmental Standards

The Section 32 – Overview and Urban Form and Development report includes details and a brief assessment of all National Environmental Standards (NES).

The NES for Electricity Transmission Activities Regulations 2009 relates to the management of existing electricity transmission lines. Clauses 23 and 24 set out permitted and restricted discretionary standards for installing or modifying signs on existing transmission line support structures. Such signs are considered to be ‘official signs’ and will be enabled by proposed Rule SIGN-R1.

There are no other relevant National Environmental Standards.

3.4 National Planning Standards

The National Planning Standards (PS) 2019 requires a more bespoke approach to planning zones than the current GDP. This includes a clearer centre hierarchy, rural settlement zones, and a wider range of residential, industrial and rural zones. The PS also requires that matters which affect the entire district are provided for in specific chapters.

The PS require that Signs be included in Part 2 District Wide Matters – General District-Wide Matters.

The PS states that:

If provisions for managing signs are addressed, they must be located in the Signs chapter.

The PS also contains the following definitions of ‘sign’ and ‘official sign’.

Sign

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

(a) is for the purposes of:

(i) identification of or provision of information about any activity, property or structure or an aspect of public safety;

- (ii) providing directions; or*
- (iii) promoting goods, services or events; and*

(b) is projected onto, or fixed or attached to, any structure or natural object; and

(c) includes the frame, supporting device and any ancillary equipment whose function is to support the message or notice.

Official sign

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

The PDP will give effect to the PS by including a separate district-wide chapter for managing signs and adopting the above definitions.

It is noted that the PS also requires provisions associated with temporary events to be addressed in a separate Temporary Activities Chapter. This s32 and the associated signs provisions address temporary signs related to temporary activities, real estate advertising and electioneering. There is a cross-reference in the Temporary Activities Chapter to alert Plan users to the district-wide chapters, which includes signs.

3.5 Regional Policy Statement

The Southland Regional Policy Statement (RPS) 2017 sets out the framework and priorities for resource management in the region. The RPS identifies the regionally significant issues around the management of the Region's natural and physical resources and sets out what needs to be achieved (objectives) and the way in which the objectives will be achieved (policies and methods). The PDP is required to give effect to the regional policy statement as required by section 75(3) of the RMA.

There is no specific reference to signs under the RPS. However, the urban section of the RPS recognises that there is a need to create and maintain sustainable urban environments that function well and provide a safe, healthy and stimulating environment. It also recognises that development can result in a range of negative effects, including reduced amenity values.

Objective URB.1 – Urban Development states:

“Urban (including industrial) development occurs in an integrated, sustainable and well-planned manner which provides for positive environmental, social, economic and cultural outcomes.”

The provision for signs in the PDP is part of providing for positive urban development, as signs serve a functional purpose which allows for economic and social outcomes, including health and safety. However, without adequate regulation, signs could result in adverse environmental, social and cultural effects, including adverse effects on amenity values, heritage features and traffic safety.

3.6 Regional Plans

Environment Southland has prepared a number of regional plans, these include:

- Regional Air Plan 2016
- Effluent Land Application Plan 1998
- Regional Water Plan 2010

Environment Southland's proposed Southland Water and Land Plan was made partially operative following a council meeting in January 2021.

To date, most district plans have relied solely on the RPS to provide strategic direction as district plans must give effect to RPS's in accordance with RMA requirements. The provisions of the Southland RPS are summarised within the Section 32 – Overview Evaluation Report, however, there are no specific provisions for signs in relation to district-level matters.

3.7 Iwi Environmental Management Plan

'Te Tangi a Tauira – The Cry of the People' the Ngai Tahu Ki Murihiku Natural Resource and Environmental Management Plan identifies a broad range of relevant matters when considering where and how Gore grows and develops.

In particular, the IMP encourages, where appropriate, respect for Ngāi Tahu's association with culturally significant places, including those with Tōpuni or Deed of Recognition provisions, through working with the Department of Conservation (DoC) to develop educational and interpretative material, including signs for users of the area.

3.8 Other Legislation and Policy Documents

The following national guidance documents are considered relevant to this topic:

- The New Zealand Transport Agency (Signs on State Highways) Bylaw 2010 prohibits signs on or over any part of a state highway, unless the Agency provides written consent. This recognises that signs can be difficult to read and can create a safety hazard, particularly in high speed environments.

The following Acts also have relevance to the topic:

- The Building Act 2004 makes provisions for signs, including small and big signs and specifies when a sign needs a building consent or is exempt from a building consent.
- The Electoral Act 1993 & Electoral (Advertisements of a Specified Kind) Regulations 2005 specifies the requirements for general election signs, which are considered to be 'official signs'.
- The Hazardous Substances and New Organisms Act 1996 has indirect associated obligations on signs where hazardous substances are stored or used.
- The Heritage New Zealand Pouhere Taonga Act 2014 (HNZPT Act) states that Heritage New Zealand Pouhere Taonga has the powers to erect suitable signs and notices on historic places and historic areas, subject to the consent of the owner first being obtained, where any historic place or historic area is not owned or controlled by Heritage New Zealand Pouhere Taonga (HNZPT) or vested in it. The HNZPT Act also states that it is an offence to unlawfully alter, remove or destroy any sign on any land that is under the control of HNZPT.

- The Local Government Act 2002 includes the ability for councils to enact bylaws and to erect and maintain signs indicating the existence or boundaries of areas in their districts in which a bylaw for alcohol control purposes apply.
- The Reserves Act 1977 provides for the preparation of Reserve Management Plans and identifies that erecting or altering any sign on any reserve is an offence and an unauthorised action.

3.9 Other Local Policies, Strategies, Guidelines and Plans

A range of other local policies, guidance and plans were reviewed to inform the PDP signs objectives, policies, rules and standards. These are summarised below:

Gore District Alcohol Strategy Implementation Plan

This action plan provides a framework for the implementation of the original Gore District Alcohol Strategy that was adopted by the Council in 2009. This plan promotes the use of signs to identify the location of security cameras to attempt to help reduce alcohol-related crime.

Gore District Streetscape Strategy

The purpose of the Streetscape Strategy is to set out a framework for the way that the streets in towns are used in the future. It includes reference to traffic signs.

Gore Election Signage Policy

This Policy outlines the relevant provisions for general and local election signage within the Gore District.

Gore Parks, Recreation and Facility Strategy

This Strategy reviews and identifies the provision of parks, recreation and facilities to ensure these are efficiently and effectively provided and are appropriate to present and anticipated future circumstances. It references the need for visible warning signs to be in place during the maintenance of street trees and park trees.

Gore Roading Bylaw 2011

This Bylaw provides for the regulation of roads and footpaths within the control of the Council. It includes controls on traffic signs and other signs that are placed within any public car park, road, reserve, reserved parking place and other places controlled by the Council. It also includes controls on warning signs for stock crossings.

Gore Subdivision and Land Development Bylaw 2019

This Bylaw provides guidelines and requirements for development, which includes reference to traffic signs and road name signs. Traffic signs and road name signs must be approved by the Council and must be in accordance with the Manual of Traffic Signs and Markings (MoTSAM), the Land Transport Rule (Traffic Control Devices) 2004 and other appropriate standards.

Gore Trading in Public Places Bylaw 2018

This Bylaw provides guidance for mobile traders in public places including the need for a licence to be obtained. A licence holder must comply with the requirements for signs in this Bylaw.

4. Resource Management Issue Analysis

4.1 Background

Section 2.1 of this report identifies three resource management issues which the provisions of the PDP Signs chapter address:

1. *The need to recognise and provide for signs which contribute to a range of business, community, and health and safety benefits within different zones.*
2. *The need to manage the extent and effects of signs, due to the potential adverse effects on the character and amenity values of local environments, as well as the values of the buildings and structures upon which signs are placed.*
3. *Signs may create a distraction for road users, potentially impacting on the traffic safety of all road users and the efficiency of the roading network.*

Issue 1

Signs provide an important function by communicating information and providing direction. Businesses need to signal their location to customers and clients by using signs that display their trading name, brand and services. The scale and design of signs will vary depending on the type of business and the environment in which it is located.

Temporary activities may also require signage to provide visitors and the community with information about the activities/events.

The provision for signs is therefore an important part of a well-functioning environment that allows people and communities to provide for their economic, social and cultural well-being.

The PDP zones provide for different purposes, functions and character. Therefore, it is appropriate to manage signs in a way which relates to the nature of activities undertaken in particular zones. The permissible extent and nature of signs reflects the anticipated amenity values for the zone.

Issue 2

Signs play an important role in the effective functioning of towns, particularly commercial areas. However, the presence of signs can result in adverse effects on a building, a site, or a streetscape, if the duration, scale, placement and number of such signs is not reasonably managed.

Signs can detract from the amenity or established character of a location. In addition, too many signs can create visual clutter and cumulative effects.

Where sites have established features which have a social and/or cultural value, such as heritage buildings or structures, signs can adversely impact these values or qualities if left unmanaged.

Residential and rural amenity values are generally more sensitive to signs, although there is still a function and demand for some types of signs in these areas.

The PDP introduces standards for different types of signs in different zones, in order to appropriately manage the adverse effects of signs on amenity values. The PDP also provides provisions for signs which are attached to scheduled heritage buildings or items.

Issue 3

Signs can result in adverse effects on the safety of the roading network. Where located adjacent to a road corridor, signs can impact on traffic safety by distracting road users, obstructing sight lines and obscuring important traffic safety signs due to the inappropriateness of the location, design, size or type of sign.

Signs that do not clearly deliver information or a message, use lighting or contain flashing or moving parts also have the potential to distract road users. The PDP manages the effects of signs on the road network through controls on the placement and illumination of signs.

4.2 Operative Plan Approach

Signage is currently managed in the Land Use Activities Framework and Rules chapters in the ODP¹. The ODP recognises that the rural environment is characterised by a minimum of signage, while the commercial area has increased signage. It further notes that signage is a factor that contributes to the amenity value of any area and that signs can give rise to adverse effects on traffic and pedestrian safety, and on amenity values.

Objective 3.3[3] seeks to:

- Ensure that signs do not give rise to adverse effects on traffic safety, cause a danger to pedestrians, or impact adversely on amenity values.

Policies 3.4[3] and 3.4[4] seeks to:

- Provide for traffic management signs, directional signs and public information signs erected by the road controlling authority.
- Enable advertising and other such signage, except where this will give rise to adverse effects on traffic safety, cause a danger to pedestrians, or impact adversely on amenity values.

Signs are controlled by Rule 4.10.

The following signs are a permitted activity throughout the district, including electioneering signs, traffic management signs, directional signs and public information signs erected by the road controlling authority and signs advertising a property for sale.

Signs (other than the above) are also a permitted activity, provided that that the 'general' standards and the standards for Rural zones, Residential zones, or Commercial, Industrial and Mixed Use zones are met as follows:

General

- The sign is not designed to be viewed from a public road where the authorised speed limit equals or exceeds 70 kph.

¹

Chapters 3 and 4, [District Plan - Gore District Council \(goredc.govt.nz\)](https://www.goredc.govt.nz/)

- An illuminated sign does not create glare or lightspill beyond the site boundary.
- Lettering on signs intended to be read from public roads is not less than 125 mm.
- The size, scale and characteristics of any sign does not obscure or detract from any public information or safety signage.
- The sign shall not exceed the height permitted in the appropriate zone.

Rural zones

- No more than two signs shall be erected on any site.
- Signs on any site do not exceed a cumulative area of 2m².
- The sign is not flashing.
- Where the sign is intended to be viewed from a public road, the sign must not contain more than six words or symbols and no more than 40 characters.
- No part of any freestanding sign shall be greater than 3 metres above ground level.
- Signs on buildings and other structures may be placed on the vertical faces of the building or structure but shall not extend above the height of that portion of the building or structure on which it is located.
- The signage is related to an activity occurring on the site.

Residential zones

- No more than one sign shall be erected on any site.
- The maximum area of the sign shall not exceed 1m².
- The sign is not lit.
- No part of the sign shall be greater than 2m above ground level.
- The signage is related to an activity occurring on the site.

Commercial, Industrial and Mixed Use zones

- No sign shall project further than 1.5 metres over the road reserve, or to within 500mm of the kerb line.
- Any sign overhanging the footpath shall be no less than 2.6 metres above the footpath directly beneath any part of the sign.

Any sign that complies with the standards is assessed as a permitted activity, while a breach of any of the standards is assessed as a discretionary activity.

4.3 Effectiveness of Operative Plan

Issue	Comment	Response
Temporary signs are not distinguished from permanent signs.	Temporary signs may be appropriate in certain circumstances. There are no objectives and policies which specifically relate to temporary signs, which results in a lack of clarity and direction.	The PDP contains a policy, which directly references temporary signs, and this policy is given effect to by the rules and standards to provide clarity and certainty.
Different types of signs are not distinguished.	Different types of signs have different effects, which cannot be managed with the generic provisions.	Signs are separated into different categories in the PDP: temporary signs, signs attached to buildings, signs attached to heritage

		building/item, freestanding signs, cultural markers and digital signs.
Signs on a scheduled heritage building or structure are not acknowledged.	There are no provisions to manage signs attached to a scheduled heritage building, which results in a lack of clarity and direction.	The PDP contains rules which directly references signs on a listed heritage building to provide clarity and certainty.
Signs in the form of cultural markers are not acknowledged.	There are no provisions to enable or manage signs in the form of cultural markers, which results in a lack of clarity and direction.	The PDP contains rules which directly enables cultural markers, to provide clarity and certainty.
Digital signs have emerged as a new type of sign in recent years.	Digital signs can integrate well into certain environments but can also be more intrusive than traditional signage. There are no provisions to provide guidance on digital signs, which results in a lack of clarity and direction.	The PDP contains rules which manage digital signs to provide clarity and certainty.
All signs that are not identified as a permitted activity are a discretionary activity.	As a discretionary activity, all matters can be considered and it is necessary to revert back to the objectives and policies, which currently provide limited guidance.	The PDP introduces the Restricted Discretionary Activity status for non-compliances to rules and standards and includes clear matters of discretion to provide guidance.

The ODP approach is not efficient or effective as there is a lack of specific objectives and policies and a lack of specific rules and standards, which can result in inefficient consent processing and a lack of clarity and direction for both plan users and decision makers.

The signs provisions are also outdated and do not reflect the variety of types of signs that exist. The signs provisions also do not protect heritage buildings and items from inappropriate signs.

4.5 Analysis of Best Practice – how other Councils are addressing the same issue

To understand whether the PDP provisions in relation to signs are appropriate and consistent with how other Councils are addressing the same issue, the following District Plans were reviewed.

- Southland District Plan² - 22 January 2018 (Southland District Council borders Gore District Council to the north, south and east)

² [District Plan | Southland District Council \(southlanddc.govt.nz\)](https://www.southlanddc.govt.nz/)

- Clutha District Plan³ - 30 June 1998 (Clutha District Council borders Gore District Council to the west)
- Proposed New Plymouth District Plan⁴ - Notified 21 November 2022
- Proposed Timaru District Plan⁵ - Notified 22 September 2022
- Proposed Selwyn District Plan⁶ - Notified 5 October 2020

These plans were selected either because these districts border the Gore district, or are the most up to date examples of approaches to managing signs in districts with comparable characteristics to the Gore District. A summary table of the signs rules from these district plans is provided in section 4.5.6 of this report.

4.5.1 Southland District Plan (SDP)

The SDP contains Section 2.12 Signage. Rules SIGN.1 to SIGN.3 provide for different signage activities, while Rule SIGN.4 provides for general signage standards that the signage activities need to comply with. These provisions are summarised in the table in section 4.5.6 of this report.

The signs provisions in the SDP cover the basic types of signage for the limited number of zones across Southland District.

The SDP distinguishes between signs attached at an angle to a building or signs attached parallel to a building, whereas Gore does not. It also provides for one sandwich board per premises as a permitted type of sign.

Small sized off-site signs (any sign for a commercial activity in the Rural Zone which is not located on the site to which it relates) require a restricted discretionary activity resource consent. However, any off-site signage that exceeds 3m² in area is a prohibited activity throughout the District. This is generally consistent with the PDP provisions for Gore in that signs which do not relate to the activity undertaken on the site where it is located, require a resource consent. The prohibited activity status is clear that large off-site signs are to be avoided across Southland.

The SDP restricts illuminated signage to the Industrial Zone or Commercial Precincts and specifies illuminance levels for signs. The PDP provisions for Gore take a more simplified approach in that any internal lighting of the sign must not result in glare or light spill beyond the site on which it is located.

4.5.2 Clutha District Plan (CDP)

The CDP contains Section 3.12 Signs. Rules SIGN.1 to SIGN.8 provide for different signage activities. These provisions are summarised in the table in section 4.5.6 of this report.

The signs provisions in the CDP are somewhat outdated and do not cover the wide range of signs that could be proposed. However, it provides for signs placed on, or affixed to, vehicles and/or trailers as a type of sign that is a restricted discretionary activity.

³ [District Plan - Clutha District Council \(cluthadc.govt.nz\)](https://www.cluthadcc.govt.nz/district-plan)

⁴ [IsoPlan \(selwyn.govt.nz\)](https://www.selwyn.govt.nz/iso-plan)

⁵ [IsoPlan \(timaru.govt.nz\)](https://www.timarudcc.govt.nz/iso-plan)

⁶ [IsoPlan \(npdc.govt.nz\)](https://www.npdc.govt.nz/iso-plan)

The provisions are generally permissive, although hoardings (any sign used to advertise anything not sold on the premises where the sign is situated) is a non-complying activity. The non-complying activity status shows that hoardings are not considered appropriate in the predominantly rural setting of the Clutha District.

The CDP also includes a unique rule whereby if any at any time the Council is of the opinion that the construction, or display of any sign will detrimentally affect the amenities of any land or will detrimentally affect fire egress from any building, or will be visually inappropriate to the locality or architecture of the locality; the Council may require that an application for a discretionary activity be made for that sign. The PDP provisions for Gore are sufficient in detail to require resource consent for a range of scenarios when a proposed sign may affect amenity and therefore a similar rule is not necessary.

4.5.3 Proposed New Plymouth District Plan (PNPDP)

The PNPDP has been prepared under the PS and therefore has the same structure and form as the PDP. Part 2 of the PNPDP - General District Wide Matters, contains the Signs chapter. Rules SIGN.R1 to SIGN.R15 provide for different signage activities, while Standards SIGN-S1 to SIGN-S12 provides for Sign Effects Standards that the signage activities need to comply with. The signs activities are summarised in the table in section 4.5.6 of this report.

The signs provisions in the PNPDP are detailed, generally permissive and generally consistent with the PDP provisions. The PNPDP provides for a range of additional signs including interpretative signs on or attached to an identified feature as a permitted activity, signs attached to street furniture in different zones, touch-screen interactive digital signs as a permitted activity, and signs affixed to vehicles or trailers where these parked on a private property and is not visible from a public place. These types of signs are not expressly provided for in the PDP and would be a discretionary activity.

Third party signs in the PNPDP are a non-complying activity in most zones. The PDP is less stringent, as any sign that does not relate to the activities undertaken on the site where it is located, is a restricted discretionary activity.

The PNPDP prescribes luminance levels for any signs that may be illuminated. The PDP takes a more simplified approach in that any internal lighting of the sign must not result in glare or light spill beyond the site on which it is located.

4.5.4 Proposed Timaru District Plan (PTDP)

The PTDP has been prepared under the PS and therefore has the same structure and form as the PDP. Part 2 of the PTDP - General District Wide Matters, contains Signs. Rules SIGN.R1 to SIGN.R4 provide for different signage activities, while Rules SIGN-S1 to SIGN-S7 provides for Sign Standards that the signage activities need to comply with. The provisions are summarised in the table in section 4.5.6 of this report.

The signs provisions in the PTDP are generally consistent with the PDP in terms the types of signs provided for and their respective activity status.

One difference is that there are fewer types of signs provided for and there is a rule that captures all signs not otherwise addressed in this chapter. These signs are a permitted activity subject to meeting the conditions of the rule and the Signs Standards, or a restricted

discretionary if there is a non-compliance. Signs not otherwise provided for in the PDP would be a discretionary activity.

Digital signs, flashing signs or moving signs that are not off-site signs are a restricted discretionary activity. The PDP provisions are similar, although there is provision for digital signs to be a permitted activity where all the standards are met.

4.5.5 Proposed Selwyn District Plan (PSDP)

The PSDP has been prepared under the PS and therefore has the same structure and form as the PDP. Part 2 of the PSDP - General District Wide Matters, contains Signs. Rules SIGN.R1 to SIGN.R5 provide for different signage activities, while Rules SIGN-REQ1 to SIGN-REQ7 provides for Sign Rule Requirements that the signage activities need to comply with. These provisions are summarised in the table in section 4.5.6 of this report.

The signs provisions in the PSDP are detailed and generally consistent with the PDP in terms the types of signs provided for and their respective activity status. There are specific rules for veranda signs in addition to rules for signs attached to buildings.

Off-site signs in the PSDP are a discretionary or non-complying activity. The PDP is less stringent, as any sign that does not relate to the activities undertaken on the site where it is located, is a restricted discretionary activity.

Digital signs in the PSDP are a restricted discretionary or non-complying activity. The PDP is similar, although there is provision for digital signs to be a permitted activity where all the standards are met.

4.5.6 Rule Summary Table and Conclusions

District Plan (column)	Proposed Gore District Plan	Southland District Plan	Clutha District Plan	Proposed New Plymouth District Plan	Proposed Timaru District Plan	Proposed Selwyn District Plan
Activity (row)						
<i>Official Signs in all zones</i>	Permitted	Information and warning signage is permitted subject to meeting conditions of the rule	Permitted, subject to meeting conditions of the rule	Permitted, subject to meeting conditions of the rule	Permitted	Permitted
			Restricted Discretionary	Controlled		
<i>Temporary Signs in all zones</i>	Permitted, subject to meeting conditions of the rule and the Signs Standards	Permitted subject to meeting conditions of the rule and the General Sign Standards	Permitted, subject to meeting conditions of the rule	Permitted, subject to meeting conditions of the rule and the Signs Effects Standards	Permitted, subject to meeting conditions of the rule and the Signs Standards	Permitted, subject to meeting conditions of the rule
	Restricted Discretionary		Restricted Discretionary	Restricted Discretionary	Restricted Discretionary	Restricted Discretionary
<i>Signs attached to buildings (excluding scheduled heritage buildings) in all zones</i>	Permitted, subject to meeting conditions of the rule and the Signs Standards	Sign must be within 200mm of the profile of and cannot exceed height of the building to which it is attached	Not provided for	Permitted (including veranda signs) subject to meeting conditions of the rule and the Signs Effects Standards	Permitted, subject to meeting conditions of the rule and the Signs Standards	Permitted (including veranda signs), subject to meeting conditions of the rule
	Restricted Discretionary			Restricted Discretionary	Restricted Discretionary	Restricted Discretionary

District Plan (column)	Proposed Gore District Plan	Southland District Plan	Clutha District Plan	Proposed New Plymouth District Plan	Proposed Timaru District Plan	Proposed Selwyn District Plan
Activity (row)						
<i>Signs on or attached to a scheduled heritage building or item</i>	Permitted, subject to meeting conditions of the rule and the Signs Standards	Not provided for	Not provided for	Permitted, subject to meeting conditions of the rule and the Signs Effects Standards	Not provided for	Restricted Discretionary
	Restricted Discretionary			Restricted Discretionary		
<i>Freestanding Signs in all zones</i>	Permitted, subject to meeting conditions of the rule and the Signs Standards	Permitted subject to meeting conditions of the rule and the General Sign Standards	Not provided for	Permitted, subject to not being for third party advertising and meeting the Signs Effects Standards	Permitted, subject to meeting conditions of the rule and the Signs Standards	Permitted, subject to meeting conditions of the rule
	Restricted Discretionary	Restricted Discretionary		Restricted Discretionary	Restricted Discretionary	Restricted Discretionary
<i>Cultural Markers in Māori Purpose Zone and Open Space and Recreation Zones</i>	Permitted, subject to meeting conditions of the rule and the Signs Standards	N/A	Not provided for	Not provided for	Not provided for	Not provided for
	Restricted Discretionary					
<i>Digital Signs in Town Centre, Local Centre, Mixed Use, Field Days and Light and General Industrial Zones</i>	Permitted, subject to meeting conditions of the rule and the Signs Standards	Restricted Discretionary for signs with reflective, moving or flashing components	Not provided for	Restricted Discretionary in City Centre Zone subject to meeting conditions of the rule	Restricted Discretionary for signs that are not off-site signs	Restricted Discretionary in Commercial and Mixed Use Zones, General Industrial Zone and General Industrial Zone
	Restricted Discretionary			Non-complying	Non-complying	
<i>Digital Signs in all other zones</i>	Non-complying	N/A	Not provided for	Non-complying in all other zones	Not provided for	Non-complying
<i>Touch-screen interactive digital signs</i>	Not provided for	Not provided for	Not provided for	Permitted, subject to meeting conditions of the rule and the Signs Effects Standards	Not provided for	Not provided for
				Restricted Discretionary		
<i>Signs not otherwise provided for</i>	Discretionary	Restricted Discretionary	Discretionary	Discretionary	Permitted, subject to meeting conditions of the rule and the Signs Standards	Not provided for
					Restricted Discretionary	
<i>Sandwich boards</i>	N/A	One per premises permitted subject to meeting conditions of the rule	Not provided for	Footpath signs are permitted, subject to meeting conditions of the rule and the Signs Effects Standards	Not provided for	Not provided for

				Restricted Discretionary		
District Plan (column)	Proposed Gore District Plan	Southland District Plan	Clutha District Plan	Proposed New Plymouth District Plan	Proposed Timaru District Plan	Proposed Selwyn District Plan
Activity (row)						
<i>Off-site signage</i>	N/A	Restricted Discretionary for off-site signage up to 3m ² in area	Hoardings are a non-complying activity	Third party signs are permitted in the City Centre Zone where not located on or adjacent to a state highway and subject to meeting the Signs Effects Standards	Restricted Discretionary	Discretionary in all zones not listed below
		Non-complying for off-site signage that exceeds 3m ² in area		Third party signs are non-complying in all other zones		Non-complying in all Residential Zones and the General Rural Zone
<i>Signs placed on, or affixed to, vehicles and/or trailers</i>	N/A	N/A	Restricted Discretionary	Permitted, subject to meeting conditions of the rule and the Signs Effects Standards	N/A	N/A
				Discretionary		
<i>Interpretative signs that provide information to the public on or attached to an identified feature</i>	N/A	N/A	N/A	Permitted, subject to meeting the Signs Effects Standards	N/A	N/A
				Restricted Discretionary		
<i>Signs on street furniture</i>	N/A	N/A	N/A	Permitted for Commercial and Mixed Use Zones and General Industrial Zone subject to meeting conditions of the rule and the Signs Effects Standards	N/A	N/A
				Restricted Discretionary		
				Restricted Discretionary for Residential Zones, Open Space and Recreation Zones, Special Purpose Zones and Rural Zones		

The PDP approach reflects the proposed objectives for signage to be consistent with the purpose, character and amenity of the zone where signage is located and for signage to not affect the safety of users of the transportation network. The provisions are generally similar to the approach being taken in more recent District Plans and include the types of signage that would most likely be established within the different zones of Gore.

4.6 Other Relevant Documents and feedback

Consenting data for the last 20 years indicate there have been approximately 18 resource consent applications specifically for signage, however, it is likely that other resource consent applications included consent for signage as part of a wider land use activity. This indicates the ODP provisions are broadly appropriate for managing signage within the district.

5. Scale and Significance

5.1 Scale and Significance Evaluation

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

	Comments	Assessment		
		Low	Medium	High
Degree of change from the Operative Plan	New provisions have been introduced to provide guidance on the different of types of signs that may be proposed in a variety of locations e.g. digital signs, signs on heritage buildings.		X	
Scale of effects – geographically (local, district wide, regional, national).	The scale of effects for signs is limited to the local and district wide level.	X		
Effects on matters of national importance (s6 RMA)	Any signs are unlikely to be positioned near a location in Gore that is a matter of national importance.	X		
Scale of effects on people (how many will be affected – single landowners, multiple landowners, neighbourhoods, the public generally, future generations?).	Signs are intended to be visible to serve their purpose. The provisions will affect the businesses who wish to advertise their products and services, and the community who wish to advertise events. The public are affected, as signs can impact upon on visual amenity, quality of the environment and the character of the zones.		X	
Scale of effects on those with specific interests, e.g., Mana Whenua	Cultural markers are a permitted activity.	X		
Degree of policy risk – does it involve effects that have been considered implicitly or explicitly by higher order documents? Does it involve effects addressed by other standards/commonly accepted best practice?	The higher order planning documents contain general reference to signs. Signs for specific activities including official signs are covered by other regulations. The provisions are consistent with the PS and best practice approach.	X		
Likelihood of increased costs or restrictions on individuals, communities or businesses.	There may be some increased costs, as the proposed rules and standards may restrict some signs or require a resource consent. These costs are not anticipated to be significant, if signs are appropriately designed and placed, and due to the variety of types of signs available.	X		

5.2 Evaluation Summary

The management of signs is not substantially controlled through other planning documents at the regional or national level. However, signs are controlled through other legislation as noted in section 3.8 of this report. The PDP provisions contain a more comprehensive approach to managing the effects of signs that are not classified as 'official signs'. More specific policies and rules are introduced and a greater distinction between zone provisions is included to reflect the characteristics of different zones and scheduled heritage buildings and items. Clearer matters of discretion are provided to assist decision makers.

Overall, the scale of significance is considered to be low and therefore, the level of detail provided within this evaluation is commensurate with the scale and significance of the environmental, economic and cultural effects that are anticipated from the implementation of the provisions.

6. Consultation

6.1 Overview

During the preparation of the District Plan Review, the Council is required by Clause 3 of Schedule 1 of the RMA to consult with the Minister for the Environment; other Ministers of the Crown and local authorities who may be affected and the mana whenua of the area through iwi authorities. The Council may consult anyone else during the preparation of a proposed policy statement or plan.

6.2 Community and Stakeholder Engagement

6.2.1 Consultation Undertaken

The Section 32 – Overview and Urban Form and Development report provides an overview of the consultation undertaken to date in respect of the PDP. The PDP has been prepared in partnership with Hokonui Runanga who have reviewed and provided feedback on the Signs Chapter to ensure consistency with the Mana Whenua Chapter and that cultural values are appropriately integrated throughout the proposed provisions.

Engagement with the community on the draft District Plan was undertaken between 10th August 2022 and 30th September 2022. The feedback received in respect of the Signs Chapter is summarised in a table in Appendix 1.

In summary, Heritage New Zealand provided feedback in respect of signs attached to heritage buildings and suggested ways to strengthen policies, rules and standards. Similarly Waka Kotahi provided feedback to ensure signage provisions adjacent to State Highways were consistent with their general requirements and in particular, around digital signs.

Transpower was generally supportive of provisions for official signs but suggested the signs standards could include cross references to other activities and earthworks within the National Grid Yard. Other feedback suggested some changes to standards for size of signs in the Industrial zones and the number of signs in the Rural Zones.

7. Proposed Plan Provisions

7.1 Strategic Objectives

The PDP includes a number of strategic objectives which have been tested in terms of section 32(1)(a) in their relevant s32 reports. However, the other chapters of the plan should align with these strategic objectives to ensure vertical integration within the PDP.

The Urban Form and Development Chapter of the PDP does not contain any specific strategic Objectives directly relevant to signs, however, Objective UFD-O7 relates to ensuring urban environments are liveable, safe and well-designed, which would include the provision of adequate and appropriate signage for the benefit of the community.

UFD-O7 Urban environments are liveable, connected, accessible, safe and well-designed spaces for the community to live, work and play in, which:

- 1. incorporate natural features, water management and topography into design to minimise environmental effects;*
- 2. recognise the local context, heritage values and character of an area including cultural histories;*
- 3. have connected and efficient transport networks; and*
- 4. are adequately serviced by utilising and/or upgrading existing infrastructure or with new infrastructure or additional infrastructure.*

The mana whenua chapter articulates mana whenua and Te Taiao values. The PDP provisions provide for cultural markers which will support the Hokonui Runanga to revitalise te reo Maori, which is instrumental to expressing cultural identity, and support their cultural values and connection to their whenua (land). The PDP also includes matters of discretion which allow for consideration of the effects of signage on Ngāi Tahu cultural values which have been expressed in the Manage Whenua Chapter.

7.2 Objectives and Policies

There are two objectives in the Signs Chapter of the PDP, they seek that signs are consistent with the purpose, character and amenity of the zone where the signs are located, and new signs do not affect the safety of users of the transportation network.

There are five policies in the Signs Chapter of the PDP that give effect to the objectives. The policies seek to:

- enable the establishment of signs which promote goods, services, or events, that are associated with the activities being undertaken on the site where the sign is located;
- provide for some types of permanent and temporary signs, where the type, scale and design are compatible with the character and visual amenity of the surrounding area.
- avoid the location of signage within legal roadways, except for official signage, and avoid signs which generate glare or light spill.

The proposed objectives and policies aim to address the resource management issues relating to signs as identified in section 2.1 of this report by enabling, managing and avoiding signs in different circumstances. The background assessment of other Councils Plans and the ODP along with the scale and significance of the issues and topic have also informed the PDP provisions.

7.3 Rules

There are seven types of activity rules for signs which give effect to the Objectives and Policies. The following are a permitted activity subject to compliance with the relevant signs standards (where applicable):

- official signs
- temporary signs
- signs attached to buildings
- signs on or attached to a scheduled heritage building or item
- freestanding signs
- cultural markers
- digital signs in some zones (Town Centre, Local Centre, Mixed Use, Field Days and Light and General Industrial Zone).

Any other types of signs that are not provided for are a discretionary activity. Digital signs in all other zones is a non-complying activity.

There are seven standards that the above signs must comply with in order to be a permitted activity. The standards include:

- requirements for Signs (including cultural markers) erected on or adjacent to a road or railway.
- requirements for temporary signs.
- requirements for digital signs.
- requirements for freestanding signs in different zones.
- requirements for signs attached to buildings (including under veranda and veranda fascia) in different zones.
- maximum words and / or symbols.
- requirements for lettering on signs.

Where any of the standards are not met, the sign would be a restricted discretionary activity. Where any of the standards for digital signs are not met, the sign would be a non-complying activity.

7.4 Definitions

The following definitions are relevant to the Signs Chapter:

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.

8. Evaluation of Objectives

This section of the report evaluates the proposed objectives as to whether they are the most appropriate to achieve the purpose of the Act.

Existing Objective	Appropriateness to achieve the purpose of the Act
Objective 3.3[3] - Ensure that signs do not give rise to adverse effects on traffic safety, cause a danger to pedestrians, or impact adversely on amenity values.	This objective provides high level guidance to decision makers around the expectations for ensuring that signs do not cause adverse traffic safety effects for drivers and pedestrians, as well as ensuring that signs do not impact adversely on amenity values within the District. This objective is broadly consistent with RMA Section 5(2)(c) but is not considered to fully achieve the purpose of the Act due to the lack of specific clarity and direction. Relevance Due to the broad nature of this objective, it is of some relevance and provides some guidance and direction for decision makers and plan users, in terms of adverse effects. Usefulness The objective does not recognise that signs can have positive effects and provide for the social, economic and cultural wellbeing or the health and safety of people. Reasonableness The objective will not result in unreasonably high costs on the community. Although the lack of clarity and direction in the Objective may increase costs in a situation where there is dispute over the outcome of a non-compliance. Achievability The current objective seeks outcomes within the scope of Council's responsibilities and can be realistically achieved through regulations at a district level.

Proposed Objective	Appropriateness to achieve the purpose of the Act
SIGN-O1- Signage is consistent with the purpose, character and amenity of the zone where it is located.	The objective is considered to be the most appropriate way to achieve the purpose of the Act because it: - Recognises that signs contribute to the purpose, character and amenity of a zone, which supports the wellbeing of people and communities (Section 5(2)). - Recognises that signs may have adverse effects on the character and amenity of a local environment, where signs may be inconsistent with the intent of a particular zone (Section 5(2)(c) and Section 7(c) and (f)). Relevance The objective is relevant to the issues identified which seek to balance the need to recognise and provide for signs which contribute to a range of business, community, and health and safety benefits within different zones. At the same time, it is inferred that there is a need to manage the potential effects of signs in more sensitive environments, or where signs are incompatible with the function and character of the zone. Usefulness The objective guides the decision maker to enable a sign that is well designed and placed to maintain the anticipated character and amenity value of a particular area. Reasonableness The signs provisions will not result in unreasonably high costs on the community, as the framework for signs that are a permitted activity is more comprehensive compared to the ODP. The new matters of discretion provide greater clarity and direction for decision makers and are expected to result in a greater consistency of decision making. The provisions address different types of signs in different zones. This provides a practical approach across the district given that there are different levels of amenity values across the various zones. Achievability: The provisions seek outcomes within the scope of Council's responsibilities and can be realistically achieved through regulations at a district level. The objective is consistent with identified mana whenua values and outcomes, which include expressing culture and identity.

Proposed Objective	Appropriateness to achieve the purpose of the Act
SIGN-O2 - Signage does not affect the safety of users of the transportation network, including pedestrians and cyclists.	The objective is considered to be the most appropriate way to achieve the purpose of the Act because it: • Recognises that signs may have adverse effects on drivers, pedestrians and cyclists, which is linked to the social wellbeing and health and safety of people and communities (RMA Section 5(2) and 5(2)(c)). Relevance The objective is relevant to the issues identified which note that signs may create a distraction for road users, potentially impacting on the traffic safety of all road users and the efficiency of the roading network. Usefulness This objective guides the decision maker to ensure that a sign is designed and placed to avoid traffic safety effects on users of the transportation network. Reasonableness The objective responds to the fact that that signs can result in traffic safety issues. The signs provisions will not result in unreasonably high costs on the community. The new standards and matters of discretion provide greater clarity and direction for decision makers and are expected to result in a greater consistency of decision making. Achievability: The provisions seek outcomes within the scope of Council’s responsibilities to the community and can be realistically achieved through regulations at a district level and do not apply to official signs.

Summary Overall, the PDP Objectives provide greater clarity and certainty for Plan users and decision makers, whilst also achieving the purpose of the Act in a reasonable, useful, relevant and achievable manner. The objectives will allow the Council to fulfil its obligations under s31 of the Act and are consistent with identified mana whenua outcomes.
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9. Evaluation of Options to Achieve the Objectives

9.1 Introduction

Section 32(1)(b) requires an evaluation of whether the provisions are the most appropriate way to achieve the objectives by identifying other reasonably practicable options, assessing the efficiency and effectiveness of the provisions in achieving the objectives, and summarising the reasons for deciding on the provisions.

The assessment must identify and assess the benefits and costs of environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions, including opportunities for economic growth and employment. The assessment must if practicable quantify the benefits and costs and assess the risk of acting or not acting if there is uncertain or insufficient information available about the subject matter.

For each potential approach an evaluation has been undertaken relating to the costs, benefits and the certainty and sufficiency of information (as informed by section 4 of this report) in order to determine the effectiveness and efficiency of the approach, and whether it is the most appropriate way to achieve the relevant objective(s). For the purpose of this evaluation, the Council has considered the following potential options:

- Option A - The proposed provisions
- Option B - The 'status quo' provisions.

9.2 Quantification of Costs and Benefits

Section 32(2)(b) requires that if practicable the benefits and costs of a proposal are quantified.

Based on the scale and significance of the proposed changes, specifically the degree of change from the ODP, level of policy risk and scale of effects, it is considered that quantifying costs and benefits is unnecessary. Therefore, exact quantification of the benefits and costs identified in this report was not considered necessary, beneficial or practicable. Rather, the table below generally identifies where there may be additional cost(s) and benefit(s).

9.3 Evaluation of Options

Option A – Proposed Provisions
Objective SIGN-O1- Signage is consistent with the purpose, character and amenity of the zone where it is located. <i>Policies and rules which give effect to Objective SIGN-O1:</i> SIGN-P1 – Enable signage which promote goods, services, cultural associations or events associated with activities being undertaken on the site where the sign is located. SIGN-P3 – Ensure signs are of a type, scale and design which is appropriate for the location by having regard to the following: 1. the safety of road users including pedestrians. 2. the amenity values, local character, cultural relationships and streetscape. 3. the effects of signage on the character and amenity values of the Town Centre and Local Centre Core Precincts in Gore and Mataura. 4. whether the sign is in proportion to the scale of the building and any architectural features on the building. SIGN-P4 – Avoid signs which generate glare or light spill through flashing lights. SIGN-P5 – Provide for temporary signs, including off-site temporary signs where their duration, size and number are limited to maintain the character and visual amenity of the surrounding area. SIGN-R2 – Temporary Signs are a permitted activity in all zones subject to limitations on duration and comply with the relevant standard. SIGN-R3 – Signs attached to buildings (excluding scheduled heritage buildings) are a permitted activity in all zones where they relate to the activity undertaken on the site and comply with the relevant standards. SIGN-R4 - Signs on or attached to a scheduled heritage building or item are a permitted activity in all zones subject to limitations on the type, size and number of signs, mechanism for attaching the sign and illumination as well as compliance with the relevant standards. SIGN-R5 – Freestanding signs are a permitted activity in all zones subject to limitations on the type of sign and compliance with the relevant standards and whether the sign is within the national grid. SIGN-R6 – Cultural markers are a permitted activity in the Māori Purpose Zone and Open Space and Recreation Zones subject to height limitations and compliance with the relevant standard. SIGN-R7 – Digital Signs are a permitted activity in the Town Centre, Local Centre, Mixed Use, Field Days and Light and General Industrial Zones subject to location requirements (not in the national grid or attached to a scheduled heritage building or structure) and the relevant standards are complied with. Digital signs in all other zones are non-complying. SIGN-R8 – Signs not otherwise provided for in SIGN-R1 to SIGN-R8 are a discretionary activity. SIGN-S2 -SIGN-S5 – requirements on size, height, setbacks, illumination and number of signs.

Objective SIGN-O2 - Signage does not affect the safety of users of the transportation network, including pedestrians and cyclists. Policies and rules which give effect to Objective SIGN-O2: SIGN-P2 - Avoid the location of signage within legal roadways, except for official signage. SIGN-P3 - Ensure signs are of a type, scale and design which is appropriate for the location by having regard to the following: 1. the safety of road users including pedestrians..... SIGN-P4 - Avoid signs which generate glare or light spill through flashing lights. SIGN-R1 - Official Signs are a permitted activity in all zones. SIGN-S1 - Requirements for Signs (including cultural markers) erected on or adjacent to a road or railway. SIGN-S2 -SIGN-S5 – requirements on size, height, setbacks, illumination and number of signs. SIGN-S6 & SIGN-S7 – Maximum words and / or symbols and requirements for lettering.	
Benefits	Costs
Environmental • All provisions are clearly set out in one chapter with a clear framework to manage signs. • Signs are controlled or managed to ensure that adverse effects on the environment will be minimised. • The quality of the environment and amenity values will be maintained. Rules for signs relate to the zone function and context, thereby reducing unnecessary restrictions. • Specific provision for digital signs are included in order to minimise adverse effects on amenity values, the character of an area and road safety. • Matters of discretion provide greater clarity and efficiency for decision making by limiting the scope to relevant matters only. • Clear definitions for terms provides greater certainty.	Environmental • There are no anticipated environmental costs associated with the proposed provisions.
Economic • There will be greater certainty and the ability for a range of signs to be constructed or installed by businesses to advertise goods and services which supports economic activity. • The proposed provisions provide greater certainty for businesses and the Council on the type and level of signs allowed.	Economic • Anyone intending to install a new sign which is not permitted may experience a financial cost associated with applying for a consent and the associated time/uncertainty. • Monitoring costs to enforce the standards are borne by the Council. • Potentially reduced ability for businesses to erect multiple, digital, third party or large-scale signs.
Social • There will be greater certainty and the ability for a range of signs including temporary signs to be constructed or installed by businesses or community groups to advertise goods, services and temporary events. In turn, this supports way finding, social and cultural wellbeing. • The proposed provisions provide some certainty for the community and the Council on the type and level of signs allowed. • The transport safety effects of signs are managed by reducing issues associated with a distraction, confusion or obstruction caused by signs; thereby contributing to an efficient and safe transport network, which in turn supports social wellbeing.	Social • There are no anticipated social costs associated with the proposed provisions.
Cultural • Provisions is made for cultural markers, in recognition of signs that have a cultural meaning and significance.	Cultural • There are no anticipated cultural costs associated with the proposed provisions.
Efficiency There are a number of improved efficiency outcomes associated with the PDP provisions. These include improved clarity through more directive objectives and policies, which provides greater certainty for plan users and decision makers and will improve efficiency compared to the status quo option. It is considered that the proposed provisions will achieve the Signs objectives in the Plan as: • The provisions recognise the positive function that signs have in a healthy economy and provide a permitted activity status for a number of types of signs. • The rules framework reflects the amenity anticipated in each zone by controlling the scale and location of signs. • The rules framework also addresses the impacts of signs on road safety by ensuring signs do not cause confusion, a distraction or an obstruction. • The provisions are aligned with the anticipated character and purpose of each zone and the different types of signs and their specific requirements are clearly defined, thereby providing a high level of certainty.	

The benefits of managing signs via this approach outweigh the costs.
Effectiveness
The proposed provisions are considered to be the most effective means of achieving the objectives as together, these will: - Address the identified resource management issues. - Enable the Council to fulfil its statutory obligations, including duties imposed on the Council by s31 of the RMA. - Clearly set out what signs can occur as a permitted activity and what signs require a resource consent. - When resource consent is required, the provisions will ensure that adverse effects from signs are managed appropriately by rules and standards which control new signs and therefore reduce the possibility that it will detract from the character of the zone, cause a reduction in amenity values or result in transport safety effects. - Enable the Council to effectively administer its District Plan in a clear and consistent manner.
Risk of acting or not acting
Risks of not acting: - The resource management issues would not be adequately addressed. - Temporary signs, signs on a listed heritage building or structure, cultural markers and digital signs are not provided for in the ODP and the current assessment of these is open to interpretation. - The Operative Plan rules lack clarity and therefore certainty. Risks of acting: - Businesses and members of the community who propose signs will need time to understand the new provisions. - Generally low risk, as the provisions have been reviewed by key parties, who have provided feedback on the draft provisions. Overall, there is sufficient information to act and the risks from not acting is higher than the risk of acting.
Overall Evaluation
The proposed policies and methods are an appropriate option to achieve the objectives for signs. The benefits outweigh the costs and the methods efficiently give effect to the proposed objectives by reaching an appropriate balance between the enablement and management of signs in order to address the identified resource management issues.

Option B – Status Quo
Objective 3.3[3] – Ensure that signs do not give rise to adverse effects on traffic safety, cause a danger to pedestrians, or impact adversely on amenity values. Policies and rules which give effect to Objective 3.3[3] Policy 3.4[4] – Enable advertising and other such signage, except where this will give rise to adverse effects on traffic safety, cause a danger to pedestrians, or impact adversely on amenity values. Rule 4.10.1(1): The following signs are a permitted activity throughout the district. (a) Electioneering signs (b) Traffic management signs, directional signs and public information signs erected by the road controlling authority (c) Signs advertising a property for sale: i. Located on the property ii. Limited in area to 1.2 square metres, for any individual selling privately, or for any companies acting as agents for that sale. Rule 4.10.1(2) Signs not provided for by (1) above, is a permitted activity provided that: (a) General (i) The sign is not designed to be viewed from a public road where the authorised speed limit equals or exceeds 70 kph. (ii) An illuminated sign does not create glare or lightspill beyond the site boundary. (iii) Lettering on signs intended to be read from public roads is not less than 125 mm. iv) The size, scale and characteristics of any sign does not obscure or detract from any public information or safety signage. (v) The sign shall not exceed the height permitted in the appropriate zone.

(b) In Rural zones (i) No more than two signs shall be erected on any site. (ii) Signs on any site do not exceed a cumulative area of 2m². (iii) The sign is not flashing. (iv) Where the sign is intended to be viewed from a public road, the sign must not contain more than six words or symbols and no more than 40 characters. (v) No part of any freestanding sign shall be greater than 3 metres above ground level. (vi) Signs on buildings and other structures may be placed on the vertical faces of the building or structure but shall not extend above the height of that portion of the building or structure on which it is located. (vii) The signage is related to an activity occurring on the site. (c) In Residential zones (i) No more than one sign shall be erected on any site. (ii) The maximum area of the sign shall not exceed 1m². (iii) The sign is not lit. (iv) No part of the sign shall be greater than 2m above ground level. (v) The signage is related to an activity occurring on the site. (d) In Commercial, Industrial and Mixed Use zones (i) No sign shall project further than 1.5 metres over the road reserve, or to within 500 mm of the kerb line. (ii) Any sign overhanging the footpath shall be no less than 2.6 metres above the footpath directly beneath any part of the sign. (3) Any signage that does not comply with either (1) or (2) above is a discretionary activity.	
Benefits	Costs
Environmental - Signs in a general sense are controlled and managed to ensure that signs do not create adverse effects on the environment. - The quality of the environment and amenity values are maintained to some extent. - Signs that are not a permitted activity are a discretionary activity and require resource consent.	Environmental The rules are out of date. Different types of signs are not distinguished and provided for. There is little guidance on large-scale, third party, temporary, cultural-related, or digital signs, or signs on a scheduled heritage building or structure.
Economic The current provisions provide some certainty for businesses and the Council on the type and level of signs allowed for the current zones across the district.	Economic Anyone intending to install a new sign may experience a financial cost associated with applying for a consent and the associated time/uncertainty.
Social The current provisions provide some certainty for the community and the Council on the number, type and scale of signage allowed for the current zones across the district.	Social There are no known social costs associated with the current provisions.
Cultural There are no known cultural benefits associated with the current provisions.	Cultural Any cultural-related signs that do not meet the permitted activity standards require a resource consent.
Efficiency	
The status quo approach is inconsistent with the PS that require a standalone chapter for signs in Part 2 District Wide Matters – General District-Wide Matters.	
Effectiveness	
The current rules are ineffective as different types of signs are not distinguished and provided for. This could be generating the need for unnecessary consents, where the effects could be appropriately managed through rules and standards.	

Risk of acting or not acting
Risks of not acting: • National Planning Standards will not be implemented. • Temporary signs, signs on a listed heritage building or structure, cultural markers and digital signs are not provided for in the ODP and the assessment of these is currently open to interpretation. • Operative Plan rules lack clarity and therefore certainty. Risks of acting: • Businesses and the community who proposes signs will need time to understand the new provisions. • Generally low risk, as the provisions have been reviewed by key parties, who have provided feedback on the draft provisions. • Overall, there is sufficient information to act and the risks from not acting is higher than the risk of acting.
Overall Evaluation
The existing policies and methods are somewhat outdated and do not effectively address the identified resource management issues.

9.4 Summary of Preferred Options

Summary The preferred option is Option A, the PDP provisions, which are anticipated to address the resource management issues and achieve the purpose of the Act and provide greater clarity and direction to plan users and decision makers, thereby being consistent with section 5 of the RMA 1991. Option B, the existing ODP approach is ineffective at addressing the resource management issues. Therefore, a revised approach is proposed based on applying rules and standards to each zone for different types of signs. The proposed provisions provide an appropriate balance between allowing for signs to be established, while managing the potential adverse effects of signs on character and amenity of different environments and the safety of the users of the transportation network.

Appendix 1 – Feedback summary

Person / Organisation	Feedback summary	Response
National Public Health Service – Southern	Remove reference to ‘siting’ from Overview section and replace with ‘placement’.	Agree - change made.
Heritage New Zealand Pouhere Taonga	- Amendment to SIGN-P3 to reflect that incompatible signage can affect heritage values beyond the character of the area, which needs to be appropriately managed. The relevant sign standard should then be amended to be consistent with the new policy wording. - Recommends an amendment to SIGN-R2 to note that attachment of temporary signage to a heritage building is not a permitted activity, as temporary attachment could adversely affect the heritage value of a structure. - Opposes the installation of digital signs within areas of heritage value and character as a permitted activity as there be may significant adverse effects on the values of individual heritage places, the wider streetscape, such as the town centre through visual dominance, impeding view shafts and incompatibility with amenity values.	Some amendments are appropriate to manage the attachment of signs to heritage buildings and structures and to ensure that particular consideration is given to the character of the Core Precinct areas in Gore and Maitāhara.
Maitāhara Valley Milk	- Freestanding signs should be permitted to have an area of 7m² as opposed to 4m². - The maximum area of the signs attached to a building should be 1m² per metre of building frontage, as opposed to 5m² or 10% of the building.	Some amendments are appropriate to increase the size of freestanding signs and signs attached to buildings in the Light and General Industrial Zones, however, the suggested limits are considered too large to avoid adverse effects on amenity values and the anticipated character of the zone.
Waka Kotahi	- Supports SIGN-O2 and SIGN-P2 which clarify and recognise the effects of signs on the safety of users of the transport network. - Supports SIGN-P5 and in particular the ‘avoid’ direction to ensure signs are located outside of the road reserve and do not generate light spill. - Supports SIGN-S3 but notes billboards are not defined and digital billboards would be included in an assessment under this rule. Suggested conditions previously used by WK have been provided for digital signs. Duration should also be a consideration on a case by case basis. - Supportive of restrictions on minimum lettering size relative to adjacent road speed limit as the limits are consistent with or more restrictive than the WK Guidelines.	Some amendments are appropriate in respect of image dwell timing for digital signs and addition of a new standard to control character and / or symbols on signs adjacent to the State Highway. The Plan includes standards which limit the size of freestanding signs, which would mean larger billboards would typically require a resource consent and assessed on a case by case basis.
Robina Johnston	Rural signs often need a property identification sign and health & safety so may need two signs. Farms often have signs on natural materials (wood, stone etc) so the rules should clarify if this is permitted.	A health and safety sign would be an ‘official sign’ if required by another legislation i.e. HSAW and therefore would be PA under SIGN-R1 which is exempt from all standards and so the restriction of one sign under SIGN-S4 would not apply to an official sign.
Transpower	- Supportive of provisions for official signs as permitted activities. - Signs within the National Grid Yard can compromise operation and maintenance of the National Grid and represent a health & safety risk. The sign standards should include cross reference to the rules relating to activities and earthworks within the National Grid Yard.	Some amendments are appropriate in respect of avoiding signs in National Grid yard.
Feedback summary		
Heritage New Zealand provided feedback in respect of signs attached to heritage buildings and suggested ways to strengthen policies, rules and standards. Similarly Waka Kotahi provided feedback to ensure signage provisions adjacent to State Highways were consistent with their general requirements and in particular around digital signs. Transpower was generally supportive of provisions for official signs but suggested the sign standards could include cross references to other activities and earthworks within the National Grid Yard. Other feedback suggested some changes to standards for signage sizes in the Industrial zones and the number of signs in the Rural Zones.		
Key changes in response to feedback		
- A minor change to the wording of the Overview to replace ‘siting’ with ‘placement’. - Amendment to SIGN-P3 to allow for specific consideration of the particular characteristics of the core precincts within Maitāhara and Gore. - Amendment to SIGN-R2 & SIGN-R7 to manage temporary and digital signs attached to heritage buildings and structures. - Amendment to SIGN-S3 to clarify the timing of image changes for digital signs. - Separation of the signage standards for the General and Light Industrial Zones from the Centre Zones and increased size allowance for freestanding signs and signs attached to buildings in the General and Light Industrial Zones. Inclusion of a setback requirement from road boundaries for signs in all zones which was previously only provided for in the Centres Zones. - Addition of a new standard to limit the number of characters and / or symbols on signs adjacent to State Highways.		